



May 2023

HOMELESSNESS

Enhanced Coordination Could Improve Disaster Shelter and Housing Assistance

Why GAO Did This Study

Disasters, such as hurricanes, cause billions of dollars in damage each year. People experiencing homelessness, who may be in shelters or on the streets, may be vulnerable and most severely affected by disasters.

The 2019 Additional Supplemental Appropriations for Disaster Relief Act provided funding for GAO to conduct audits related to 2018 disasters. This report examines (1) how federal disaster programs can provide shelter or housing assistance to the homeless population, (2) how federal homelessness programs can provide housing assistance to this population during disasters, and (3) coordination by FEMA and HUD on these issues. GAO reviewed federal agency documentation and interviewed staff at FEMA and HUD offices and at state and local governments, selected program grantees and recipients, emergency managers, and homeless service providers in four states affected by 2018 disasters (California, Florida, North Carolina, and Wisconsin). GAO selected 2018 disasters in these states due to the significance of their impact and for geographic diversity.

What GAO Recommends

GAO is making three recommendations, including that HUD establish time frames for reviewing information on ESG CARES Act waivers and alternative program requirements and that HUD and FEMA coordinate on federal disaster sheltering and housing assistance for the homeless population. FEMA agreed and HUD neither agreed nor disagreed with GAO's recommendations.

View [GAO-23-105379](#). For more information, contact Alicia Puente Cackley at (202) 512-8678 or cackleya@gao.gov.

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Enhanced Coordination Could Improve Disaster Shelter and Housing Assistance

What GAO Found

No federal programs are specifically designed to address the housing needs of the homeless population in a disaster. However, the Federal Emergency Management Agency's (FEMA) Public Assistance program can provide this population with emergency shelter (available to the entire community after a disaster). In addition, grantees of the Department of Housing and Urban Development's (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) program can use program funds to provide the homeless population with housing assistance, such as transitional and permanent supportive housing.

Two homelessness programs—HUD's Continuum of Care and Emergency Solutions Grants (ESG) program—can provide housing assistance during a disaster, although they generally do not receive supplemental disaster funding. HUD may waive program requirements during a disaster to give affected recipients more flexibility. In 2020, the CARES Act provided \$4 billion in ESG grants to respond to the COVID-19 pandemic and authorized HUD to provide statutory and regulatory waivers and alternative program requirements for all recipients. For example, the act waived the 60 percent cap on street outreach and emergency shelter expenses. Recipients and homeless service providers GAO spoke with generally found these waivers to be useful. As of November 2022, HUD said it planned to evaluate the use of ESG waivers and alternative program requirements during the pandemic but did not provide an estimated time frame for doing so. Such a review would better inform HUD and Congress on the use of ESG waivers and alternative program requirements in future disasters.

FEMA and HUD do not regularly coordinate on issues related to disaster sheltering and housing assistance provided to the homeless population. While both agencies participate in some interagency efforts on disaster response, these efforts either do not address the homeless population or do not occur regularly. Stakeholders GAO interviewed shared lessons learned regarding the importance of having established relationships between emergency management and homelessness stakeholders to collaborate on providing assistance for the homeless population. The United States Interagency Council on Homelessness (USICH), which includes HUD and FEMA, plans to implement a federal strategy to strengthen coordination among homelessness, public health, and emergency management agencies. However, it has not yet determined when or how to do so. By regularly coordinating—for example, through efforts being undertaken through USICH to implement the federal strategy on improving collaboration in the event of a disaster—FEMA and HUD could help increase knowledge sharing and disseminate information among federal and local partners.

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Abbreviations

CDBG-DR	Community Development Block Grant Disaster Recovery
CoC	Continuum of Care
ESG	Emergency Solutions Grants
ESG-CV	Emergency Solutions Grants–CARES Act
FEMA	Federal Emergency Management Agency
HUD	Department of Housing and Urban Development
McKinney-Vento Act	McKinney-Vento Homeless Assistance Act (as amended)
RUSH	Rapid Unsheltered Survivor Housing program
SBA	Small Business Administration
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
USICH	United States Interagency Council on Homelessness
VA	Department of Veterans Affairs

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May 16, 2023

The Honorable Brian Schatz
Chair
The Honorable Cindy Hyde-Smith
Ranking Member
Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies
Committee on Appropriations
United States Senate

The Honorable Tom Cole
Chairman
The Honorable Mike Quigley
Ranking Member
Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies
Committee on Appropriations
House of Representatives

Each year, disasters such as floods, hurricanes, and wildfires affect hundreds of American communities and cause billions of dollars of damage.¹ People experiencing homelessness, who may be in shelters, tents, or encampments, can be particularly vulnerable and most severely affected by a disaster.² *The 2022 Annual Homelessness Assessment Report (AHAR) to Congress* reported that on a single night in 2022, roughly 582,500 people were experiencing homelessness in the United States. About 60 percent were staying in sheltered locations—emergency shelters, safe havens, or transitional housing programs—and about 40 percent were in unsheltered locations such as on the street, in

¹According to the U.S. Global Change Research Program, extreme weather events are projected to become more frequent and intense in parts of the U.S. as a result of changes in the climate. GAO, *Disaster Recovery: Actions Needed to Improve the Federal Approach*, [GAO-23-104956](#) (Washington, D.C.: Nov. 15, 2022).

²June L. Gin et al., “Including Homeless Populations in Disaster Preparedness, Planning, and Response: A Toolkit for Practitioners,” *Journal of Public Health Management and Practice*, vol. 28, no. 1 (January/February 2022): E62.

abandoned buildings, or in other places not suitable for human habitation.³

The Additional Supplemental Appropriations for Disaster Relief Act, 2019 provided funding for GAO to conduct audits related to presidentially declared major disasters that occurred in calendar year 2018.⁴ This report examines the availability of sheltering or housing assistance for those experiencing homelessness in the event of a natural disaster.⁵

Specifically, we examine (1) how selected federal disaster programs can be used to assist those experiencing homelessness; (2) how selected federal homelessness programs can be used to assist those experiencing homelessness in the event of a disaster; and (3) the extent to which the Federal Emergency Management Agency (FEMA) and the Department of Housing and Urban Development (HUD) plan, evaluate, and coordinate efforts to provide housing assistance to those experiencing homelessness in the event of a disaster. Throughout this report, when we refer to those experiencing homelessness, we mean people who were already experiencing homelessness prior to a disaster event and not people who may have become homeless as a result of the disaster.

For all three objectives, we reviewed key legislation, GAO and Congressional Research Service reports, and federal agency documentation. We also reviewed the FEMA recent strategic plan and the HUD recent annual performance plan for any relevant goals and performance information for the selected programs and compared them against relevant agency efforts. We interviewed officials from FEMA, HUD, and the United States Interagency Council on Homelessness (USICH).

We also conducted 41 interviews with federal, state, and local stakeholders that have a disaster or homelessness response role and are located in one of four areas affected by 2018 disasters: the wildfires in California, Hurricane Michael in Florida, Hurricane Florence in North

³Department of Housing and Urban Development, *The 2022 Annual Homelessness Assessment Report (AHAR) to Congress Part 1: Point-in-Time Estimates of Homelessness* (Washington, D.C.: Dec. 2022). This report describes a person experiencing homelessness as a person who lacks a fixed, regular, and adequate nighttime residence.

⁴Pub. L. No. 116-20, 133 Stat. 871, 892-893.

⁵With respect to FEMA sheltering, we are referring to “emergency shelter” per the Robert T. Stafford Disaster Relief and Emergency Assistance Act. 42 U.S.C. §5170b(a)(3)(B).

Carolina, and storms in Wisconsin.⁶ We selected these disasters because they had significant impacts and represented different geographic locations and types of disasters.

We judgmentally selected stakeholders to interview who had a disaster or homelessness response role or were a recipient of one of our selected programs (described below), and were located in the selected disaster-impacted areas. We held four interviews with FEMA regional office staff and four with HUD regional and field office staff covering areas affected by the selected disasters. We also interviewed the four state emergency management agencies and five additional state agencies that administer the selected grant programs, nine city or county agencies, nine Continuums of Care (CoC) (local planning bodies that coordinate homelessness services), and 10 homeless service providers. We also conducted a literature review to identify studies and research reports issued from 2016 to 2021 that addressed housing assistance for the homeless population in the event of a disaster.

To identify federal disaster and homelessness programs, we reviewed GAO and Congressional Research Service reports and agency documentation and interviewed representatives of FEMA, HUD, the Department of Veterans Affairs (VA), the Small Business Administration (SBA), and the Department of Agriculture.⁷ We selected programs that provided sheltering or housing assistance to a broad spectrum of people experiencing homelessness and were active in 2018.⁸ From the resulting list of programs, we selected two federal disaster assistance programs—FEMA’s Public Assistance program and HUD’s Community Development

⁶While the focus of this report is on 2018 disasters and not the COVID-19 pandemic, we also asked interviewees about their pandemic response because the lessons learned may inform the response to natural disasters.

⁷To compile a list of federal programs that could be used in a disaster to provide emergency shelter or housing assistance, we reviewed a 2016 GAO report that identified disaster-specific programs (i.e., those specifically authorized for the purposes of mitigation, disaster response, and disaster recovery) and disaster-applicable programs (i.e., those not specifically designated for disaster or emergency situations but that can be used to mitigate, respond to, or recover from a disaster incident). See GAO, *Federal Disaster Assistance: Federal Departments and Agencies Obligated at Least \$277.6 Billion during Fiscal Years 2005 through 2014*, [GAO-16-797](#) (Washington, D.C.: Sept. 22, 2016). In this report, we refer to disaster-specific and disaster-applicable programs collectively as “disaster assistance programs.”

⁸In this report, we consider “direct assistance” to be assistance provided directly to the disaster survivor and “indirect assistance” to be assistance provided in the form of grants to localities.

Block Grant Disaster Recovery (CDBG-DR) program—and two homelessness assistance programs—HUD’s Continuum of Care and the Emergency Solutions Grants (ESG) programs.

For our third objective, we reviewed key Department of Homeland Security and FEMA disaster framework documents and other evidence and compared FEMA’s efforts against our Disaster Resilience Framework.⁹ We also reviewed FEMA’s and HUD’s guidance on disaster planning. We reviewed USICH’s federal strategic plan and any ongoing efforts related to disaster assistance and homelessness. For more details on our methodology, see appendix I.

We conducted this performance audit from August 2021 to May 2023 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.

Background

National Disaster Response and Recovery

FEMA, a component of the Department of Homeland Security, is the lead agency in the federal response to disasters. In response to a presidential policy directive released in March 2011, FEMA developed the National Preparedness Goal, which outlines the core capabilities needed to prepare for all types of disasters and emergencies.¹⁰ The National Preparedness Goal is achieved through the National Preparedness System, which includes a series of national planning frameworks to implement the core capabilities covering the areas of disaster prevention, protection, mitigation, response, and recovery. In this report, we focus on the disaster response and recovery areas—specifically, housing assistance available to those experiencing homelessness.

FEMA’s National Response Framework defines the roles of entities that respond to all types of incidents, such as hurricanes and other disasters,

⁹GAO, *Disaster Resilience Framework: Principles for Analyzing Federal Efforts to Facilitate and Promote Resilience to Natural Disasters*, [GAO-20-100SP](#) (Washington, D.C.: Oct. 2019).

¹⁰Department of Homeland Security, *National Preparedness Goal* (Washington, D.C.: Sept. 2015). The National Preparedness Goal is “a secure and resilient nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.”

including local and state governments, the federal government, the private sector, and voluntary organizations. The response framework also defines emergency support functions. Each emergency support function is composed of a department or agency that is designated as the function coordinator, along with primary and support agencies with the resources or capabilities to assist in the response function. Emergency support function #6 includes mass care, emergency assistance, temporary housing, and human services support functions.¹¹ Mass care services include emergency shelter, feeding operations, distribution of emergency items, and reunification efforts. This emergency support function is coordinated by FEMA and supported by various agencies, including HUD, and organizations, such as the American Red Cross.¹²

The National Disaster Recovery Framework serves as a guide to help communities coordinate recovery efforts to address their unique needs, capabilities, demographics, and governing structures. According to this framework, the federal government's role in disaster recovery is to support state, local, tribal, territorial, and insular area governments in pursuit of their own successful recoveries. These nonfederal entities are responsible for defining their own long-term recovery goals, which the federal government helps to support through funding and technical assistance.

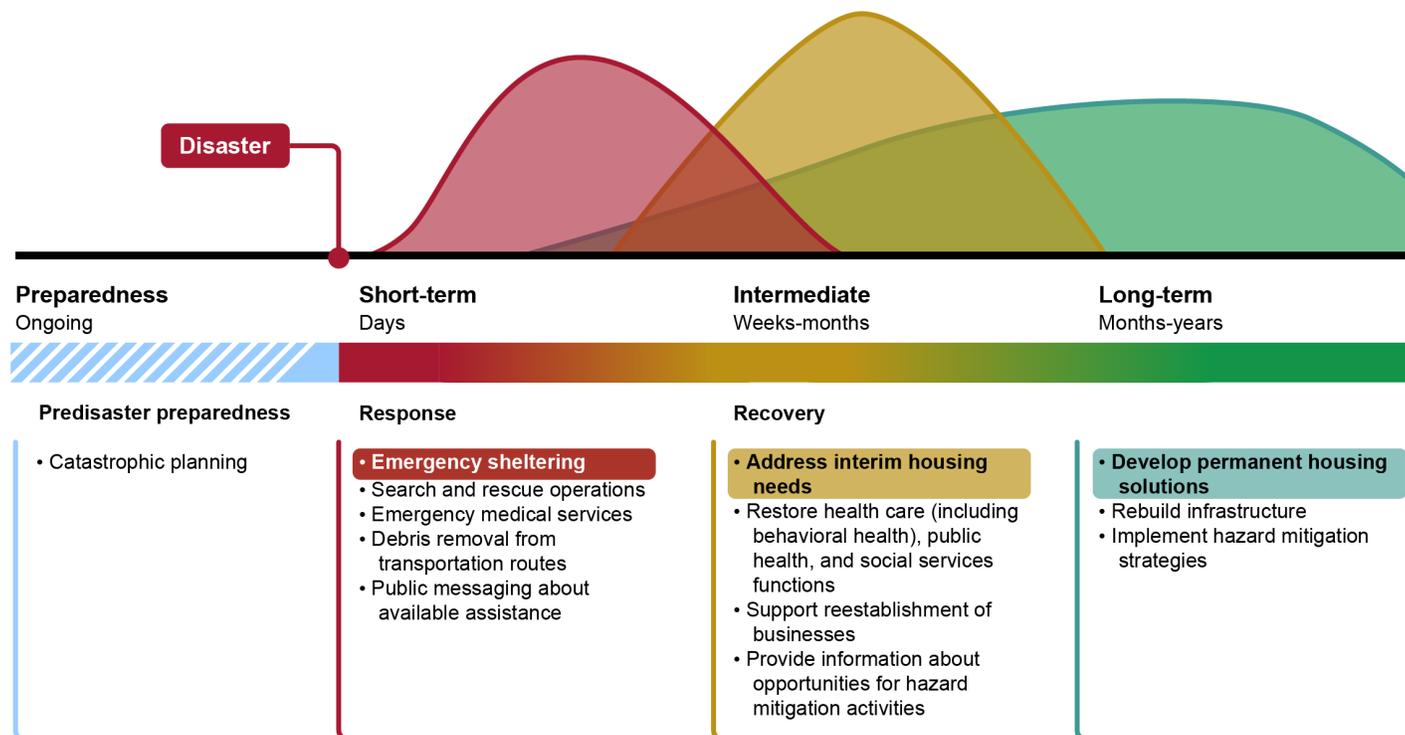
State, local, tribal, territorial, and federal governments therefore have the primary role of planning and managing all aspects of a community's recovery. State and territorial governments can support local governments by coordinating or providing any needed technical or financial support to help communities address recovery needs. States assist local governments after disasters by identifying, securing, and leveraging recovery resources and funds. In addition to managing federally provided resources, state, tribal, and territorial governments may develop programs or secure funding that can help finance recovery.

¹¹The National Response Framework includes 15 emergency support functions. In addition to emergency support function #6, the framework includes emergency support functions related to transportation, communication, and public safety and security, among other things.

¹²The Red Cross is the nation's largest voluntary organization involved in disaster relief. It is the only voluntary organization designated as a primary agency in the National Response Framework to coordinate the mass care emergency support function with FEMA. The Red Cross also has a role as a service provider in the immediate aftermath of disasters. As a mass care service provider, it works across sectors to provide services such as sheltering, feeding, distribution of supplies, family reunification, and casework.

Figure 1 depicts the national disaster response and recovery phases as outlined in the National Disaster Recovery Framework.

Figure 1: Disaster Response and Recovery Phases and Example Actions, by Phase



Source: GAO analysis of Federal Emergency Management Agency policy. | GAO-23-105379

Note: Shaded actions represent actions related to disaster shelter and housing assistance.

Federal Disaster Housing Assistance

Multiple federal agencies administer a number of disaster response and recovery programs that assist communities and individuals in the event of a federally declared major disaster. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) constitutes the statutory authority for FEMA’s federal disaster response activities.¹³ The act establishes the process for states, territories, and federally recognized Tribes to request a presidential major disaster or emergency declaration. In the event of a major disaster, a state or tribal government may request that FEMA conduct a joint Preliminary Damage Assessment. If the damage caused by the disaster exceeds the resources of the state or tribal government, the governor or Tribal Chief Executive may request a presidential disaster declaration through the FEMA regional office. If

¹³42 U.S.C. §§ 5121-5207.

approved, the declaration triggers federal response and recovery programs.

Several federal disaster assistance programs offer direct or indirect housing assistance for homeowners and renters. For example, the Housing Assistance provision of FEMA's Individuals and Households Program provides financial and direct assistance for disaster-caused housing needs not covered by insurance or provided for by another source. Other programs may provide indirect assistance in the form of grants to communities affected by a disaster. This report focuses on two federal disaster assistance programs that provide emergency sheltering or housing assistance to those who were homeless prior to the disaster: FEMA's Public Assistance program and HUD's CDBG-DR program (see table 1).

- **FEMA's Public Assistance program** provides grants to state, local, tribal, and territorial governments, and certain types of private nonprofit organizations to reimburse eligible costs incurred responding to and recovering from a disaster.¹⁴ Public Assistance may provide funding for eligible work and costs related to emergency sheltering of disaster survivors and may also be used to temporarily relocate or repair eligible facilities that were damaged by a disaster.
- **HUD's CDBG-DR program** may provide state, local, territorial, or tribal governments with grants to aid in disaster recovery. Governments may use these grants to repair or construct housing as needed in the community, such as additional multifamily housing, or to establish transitional housing, permanent supportive housing, or rapid rehousing programs.¹⁵

¹⁴Under its Public Assistance program, FEMA provides assistance to eligible applicants which include state, local, territorial, and tribal governments, and certain private nonprofit organizations. The state or territorial government designates one of the agencies (usually the emergency management agency) as the "recipient," which serves as the pass through entity to the other agencies, which are "subrecipients." A tribal government may elect to be a "recipient" or "subrecipient" under a state or territorial declaration or request its own declaration as a "recipient."

¹⁵Transitional housing provides temporary housing for households needing additional stabilization support before moving into permanent housing. Permanent supportive housing involves the construction or rehabilitation of affordable housing and supportive services. Rapid rehousing is a permanent housing model that provides short- and medium-term rental assistance and supportive services to help individuals and families achieve and maintain housing stability as quickly as possible. Department of Housing and Urban Development, "Strategy: Address Homelessness in Your CDBG-DR Action Plan," accessed Oct. 29, 2021, <https://www.hudexchange.info/resources/documents/DR-H-Strategy-Address-Homelessness-in-Your-CDBG-DR-Action-Plan.pdf>.

Table 1: Selected Federal Disaster Programs That Can Provide Housing Assistance to Those Experiencing Homelessness

	FEMA’s Public Assistance Program	HUD’s Community Development Block Grant Disaster Recovery Program
Eligible recipients	Recipients: State, tribal, and territorial governments Subrecipients: Local governments and certain types of private nonprofit organizations ^a	Grantees: State, local, territorial, and tribal governments Subrecipients: State agencies, nonprofit organizations, economic development agencies
General purpose	Provides supplemental federal grant assistance for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly owned facilities and those owned/operated by certain private nonprofit organizations.	Provides disaster-affected communities with funding to meet unmet recovery needs, especially in low- and moderate-income areas. Funding can be used for a range of efforts to help rebuild communities.
Examples of eligible activities	Emergency protective measures such as medical care and transportation, evacuation and emergency sheltering, fire and flood fighting, and security	Necessary expenses related to disaster relief, long-term recovery, and restoration of infrastructure, housing, and economic revitalization

Source: GAO analysis of documentation from the Federal Emergency Management Agency (FEMA) and Department of Housing and Urban Development (HUD). | GAO-23-105379

^aUnder the Public Assistance program, FEMA provides assistance to eligible applicants which include state, local territorial, and tribal governments, and certain private nonprofit organizations. The state or territorial government designates one of the agencies (usually the emergency management agency) as the “recipient,” which serves as the pass through entity to the other agencies, which are “subrecipients.” A tribal government may elect to be a “recipient” under a state or territorial declaration or request its own declaration as a “recipient.”

For additional information on how selected federal disaster assistance programs may provide housing assistance to disaster survivors, see appendix II.

Federal Homelessness Assistance

Multiple federal agencies administer a number of programs that assist people experiencing homelessness by providing housing, services, and support. Some programs assist all people experiencing homelessness, while others target assistance to specific populations, such as veterans and youth. Eligibility for assistance may also depend on how these programs define “homelessness.”

The McKinney-Vento Homeless Assistance Act (McKinney-Vento Act), as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act, codifies HUD’s homeless assistance programs.¹⁶ Section 103, as amended, of the act defines a “homeless individual” as

¹⁶The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), Pub. L. No. 111-22, div. B, 123 Stat. 1632, 1663, amended the McKinney-Vento Homeless Assistance Act (codified as amended at 42 U.S.C. §§11301-11435).

-
- an individual who lacks a fixed, regular, and adequate nighttime residence;
 - an individual who has a primary nighttime residence that is a public or private place not designed or ordinarily used for a regular sleeping accommodation;
 - an individual who lives in a supervised public or private shelter designed to provide temporary living accommodations;
 - an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
 - an individual who will imminently lose their housing, has no subsequent residence identified, and lacks the resources or support networks needed to obtain permanent housing;¹⁷ or
 - certain unaccompanied youth and homeless families with children and youth defined as homeless under other federal statutes.¹⁸

¹⁷Loss of housing includes housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations.

¹⁸42 U.S.C. § 11302(a). Other federal agencies use other definitions of “homelessness” to determine eligibility for their applicable programs. For example, the Department of Education’s Education for Homeless Children and Youths defines homeless children and youths in part by reference to the Section 103 definition of homeless individuals as those lacking a fixed, regular, and adequate nighttime residence. In addition, the program’s definition generally includes children and youth who are (1) sharing housing with other persons due to loss of housing or economic hardship; (2) living in hotels or motels, trailer parks, or campgrounds due to lack of adequate accommodations; (3) living in emergency or transitional shelters or abandoned in hospitals; (4) living in substandard housing; and (5) certain children of migrant workers. 42 U.S.C. § 11434a.

The McKinney-Vento Act also created the United States Interagency Council on Homelessness (USICH), which includes representatives of 19 federal member agencies and its own full-time staff and coordinates the federal response to homelessness.¹⁹

In this report, we focused on two federal homelessness programs that may be used to provide housing assistance to people experiencing homelessness in the event of a disaster: HUD's CoC program and its ESG program (see table 2).

- **The CoC program** provides recipients with funding for supportive services and housing for those experiencing homelessness who are eligible to receive assistance. A CoC is a regional or local planning body that coordinates homelessness response funding in a

¹⁹42 U.S.C. § 11311. Council members designated in the act are the Secretaries of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Housing and Urban Development, Interior, Labor, Transportation, and Veterans Affairs; Attorney General of the United States; Chief Executive Officers of the Corporation for National and Community Service; Administrator of the Federal Emergency Management Agency; Administrator of the General Services Administration; Director of the Office of Management and Budget; Commissioner of the Social Security Administration; U.S. Postmaster General; and Director of the White House Office of Faith-Based and Community Initiatives (or their designees). The act also designates the Director of USA FreedomCorps—a former White House office and policy council—as a council member, as well as the heads of such other federal agencies as the council considers appropriate (or their designees). 42 U.S.C. § 11312(a).

geographic area.²⁰ CoCs collect data on program participants through the Homeless Management Information System.²¹

- **The ESG program** provides grants to state, local, and territorial governments to assist those experiencing homelessness through various eligible activities, including emergency shelter, temporary housing, and homelessness prevention.

HUD's Office of Community Planning and Development administers both programs.²²

²⁰CoCs may include representatives of several organizations, such as nonprofit homeless providers, faith-based organizations, local governments, public housing agencies, and social service providers. 24 C.F.R. § 578.3.

²¹As part of the CoC program, permanent housing is community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least 1 year, which is renewable for terms that are a minimum of 1 month long, and is terminable only for cause. Permanent supportive housing is permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently. Transitional housing is housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least 1 month that ends in 24 months and cannot be extended. 24 C.F.R. § 578.3. Supportive service only funds may be used for acquisition, rehabilitation, relocation costs, or leasing of a facility from which supportive services will be provided to unsheltered and sheltered homeless persons for whom the recipient or subrecipient is not providing housing or housing assistance. Supportive services only includes street outreach. 24 C.F.R. § 578.37(a)(3). Homelessness prevention services use CoC funds to provide for housing, relocation and stabilization services, and certain short-term and/or medium term rental assistance that are necessary to prevent an individual or family from becoming homeless. 24 C.F.R. § 578.37(a)(5). Recipients and subrecipients may also use funding to establish and operate a Homeless Management Information System. 24 C.F.R. § 578.57.

²²HUD's Office of Community Planning and Development manages a number of grant programs that promote community-based efforts to develop housing and economic opportunities.

Table 2: Selected Federal Homelessness Programs That Can Provide Housing Assistance Applicable to Disaster Situations

	HUD’s Continuum of Care Program	HUD’s Emergency Solutions Grants Program
Eligible recipients	Recipients: Nonprofit organizations, state, local, and tribal governments, or a tribally designated housing entity Subrecipients: Private nonprofit organizations or other government entities	Recipients: State, local, and territorial governments Subrecipients: Local governments, private nonprofit organizations, public housing agencies, and local redevelopment authorities, among others
General purpose	To promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals; promote access to mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness	To engage individuals and families who are living on the street; improve the number and quality of emergency shelters and help operate them; rapidly rehouse individuals and families who become homeless; and prevent families and individuals from becoming homeless
Examples of eligible activities	Program components are permanent housing, transitional housing, supportive services (only), data management, and homelessness prevention (in some cases).	Program components are street outreach, emergency shelter, homelessness prevention, rapid rehousing assistance, and data management, as well as administrative activities.

Source: GAO analysis of Department of Housing and Urban Development (HUD) documents. | GAO-23-105379

Two Federal Disaster Programs Provide Shelter or Housing Assistance to People Experiencing Homelessness

Of the 16 federal disaster assistance programs that provide some form of shelter or housing assistance, two can provide such assistance to the general homeless population: FEMA’s Public Assistance program and HUD’s CDBG-DR program. There are no federal programs specifically designed to address the housing needs of those experiencing homelessness in a disaster. Instead, most disaster assistance programs are designed to serve homeowners or renters. (See app. II for more details on federal disaster programs.)

Many of the disaster housing assistance programs we reviewed require that an applicant must have been housed prior to the disaster to be eligible for assistance. For example, FEMA officials stated that individuals who were homeless before a disaster are not eligible for FEMA’s Individuals and Households Program within the Individual Assistance

program because their need for housing was not caused by the disaster.²³

FEMA's Public Assistance Program Funds Emergency Shelter That the Homeless Population Can Access

Reported Uses for Those Experiencing Homelessness

FEMA's Public Assistance program does not specifically serve the homeless population, but can assist this population, for example, by funding emergency shelter that is broadly available to people or organizations affected by a disaster. The Stafford Act provides statutory authority for the Public Assistance program and does not specifically address those experiencing homelessness prior to a disaster.²⁴

According to Public Assistance program policy, those experiencing homelessness may benefit from Public Assistance funding in two ways.²⁵ First, as an emergency protective measure, Public Assistance can fund emergency shelters operated by government entities, the Red Cross, or other private nonprofit partners.²⁶ FEMA and Red Cross officials stated

²³FEMA's Individuals and Households Program within its Individual Assistance program provides financial assistance and direct services to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs as a result of a major disaster. FEMA officials stated that the Individuals and Households Program does not provide housing assistance (rental assistance, direct assistance, home repair assistance, or home replacement assistance) to applicants experiencing homelessness because the need for housing was not caused by the disaster. Applicants experiencing homelessness before a disaster may be eligible for certain types of Other Needs Assistance provided through the Individuals and Households Program, including transportation assistance, medical and dental assistance, funeral assistance, and child care assistance. FEMA officials stated that, when authorized, FEMA's Individual Assistance program also provides Transitional Sheltering Assistance, a form of noncongregate sheltering assistance using participating hotels to provide short-term emergency sheltering to eligible displaced disaster survivors. To be eligible, individuals must apply through FEMA and show that they were displaced from and unable to live in their predisaster residence, which excludes those experiencing homelessness prior to a disaster.

²⁴42 U.S.C. §§ 5121-5207.

²⁵For more information, see Federal Emergency Management Agency, Public Assistance Program and Policy Guide (Washington, D.C.: June 1, 2020).

²⁶Typically, such sheltering occurs in facilities with large open spaces, such as schools, churches, community centers, armories, or other similar facilities. FEMA refers to these shelters as congregate shelters.

that emergency shelters are available to anyone displaced from their place of residence, including those experiencing homelessness. Most Public Assistance recipients we interviewed (seven of the 10) confirmed that they could use or specifically had used Public Assistance funding to provide emergency shelter following a disaster.²⁷ FEMA officials noted that as shelter residents' needs diminish and they become able to return to their predisaster living conditions, emergency shelters consolidate and eventually cease. Those who cannot transition in the short-term (including the predisaster homeless) need to find alternative accommodations or housing programs.

The second way the Public Assistance program may assist those experiencing homelessness is through funding for permanent work activities, which include the repair, restoration, reconstruction, or replacement of facilities damaged or destroyed by a major disaster. FEMA's Public Assistance Program and Policy Guide states that homeless shelters may receive Public Assistance funding for repairs when the shelter is damaged by a declared incident and is owned and operated by an eligible applicant (which may include certain private nonprofit organizations).

Recipients reported certain challenges in using the Public Assistance Program to assist people experiencing homelessness. Two Public Assistance recipients stated that the program's reimbursement system can create challenges because it requires an organization to pay up front for costs that may not be reimbursed. They also said that tracking and providing the required documentation after a disaster can be difficult. Another Public Assistance recipient noted that private nonprofit organizations may be eligible to receive Public Assistance funding; however, they must apply for SBA loans and other disaster assistance before seeking Public Assistance.²⁸ Public Assistance guidance confirms that private nonprofit organizations that provide noncritical, but essential social services, must apply for a disaster loan from SBA before receiving any Public Assistance funding for eligible permanent work costs.

FEMA categorizes Public Assistance funding based on its intended purpose, and category B (emergency protective measures) covers evacuation and emergency sheltering costs, among other costs. FEMA's

²⁷During the course of our work, we interviewed 10 state and local governments that had experience with Public Assistance funding. FEMA considers state governments as recipients and local governments as subrecipients. In this report, we refer to them collectively as Public Assistance recipients.

²⁸42 U.S.C. §§ 5172(a)(3)(A)(ii), 5172(a)(3)(B); 44 C.F.R. § 206.226(c).

COVID-19 Response

Public Assistance disbursement data show that for the four selected 2018 disasters in the four states under our review, approximately \$896 million was allocated for emergency protective measures (category B), which could include emergency sheltering costs. FEMA officials said they do not track whether category B or other Public Assistance funds were used to assist people experiencing homelessness because the program does not have a goal to specifically serve this group.

Under the COVID-19 emergency declaration and subsequent major disaster declarations, Public Assistance provided assistance for emergency protective measures that included noncongregate medical sheltering.²⁹ Noncongregate sheltering includes locations where each individual or household has living space that offers some level of privacy (e.g., hotels, casinos, or dormitories). Prior to the COVID-19 response, Public Assistance funding was generally not used to reimburse eligible applicants for noncongregate emergency sheltering costs, except in limited circumstances.³⁰ However, FEMA officials said they expanded their approval of noncongregate sheltering for other disasters declared during the COVID-19 pandemic.³¹

The target population for noncongregate medical sheltering was based on need: people who tested positive for or had been exposed to COVID-19 and asymptomatic people at high risk for contracting COVID-19, such as those over age 65 or with certain underlying health conditions.³²

In June 2020, HUD, FEMA, and the Centers for Disease Control and Prevention jointly issued guidance to organizations operating noncongregate medical shelter for those experiencing homelessness.

²⁹For more information, see Federal Emergency Management Agency, *FEMA Frequently Asked Questions, Coronavirus (COVID-19) Pandemic: Non-Congregate Sheltering*, accessed Feb. 17, 2023, https://www.fema.gov/sites/default/files/2020-07/fema_covid_noncongregate-sheltering-faq_factsheet.pdf.

³⁰In limited circumstances, such as when congregate shelters are not available or sufficient, FEMA may reimburse costs related to emergency sheltering in noncongregate environments (if approved in advance by FEMA). For more information, see Federal Emergency Management Agency, *Public Assistance Program and Policy Guide*.

³¹For more information, see Federal Emergency Management Agency, *FEMA Emergency Non-Congregate Sheltering during the COVID-19 Public Health Emergency (Interim)*, FEMA Policy 104-009-18, version 3 (Jan. 29, 2021).

³²For more information, see Federal Emergency Management Agency, *FEMA Frequently Asked Questions: Coronavirus (COVID-19) Pandemic: Non-Congregate Sheltering*, accessed Feb. 17, 2023, https://www.fema.gov/sites/default/files/2020-07/fema_covid_noncongregate-sheltering-faq_factsheet.pdf.

The guidance stated that sheltering specific populations, such as the homeless population, in a noncongregate setting should be determined by public health directives in local jurisdictions.³³ For example, in April 2020 California implemented Project RoomKey, a temporary FEMA- and state-supported program that used Public Assistance funding to provide temporary noncongregate shelter for anyone at risk from COVID-19 in California, including those experiencing homelessness.

Officials from one state emergency management agency used Public Assistance funds during the pandemic for noncongregate shelter when a state health directive required such shelter for the homeless population. They explained that for local governments to use these funds for noncongregate shelter, a local health directive must also be in place. Three Public Assistance recipients told us that Public Assistance funding was used to address the housing needs of those experiencing homelessness through noncongregate sheltering.

Two recipients stated that during the pandemic, some recipients were not eligible for Public Assistance funding for noncongregate medical shelter for those experiencing homelessness because they did not have a local public health directive or a medical reason. Officials from one state emergency management agency told us there was some ambiguity about who qualifies for funding under a public health directive at the state level. They said nonprofits and local governments could be confused about their eligibility for Public Assistance funding when local public health directives do not explicitly mention those experiencing homelessness.

In September 2021, FEMA and HUD issued guidance on transitioning people experiencing homelessness from noncongregate medical shelter to stable housing.³⁴ FEMA officials noted that the joint effort between FEMA and HUD during the COVID-19 pandemic has focused on transitioning people experiencing homelessness from COVID-19-specific medical noncongregate sheltering to more sustainable housing solutions. FEMA officials told us they are not exploring noncongregate sheltering for housing because FEMA does not have the statutory authority to provide

³³For more information, see Centers for Disease Control and Prevention, Federal Emergency Management Agency, and Department of Housing and Urban Development, *Federal Funding Priority Order for Non-Congregate Shelter during COVID-19* (Washington, D.C.: June 23, 2020).

³⁴Department of Housing and Urban Development and the Federal Emergency Management Agency, "Model Transitions from Non-Congregate Shelter: Joint Recommendations for Assisting People Experiencing Homelessness" (Sept. 22, 2021), https://www.hud.gov/sites/dfiles/CPD/documents/Model-Transitions-Documents_FINAL.pdf.

direct or indirect housing assistance under the Public Assistance program. They reiterated that the Public Assistance program funds emergency sheltering of evacuees or disaster survivors. As the situation stabilizes, survivors whose needs were not caused by the disaster are not eligible for noncongregate sheltering options.

HUD Has Guidance on Using CDBG-DR Funds for the Homeless Population, but Stakeholders Cited Challenges to Doing So

Reported Uses for Those Experiencing Homelessness

The CDBG-DR program can be used to assist those experiencing homelessness through various forms of housing assistance.³⁵ As discussed previously, the CDBG-DR program provides flexible grants through congressional appropriation to help counties, states, local, territorial, and tribal governments to recover from presidentially declared major disasters. CDBG-DR funding is used to help disaster-affected communities with unmet needs, especially in low- and moderate-income areas, and can be used for a range of activities to help communities rebuild and to mitigate future disaster risk.³⁶ The program's statutory authority derives from Title 1 of the Housing and Community Development Act of 1974 and individual supplemental appropriations acts that provide funding for each disaster and specify rules for program eligibility and funding allocation for disasters covered by the appropriation.³⁷

HUD guidance states that CDBG-DR program funds can be used to assist those experiencing homelessness through services, including transitional housing, permanent supportive housing, rapid rehousing, and

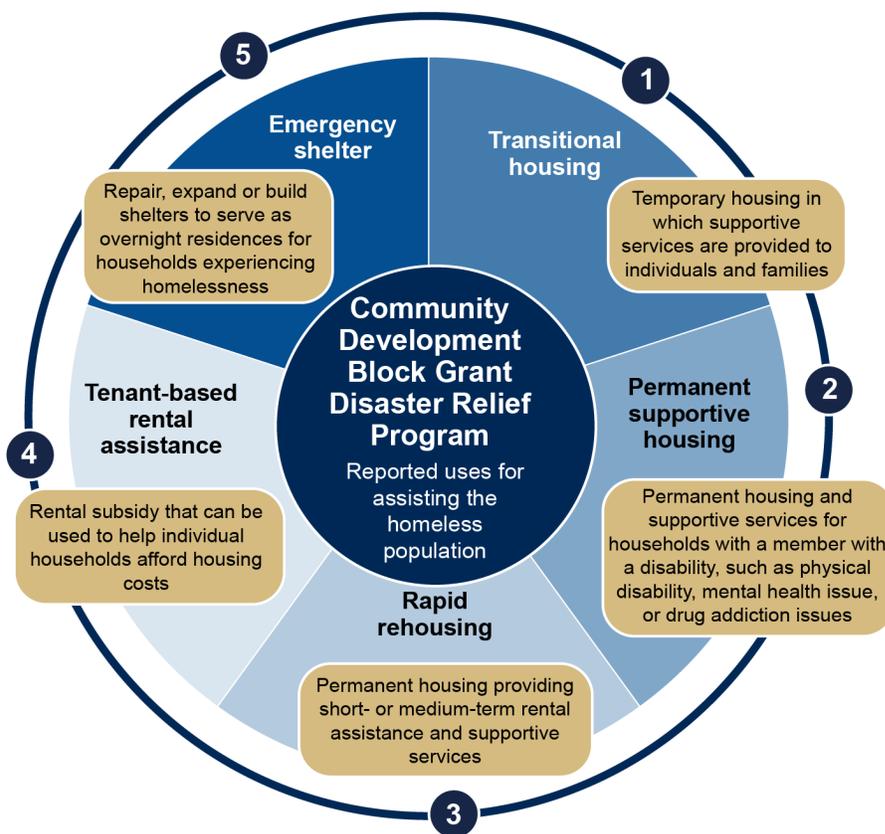
³⁵All eligible activities funded through CDBG-DR must address disaster-related impacts (direct or indirect) in a presidentially declared area for the covered disaster and meet the standard CDBG criteria for activities and national objectives. Department of Housing and Urban Development, *Community Development Block Grant Disaster: CDBG-DR Overview* (Washington, D.C.: Jan. 30, 2023).

³⁶Activities can include housing (rehabilitation, new construction, and reconstruction), public facilities (repair, replacement, or relocation), and economic development (loans and job training), among others.

³⁷CDBG-DR-appropriated funding was not eligible to be used for responding to the COVID-19 pandemic.

tenant-based rental assistance (see fig. 2).³⁸ The CDBG-DR program does not provide direct assistance to individuals. Funds may be provided to state and local government grantees, Indian Tribes, and entities in other areas designated by the President as disaster areas that administer the funds directly or through subrecipients.³⁹

Figure 2: How the Community Development Block Grant Disaster Recovery Program May Be Used to Assist the Homeless Population after a Disaster



Source: GAO analysis of Department of Housing and Urban Development guidance. | GAO-23-105379

HUD requires CDBG-DR grantees (state, local, territorial, and tribal governments) to expend the majority of funds to benefit low- and

³⁸Department of Housing and Urban Development, "Strategy: Address Homelessness in Your CDBG-DR Action Plan."

³⁹Subrecipients are generally public or private nonprofit agencies, authorities, or organizations receiving CDBG-DR funds from a grantee or another subrecipient to undertake disaster recovery efforts. Grantees can enter into agreements with subrecipients to carry out certain disaster recovery activities on behalf of grantees.

moderate-income persons and those with unmet needs, a group that has a substantial overlap with vulnerable populations such as homeless individuals and families. HUD also requires grantees to submit action plans that include addressing predisaster and post-disaster homelessness. In November 2021, we reported that HUD's *Federal Register* notices have increasingly directed grantees to focus on serving vulnerable populations.⁴⁰

We reviewed the action plans of our four selected states. All four mentioned homelessness, and two detailed how CDBG-DR funding would assist those who were experiencing homelessness before the disaster. For example, one state discussed using CDBG-DR funds to identify and address the rehabilitation, reconstruction, and replacement of emergency shelters and transitional and permanent housing for people experiencing homelessness. Another state's plan stated that CDBG-DR funding would increase permanent supportive housing for people experiencing homelessness or at risk of chronic homelessness. Two of four CDBG-DR grantees we interviewed reported using CDBG-DR funds to build more affordable housing, which may benefit those experiencing homelessness in the future.

HUD's CDBG-DR program data showed that HUD allocated approximately \$2.3 billion in CDBG-DR funds for the four selected 2018 disasters in the four states under our review.

California received the largest amount of funds at \$1.0 billion. Although HUD collects some data on those served with CDBG-DR funds, it is challenging to determine how CDBG-DR benefits those who were experiencing homelessness prior to a disaster because HUD does not track certain data on program applicants that would be needed to assess if CDBG-DR grantees were serving the homeless populations specifically.⁴¹

Reported Challenges

All four grantees we interviewed stated that lengthy timelines for receiving funds after a disaster create a challenge for using CDBG-DR funds for people experiencing homelessness.⁴² State and local government grantees may either use the CDBG-DR funding directly or distribute funds to subrecipients (i.e., homeless service providers) who assist those

⁴⁰GAO, *Disaster Recovery: Better Data Are Needed to Ensure HUD Block Grant Funds Reach Vulnerable Populations*, [GAO-22-104452](#) (Washington, D. C.: Nov. 10, 2021).

⁴¹For more information, see [GAO-22-104452](#).

⁴²We interviewed four CDBG-DR grantees during the course of our work.

experiencing homelessness. The procedures and requirements for designating CDBG-DR subrecipients vary by grantee, which may contribute to longer timelines in some states. A 2019 HUD-commissioned evaluation of the CDBG-DR program found that a variety of factors can impact CDBG-DR but that, on average, housing recovery programs across all housing activity types took about 3.8 years from disaster declaration to completion.⁴³

One CDBG-DR grantee shared with us that changing regulations—due to the temporary authority of CDBG-DR funding—make planning for CDBG-DR use challenging. As we previously reported, CDBG-DR lacks permanent authority and regulations—unlike other disaster assistance programs—and requires that HUD issue customized grant requirements for each disaster.⁴⁴ In addition, officials from three HUD field offices noted that having a new CDBG-DR disaster appropriation and related requirements in response to each disaster can slow the process of using CDBG-DR funds. For example, HUD needs to train grantees on the new requirements and grantees must adjust their processes as necessary. In 2019, we recommended that Congress consider legislation establishing permanent statutory authority for a disaster assistance program.⁴⁵

Homelessness Programs Are Limited in Responding to Disasters, and HUD Has Not Evaluated the Usefulness of Waivers

⁴³Carlos Martin et al., *Housing Recovery and CDBG-DR: A Review of the Timing and Factors Associated with Housing Activities in HUD’s Community Development Block Grant for Disaster Recovery Program*, a report prepared at the request of the Department of Housing and Urban Development, April 2019.

⁴⁴GAO, *Disaster Block Grants: Factors to Consider in Authorizing a Permanent Program*, [GAO-21-569T](#) (Washington, D.C.: May 19, 2021).

⁴⁵GAO, *Disaster Recovery: Better Monitoring of Block Grant Funds Is Needed*, [GAO-19-232](#) (Washington, D.C.: Mar. 25, 2019). As of January 2023, this matter for congressional consideration remained unaddressed.

CoCs Do Not Receive Disaster Funding

HUD's CoC program may provide services in the event of a disaster, but it does not receive special disaster funding. Each year, HUD awards CoC program funding to applicants designated by CoCs to use toward coordinating the homeless response and providing homelessness services in a geographic area.⁴⁶ CoCs can face challenges in using their funds for disaster assistance, but have also identified lessons learned from responding to disasters and the COVID-19 pandemic.

Use of CoC Funds for Disaster Response

CoC program funding may be used to provide five types of services—permanent housing (which includes rapid rehousing and permanent supportive housing), transitional housing, supportive services only (which includes street outreach), homelessness prevention (in some cases), and the administration of the Homeless Management Information System. CoC-funded services that may be applicable during the short-term or intermediate phases of disaster response and recovery include rapid rehousing and transitional housing. More generally, the CoC's function as a coordinating body of homeless services is important in disaster response.

Homeless service providers generally offer the same CoC-funded services during a disaster as they do under normal circumstances, according to staff from five CoCs and five homeless service providers.⁴⁷ They said that during a disaster they continue to serve those who meet CoC program eligibility criteria, to the extent their resources allow.⁴⁸ Staff from a CoC and a homeless service provider noted that although Hurricane Michael in 2018 increased homelessness and created a drain on their resources, they were able to continue to provide services without additional CoC or ESG funds. Staff of another homeless service provider similarly noted that its role does not change during a disaster; it continues to operate its shelters as usual and can expand capacity as needed.

⁴⁶HUD calculates the maximum amount available per CoC using a process that considers available funding, local conditions, and ongoing demand.

⁴⁷We met with nine CoCs and 10 homeless service providers.

⁴⁸To be eligible to receive CoC-funded housing, people must meet HUD's definition of homelessness that corresponds to the categories established by the definition in the McKinney-Vento Act (codified as amended at 42 U.S.C. § 11302), which generally includes living in an emergency shelter, on the streets, or in another place not meant for human habitation; being housed but imminently losing their primary nighttime residence within 14 days; or fleeing or attempting to flee domestic violence or other unsafe situations.

Challenges in Using CoC Funds in Disaster Response and Recovery

Staff from CoCs and homeless service providers we interviewed cited challenges in using CoC funding to address the housing needs of those experiencing homelessness in the event of a disaster.

- **Funding planned in advance.** Staff from four CoCs we interviewed said that funding is planned in advance and designated for specific activities.⁴⁹ Consequently, those planned activities may not include housing needs following a disaster. CoCs receive a set amount of funds each year based on their planned use of those funds as cited in the CoC application, and eligible planned uses do not include setting aside funding for an unknown disaster event. Our analysis of the 2018 CoC award data for the nine CoCs we interviewed showed that permanent supportive housing for people with disabilities made up the greatest percentage of total funding awarded for eight CoCs.⁵⁰ However, this may not be the most applicable funding for use in short-term disaster response, in part because it serves a smaller pool of those experiencing homelessness and may take longer to secure. In contrast, rapid rehousing emphasizes housing search and relocation services and seeks to move people and families experiencing homelessness (with or without a disability) into permanent housing as rapidly as possible.
- **Limited flexibility to redirect funds.** CoCs and homeless service providers have limited flexibility to redirect funds in the event of a disaster. Generally, HUD allows some reallocation of funding among activities if the total reallocated funds are not more than 10 percent of total annual CoC funding. Reallocation exceeding this amount requires an amendment to the CoC's annual application, which must be reapproved by HUD. This process can take some time, according to staff from two CoCs. Further, a CoC may have no or limited additional funds to redirect in the event of a disaster.
- **Lack of affordable housing.** Staff from five CoCs and two homeless service providers told us that a lack of affordable housing makes it difficult to place people experiencing

⁴⁹According to HUD's guidance for CoCs, CoCs must approve the submission of annual applications for funds to HUD with a plan for how they will use the CoC funds. Department of Housing and Urban Development, *Introductory Guide to the Continuum of Care (CoC) Program: Understanding the CoC Program and the Requirements of the CoC Program Interim Rule* (2012).

⁵⁰One of the CoCs did not receive any funding for permanent supportive housing in 2018, and seven of the nine CoCs used more than 50 percent of their funding for permanent supportive housing.

Lessons Learned for CoCs
from Prior Disasters and the
Pandemic

homelessness in permanent housing, an issue exacerbated if a disaster destroys existing housing stock. For example, the 2018 wildfires destroyed 20 percent of the affordable housing stock in one California county, according to county officials. A research study found that wildfires that destroy housing stock can make it more difficult for people experiencing homelessness to find housing, particularly in high-cost regions.⁵¹ Further, in 2020, we reported that CoC representatives and others said that the lack of affordable housing was a major factor related to the increase in homelessness from 2012 through 2018.⁵²

HUD has authority to waive certain requirements in the event of a natural disaster to mitigate challenges for affected recipients. It issues memorandums explaining the availability of regulatory waivers for certain grant programs, including the CoC program. For example, in response to Hurricane Ian in 2022, HUD waived the CoC program's 24-month cap on rapid rehousing rental assistance to provide additional time to stabilize individuals and families in permanent housing.⁵³ HUD issued similar memorandums in response to some 2018 disasters, but no waivers for the CoC program for the selected disasters in this review.

CoCs and homeless service providers highlighted lessons learned in assisting people experiencing homelessness during disaster response and recovery and the COVID-19 pandemic. We talked to CoCs and homeless service providers about lessons learned during the pandemic that could potentially inform their response to natural disasters.

- **Early access to people using emergency shelters following a disaster.** Homeless service providers told us it was helpful to have early access to emergency disaster shelters to meet with homeless survivors soon after a disaster happens. Staff from one CoC told us that case managers assessed individuals in the emergency shelters on a case-by-case basis to determine what additional supportive services they needed. Three homeless service providers told us being allowed into the emergency shelter early to assess the population and begin setting up individual

⁵¹June L. Gin et al., "Managing the Unexpected: The Role of Homeless Service Providers during the 2017–2018 California Wildfires," *Journal of Community Psychology*, vol. 49 (2021): 2532–2547.

⁵²GAO, *Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*, [GAO-20-433](#) (Washington, D.C.: July 14, 2020).

⁵³Department of Housing and Urban Development, *Updated Availability of Waivers of Community Planning and Development Grant Program and Consolidated Plan Requirements to Facilitate Recovery from Hurricane Ian* (Dec. 8, 2022).

plans to transition out of the emergency shelter was much more effective than waiting until the shelter was trying to close.

- **Establishing relationships between local government and CoCs and homeless service providers.** Staff from six of the nine CoCs and two homeless service providers cited the benefits of establishing relationships with local government entities so they could coordinate effectively with local emergency managers and other partners and be aware of available resources. We interviewed county officials in one state where a local CoC was under the umbrella of the county government. This relationship with the county allowed the local CoC to stay involved in the long-term recovery of people experiencing homelessness as they transitioned them from the shelters. Staff from another CoC said they worked with local governments to set up long-term recovery organizations after the 2018 disaster, noting that establishing these relationships in advance facilitates coordination when a disaster hits. A homeless service provider said strengthened ties to local emergency management services during the pandemic would be important for sharing resources and working together to provide homeless services in future disasters.
- **HUD technical assistance and other resources to CoCs.** Five CoCs reported that HUD provided technical assistance, and three of those further mentioned that this assistance was useful in standing up an emergency response immediately and keeping CoCs aware of how other communities were responding to the pandemic. We reported in September 2021 that HUD officials said they had provided over 100 resources to assist communities in responding to the challenges of serving people experiencing or at-risk of homelessness during the pandemic.⁵⁴ HUD offered guidance on serving the homeless population during the pandemic through a frequently asked questions page and weekly office hours to present best practices and address grantee questions. In addition, HUD, FEMA, and the Centers for Disease Control and Prevention jointly issued guidance on the use of federal funding for noncongregate sheltering.

⁵⁴GAO, *COVID-19: Additional Risk Assessment Actions Could Improve HUD Oversight of CARES Act Funds*, [GAO-21-104542](#) (Washington, D.C.: Sept. 30, 2021).

Typical ESG Activities Can Be Used in Disaster Response, but Some Recipients Noted Challenges

Use of ESG Funds for Disaster Response

ESG recipients generally offer the same ESG-funded services during a natural disaster as they do under normal circumstances, according to four ESG recipients and one homeless service provider with whom we spoke, but they generally do not receive supplemental disaster funds.⁵⁵ Two ESG recipients, one homeless service provider, and two CoCs we interviewed told us that a disaster situation would further stretch their limited ESG resources. ESG recipients must consult with the local CoC operating within their jurisdiction in determining how to allocate ESG funds. All seven ESG recipients, four of nine CoCs, and three of 10 homeless service providers we spoke to told us they have used their ESG funds for street outreach, emergency shelter, or rapid rehousing—all useful activities in responding to a disaster.⁵⁶ One CoC official noted that unlike CoC funds, ESG funds can be used for emergency sheltering and street outreach.

Challenges in Using ESG Funds in Disaster Response and Recovery

ESG state and local recipients experienced challenges in using ESG program funds for disaster recovery similar to those CoC recipients experienced in using the CoC funding.

- **Funding planned in advance.** Similar to the CoC program, ESG recipients receive an annual grant and allocate funds for specific initiatives. Generally, eligible recipients apply for ESG through the consolidated planning process, which requires recipients to assess homelessness assistance and housing needs, examine available resources, set 3- to 5-year strategies, and develop annual action plans to submit to HUD.⁵⁷ Because most of the annual grant may

⁵⁵We interviewed seven ESG recipients during the course of our work.

⁵⁶Eligible costs for street outreach are defined as the costs of providing essential services necessary to reach out to unsheltered homeless individuals and families; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter or an appropriate health facility. 24 C.F.R. § 576.101(a).

⁵⁷Annual action plans include a concise executive summary including objectives and outcomes identified in the plan, an evaluation of past performance, and a summary of consultations with public and private entities that participated in the development of the plan. 24 C.F.R. §§ 91.220; 91.320.

already be allocated by the recipients for various activities before a disaster occurs, there may be few funds left to redirect toward the disaster, according to four ESG recipients and three CoCs.

- **Limited flexibility to redirect funds.** To use ESG funds in a way not covered under the action plan, recipients must amend the plan and seek approval from HUD. This process allows recipients to use ESG funds during disasters, but getting action plans amended and approved takes time, one ESG recipient and two CoCs told us. One state recipient said the state redesigned its ESG action plan to redistribute unexpended funds to counties affected by a 2018 disaster. The counties amended their existing contracts with homeless service providers to incorporate the additional resources. However, this kind of redistribution was not typical.
- **HUD's definition of homelessness.** Three ESG recipients and one homeless service provider said HUD's homelessness definition prevents some people from accessing services because it excludes certain situations, such as people staying with family or friends, and families doubled up in a housing unit.
- **Lack of affordable housing.** The general lack of affordable housing, discussed earlier, also makes it challenging to use ESG funds for rapid rehousing, noted three ESG state recipients.⁵⁸ As previously discussed, this problem can be exacerbated when housing stock is destroyed during a disaster.

HUD has authority to waive certain ESG regulatory requirements in the event of a natural disaster, as noted earlier. It issues memorandums explaining the availability of waivers for various Office of Community Planning and Development grant programs, including available regulatory waivers for the ESG program.⁵⁹ HUD officials explained that HUD decides which waivers to provide based on prior experiences with disasters. In

⁵⁸The ESG program allows short- and medium-term rental assistance to be provided to eligible program participants only when the rent, including utilities, for the housing unit does not exceed fair market rent established by HUD for the geographic area and complies with HUD's standard of rent reasonableness (e.g., the rent must be reasonable when compared to other units of similar location, type, size, and amenities within a community). 24 C.F.R. § 576.106(d); 24 C.F.R. pt. 888; 24 C.F.R. § 982.503 and 24 C.F.R. §.982.507.

⁵⁹Upon determination of good cause, in accordance with 24 C.F.R. §.5.110, HUD may waive regulatory provisions subject to statutory limitations. Additional regulatory waiver authority is in 24 C.F.R. § 91.600 and 24 C.F.R. § 570.5. The provisions provide HUD the authority to make waiver determinations for certain HUD programs, including the CoC and ESG programs.

Rapid Unsheltered Survivor Housing Program

response to 2018's Hurricane Michael and 2022's Hurricane Ian, HUD waived the restrictions on providing rental assistance to units above fair market rent to make more permanent housing units available.⁶⁰

In October 2022, HUD announced the first round of funding allocations for the new Rapid Unsheltered Survivor Housing (RUSH) program. HUD noted that the program falls under the ESG umbrella and is designed to fill gaps left by FEMA's disaster programs, which are mostly inaccessible to people without homes prior to a disaster. This rapid response program funds long-term housing after the disaster shelters close for people who were experiencing homelessness or at risk of homelessness before the disaster. The program was designed to be more flexible than ESG—for example, by waiving the requirement to match ESG funds with funds from other sources.⁶¹

Congress provided new reallocation authority that HUD used to fund RUSH.⁶² As of October 2022, \$56 million had been set aside for this program, with \$6.8 million allocated during the first round of funding to the state of Florida and seven Florida localities affected by Hurricane Ian. As of November 2022, HUD was working to finalize a *Federal Register* notice with more details about the program and did not have an estimate for when the notice would be completed.

HUD Has Not Evaluated Its Use of Waivers during the COVID-19 Pandemic to Inform Its Response to Future Disasters

During the COVID-19 pandemic, the ESG program received \$4 billion under the CARES Act (referred to as ESG-CV funds) to support homelessness prevention activities and to mitigate the effects of COVID-19 among those experiencing homelessness.⁶³ This funding was an increase of over 10 times ESG's original annual appropriation for fiscal year 2020. The CARES Act also authorized HUD to provide both statutory and regulatory waivers and alternative program requirements to all ESG-CV recipients. HUD has utilized regulatory waiver authority to make

⁶⁰Department of Housing and Urban Development, *Updated Availability of Waivers, and Availability of Regulatory Waivers of Emergency Solutions Grants (ESG) Program and Citizen Participation Requirements of the Consolidated Plan to Facilitate Recovery from Hurricane Michael in the State of Florida* (Apr. 2, 2019).

⁶¹ESG regulations generally require recipients to match 100 percent of ESG funds with funds from other sources. See 24 C.F.R. § 576.201.

⁶²HUD utilized reallocation authority provided in the Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, div. H, tit. II, § 231, 133 Stat. 3008 (2019) (codified at 42 U.S.C. § 11364a).

⁶³Pub. L. No. 116-136, 134 Stat. 608-609 (2020).

regulatory waiver determinations for the ESG program to address disaster recovery needs of program participants affected by a disaster.

HUD provided over 40 waivers and alternative program requirements related to the use of ESG-CV funds and ESG funds to be used by recipients to prevent, prepare for, and respond to the pandemic.⁶⁴ Table 3 provides examples of statutory and regulatory waivers offered under ESG-CV.

Table 3: Examples of Statutory and Regulatory Waivers or Alternative Requirements for Using Emergency Solutions Grants CARES Act (ESG-CV) Funding

Statutory examples	Regulatory examples
Eliminating the cap on street outreach and emergency shelter expenses (regular Emergency Solutions Grants (ESG) has an annual funding cap)	Waiver of fair market rent requirement for rental assistance
Waiving the funding match requirement (regular ESG recipients must match ESG funds with funds from other sources)	Waiver of the limit on the total period of time certain program participants may receive rental assistance and services while receiving ESG-CV assistance
Allowing a higher income threshold to expand eligibility	

Source: GAO analysis of Department of Housing and Urban Development information. | GAO-23-105379

HUD decides which regulatory waivers to offer to those recipients affected by a natural disaster based on its experience with prior disasters. Prior to allowing waivers of program requirements, HUD must first determine there is good cause. While waivers can provide flexibility, they may also pose additional program risk as regular requirements are suspended for a period of time. In response to the pandemic, as authorized by the CARES Act, HUD provided a larger number of waivers and alternative requirements to a larger number of ESG recipients to facilitate a fast response to the crisis. These waivers provided HUD additional experience from which it could draw to better understand the waivers that may be particularly useful in future emergencies, such as natural disasters, and any disadvantages to their use.

In November 2022, HUD officials said they plan to review the ESG program requirements waived during the COVID-19 pandemic to consider updates to the ESG program rule; however, updating the ESG rule had been delayed due to the pandemic. The ESG program rule is an interim rule and developing a proposed rule for the program was listed on HUD's

⁶⁴See 85 Fed. Reg. 51457 (Aug. 20, 2020).

fall 2022 regulatory agenda, but no time frame for completion was indicated.⁶⁵

HUD's fiscal year 2023 performance plan includes a strategic objective to improve ease of, effectiveness of, and trust in HUD services. The objective states that HUD will investigate how its policies, programs, and services affect customers during various situations, including in surviving a disaster and experiencing homelessness.

Our interviews with stakeholders found that ESG-CV flexibilities, such as waivers, had an important impact on recipients' administration of ESG-CV and facilitated their ability to rapidly provide housing assistance to those experiencing homelessness during the pandemic. By conducting a review of the use of ESG-CV waivers and alternative program requirements—including lessons learned from their use and any additional risks they posed—HUD could help inform the use of ESG waivers and alternative program requirements for future disasters.

FEMA and HUD Do Not Regularly Coordinate on Disaster Shelter and Housing Assistance for the Homeless Population

FEMA and HUD have issued some guidance to assist state and local governments in planning for the needs of the homeless population in the event of a disaster. In addition, some local entities that implement federal programs have evaluated their efforts to assist this population after a disaster. However, outside of specific disasters, FEMA and HUD do not regularly coordinate on issues related to shelter or housing assistance for the homeless population during a disaster. USICH's federal strategic plan to prevent and end homelessness includes a strategy related to coordination between emergency response, public health, and homelessness systems, but it is not clear when this strategy will be implemented.

FEMA and HUD Have Issued Some Guidance Related to Disaster Planning for the Homeless Population

FEMA's National Response Framework and National Disaster Recovery Framework do not impose specific requirements for state and local governments to plan for the response and recovery housing needs of the homeless population. Instead, the response framework discusses more generally the need to conduct operational disaster planning across the whole community, including the private sector, nongovernmental organizations, and all levels of government. According to the framework, planning is fundamental to national preparedness, and plans are a continuous, evolving instrument of anticipated actions that maximize

⁶⁵The ESG interim program rule was first established in 2011. Federal agency regulatory agendas are set semiannually.

opportunities and guide response operations.⁶⁶ Disaster planning occurs at the state and local levels, and FEMA encourages state, local, tribal, and territorial governments to develop emergency operations plans. FEMA has representatives who work as liaisons between FEMA and state emergency management offices. FEMA also maintains policy guidance and provides disaster trainings for state and local governments.

With respect to the selected programs we reviewed, FEMA has requirements for Public Assistance recipients to submit a hazard mitigation plan to identify risks and vulnerabilities associated with natural disasters and develop long-term strategies for protecting people and property from future incidents. The plan is not required to include disaster response considerations for specific groups. HUD has some requirements for CDBG-DR related to disaster planning for homeless populations. Recent *Federal Register* notices for CDBG-DR funds direct grantees to demonstrate how their programs will promote housing for vulnerable populations, including those at risk of or experiencing homelessness.⁶⁷

FEMA and HUD offer some resources to assist local stakeholders with planning for the needs of the homeless population in a disaster. FEMA discusses the homeless population in its guidance on planning considerations for disaster housing, which is addressed to state, local, tribal, and territorial government partners. The guidance reiterates the need for planning for disaster housing to occur at all levels of government before a disaster occurs.⁶⁸ HUD offers resources such as the Disaster Recovery Homelessness toolkit, which includes guidance for local jurisdictions to address people experiencing homelessness in their disaster planning efforts.⁶⁹

⁶⁶According to the FEMA National Planning System, operational plans describe roles and responsibilities, tasks, integration requirements, actions, and other expectations of an organization or jurisdiction during actual or potential incidents. Operational plans may include the coordination and integration of activities and resources from other departments, agencies, and organizations within a jurisdiction and across the whole community.

⁶⁷For more information, see [GAO-22-104452](#).

⁶⁸For more information, see Federal Emergency Management Agency, *Planning Considerations: Disaster Housing* (Washington, D.C.: May 2020).

⁶⁹For more information, see Department of Housing and Urban Development, "Local Planning Guide," *Disaster Recovery Homelessness Toolkit*, accessed Nov. 1, 2022, <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/local-planning-guide/>.

Of the four state governments whose staff we interviewed, three said they do not work closely with FEMA, HUD, or both on disaster planning specifically with respect to the housing needs of those experiencing homelessness. According to one FEMA regional office, FEMA allows states to set their own priorities for emergency planning for homeless populations. One of the four states' emergency operations plans specifically discusses the needs of the homeless population during disaster response and recovery.⁷⁰ However, four of the nine CoCs we interviewed provided some input into their state plan; the other five CoCs said they provided no or limited input to their state's emergency plan. Five of the CoCs had worked with local agencies on their local emergency plans—for example, one participated in “table top” exercises to plan for various disaster scenarios.

Some Local Entities That Implement Federal Programs Have Evaluated Their Efforts to Assist the Homeless Population after a Disaster

FEMA encourages states to evaluate their disaster response generally. FEMA's Continuous Improvement Technical Assistance Program has established processes to allow states to collect and evaluate data to identify and act on gaps and strengths in their operations, objectives, policies, and regulations.⁷¹ States can use these data to develop an after-action report to summarize key information, including strengths, potential best practices, areas for improvement, and potential recommended actions. FEMA officials said the scope of these after-action reports varies by disaster, but the reports generally do not examine specific populations in depth, given the resources available and timing requirements.

In the event of a disaster, HUD reviews its housing inventory and data to facilitate identifying available housing for rehousing purposes. As discussed previously, HUD's CoC and ESG programs are homelessness programs not designed for disaster response. HUD requires CoCs to collect certain data on program clients and report progress on project

⁷⁰Wisconsin Emergency Management, *Wisconsin Emergency Response Plan 2021–2023* (Madison, WI: Dec. 22, 2021); Florida Division of Emergency Management, *State of Florida 2020 Comprehensive Emergency Management Plan* (Tallahassee, FL: 2020); California Governor's Office of Emergency Services, *State of California Emergency Plan* (Sacramento, CA: Oct. 1, 2017); and North Carolina Emergency Management, *2020 North Carolina Emergency Operations Plan* (Raleigh, NC: Dec. 2020). We reviewed the most recent version of each state plan as of February 2023 for our selected disaster sites.

⁷¹Federal Emergency Management Agency, *National Continuous Improvement Guidance* (Washington, D.C.: Oct. 2022). The FEMA Continuous Improvement Process encourages states and local governments, Tribes, and territories to establish a culture of learning in which capabilities and processes are periodically examined to determine if their jurisdiction can effectively handle relevant threats and hazards, and identify what learning they should incorporate into their preparedness and future operations.

activities, but it does not require them to evaluate how they performed during a disaster. Some CoCs collect data on their own to evaluate or improve their disaster response. Six CoCs and four homeless service providers we interviewed described using data sources such as the Homeless Management Information System to evaluate their efforts in response to the 2018 disasters or the COVID-19 pandemic. One CoC told us that after the 2018 California wildfires, staff used the Point-in-Time data collection effort to ask respondents if they were experiencing homelessness as a result of the wildfires.⁷² This information may help the CoC identify those who may need additional assistance through the CoC program.

FEMA and HUD Do Not Regularly Coordinate on Disaster Shelter and Housing Assistance for the Homeless Population

Disaster assistance is spread across multiple federal agencies and local entities that are responsible for planning for and responding to disasters. FEMA and HUD may coordinate on federal recovery support but do not regularly coordinate on the unique disaster housing or sheltering needs of those experiencing homelessness.

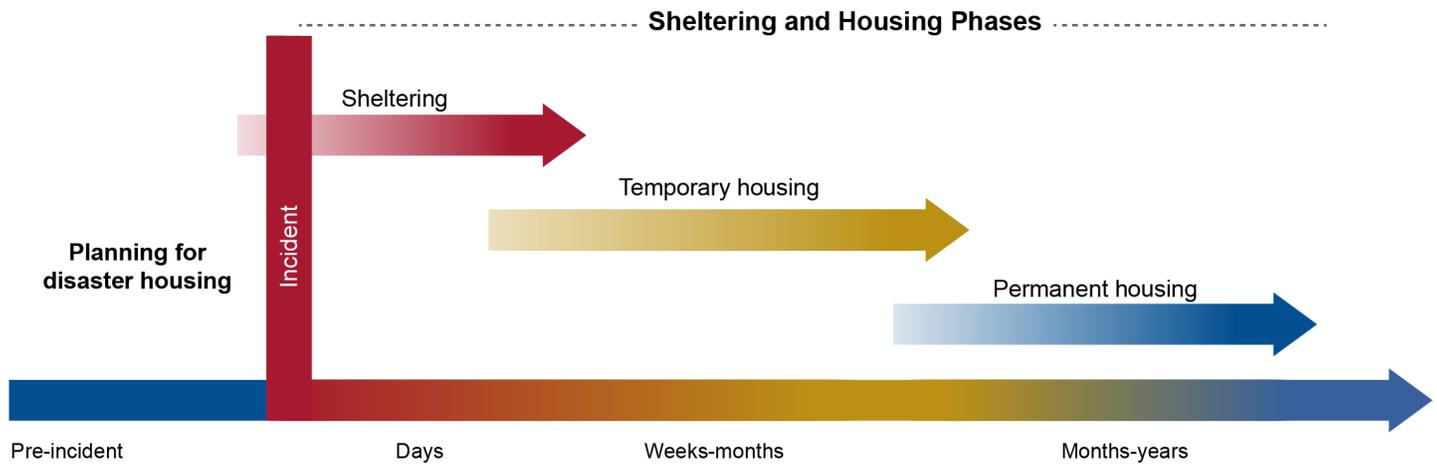
Local Coordination on Disaster Sheltering and Housing Assistance

According to the National Response Framework, coordination of disaster sheltering and housing is first managed at the local government level. FEMA's guidance on disaster housing defines three phases of disaster sheltering and housing: sheltering, temporary housing, and permanent housing (see fig. 3).⁷³

⁷²For more information on the Point-in-Time count, see [GAO-20-433](#). HUD requires CoCs to conduct a Point-in-Time count of the homeless population in their jurisdictions at least every 2 years, as well as a count of available shelter beds.

⁷³Federal Emergency Management Agency, *Planning Considerations: Disaster Housing*.

Figure 3: Disaster Sheltering and Housing Phases



Source: Federal Emergency Management Agency guidance. | GAO-23-105379

In the event of a disaster, stakeholders may coordinate during all three phases of disaster sheltering and housing. Local governments may coordinate with other partners to set up emergency shelters and assess the disaster housing needs of the community. States may provide additional resources to local governments to aid in disaster housing efforts. Four CoCs told us that they help to staff emergency shelters to assist disaster survivors among the homeless population. The Red Cross coordinates with state and local agencies in advance of a disaster to facilitate coordination and planning and to plan for emergency shelter operations. Five local governments and two CoCs we met with said they coordinate closely with the Red Cross on emergency sheltering or housing assistance after a disaster.

CoCs told us they also coordinated with local government agencies and homeless service providers to address the needs of the homeless population during the COVID-19 pandemic. For example, four CoCs worked with local government partners to administer federal funding received during the pandemic or worked with local health departments to improve the safety of shelters. One CoC told us its city government helped set up noncongregate shelters and made referrals to the CoC for people who may have been eligible for housing assistance through CoC programs. In addition, local public health agencies helped staff quarantine facilities and worked with the CoC to develop symptom screeners, policies, and procedures related to noncongregate sheltering.

Federal Coordination on Disaster Sheltering and Housing Assistance

If disaster housing needs exceed the capacity of state and local governments, the federal government may provide additional support or resources for sheltering and temporary housing under emergency support function #6.⁷⁴ FEMA coordinates with other emergency support function #6 partner agencies, including HUD, to establish disaster recovery centers where the community can access information and assistance, including disaster housing assistance. In addition, FEMA may issue a mission assignment to HUD under emergency support function #6.⁷⁵ HUD officials noted that they have worked with both FEMA and the Red Cross on emergency shelter operations.⁷⁶

HUD officials said they deploy trained and experienced HUD disaster technical assistance providers to disaster locations to help survivors transition from emergency shelters and find temporary housing. HUD staff said that the predisaster homeless are often among those that HUD assists with temporary housing when disaster shelters close. This effort is a collaboration among HUD deployed staff, HUD field office staff, and CoCs.

During the COVID-19 pandemic, FEMA and HUD coordinated with states, local entities, and other stakeholders to provide additional nonfinancial resources, such as training and technical assistance on COVID-19-related topics. For example, two state agencies described participating in calls with FEMA or HUD to discuss the states' pandemic needs. Similarly, two CoCs told us they participated in weekly calls that brought in staff from FEMA and other emergency support function #6 agencies to discuss different issues and to direct participants to related federal resources. A Red Cross official told us that collaboration between the Red Cross and federal agencies such as FEMA and HUD improved and increased during the pandemic. For example, the Red Cross began to meet regularly with

⁷⁴As part of the National Response Framework, emergency support function #6 includes mass care, emergency assistance, temporary housing, and human services support functions. Mass care services include shelter, feeding operations, distribution of emergency items, and reunification efforts. This emergency support function is coordinated by FEMA and supported by various agencies, including HUD and the Red Cross.

⁷⁵As authorized by the Stafford Act, a mission assignment is a work order issued by FEMA to another federal agency directing completion of a specified task and citing funding, other managerial controls, and guidance.

⁷⁶In 2007, HUD and the Red Cross signed a memorandum of understanding to allow HUD staff to enter emergency shelters run by the Red Cross to register disaster survivors for HUD services.

FEMA, HUD, and the Centers for Disease Control and Prevention to discuss COVID-19 initiatives.

Staff from two HUD field offices told us that receiving a mission assignment from FEMA earlier in the disaster response could improve HUD's ability to address a community's disaster housing needs. One HUD field office official told us that staff may not receive a mission assignment and begin coordinating with FEMA as part of the formal disaster response until 2 to 3 weeks after the disaster occurs. Staff from one FEMA regional office suggested that HUD should have more robust involvement in the initial response to a disaster, given the agency's expertise in housing. As discussed previously, homeless service provider staff found that providing staff with early access to people using emergency shelters after a disaster was an effective practice to facilitate their transition before an emergency shelter closes.

Although FEMA and HUD coordinate on sheltering activities in response to specific disasters, they do not have a mechanism through which they regularly coordinate with each other—outside of response to specific disasters—on assisting the homeless population in the event of a disaster. Outside of sheltering activities and the identification of potential housing resources, FEMA officials said the agencies do not coordinate on disaster housing specifically for the predisaster homeless population because FEMA does not have statutory authority to assist this group specifically. FEMA and HUD coordinate on federal disaster recovery support for communities through the Recovery Support Function Leadership Group, an interagency group that strives to improve the effectiveness and unity of effort of coordinated federal recovery responsibilities. However, this group does not coordinate on the recovery needs of the homeless population specifically. In November 2022, we recommended that FEMA and HUD should, in consultation with the Recovery Support Function Leadership Group, identify and take steps to better manage fragmentation between their disaster recovery programs and other federal programs.⁷⁷

HUD has made some efforts to coordinate with other federal agencies and stakeholders on this issue. In implementing its performance plan for fiscal year 2023, HUD held workshops in December 2022 to address post-disaster homelessness issues with various stakeholders including federal, state, and local emergency management officials, according to HUD officials. HUD officials told us that additional workshops may be

⁷⁷[GAO-23-104956](#). The agencies agreed with this recommendation but, as of February 2023, had not taken steps to implement it.

implemented in areas at high risk for disasters in 2023. However, because these workshops may not be ongoing, it is not clear that this effort can serve as a regular coordination mechanism between HUD, FEMA, and other entities involved in assisting the homeless population after a disaster.

USICH's most recent federal strategic plan includes a strategy to solidify the relationship among CoCs, public health agencies, and emergency management agencies and improve coordination when future public health emergencies and disasters occur.⁷⁸ As discussed previously, staff from several CoCs and homeless providers said, based on their prior experience with disasters, having established relationships with local emergency managers and other partners helped them collaborate effectively in the event of a disaster.

To implement the new federal strategic plan, according to USICH officials, USICH and its member agencies are currently developing an implementation work plan that will include specific action steps, timelines, and agency commitments. This process will also identify work that is already planned or underway that supports the strategies and actions in the federal strategic plan. The officials said that once the implementation work plan is developed, USICH will have a better sense of when and how the federal strategy related to improving disaster coordination might be implemented.

Officials from two HUD field offices told us that a standing interagency group—such as a USICH working group—could be helpful in developing strategies to guide such coordination between the agencies. The activities of such a coordination mechanism could include

- identifying and planning for the unique needs of this population;
- sharing potential methods and data for evaluating the disaster response and its impact on homeless populations; and
- sharing lessons learned from prior disasters and the COVID-19 pandemic.

The Integration Principle of GAO's Disaster Resilience Framework calls for promoting coordination across missions and sectors.⁷⁹ It notes that integrated analysis and planning can help decision makers take coherent

⁷⁸United States Interagency Council on Homelessness, *All In: The Federal Strategic Plan to Prevent and End Homelessness* (Washington, D.C.: Dec. 19, 2022).

⁷⁹[GAO-20-100SP](#). The framework serves as a guide for analysis of federal actions to facilitate and promote resilience to natural disasters.

and coordinated resilience actions. Increased sharing of knowledge and experience among federal agencies could help federal and local partners to proactively coordinate the federal disaster shelter and housing assistance available to people experiencing homelessness.

A federally sponsored study found that U.S. communities have often failed to adequately address the needs of homeless populations in disaster planning, response, and recovery activities.⁸⁰ Local emergency management planners may not adequately plan for the unique needs of those experiencing homelessness during disaster situations, according to four CoCs and three homeless service providers we spoke with. A 2014 HUD study of two Florida counties that frequently experience natural disasters found that people experiencing homelessness may be the first and most severely affected by natural disasters.⁸¹

By coordinating more regularly, such as through USICH's efforts to implement a strategy to improve collaboration in the event of a disaster, FEMA and HUD could enhance their coordination and leverage recent experiences to help local stakeholders, such as emergency managers and CoCs, assist the homeless population with shelter and housing assistance in the event of a disaster.

Conclusions

Hundreds of thousands of people are experiencing homelessness, in shelters or on the streets, and may be the first and most severely impacted by a disaster.⁸² Under its ESG homelessness assistance program, HUD is able to offer recipients responding to a disaster regulatory waivers that provide additional flexibilities to facilitate assistance. According to HUD officials, HUD plans to review ESG-CV grantees' experience with a larger number of waivers and alternative requirements provided in response to COVID-19 pandemic, some of which may be applicable to future natural disasters. However, as of December 2022, it had not established a time frame for doing so. Reviewing information on these waivers and alternative requirements, including on their applicability and potential usefulness in future disasters and any potential risks posed, would better inform HUD and Congress in

⁸⁰Gin et al., "Including Homeless Populations."

⁸¹Department of Housing and Urban Development, *Send Red, Not Blue: The Homeless Resident: Report and Recommendations on Working with Homeless Families and Individuals in Disaster Preparedness, Response and Recovery* (Washington, D.C.: 2014).

⁸²GAO, *Homelessness: HUD Should Help Communities Better Leverage Data to Estimate Homelessness*, [GAO-22-104445](#) (Washington, D. C.: Nov. 22, 2021).

their future efforts to assist ESG recipients and the homeless populations they serve in the event of a disaster.

Further, while FEMA and HUD coordinate to provide shelter after disasters occur, they do not have a mechanism to coordinate regularly on housing assistance, as defined for this report, to assist the homeless population in the event of a disaster. The most recent USICH federal strategic plan recognized the need for federal partners to encourage more collaboration among local emergency management, public health management, and CoCs in the event of a disaster. As of April 2023, USICH officials said that USICH and its member agencies were developing an implementation work plan and that once it is developed, USICH will have a better sense of when and how the strategy related to improving disaster coordination might be implemented. By coordinating more regularly, such as through USICH's efforts to implement a strategy on disaster coordination for the homeless population, FEMA and HUD could help to increase knowledge sharing and disseminate information among federal and local partners. They could also facilitate more proactive coordination of federal shelter and housing assistance available to the homeless population in the event of a disaster.

Recommendations for Executive Action

We are making three recommendations, including two to HUD and one to FEMA:

The Secretary of Housing and Urban Development should ensure that the Assistant Secretary for Community Planning and Development establishes specific time frames for conducting a review of the use of waivers and alternative requirements provided for ESG-CV and the lessons learned that would inform their future use for disasters. Such a review should include an assessment of both the effectiveness of the waivers and alternative requirements in benefitting the homeless population and its providers and the risks such waivers may have posed. (Recommendation 1)

The Administrator of FEMA should coordinate with HUD on federal disaster shelter and housing assistance for the homeless population, through efforts such as those related to the implementation of USICH's federal strategic plan to prevent and end homelessness (issued December 2022). Activities could include (1) identifying the needs of those experiencing homelessness and lessons learned related to planning, evaluating, and coordinating efforts to address their disaster shelter and housing needs and (2) disseminating this information to state and local partners. (Recommendation 2)

HUD's Assistant Secretary for Community Planning and Development should coordinate with FEMA on federal disaster shelter and housing assistance for the homeless population, through efforts such as those related to the implementation of USICH's federal strategic plan to prevent and end homelessness (issued December 2022). Activities could include (1) identifying the needs of those experiencing homelessness and lessons learned related to planning, evaluating, and coordinating efforts to address their disaster shelter and housing needs and (2) disseminating this information to state and local partners. (Recommendation 3)

Agency Comments

We provided a draft copy of this report to FEMA, HUD, USICH, SBA, the Department of Agriculture, and VA for their review and comment. We received written comments from two agencies—FEMA and HUD—which are reproduced in appendixes III and IV, respectively, and summarized below. FEMA, USICH, and VA provided technical comments, which we incorporated as appropriate. SBA and the Department of Agriculture informed us that they had no comments on our report.

In its written comments, FEMA stated that it generally agrees with our findings and recommendation. In its comments on the report, FEMA stated that it is committed to implementing USICH's federal strategic plan, including (1) enhancing and expanding technical assistance and training on disaster response and recovery planning for homelessness systems; (2) facilitating greater collaboration between federal partners that play a key role on disaster and public health response; and (3) encouraging state emergency management agencies to include people experiencing homelessness in their disaster response and emergency management protocols. FEMA said it will coordinate with HUD, through USICH, to implement these commitments and estimated that it will develop a related work plan by the end of September 2023.

In its comment letter, FEMA also provided additional information about the Individuals and Households Program within the Individual Assistance program. This program is designed to assist individuals whose primary residence or rental unit is destroyed or uninhabitable due to a disaster. FEMA stated that a damaged tent or other form of nontraditional housing could qualify for limited housing assistance (2-month rental assistance and lodging expenses reimbursement) if a public official or homelessness advocate verifies a disaster survivor's occupancy and if that individual

meets all other eligibility requirements.⁸³ FEMA did not provide technical comments related to this matter.

In its written comments, HUD generally agreed with our findings and neither agreed nor disagreed with our recommendations. With respect to our recommendation to establish a time frame to further analyze the use of ESG-CV waivers and alternative requirements for future natural disasters, HUD stated that it continuously evaluates the impact of waivers for future use in disaster planning and response. It also noted that ESG-CV funding associated with waivers and alternative requirements will close out between September 2023 and October 2024, meaning many are still in use. HUD said it continues to monitor their effect along with the impact of local conditions. As part of HUD's work to update the ESG program interim rule, HUD stated that it would solicit comments and use that opportunity to review waivers and alternative requirements for future adoption. Consistent with our recommendation, HUD said this effort will include an assessment of the effectiveness of waivers and alternative requirements in benefiting people experiencing homelessness, as well as the potential risks or complications the waivers may create. HUD did not establish a specific time frame for this review.

With respect to the recommendation that HUD coordinate with FEMA on federal disaster shelter and housing for the homeless population, HUD stated that it is engaged in multiple interagency efforts, including regularly scheduled collaboration efforts with both FEMA and USICH. Similar to FEMA, HUD noted that efforts are underway to develop a work plan to implement the new federal strategic plan, including action steps, timelines, and agency commitments. In the meantime, HUD said it continues to partner with FEMA and other federal agencies to benefit people experiencing homelessness in their planning and disaster response efforts.

⁸³In its Individuals and Households Program guide book, FEMA states that it does not provide housing assistance to those experiencing homelessness as their housing needs were not caused by a disaster. The guidebook defines homeless as "an individual whose predisaster living arrangements were transient in nature and void of any form of structural ownership. Examples of homeless living situations may include rent-free shelters, bridges, underpasses, or streets." The guidebook further states that FEMA may provide initial rental assistance and Other Needs Assistance to applicants who resided in nontraditional forms of housing (e.g., tents and certain types of huts and lean-to structures) before a disaster. Nontraditional housing may be more prevalent in certain areas, such as tribal communities, territories, and insular areas. Occupancy must be verified by a credible or official source (e.g., tribal council, public official, or homeless outreach advocate) at the time of inspection. For more information, see Federal Emergency Management Agency, Individual Assistance Program and Policy Guide (IAPPG), version 1.1, FP 104-009-03 (Washington, D.C.: May 2021).

We are sending copies of this report to the Administrator of FEMA, the Secretary of HUD, the Executive Director of USICH, the Administrator of the SBA, the Secretary of Agriculture, the Secretary of Veterans Affairs, the appropriate congressional committees and members, and other interested parties. In addition, the report is 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) 512-8678 or cackleya@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 V.

A handwritten signature in black ink that reads "Alicia Puente Cackley". The signature is written in a cursive, flowing style.

Alicia Puente Cackley
Director, Financial Markets and Community Investment

Appendix I: Objectives, Scope, and Methodology

This report examines the availability of sheltering or housing assistance for those experiencing homelessness (prior to a disaster) in the event of a natural disaster. Specifically, it examines (1) how selected federal disaster programs can be used to assist those experiencing homelessness; (2) how selected federal homelessness programs can be used to assist those experiencing homelessness in the event of a disaster; and (3) the extent to which the Federal Emergency Management Agency (FEMA) and the Department of Housing and Urban Development (HUD) plan, evaluate, and coordinate efforts to provide housing assistance to those experiencing homelessness in the event of a disaster. When we refer to those experiencing homelessness, we mean those who were already experiencing homelessness prior to a disaster event and not people who may have become homeless as a result of the disaster.

Our report focuses on the response to four presidentially declared disasters that occurred in 2018: the wildfires in California (DR-4407-CA), Hurricane Michael in Florida (DR-4399-FL), Hurricane Florence in North Carolina (DR-4393-NC), and storms in Wisconsin (DR-4402-WI). We selected disasters from 2018 because this report responds to a legislative mandate that we conduct audits related to disasters occurring that year.¹ We identified disasters that occurred in 2018 using the FEMA disaster declaration website. We selected these four disasters because they had a significant impact (based on 2018 dollar amounts approved for FEMA's Individuals and Households Program) and because they represented diversity in geographic location and type of disaster.

To select federal disaster programs for our first objective, we reviewed a 2016 GAO report that identified disaster-specific and disaster-applicable programs.² From this list, we initially identified 18 federal programs that could provide either direct or indirect housing assistance (including shelter) in the event of a federally declared natural disaster and later scoped out two programs.³ To do so, we reviewed agency websites and

¹Additional Supplemental Appropriations for Disaster Relief Act, 2019, Pub. L. 116-20, 133 Stat. 871, 892-893.

²GAO, *Federal Disaster Assistance: Federal Departments and Agencies Obligated at Least \$277.6 Billion during Fiscal Years 2005 through 2014*, [GAO-16-797](#) (Washington, D.C.: Sept. 22, 2016). In this report, we refer to disaster-specific and disaster-applicable collectively as "disaster assistance programs."

³For purposes of this report, we define "direct assistance" as federal assistance provided directly to the disaster survivor and "indirect assistance" as federal assistance provided in the form of grants to localities. We scoped out FEMA and the Department of Housing and Urban Development's Disaster Housing Assistance Program since it had not been activated since 2013. In addition, based on agency review, we removed the Department of Veterans Affairs' Homeless Shelter Program from our initial list of 18.

documentation and interviewed representatives of FEMA, HUD, the Department of Veterans Affairs, the Small Business Administration, and the Department of Agriculture.

Using these sources, we determined that of the 16 programs, seven provided housing assistance to the homeless population in the event of a disaster. Because our focus was programs that provide services to the broader homeless population, we excluded five programs that focused on specific populations (for example, veterans or tribal communities). Therefore, we focused our review on the two remaining programs: FEMA's Public Assistance program and HUD's Community Development Block Grant Disaster Recovery program.

To identify federal homelessness programs for our second objective, we reviewed Congressional Research Service reports and agency websites and documentation.⁴ We also interviewed officials of three federal agencies that implement homelessness programs about key homelessness programs applicable to a disaster event. We focused on programs that were active during 2018, which we determined by reviewing 2018 program obligations. We also focused on homelessness programs that served the broader homeless population (e.g., not specific to youth or veterans). As a result, we selected two homelessness assistance programs on which to focus: the HUD's Continuum of Care and Emergency Solutions Grants programs.

For our third objective, we reviewed the Department of Homeland Security's National Response Framework, its National Disaster Recovery Framework, and key FEMA disaster documents.⁵ We compared FEMA's and HUD's efforts against our Disaster Resilience Framework, which serves as a guide for analysis of federal actions to facilitate and promote resilience to natural disasters.⁶ We reviewed FEMA and HUD guidance

⁴Congressional Research Service, *Homelessness: Targeted Federal Programs*, RL30442 (Oct. 18, 2018) and *The HUD Homeless Assistance Grants: Programs Authorized by the HEARTH Act*, RL33764 (Aug. 30, 2017).

⁵For example, see Federal Emergency Management Agency, *National Disaster Housing Strategy* (Washington, D.C.: Jan. 16, 2009); Department of Homeland Security, *National Planning System* (Washington, D.C.: Feb. 2016), and Federal Emergency Management Agency, *Planning Considerations: Disaster Housing* (Washington, D.C.: May 2020).

⁶GAO, *Disaster Resilience Framework: Principles for Analyzing Federal Efforts to Facilitate and Promote Resilience to Natural Disasters*, [GAO-20-100SP](#) (Washington, D.C.: Oct. 2019).

on disaster planning considerations.⁷ We also reviewed agency program documentation for the four federal disaster and homelessness assistance programs we reviewed for any requirements or guidance related to disaster planning for the homeless population. In addition, we reviewed the United States Interagency Council on Homelessness's (USICH) 2022 federal strategic plan and asked its staff about any ongoing efforts in the plan related to disaster assistance and homelessness.⁸

For all three objectives, we also reviewed FEMA's 2022–2026 strategic plan and HUD's fiscal year 2023 annual performance plan for any relevant goals and performance information for the selected programs, as well as goals and performance information related to providing disaster assistance to the homeless population.⁹ We compared agency efforts to implement the selected programs against these goals.

We also interviewed officials from FEMA, HUD, and USICH. In addition, we interviewed representatives of three advocacy organizations (selected based on their experience with these issues): the National Low Income Housing Coalition, the National Coalition for the Homeless, and the National Alliance to End Homelessness. We also interviewed representatives of the American Red Cross about their role during disasters and coordination with federal and local government entities.

We also held 41 interviews with other disaster assistance and homelessness stakeholders on topics that included use of selected federal programs, planning and coordination, and lessons learned from

⁷For example, see Department of Housing and Urban Development, "Local Planning Guide," *Disaster Recovery Homelessness Toolkit*, accessed Nov. 1, 2022, <https://www.hudexchange.info/homelessness-assistance/disaster-recovery-homelessness-toolkit/local-planning-guide/>; Centers for Disease Control and Prevention, Federal Emergency Management Agency, and Department of Housing and Urban Development, *Federal Funding Priority Order for Non-Congregate Shelter During COVID-19* (Washington D.C.: June 23, 2020); and Federal Emergency Management Agency, *Planning Considerations*.

⁸For more information, see United States Interagency Council on Homelessness, *All In: The Federal Strategic Plan to Prevent and End Homelessness* (Washington, D.C.: Dec. 2022).

⁹Federal Emergency Management Agency, *2022–2026 FEMA Strategic Plan: Building the FEMA our Nation Needs and Deserves* (Washington, D.C.: Dec. 9, 2021) and Department of Housing and Urban Development, *Fiscal Year 2023 Annual Performance Plan* (Washington, D.C.: Mar. 28, 2022).

the COVID-19 pandemic response.¹⁰ We judgmentally selected stakeholders to interview who had a disaster or homelessness response role or were a recipient of one of the selected programs, and were located in the selected disaster-impacted areas. These included four interviews with FEMA regional office staff and four with HUD regional and field office staff covering areas affected by the selected disasters. We also interviewed state emergency management agencies in four states, five additional state agencies that administer our four selected grant programs (discussed below), nine local governmental agencies (cities and counties), nine Continuums of Care, and 10 homeless service providers. Certain interviewees were able to speak about multiple selected programs. Among the interviewees were 10 recipients of FEMA's Public Assistance Program, four grantees of HUD's Community Development Block Grant Disaster Recovery program, and seven recipients of HUD's Emergency Solutions Grants program.

We reviewed key legislation, including the Robert T. Stafford Disaster Relief and Emergency Assistance Act and the McKinney-Vento Homeless Assistance Act, as amended.¹¹ We reviewed GAO and Congressional Research Service reports and federal agency documentation, such as

¹⁰While the focus of this report is on 2018 disasters and not the COVID-19 pandemic, we also asked interviewees about their pandemic response because the lessons learned may inform the response to natural disasters.

¹¹42 U.S.C. §§ 5121-5207 and 42 U.S.C. §§11301-11435.

program policy guides.¹² In addition, we conducted a literature review to identify studies and research reports published from 2016 through 2021 that discussed issues related to housing assistance for the homeless population in the event of a disaster. We reviewed this literature for added context to our work.

We conducted this performance audit from August 2021 to May 2023 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.

¹²GAO, *Disaster Recovery: Actions Needed to Improve the Federal Approach*, [GAO-23-104956](#) (Washington, D.C.: Nov. 15, 2022); *Climate Resilience: Opportunities to Improve Federal Planning and Implementation*, [GAO-22-105688](#) (Washington, D.C.: Mar. 8, 2022); *COVID-19: Additional Risk Assessment Actions Could Improve HUD Oversight of CARES Act Funds*, [GAO-21-104542](#) (Washington, D. C.: Sept. 30, 2021); *Homelessness: HUD Should Help Communities Better Leverage Data to Estimate Homelessness*, [GAO-22-104445](#) (Washington, D. C.: Nov. 22, 2021); *Disaster Recovery: Better Data Are Needed to Ensure HUD Block Grant Funds Reach Vulnerable Populations*, [GAO-22-104452](#) (Washington, D.C.: Nov. 10, 2021); *Disaster Block Grants: Factors to Consider in Authorizing a Permanent Program*, [GAO-21-569T](#) (Washington, D.C.: May 19, 2021); *Interagency Council on Homelessness: Governance Responsibilities Need Further Clarification*, [GAO-20-602](#) (Washington, D.C.: Aug. 19 2020); *Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*, [GAO-20-433](#) (Washington, D. C.: July 14, 2020); [GAO-20-100SP](#); *Disaster Recovery: Better Monitoring of Block Grant Funds Is Needed*, [GAO-19-232](#) (Washington, D.C.: Mar. 25, 2019); and [GAO-16-797](#). See also Congressional Research Service, *Overview of Federal Housing Assistance Programs and Policy*, RL34591 (Mar. 27, 2019); *Homelessness: Targeted Federal Programs*; *Federal Disaster Assistance: The National Flood Insurance Program and Other Federal Disaster Assistance Programs Available to Individuals and Households After a Flood*, R44808 (July 31, 2018); *Federal Disaster Assistance Response and Recovery Programs: Brief Summaries*, RL31734 (June 20, 2018); and *The HUD Homeless Assistance Grants*.

Appendix II: Federal Disaster-Specific and Disaster-Applicable Programs That Provide Shelter or Housing Assistance

This appendix provides information on federal programs that provide shelter or housing assistance in the event of a disaster. A 2016 report on disaster assistance identified disaster-specific and disaster-applicable programs:

- **Disaster-specific programs and activities** are those that are specifically authorized for the purposes of mitigation (including predisaster), disaster response, or disaster recovery.
- **Disaster-applicable programs and activities** are those that, while not specifically designated for disaster or emergency situations, can be used to mitigate (including predisaster), respond to, or recover from a disaster incident.¹

From this list, we identified 16 disaster-specific or disaster-applicable programs—collectively “federal disaster programs”—that could provide either direct or indirect shelter or housing assistance in the event of a federally declared natural disaster to those impacted by the disaster.² This list does not include programs created in response to the COVID-19 pandemic. Tables 4–8 provide information on these programs, by agency.

¹GAO, *Federal Disaster Assistance: Federal Departments and Agencies Obligated at Least \$277.6 Billion during Fiscal Years 2005 through 2014*, [GAO-16-797](#) (Washington, D.C.: Sept. 22, 2016).

²We consider “direct assistance” to be assistance provided directly to the disaster survivor and “indirect assistance” to be assistance provided in the form of grants to states and localities, for example. We did not include FEMA and HUD’s Disaster Housing Assistance Program since it had not been activated since 2013. In addition, based on agency review, we removed VA’s Homeless Shelter Program as the agency noted that it was an authority and not a program.

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Table 4: FEMA Programs That Can Provide Shelter or Housing Assistance in a Disaster

Program name	Grantees (for grant programs)	Eligible applicants (for nongrant programs)	General description	Shelter or housing assistance provided	Provides direct or indirect assistance to homeowners or renters affected by a disaster	Provides direct or indirect assistance to those experiencing homelessness prior to a disaster
Public Assistance Program	State, territory, or tribal government (recipients) and local government or certain types of private nonprofit organizations (subrecipients) may apply for reimbursement.	n/a	Provides supplemental federal grant assistance for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly owned facilities and those owned/operated by certain private nonprofit organizations.	Reimbursement of debris removal activities, emergency protective measures such as medical care and sheltering costs, and the restoration of facilities damaged or destroyed by a major disaster.	Yes	Yes

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Individuals and Households Program (within the Individual Assistance Program)	n/a	<p>General eligibility criteria include the following: the applicant must be a U.S. citizen, noncitizen national, or qualified alien; FEMA must be able to verify the applicant's identity; the applicant's insurance, or other forms of disaster assistance received, cannot meet their disaster-caused needs; and the applicant's necessary expenses and serious needs are directly caused by a declared disaster.</p> <p>Additional eligibility requirements vary depending on the specific disaster-caused unmet need for which the applicant needs assistance.</p>	Provides financial assistance and direct services to eligible individuals and households affected by a disaster who have uninsured or underinsured necessary expenses and serious needs.	<p>Financial and direct assistance for applicants with disaster-caused housing needs. Financial assistance refers to funds provided to eligible applicants for temporary lodging expenses, rental of temporary housing, or repair or replacement of a damaged primary residence. When requested by the state, locality, tribal, or territorial partner and authorized by FEMA, FEMA's Individual Assistance Program may also provide Transitional Sheltering Assistance, a form of noncongregate sheltering assistance for eligible displaced disaster survivors using participating hotels to provide short-term emergency sheltering.</p>	Yes	No
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Legend: n/a = not applicable

Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-23-105379

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Table 5: HUD Programs That Can Provide Shelter or Housing Assistance in a Disaster

Program name	Grantees (for grant programs)	Eligible applicants (for nongrant programs)	General description	Shelter or housing assistance provided	Provides direct or indirect assistance to homeowners or renters affected by a disaster	Provides direct or indirect assistance to those experiencing homelessness prior to a disaster
Community Development Block Grants Disaster Recovery	State, local, and tribal government grantees who may award funds to nonprofit organizations, economic development agencies, citizens and businesses.	n/a	Provides disaster-affected communities with funding to meet unmet recovery needs, especially in low- and moderate-income areas. Funding can be used for a range of efforts to help rebuild communities.	Provision of shelter, transitional housing, and permanent housing. Disaster-related activities include those that demonstrate a logical connection between the impacts of the covered disaster and the activity's contribution to community recovery.	Yes	Yes
Single Family Housing Program—Mortgage Insurance for Disaster Victims	n/a	Individuals with homes destroyed or damaged by a disaster in a presidentially designated disaster area. If homes were destroyed or damaged to such an extent that reconstruction or replacement is necessary, individuals may apply for the mortgage insurance.	Provides mortgage insurance to protect lenders against the risk of default on mortgages to qualified disaster victims. Insured mortgages may be used to finance the purchase or reconstruction of a single-family home that will be the principal residence of the homeowner.	Mortgage insurance for permanent housing	Yes	No

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Multifamily Housing Programs—Mortgage Insurance	n/a	Property owners who apply for the program must purchase or refinance a property with at least five residential units with complete kitchens and baths.	Provides mortgage insurance assistance for multifamily housing properties such as insuring mortgage loans to: facilitate the purchase or refinancing of existing multifamily housing; facilitate the new construction or substantial rehabilitation of multifamily rental or cooperative housing for moderate-income families, elderly, and the handicapped; and finance repairs, additions, and improvements to multifamily rental housing and health care facilities with FHA insured first mortgages or HUD-held mortgages, among others.	Mortgage insurance	Yes	No
Indian Housing Programs—Indian Community Development Block Grants	Any Indian Tribe, band, group, or nation (including Alaska Indians, Aleut, and Eskimos) or Alaska Native village which has established a relationship to the federal government as defined in the program regulations. In certain instances, tribal organizations may be eligible to apply.	n/a	Provides grants for the development of viable Indian and Alaska Native communities, including decent housing, a suitable living environment, and economic opportunities, primarily for low- and moderate-income persons.	Housing rehabilitation; land acquisition to support new housing construction; new housing construction (under limited circumstances); infrastructure construction (e.g., roads, water and sewer facilities); single or multipurpose community buildings; and other facilities (including shelters for the homeless population).	Yes	Yes

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Indian Housing Programs— Indian Community Development Block Grant Program Imminent Threat Grants	Any Indian Tribe, band, group, or nation (including Alaska Indians, Aleut, and Eskimos) and any Alaska Native village of the U.S. considered an eligible recipient under Title I of the Indian Self-Determination and Education Assistance Act or that had been an eligible recipient under the State and Local Fiscal Assistance Act of 1972.	n/a	Provides noncompetitive, first come, first served funding to eliminate or lessen problems that pose an imminent threat to the public health or safety of tribal residents.	Activities (similar to those under the regular programs, such as shelter and housing activities) that alleviate or remove imminent threats to health or safety and address urgent threats not evident at the time of the Indian Community Development Block Grant single-purpose funding cycle.	Yes	Yes
Indian Housing Programs— Indian Housing Block Grant Program	Federally recognized Indian Tribes or their tribally designated housing entities and a limited number of state-recognized Tribes.	n/a	Provides a range of affordable housing activities on Indian reservations and in Indian areas.	Housing development, assistance for housing developed under the Indian Housing Program, housing services for eligible families and individuals, crime prevention and safety, and model activities that provide creative approaches to solving affordable housing problems.	Yes	Yes

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Indian Housing Programs—Native Hawaiian Housing Block Grant Program	Hawaii State Department of Hawaiian Home Lands.	n/a	Provides funding for eligible affordable housing activities for low-income Native Hawaiians eligible to reside on Hawaiian home lands. Housing can be either rental or owner-occupied. Program funds can also be used for certain types of community facilities if the facilities serve eligible residents.	New construction, rehabilitation, acquisition, infrastructure, and various support services.	Yes	Yes
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Legend: n/a = not applicable

Source: GAO analysis of Department of Housing and Urban Development (HUD) information. | GAO-23-105379

Table 6: Small Business Administration Program That Can Provide Shelter or Housing Assistance in a Disaster

Program name	Eligible applicants	General description	Example of housing assistance provided	Provides direct or indirect assistance to homeowners or renters affected by a disaster	Provides direct or indirect assistance to those experiencing homelessness prior to a disaster
Disaster Loan Subsidy	Homeowners, renters, and personal property owners in a declared disaster area.	Provides financial assistance for homeowners, renters, and personal property owners to repair or replace property damaged by a disaster. The homeowner or renter is not eligible for a disaster loan if the damaged property can be repaired or replaced with the proceeds of insurance or other compensation.	Loans to replace or repair disaster-damaged property or personal property damaged by disaster (e.g., clothes, furniture, cars, appliances). Homeowners may apply for up to \$200,000 to replace or repair their primary residence, \$40,000 to replace or repair personal property (applies to both homeowners and renters), or \$200,000 to refinance an existing mortgage under certain conditions.	Yes	No

Source: GAO analysis of Small Business Administration information. | GAO-23-105379

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Table 7: Department of Agriculture Programs That Can Provide Shelter or Housing Assistance in a Disaster

Program name	Eligible applicants	General description	Shelter or housing assistance provided	Provides direct or indirect assistance to homeowners or renters affected by a disaster	Provides direct or indirect assistance to those experiencing homelessness prior to a disaster
Multifamily Housing Direct Loans Program	Individuals, trusts, associations, partnerships, limited partnerships, nonprofit organizations, for-profit corporations, consumer cooperatives, state and local governmental entities, and federally recognized Tribes.	Assists qualified applicants that cannot obtain commercial credit on terms that allow them to charge rents that are affordable to low-income tenants in eligible rural areas.	Financing for construction, improvement, and purchase of multifamily rental housing in eligible rural areas for low-income families, the elderly, and disabled individuals and families.	Yes	No
Single Family Housing Guaranteed Loan Program	Applicants must have a household income that does not exceed 115 percent of median household income; agree to occupy the dwelling as their primary residence; be U.S. citizens, U.S. noncitizen nationals, or qualified aliens; be unable to obtain conventional financing with no private mortgage insurance; and not be suspended or debarred from participation in federal programs. Applicants also need to meet certain income and credit requirements.	Guarantees for loans with no down payment, 100 percent financing that assists approved lenders in providing low- and moderate-income households the opportunity to own adequate, safe, and sanitary dwellings as their primary residence in eligible rural areas. Provides a 90 percent loan note guarantee to approved lenders in order to reduce the risk of extending 100 percent loans to eligible rural homebuyers.	Loan guarantees to support full financing to purchase, build, rehabilitate, improve, or relocate a dwelling in an eligible rural area.	Yes	No

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Single Family Housing Direct Home Loans	Applicants must have an adjusted household income at or below the applicable low-income limit in their area; be unable to obtain a loan from other sources on terms and conditions they can reasonably be expected to meet; agree to occupy the property as a primary residence; have the legal capacity to incur a loan obligation; and meet citizenship or eligible noncitizen requirements.	Provides loan funds to help low-income individuals or households purchase, repair, or relocate homes in rural areas.	Loans for permanent housing for low-income individuals and households in rural areas. Loan funds may be used to purchase homes in rural areas; repair, renovate, or relocate a home; or purchase and prepare sites, including providing water and sewage facilities.	Yes	No
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Source: GAO analysis of Department of Agriculture information. | GAO-23-105379

Table 8: VA Programs That Can Provide Shelter or Housing Assistance in a Disaster

Program name	Eligible applicants	General description	Example of housing assistance provided	Provides direct or indirect assistance to homeowners or renters affected by a disaster	Provides direct or indirect assistance to those experiencing homelessness prior to a disaster
VA Home Loan Program	Veterans who meet service length requirements. Service members on active duty who have served a minimum period. Certain Reservists and National Guard members. Certain surviving spouses of deceased Veterans and active duty Service members. ^a	Provides a home loan guaranty benefit and other housing-related programs to help purchase, construct, repair, alter or improve a home for occupancy or refinance an existing mortgage (or other liens) which are secured on a home occupied by the eligible applicant.	Loans (provided by a private lender), a portion of which are guaranteed by VA (enabling the lender to provide more favorable terms). ^b	Yes	No
Department of Housing and Urban Development (HUD)—Veterans Affairs Supportive Housing Program ^c	Homeless veterans. ^d	Provides rental assistance in the form of a subsidy through vouchers, case management, and supportive services to eligible homeless veterans.	Rental assistance vouchers for veterans experiencing homelessness.	No	Yes

**Appendix II: Federal Disaster-Specific and
Disaster-Applicable Programs That Provide
Shelter or Housing Assistance**

Specially Adapted Housing Assistance Program	<p>Veterans and Service members with certain service-connected disabilities—for example, permanent and total disability due to the following:</p> <p>The loss, or loss of use, of both lower extremities or one lower extremity together with residuals of organic disease or injury or the loss or loss of use of one upper extremity so as to preclude locomotion without the aid of braces, crutches, cane or a wheelchair;</p> <p>The loss, or loss of use of, both upper extremities such as to preclude the use of the arms at or above the elbow;</p> <p>Severe burn injury.</p>	Provides grants to Veterans and Service members with certain severe service-connected disabilities so they can acquire or adapt a home to meet their needs and live more independently.	Building, purchasing or adapting home. Type of assistance depends on type of disability, and can include wheelchair-accessible bathrooms and entries, smart home technology, and other essential features to enhance safety and independent living.	Yes	No
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Source: GAO analysis of Department of Veterans Affairs (VA) information. | GAO-23-105379

^aEligible applicants include certain surviving spouses of deceased Veterans and certain surviving spouses of active-duty Service members listed as missing in action, captured in line of duty by a hostile force or forcibly detained or interned in line of duty by a foreign government or power for 90 days or more.

^bVA Direct loans may be available in limited circumstances involving a housing credit shortage. Direct loans are also available through the Native American Direct Loan Program.

^cHUD–Veterans Affairs Supportive Housing (also known as HUD-VASH) is a collaborative program that pairs HUD’s Housing Choice Voucher rental assistance with VA case management and supportive services for homeless veterans.

^dHomeless (as that term is defined in 42 U.S.C. § 11302) Veterans (as that term is defined in 38 U.S.C. § 2002(b)). Section 9103 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Pub.L.No. 116-283, 134 Stat. 283, 4781) extended eligibility to any individual meeting the definition of “Veteran” in 38 U.S.C. § 2002(b)).

Appendix III: Comments from the Department of Homeland Security

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



**Homeland
Security**

April 14, 2023

Alicia Puente Cackley
Director, Financial Markets and Community Investment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-23-105379, "HOMELESSNESS:
Enhanced Coordination Could Improve Disaster Shelter and Housing Assistance"

Dear Ms. Cackley:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) 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 positive recognition of the collaboration between the Federal Emergency Management Agency (FEMA) and the U.S. Department of Housing and Urban Development (HUD) to (1) establish disaster recovery centers, (2) establish mission assignments, (3) provide training and technical assistance, and (4) develop and issue joint guidance addressing sheltering and transitioning individuals to stable housing in the wake of a disaster. FEMA and HUD routinely coordinate sheltering activities in response to specific disasters, which includes support to those experiencing homelessness.

FEMA and HUD also coordinate through the U.S. Interagency Council on Homelessness (USICH or Council), the only federal agency with a sole mission focused on preventing and ending homelessness in America. The Council consists of 19 federal agencies (including DHS and HUD) that helped create and catalyze implementation of "All In: Federal Strategic Plan to Prevent and End Homelessness" (dated December 19, 2022, known as the All In Plan).¹ Stakeholders from FEMA's Resilience office and FEMA's Recovery Directorate's Interagency Coordination Division participate in USICH coordination, among other DHS representatives such as the Cybersecurity and Infrastructure Security Agency. Specifically, FEMA's Interagency Coordination

¹ https://www.usich.gov/All_In.pdf

Division facilitates interagency coordination in support of Recovery Directorate's Public Assistance (PA) program and Individual Assistance (IA) program.

It is important to note that FEMA's PA program and IA program are not specifically designed to address the long-term housing needs of the homeless population in the event of a disaster. However, in specific circumstances in which FEMA's PA program and IA program intersect with the needs of the homeless community in the aftermath of a declared disaster incident, FEMA is committed to supporting the homeless community, as well as all other underserved communities before, during and after disasters.

FEMA's PA Program

FEMA's PA program provides assistance to state, local, territorial, or tribal (SLTT) governments and certain private non-profit (PNP) organizations to perform debris removal, emergency protective measures, and the restoration of disaster-damaged publicly owned facilities, as well as specific facilities of certain PNP organizations.² The Stafford Act does not provide FEMA with the authority to provide assistance to individuals, nor to provide housing assistance, through its PA program.

Under the Emergency Protective Measures provisions of the PA program,³ the PA program can provide funding to SLTT governments for eligible costs related to emergency sheltering of evacuees and disaster survivors, which may include those experiencing homelessness.⁴ FEMA is committed to supporting eligible emergency sheltering activities. Furthermore, FEMA is committed to collaborating and coordinating with partners, such as HUD, to ensure that all individuals are provided an equal opportunity for emergency sheltering in the event of a disaster. Additionally, pursuant to the Permanent Work provisions of the PA program,⁵ the PA program can provide funding to SLTT governments and certain PNP organizations for costs associated with the repair or restoration of disaster-damaged homeless shelters that are owned and operated by an eligible applicant.

² The statutory authority that undergirds the provision of PA Program funding to SLTT government jurisdictions and certain PNP organizations are sections 403, 406, and 407 of the Robert T. Stafford Disaster Relief and Emergency Assistance (Stafford) Act, Title 42, United States Code (42 U.S.C.) 5170b, 5172, and 5173.

³ Section 403 of the Stafford Act provides emergency protective measures provisions.

⁴ FEMA may provide PA funding to SLTT governments for costs related to emergency sheltering for survivors. Typically, such sheltering occurs in facilities with large open spaces, such as schools, churches, community centers, armories, or other similar facilities. FEMA refers to these shelters as congregate shelters. See FEMA, "Public Assistance Program & Policy Guide" (PAPPG) Version 4 (dated June 1, 2020). https://www.fema.gov/sites/default/files/documents/fema_pappg-v4-updated-links_policy_6-1-2020.pdf.

⁵ Section 406 of the Stafford Act provides permanent work provisions.

FEMA's IA Program

The Individuals and Households Program (IHP) within FEMA's IA program is designed to provide housing assistance and Other Needs Assistance (ONA) to individuals.⁶ Specifically, FEMA may only provide housing assistance when an IA applicant's primary residence has been destroyed, is uninhabitable or inaccessible, or if a renter's primary residence is no longer available as a result of the disaster, and the disaster survivor is able to verify their occupancy at a primary residence. A damaged tent, or other form of non-traditional housing, could be used to qualify for housing assistance under the IHP. when a credible or official source, such as a public official or homeless outreach advocate, verifies the disaster survivor's occupancy. If all other eligibility criteria are met, these disaster survivors may receive limited housing assistance, to include two months of rental assistance and lodging expense reimbursement.

The ONA provision of the IA IHP provides financial assistance for disaster-related necessary expenses and serious needs that are not covered by insurance or provided by any other source. When occupancy cannot be verified, FEMA's IA program can only provide ONA in the form of transportation assistance, medical and dental assistance, funeral assistance, and childcare assistance. When a disaster survivor's occupancy can be verified (including by a credible or official source, such as a public official or homeless outreach advocate), FEMA's IA program can provide all forms of ONA (including personal property assistance).

The draft report contained three recommendations, including one for FEMA with which the Department concurs. Enclosed find our detailed response to the recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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 
Digitally signed by JIM H
CRUMPACKER
Date: 2023.04.14 15:48:32 -04'00'

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

Enclosure

⁶ Section 408 of the Stafford Act provides the statutory authority for the IHP program.

**Enclosure: Management Response to Recommendation
Contained in GAO-23-105379**

GAO recommended that the Administrator of FEMA, in collaboration with HUD:

Recommendation 2: Coordinate on federal disaster shelter and housing assistance for the homeless population, through efforts such as those related to the implementation of USICH's federal strategic plan to prevent and end homelessness (issued December 2022). Efforts could include (1) identifying the needs of those experiencing homelessness and lessons learned related to planning, evaluating, and coordinating efforts to address their disaster shelter and housing needs and (2) disseminating this information to state and local partners.

Response: Concur. FEMA's Office of Policy and Program Analysis (OPPA), as a member of USICH, is committed to implementing the All In Plan. The All In Plan includes commitments to:

1. Enhance and expand technical assistance and training on disaster response and recovery planning for homelessness systems;
2. Facilitate greater collaboration between federal partners that play a key role on disaster and public health response; and
3. Encourages state emergency management agencies to include people experiencing homelessness in their disaster response and emergency management protocols.

FEMA's OPPA and Recovery Directorate will coordinate with HUD, through USICH, to implement these commitments. Specific efforts will be identified through the joint development of an All In Plan workplan. Estimated Completion Date: September 29, 2023.

Appendix IV: Comments from the Department of Housing and Urban Development



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

PRINCIPAL DEPUTY ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

Ms. Alicia Puente Cackley
Director
Financial Markets and Community Investment
U.S. Government and Accountability Office
441 G Street, NW
Washington, DC 20548-0001

RE: Response of the Office of Community Planning and Development (CPD) for Draft Report titled "Homelessness: Enhanced Coordination Could Improve Disaster Shelter and Housing Assistance (GAO-23-105379)"

Dear Ms. Cackley:

In March 2023, the Government Accountability Office (GAO) provided a draft report, "Homelessness: Enhanced Coordination Could Improve Disaster Shelter and Housing Assistance (GAO-23-105379)", for a written response with a revised recommendation received in April 2023. This report suggests the need for further analysis of the use of waivers and alternative requirements provided for ESG-CV to identify those effective and efficient waivers for future natural disasters. The report also recommends increased interagency collaboration between HUD and FEMA to better identify the needs of people experiencing homelessness and to support communities with lessons learned related to planning, evaluating, and coordinating efforts to address disaster shelter and housing needs. The GAO report provides two recommendations for HUD summarized below.

The need for coordination of Federal resources is always important to ensure communities can utilize all available resources effectively to address their needs. To this end, the Department is engaged in multiple interagency efforts, including regularly scheduled collaboration efforts with both FEMA and United States Interagency Council on Homelessness (USICH). HUD is providing comments on the recommendations intended for HUD:

GAO Recommendation 1: The Secretary of Housing and Urban Development should ensure that the Assistant Secretary for Community Planning and Development establish specific timeframes for conducting a review on the use of waivers and alternative requirements provided for ESG-CV and the lessons learned that would inform their future use for natural disasters. Such a review should include an assessment of both the effectiveness of the waivers and alternative requirements in benefitting the homeless population and its providers and the risks such waivers may have posed.

www.hud.gov

espanol.hud.gov

Response: As noted in the report, HUD may waive program requirements during a disaster to give affected grantees more flexibility and waivers are issued based on previous experience, lessons learned, determination of good causes, and the unique conditions imposed by a disaster. As part of HUD's efforts to improve the efficiency and effectiveness of HUD programs, HUD staff continuously evaluate the impact of waivers for future use in disaster planning and response. ESG-CV funding, including the first and second allocations and reallocated funds, with its applicable waivers and alternative requirements will have final draws and close out between September 2023 and June 2024. In September 2022, all ESG-CV waiver flexibilities expired for annual ESG funds (FY20 and older) that recipients designated for COVID response (i.e., recipient met conditions of Notice CPD-21-08). Per Part 200 closeout requirements, ESG-CV recipients will have until October 31, 2024, to make final draws. This means the waivers and alternative requirements provided for ESG-CV are still in use in many communities and HUD continues to monitor and analyze their effect along with the impact of local conditions.

As part of HUD's work to update the ESG program interim rule, HUD will solicit comments and use that opportunity to review waivers and alternative requirements for future adoption. HUD's analysis would include an assessment of the effectiveness of waivers and alternative requirements in benefiting people experiencing homelessness and recipients as well as the potential risks or complications the waivers may create.

GAO Recommendation 3: HUD's Assistant Secretary for Community Planning and Development, in collaboration with FEMA, should coordinate on federal disaster shelter and housing assistance for the homeless population, through efforts such as those related to the implementation of USICH's federal strategic plan to prevent and end homelessness (issued December 2022). Efforts could include (1) identifying the needs of those experiencing homelessness and lessons learned related to planning, evaluating, and coordinating efforts to address their disaster shelter and housing needs and (2) disseminating this information to state and local partners.

Response: The need for coordination of Federal resources is always important to ensure communities can utilize all available resources effectively to address their needs. To this end, the Department is engaged in multiple interagency efforts, including regularly scheduled collaboration efforts with both FEMA and United States Interagency Council on Homelessness (USICH). As noted in the report, HUD and FEMA staff routinely engage nationally and locally for disaster planning, response, and recovery efforts. As a member agency, HUD will work with USICH on implementation of the new federal strategic plan. Efforts are underway to develop an implementation workplan including action steps, timelines, and agency commitments. In the meantime, HUD continues to partner with FEMA and other federal agencies to benefit people experiencing homelessness and recipients in their planning and disaster response efforts.

For example, HUD, FEMA, and the Centers for Disease Control and Prevention (CDC) published a guide to federal funding for non-congregate shelter (NCS) during COVID-19. HUD and FEMA followed up on that work with a guide to inform communities on strategies and funding so people experiencing homelessness and being sheltered in COVID-response NCS can

**Appendix IV: Comments from the Department
of Housing and Urban Development**

3

be stably housed on exit from that shelter instead of returning to homelessness. HUD agrees with GAO's statement that continued interagency coordination and collaboration will better serve people experiencing homelessness and their communities in planning, evaluating, and coordinating local, regional, and national efforts to address disaster shelter and housing needs.

If you have any follow-up questions, please contact Norman Suchar at Norman.A.Suchar@hud.gov.

Sincerely,



Marion M. McFadden
Principal Deputy Assistant Secretary
Office of Community Planning and Development

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Alicia Puente Cackley, (202) 512-8678 or cackleya@gao.gov

Staff Acknowledgments

In addition to the contact named above, Allison Abrams (Assistant Director), Rhonda Rose (Analyst in Charge), Rachel DeMarcus, Laura Gibbons, Alicia Martinez Melton, Brian Noyes, Jennifer Schwartz, Jena Sinkfield, Farrah Stone, and John Tanis made key contributions to this report.

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