



May 2018

FEDERAL DISASTER ASSISTANCE

Individual Assistance
Requests Often
Granted, but FEMA
Could Better
Document Factors
Considered

GAO Highlights

Highlights of [GAO-18-366](#), a report to congressional requesters

Why GAO Did This Study

FEMA's IA program provides help to individuals to meet their immediate needs after a disaster, such as shelter and medical expenses. When a state, U.S. territory, or tribe requests IA assistance through a federal disaster declaration, FEMA evaluates the request against regulatory factors, such as concentration of damages, and provides a recommendation to the President, who makes a final declaration decision.

GAO was asked to review FEMA's IA declaration process. This report examines (1) the number of IA declaration requests received, declared, and denied, and IA actual obligations from calendar years 2008 through 2016, (2) the extent to which FEMA accounts for the regulatory factors when evaluating IA requests, and (3) any challenges FEMA regions and select states reported on the declaration process and factors and any FEMA actions to revise them. GAO reviewed FEMA's policies, IA declaration requests and obligation data, and FEMA's RVARs from July 2012 through December 2016, the most recent years for which data were available. GAO also reviewed proposed rulemaking comments and interviewed FEMA officials from all 10 regions and 11 state emergency management offices selected based on declaration requests and other factors.

What GAO Recommends

GAO recommends that FEMA evaluate why regions are not completing the RVARs for each element of the current IA regulatory factors and take corrective steps, if necessary. DHS concurred with the recommendation.

View [GAO-18-366](#). For more information, contact Chris P. Currie at (404) 679-1875 or curriec@gao.gov.

May 2018

FEDERAL DISASTER ASSISTANCE

Individual Assistance Requests Often Granted, but FEMA Could Better Document Factors Considered

What GAO Found

From calendar years 2008 through 2016, the Department of Homeland Security's (DHS) Federal Emergency and Management Agency (FEMA) received 294 Individual Assistance (IA) declaration requests from states, U.S. territories, and tribes to help individuals meet their immediate needs after a disaster. Of these, the President declared 168 and denied 126 requests. Across the various types of IA declaration requests, severe storms (190) were the most common disaster type and drought (1) was among the least common. FEMA obligated about \$8.6 billion in IA for disaster declarations during this period.

GAO found that FEMA regions did not consistently obtain and document information on all elements of established IA regulatory factors when making IA recommendations to headquarters. Following a declaration request, a FEMA region is to prepare a Regional Administrator's Validation and Recommendation (RVAR)—a document designed to include data on each of the six IA regulatory factors for each declaration request as well as the regional administrator's recommendation. GAO reviewed all 81 RVARs from July 2012—the date FEMA began using the new RVAR template—through December 2016. GAO found that regions did not consistently obtain and document information for the elements required under the six regulatory factors (see table). For example, only 44 of the 81 RVARs documented all elements under the concentration of damage factor. By evaluating why regions are not completing all elements of each current IA regulatory factor, FEMA could identify whether any corrective steps are needed.

Analysis of 81 Regional Administrator's Validation and Recommendations by Element for Each Individual Assistance (IA) Regulatory Factor Documented from July 2012 through December 2016

IA Regulatory Factor	All elements documented	Some elements documented	No elements documented
Concentration of damages	44	37	0
Trauma	30	51	0
Special populations	72	8	1
Voluntary agency assistance	76	5	0
Insurance coverage	5	73	3
Average amount of IA by state	11	66	4

Source: GAO analysis based of Federal Emergency Management Agency's Regional Administrator's Validation and Recommendations. | GAO-18-366

Officials from the 10 FEMA regions and 11 states GAO interviewed, reported positive relationships with each other, but also cited various challenges with the IA declaration process and regulatory factors. For example, these officials told GAO that there are no established minimum thresholds for IA, making final determinations more subjective and the rationale behind denials unclear. However, as required by the Sandy Recovery Improvement Act of 2013, FEMA has taken steps to revise the IA factors by issuing a notice of proposed rulemaking. According to FEMA, the proposed rule aims to provide more objective criteria, clarify the threshold for eligibility, and speed up the IA declaration process. As of April 2018, the proposed rule was still under consideration. According to FEMA officials, they plan to finalize the rule in late 2018; therefore, it is too early to know the extent to which it will address these challenges.

Contents

Letter		1
	Background	5
	The President Declared 57 Percent of All IA Requests from 2008 through 2016, with Total Obligations of Approximately \$8.6 Billion	11
	FEMA Regions Varied in How They Considered IA Regulatory Factors and Did Not Consistently Obtain and Document Information on All Elements of These Factors	18
	FEMA and States Reported Challenges in the IA Declaration Process, and FEMA Is Revising the Regulatory Factors Used to Assess Declaration Requests	22
	Conclusions	27
	Recommendation for Executive Action	28
	Agency Comments and Our Evaluation	28
Appendix I	Individual Assistance Declarations Requested, Declared, and Denied, Calendar Years 2008-2016	30
Appendix II	Individual Assistance Actual Obligations for Declarations Made, Calendar Years 2008-2016	33
Appendix III	Regional Administrator's Validation and Recommendation Template	43
Appendix IV	Information on the Elements of the Six Individual Assistance Regulatory Factors	50
Appendix V	Comments from the Department of Homeland Security	53
Appendix VI	GAO Contact and Staff Acknowledgments	56

Tables

Table 1: Average Amount of Individual Assistance per Disaster by Size of State Contained in 44 C.F.R. § 206.48(b)(6) (July 1994 to July 1999)	10
Table 2: Information on Individual Assistance (IA) Requests and Declarations by Federal Emergency Management Agency (FEMA) Region from Calendar Years 2008 through 2016	11
Table 3: Number of Individual Assistance (IA) Declarations Denied by Federal Emergency Management Agency (FEMA) Region from Calendar Years 2008 through 2016	12
Table 4: Information on Individual Assistance (IA) Declarations Requests by Type of Disaster from Calendar Years 2008 through 2016	13
Table 5: Actual Obligations of Individual Assistance by State for Disaster Declarations Made from Calendar Years 2008 through 2016	16
Table 6: Analysis of 81 Regional Administrator's Validation and Recommendations (RVAR) by Element Pertaining to Each Individual Assistance (IA) Regulatory Factor Documented from July 2012 through December 2016	20
Table 7: Example of Regional Administrator's Validation and Recommendations Information on the Individual Assistance Regulatory Factors for Four States Affected by the Same Disaster in 2012	23
Table 8: Federal Emergency Management Agency's (FEMA) Description of Current and Proposed Individual Assistance Regulatory Factors	26
Table 9: Individual Assistance Requested, Declared, and Denied, by Region, State, and Tribe for Disaster Declarations Requested from Calendar Years 2008 through 2016 ^a	30
Table 10: Federal Emergency Management Agency's Individual Assistance (IA) Actual Obligations by State and Type of Disaster for Declarations Made from Calendar Years 2008 through 2016	34
Table 11: Information on Concentration of Damages by Element Found in Regional Administrator's Validation and Recommendation (RVAR) from July 2012 through December 2016	50
Table 12: Information on Trauma by Element Found in Regional Administrator's Validation and Recommendation (RVAR) from July 2012 through December 2016	50

Table 13: Information on Special Populations by Element Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016	51
Table 14: Information on Voluntary Assistance by Element Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016	51
Table 15: Information on Insurance Coverage Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016	51
Table 16: Information on Average Amount of Individual Assistance by State Found in Regional Administrator’s Validation and Recommendations (RVAR) from July 2012 through December 2016	52

Figures

Figure 1: Federal Emergency Management Agency’s (FEMA) Major Disaster Declaration Process	7
Figure 2: Federal Emergency Management Agency’s (FEMA) Individual Assistance (IA) Actual Obligations by Regions for Disaster Declarations Made from Calendar Years 2008 through 2016	15
Figure 3: Federal Emergency Management Agency’s (FEMA) Regional Administrator’s Validation and Recommendation Template	44

Abbreviations

DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
IA	Individual Assistance
RVAR	Regional Administrator’s Validation and Recommendation
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



May 31, 2018

The Honorable Kevin McCarthy
Majority Leader
House of Representatives

The Honorable Dianne Feinstein
United States Senate

Natural disasters in 2017, such as the California wild fires and the Atlantic hurricane season, affected approximately 25.8 million people in the United States—nearly 8 percent of the U.S. population. As a result of these disasters, 4.7 million individuals applied for assistance in 2017 from the Federal Emergency Management Agency (FEMA) through its Individual Assistance (IA) program, which provides help to individuals and families to meet their immediate needs, shelter, and medical needs in the wake of a disaster. FEMA provided more than \$2 billion in IA funds in response to these disasters. FEMA is a component of the Department of Homeland Security (DHS) that leads the federal effort to prepare, respond to, and help recover from disasters, both natural and man-made. Following a major disaster declaration by the President, FEMA may provide three principal forms of assistance.¹ These include IA; Public Assistance, which addresses repairs to communities' and states' infrastructure; and Hazard Mitigation Assistance, which provides funding for projects a state submits to reduce the threat of future damage.

To obtain federal disaster assistance, a state or tribe must request a disaster declaration through FEMA (IA declaration), and then FEMA

¹In response to a request from a governor of a state or the chief executive of an affected Indian tribal government, the President may declare that a major disaster or emergency exists. 42 U.S.C. §§ 5170, 5191. If the President declares an emergency, rather than a major disaster, the federal government may provide immediate and short-term assistance that is necessary to save lives, protect property and public health and safety, or lessen or avert the threat of a catastrophe, among other things. 42 U.S.C. § 5192. Federal assistance may not exceed \$5 million under an emergency declaration unless continued emergency assistance is immediately required; there is a continuing and immediate risk to lives, property, public health or safety; and necessary assistance will not otherwise be provided on a timely basis. 42 U.S.C. § 5193. Additionally, upon the request of a governor, the President may issue a fire assistance declaration that provides financial and other assistance to supplement state and local firefighting resources for fires that threaten destruction that might warrant a major disaster declaration. 44 C.F.R. § 204.21. Hereafter in this report, major disaster declarations are referred to as disaster declarations.

determines whether to make a recommendation to the President to declare a major disaster.² In reviewing the state or tribe's IA disaster declaration request, FEMA is to consider six primary factors, established in regulation in 1999, to determine the severity, magnitude, and impact of a disaster event.³ These IA regulatory factors include: (1) concentration of damages (e.g., homes destroyed); (2) trauma (e.g., injuries and death); (3) special populations (e.g., elderly and disabled); (4) voluntary agency assistance; (5) insurance coverage; and (6) average amount of individual assistance by state. After Hurricane Sandy, Congress passed the Sandy Recovery Improvement Act of 2013 to improve certain aspects of disaster assistance, and the act directed FEMA to review, update, and revise the IA factors in order to provide more objective criteria, clarify the threshold for eligibility, and speed the IA declaration process.⁴

You asked us to review the IA declaration process and regulatory factors along with FEMA's proposed changes to the factors. This report examines (1) the number of IA declaration requests received, declared, and denied, including the types of disasters and related obligations for IA major disaster declarations from calendar years 2008 through 2016; (2) the extent to which FEMA accounts for the six IA factors when evaluating state and tribal IA declaration requests; and (3) what challenges, if any, FEMA regions and selected states report regarding the factors used in the IA declaration process, and what actions, if any, FEMA has taken to revise these factors.

To answer our first objective, we reviewed FEMA policies and procedures, regulations, and internal documents related to the IA disaster declaration process such as FEMA's guidance on the process, manual on damage assessment, and fact sheets on IA programs. We obtained and analyzed data from FEMA's systems for disaster declaration requests made by states and tribal entities; and IA actual obligations for declarations made from calendar years 2008 through 2016, the most

²Throughout this report, and in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

³44 C.F.R. § 206.48(b).

⁴Pub. L. No. 113-2, § 1109, 127 Stat. 4, 47 (2013).

recent data available at the beginning of our review.⁵ To assess the reliability of these data, we reviewed the data and discussed data quality control procedures with FEMA officials. We determined that the data we used from these systems were sufficiently reliable for the purposes of this report.

To answer our second objective, we reviewed relevant laws, FEMA policies and procedures, regulations, guides, memoranda, internal documents, and other documents related to the IA disaster declarations process, including the current IA factors established in regulation. We reviewed and analyzed the completeness of all 81 FEMA nonemergency and nonexpedited Regional Administrator's Validation and Recommendations (RVAR) prepared from July 2012 through December 2016, the most recent years for which data were available at the time of our review.⁶ We excluded emergency and expedited disaster declaration requests because such requests are not required to include all the information related to the regulatory factors. We did not include RVARs prepared prior to July 2012, after FEMA updated its RVAR guidance and training and began recommending the use of a new RVAR template in order to help ensure consistency across regions.⁷ We also obtained a copy of the RVAR template, which we determined contained 28 elements, most of which pertain to the six IA factors identified in the regulation.⁸ We

⁵We requested data on disaster declaration requests, including IA requests, from FEMA's National Emergency Management Information System and IA actual obligations from FEMA's Integrated Financial Management Information System.

⁶RVAR is a document submitted by the FEMA regional administrator to FEMA headquarters, comprising a state's or tribe's disaster declaration request, information on the IA regulatory factors compiled through regional assessments of the request, and the regional administrator's validation and recommendation regarding the request.

⁷FEMA staff began using the RVAR template for events occurring June 13, 2012, or later. As such, we limited our review of the RVARs from July 1, 2012 in order to analyze consistent data.

⁸See 44 C.F.R. 206.48(b). The elements identified in FEMA's RVAR template include: (1) total estimated federal obligation, (2) recent disasters in the same area in the past/within 12 months, (3) damage to critical facilities, (4) hazard mitigation measures, (5) impact and frequency of prior disasters, (6) level of volunteer assistance, (7) other federal assistance available, (8) trauma-death, (9) trauma-injury, (10) trauma-power outage, (11) trauma-disruption of community functions/services, (12) damage concentration, (13) homes destroyed, (14) homes with major damage, (15) homes with minor damage, (16) homes affected, (17) home ownership, (18) insurance, (19) flood insurance, (20) low income, (21) median household income, (22) poverty, (23) disabled, (24) elderly, (25) Small Business Administration loans, (26) resident loans, (27) Small Business Administration number of loans, and (28) resident number of loans.

used these elements to analyze the 81 RVARs to determine if information on the IA regulatory factors were obtained and documented. We interviewed officials from FEMA headquarters and all 10 FEMA regions on their consideration of the IA regulatory factors and development of the RVARs. We also compared the 81 RVARs to *Standards for Internal Control in the Federal Government*.⁹ To assess the reliability of the RVARs, we reviewed and analyzed the RVARs that FEMA officials provided and discussed quality control procedures with them. We determined that the information we used from the RVARs was sufficiently reliable for the purposes of this report.

To answer our third objective, we reviewed relevant laws and FEMA policies and procedures, notices, regulations, and guidance related to the IA disaster declaration process and FEMA's proposed rulemaking, which proposes revisions to the current six IA regulatory factors. We interviewed officials from all 10 FEMA regions, FEMA headquarters officials, and state-level emergency management officials in 11 states to discuss their perspectives on the IA declaration process and current regulatory factors, any associated challenges, and their perspectives on the proposed changes to the current IA regulatory factors. We selected the 11 states based on those that have undergone multiple IA requests from calendar years 2008 through 2016 and those that have experienced various types of disasters in different regions of the country. We selected California, Illinois, Indiana, Kentucky, Mississippi, Missouri, New York, Ohio, Oklahoma, South Dakota, and Virginia. We made three site visits to obtain more detailed information on the IA declaration processes. We visited FEMA regions IX and V, and spoke with regional FEMA officials, as well as with emergency management officials for the states of California and Illinois. We also visited region IV and we spoke with FEMA officials for that region. We chose these locations to obtain examples and experiences across a wide variety of disaster types and regions. The information gathered during these site visits is not generalizable to other states or regions, but the details provide insights regarding FEMA's and states' management of these processes. We also reviewed and summarized the 14 public comments states submitted on FEMA's proposed rulemaking that proposes changes to the current IA regulatory factors.

⁹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

We conducted this performance audit from January 2017 to May 2018 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 finding 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

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, establishes the process for states or tribal entities to request a presidential disaster declaration.¹⁰ The act also generally defines the federal government's role during the response and recovery after a disaster and establishes the programs and process through which the federal government provides disaster assistance to state, local governments, tribal entities and individuals.¹¹ In addition to its central role in recommending to the President whether to declare a disaster, FEMA has primary responsibility for coordinating the federal response when a disaster is declared as well as recovery, which typically consists of providing grants to assist state and tribal entities to alleviate the damage resulting from such disasters. Once a disaster is declared, FEMA provides assistance through the IA, Public Assistance, and Hazard Mitigation Assistance programs. For instance, some declarations may provide grants only for IA and others only for Public Assistance. Hazard Mitigation Assistance grants, on the other hand, are available for all declarations if the affected area has a FEMA-approved Hazard Mitigation plan. The process for requesting assistance is the same for the three types of assistance.

Disaster Declaration Process

Under the Stafford Act, states' governors or tribal chief executives may request federal assistance, if state and tribal resources are overwhelmed after a disaster.¹² As part of the request to the President, a governor or tribal chief executive must affirm that the state or tribe has implemented an emergency plan and that the situation is of such severity and magnitude that effective response is beyond the capabilities of the state

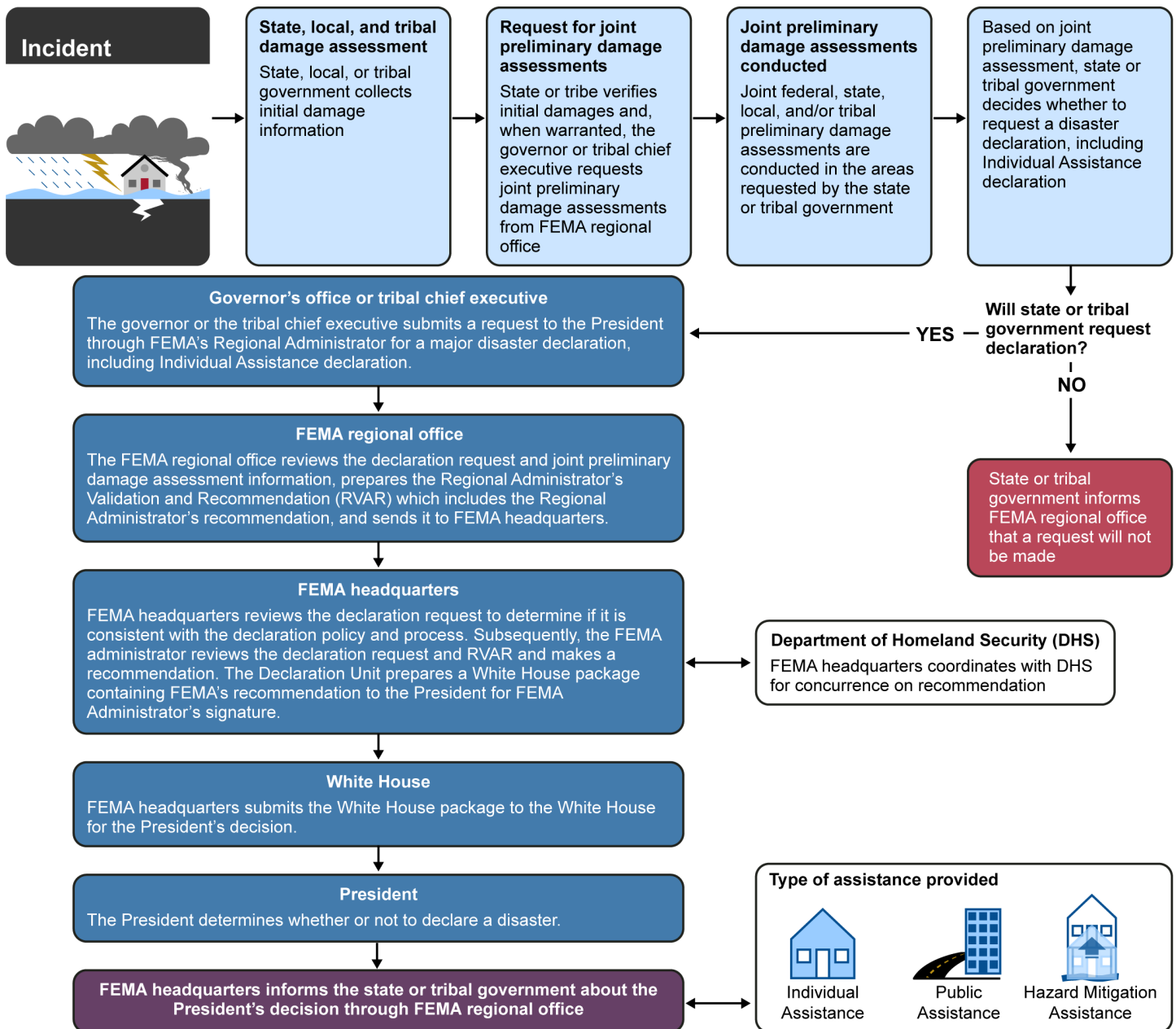
¹⁰Pub. L. No. 93-288, 88 Stat. 143 (codified as amended at 42 U.S.C. § 5121 et seq.).

¹¹See generally 42 U.S.C. § 5121 et seq.

¹²See 42 U.S.C. § 5170.

or tribal entity, among other things. After a state or tribe submits a request for disaster declaration through FEMA's regional office, the regional office is to evaluate the request and make a regional recommendation through the RVAR, which is submitted to FEMA headquarters for further review. The FEMA administrator then is to review the state's or tribe's request and the RVAR, and recommend to the President whether a disaster declaration is warranted. Figure 1 shows the process for a disaster declaration from the time a disaster occurs until the President approves or denies a declaration request.

Figure 1: Federal Emergency Management Agency's (FEMA) Major Disaster Declaration Process



Source: GAO analysis of FEMA information. | GAO-18-366

Five Programs Available under Individual Assistance

The IA program provides financial and direct assistance to disaster victims for expenses and needs that cannot be met through other means, such as insurance. The IA comprises five different programs as shown below. When states or tribal entities request disaster declarations, they may request assistance under any or all of the five programs. Likewise, when the President makes a disaster declaration, the declaration may authorize IA which may also include any or all of the five IA programs.

1. **Individuals and Households Program** provides assistance to eligible disaster survivors with necessary expenses and serious needs which they are unable to meet through other means, such as insurance.¹³ According to FEMA headquarter officials, direct assistance is provided to individuals to meet housing needs.
2. **Crisis Counseling Program** assists individuals and communities by providing community-based outreach and psycho-educational services.¹⁴
3. **Disaster Legal Services** provides assistance through an agreement with the Young Lawyers Division of the American Bar Association for free legal help to survivors who are unable to secure legal services adequate to meet their disaster-related needs.¹⁵
4. **Disaster Case Management Program** involves a partnership between a FEMA disaster case manager and a survivor to develop and carry out a Disaster Recovery Plan.¹⁶
5. **Disaster Unemployment Assistance** provides unemployment benefits and reemployment services to individuals who have become unemployed as a result of a major disaster and who are not eligible for regular state unemployment insurance.¹⁷

The Six IA Regulatory Factors Used to Assess IA Declaration Requests

In accordance with its responsibilities under the Stafford Act, FEMA issued a regulation in 1999 that outlines the six factors regional and headquarters officials are to consider when assessing requests for a disaster declaration and when developing a recommendation to the

¹³See 42 U.S.C. § 5174; 44 C.F.R. §§ 206.110-206.120.

¹⁴See 42 U.S.C. § 5183; 44 C.F.R. § 206.171.

¹⁵See 42 U.S.C. § 5182; 44 C.F.R. § 206.164.

¹⁶See 42 U.S.C. § 5189d.

¹⁷See 42 U.S.C. §5177; 44 C.F.R. § 206.141.

President for a federal disaster declaration.¹⁸ The regulation states that FEMA considers the six factors not only to evaluate the need for IA but also to measure the severity, magnitude, and impact of the disaster. The state or tribe provides information on these factors when submitting its disaster declaration request. The six factors for IA include the following:

1. **Concentration of Damages**—characterizes the density of the damage in individual communities. The regulation states that highly concentrated damages “generally indicate a greater need for federal assistance than widespread and scattered damages throughout a state.” For example, concentration of damage data includes the numbers of homes destroyed, homes with major or minor damages, and homes affected.
2. **Trauma**—the regulation provides conditions that might cause trauma including large numbers of injuries and deaths, large-scale disruption of normal community functions, and emergency needs such as extended loss of power or water.
3. **Special Populations**—FEMA considers the impact of the disaster on special populations, such as low-income populations, the elderly, or the unemployed.
4. **Voluntary Agency Assistance**—involves the availability and capabilities of voluntary, faith, and community-based organizations, and state and local programs to help meet both the emergency and recovery needs of individuals affected by disasters.
5. **Insurance Coverage**—addresses the level of insurance coverage among those affected by disasters.¹⁹ Because disaster assistance cannot duplicate insurance coverage, as recognized in the regulation, if a disaster occurred where almost all of the damaged dwellings were fully insured for the damage that was sustained, FEMA could

¹⁸44 C.F.R. § 206.48(b); see also 42 U.S.C. § 5170. Consistent with 42 U.S.C. § 5170, as amended by the Sandy Recovery Improvement Act of 2013, the Governor of an affected state or the Chief Executive of an affected Indian tribal government may submit a request for a declaration. See Pub. L. No. 113-2, § 1110, 127 Stat. 4, 48 (codified as amended at 42 U.S.C. §§ 5170, 5191, 5122).

¹⁹By law, federal disaster assistance cannot duplicate insurance coverage. See 42 U.S.C. § 5155; 44 C.F.R. § 206.48(b)(5).

conclude that a disaster declaration by the President was not necessary in accordance with this factor.²⁰

6. **Average Amount of Individual Assistance by State**—according to the regulation, there is no set threshold for recommending IA. However, it states that the averages, depicted in table 1, may prove useful to states and voluntary agencies as they develop plans and programs to meet the needs of disaster victims. The inference is that these averages generally indicate the amount of damages that could be expected for a state based on its size (small, medium, and large). The averages contained within the regulation and depicted in table 1 are based on disasters that occurred between July of 1994 and July of 1999.²¹

Table 1: Average Amount of Individual Assistance per Disaster by Size of State Contained in 44 C.F.R. § 206.48(b)(6) (July 1994 to July 1999)

	Small states (under 2 million population)	Medium states (2-10 million population)	Large states (over 10 million population)
Average population (1990 census data)	1,000,057	4,713,548	15,522,791
Number of Disaster Housing applications approved	1,507	2,747	4,679
Number of homes estimated major damage/destroyed	173	582	801
Dollar amount of housing assistance (\$)	2.8 million	4.6 million	9.5 million
Number of Individual and Family Grant applications approved	495	1,377	2,071
Dollar amount of Individual and Family Grant assistance (\$)	1.1 million	2.9 million	4.6 million
Disaster Housing/Individual and Family Grant combined assistance (\$)	3.9 million	7.5 million	14.1 million

Source: 44 C.F.R. § 206.48(b)(6). | GAO-18-366

²⁰This provision does not necessarily result in delayed assistance. FEMA is able to provide help to individuals and households that have disaster damages but are waiting on insurance or other assistance for help. Those applicants can receive FEMA help as long as they agree to reimburse FEMA when they receive their other assistance. See 44 C.F.R. § 206.113(a)(3).

²¹FEMA headquarters officials stated that the table titled “Average Amount of Assistance per Disaster by Size of State” contained within 44 C.F.R. § 206.48(b)(6) is considered outdated and is no longer relevant to the declaration process. FEMA officials indicated that to satisfy the factor of average amount of IA assistance by state they evaluate the total number of homes destroyed and suffering major damage (as well as the accessibility and habitability of the dwellings and the community).

The President Declared 57 Percent of All IA Requests from 2008 through 2016, with Total Obligations of Approximately \$8.6 Billion

The Number of IA Declarations Varied by Region and Severe Storms Were the Most Frequent Disaster Type

The President declared 57 percent of all IA declaration requests from calendar years 2008 through 2016, with total IA obligations of approximately \$8.6 billion. FEMA received 294 IA declaration requests from calendar years 2008 through 2016. Of these, the President declared 168 requests (57 percent), and 51 percent of these declarations were from Regions IV and VI, as shown in table 2.²²

Table 2: Information on Individual Assistance (IA) Requests and Declarations by Federal Emergency Management Agency (FEMA) Region from Calendar Years 2008 through 2016

Region	IA Requested	IA Declared	Percentage Declared (%)
I	15	13	87
II	18	10	56
III	26	13	50
IV	69	53	77
V	32	16	50
VI	59	32	54
VII	25	13	52
VIII	18	8	44
IX	18	6	33
X	14	4	29
Total	294	168	57

Source: GAO analysis of FEMA data. | GAO-18-366

²²Information on the composition of the FEMA regions by state or tribe related to the IA declaration requests is found in appendix I of this report.

Additionally, of the 126 IA declaration requests denied by the President, Regions X and IX had the highest percentage of denials, at 71 percent (10 out of 14) and 67 percent (12 out of 18), respectively, and Region I had the lowest percentage of denials at 13 percent (2 out of 15), as shown in table 3. See appendix I for the number of IA declarations requested, declared, and denied by states and tribes from each FEMA region for disaster declarations requested from calendar years 2008 through 2016.

Table 3: Number of Individual Assistance (IA) Declarations Denied by Federal Emergency Management Agency (FEMA) Region from Calendar Years 2008 through 2016

Region	IA Requested	IA Denied	Percentage Denied (%)
X	14	10	71
IX	18	12	67
VIII	18	10	56
III	26	13	50
V	32	16	50
VII	25	12	48
VI	59	27	46
II	18	8	44
IV	69	16	23
I	15	2	13
Total	294	126	43

Source: GAO analysis of FEMA data. | GAO-18-366

According to a FEMA headquarters official, when a disaster declaration is denied, FEMA sends a denial letter to states or tribes based on the review of all the information available. The letter generally states that the damage was not of such severity and magnitude as to be beyond the capabilities of the state, affected local governments, and voluntary agencies, and accordingly the supplemental federal assistance is not necessary. Of the emergency management officials we interviewed in 11 states, officials in five states reported that FEMA provided a rationale behind the denial, while officials in three states reported that no rationale was provided.²³

²³The other 3 state emergency officials did not provide any comments on the rationale behind denied IA declaration requests in their state.

Among the various types of disasters for which IA declaration requests were received, severe storms, flooding, and tornados accounted for the highest number of IA requests, with drought, fishery closure, and contaminated water being the least common, as shown in table 4.

Table 4: Information on Individual Assistance (IA) Declarations Requests by Type of Disaster from Calendar Years 2008 through 2016^a

Disaster Types	IA Requested	IA Declared	IA Denied
Severe storm	190	113	77
Flooding	149	92	57
Tornado	117	68	49
Straight-line wind	60	35	25
Hurricane	27	24	3
Wildfire	16	6	10
Mudslide	15	11	4
Tropical storm	14	9	5
Winter storm	12	2	10
Landslide	12	7	5
Earthquake	5	2	3
Snow storm	3	0	3
Typhoon	2	1	1
Ice jam	2	1	1
Tsunami	2	1	1
Explosion	2	0	2
Fishery closure	1	0	1
Contaminated water	1	0	1
Drought	1	0	1

Source: GAO analysis of Federal Emergency Management Agency data. | GAO-18-366

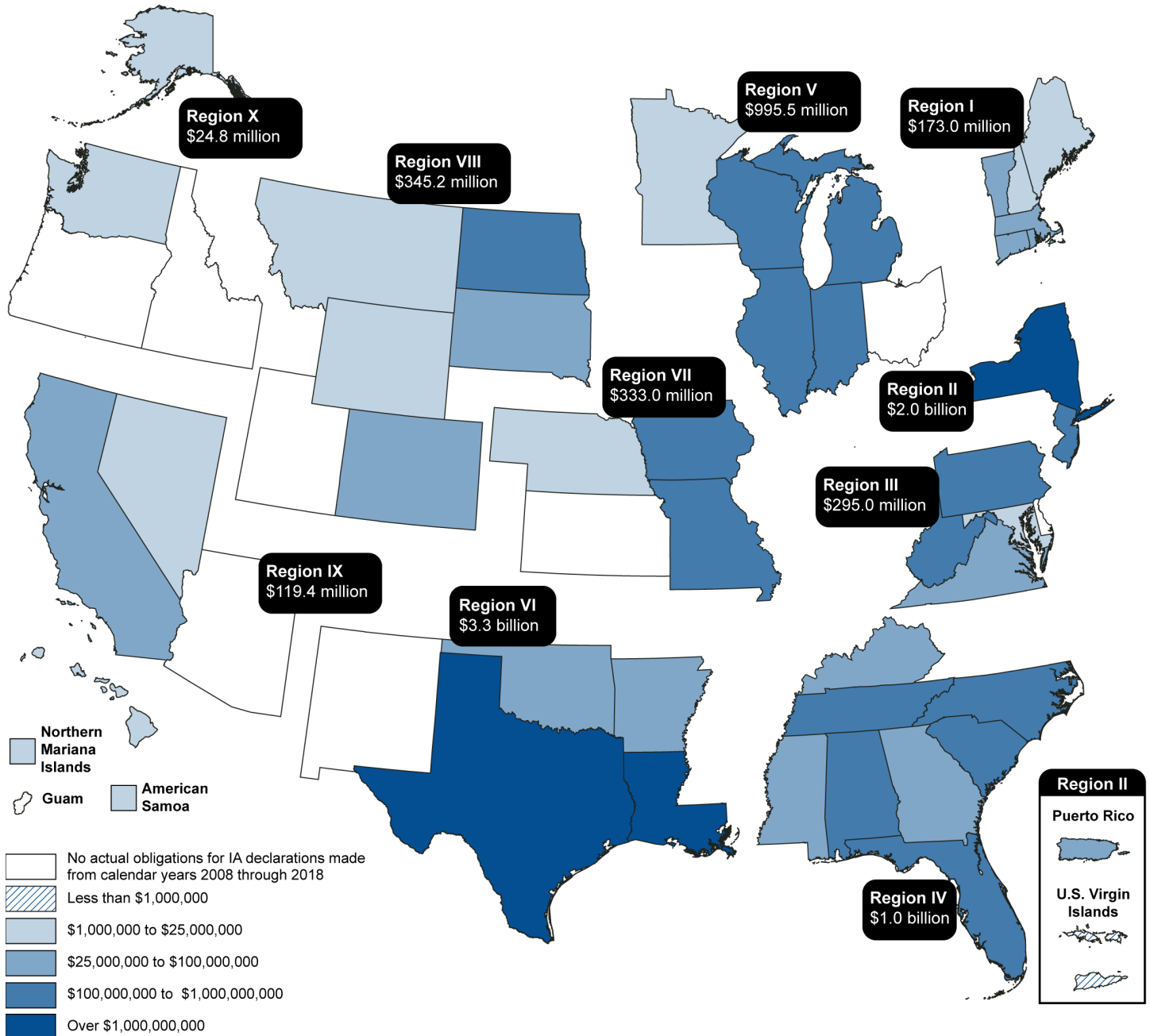
^aEach disaster declaration request may have more than one type of disaster. As such, the table does not include a row for totals.

FEMA IA Obligations Varied by Region and State

FEMA obligated a total of approximately \$8.6 billion in IA for disaster declarations made from calendar years 2008 through 2016. These actual obligations were provided to 46 states and they ranged from less than \$1 million to more than \$1 billion as shown in figure 2.²⁴ See appendix II for FEMA's IA actual obligations by state and type of disasters for disaster declarations made from calendars years 2008 through 2016.

²⁴Throughout this report, actual obligations refer to funds obligated by FEMA and are not adjusted for inflation. Also, these actual obligations were made from the time of the declaration to March 2017

Figure 2: Federal Emergency Management Agency's (FEMA) Individual Assistance (IA) Actual Obligations by Regions for Disaster Declarations Made from Calendar Years 2008 through 2016^a



Source: GAO analysis of FEMA data; Map Resources (map). | GAO-18-366

^aFigure includes IA actual obligations made from the time of the declaration to March 2017. In accordance with the Stafford Act, "state" means any state of the United States, the District of

Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

Additionally, actual obligations for IA declarations made from calendar years 2008 through 2016 varied greatly by FEMA region, as also shown in figure 3. For example, FEMA Region VI had the highest obligations at around \$3.3 billion. Region X had the lowest obligations at \$24.8 million. As shown in table 5, the amount of obligations for disasters declarations also varied greatly by state. For example, Louisiana had the highest obligations at approximately \$2 billion, followed by New York and Texas at about \$1.3 billion and \$1.1 billion, respectively. The state with the lowest obligations was the U.S. Virgin Islands at about \$2,100.

Table 5: Actual Obligations of Individual Assistance by State for Disaster Declarations Made from Calendar Years 2008 through 2016^a

State	Region	Total (\$)
Louisiana	VI	2,003,244,709
New York	II	1,309,869,042
Texas	VI	1,149,629,671
New Jersey	II	656,334,017
Illinois	V	621,800,788
Iowa	VII	210,526,142
North Dakota	VIII	200,890,261
Tennessee	IV	199,447,951
North Carolina	IV	174,448,712
Pennsylvania	III	165,486,633
Michigan	V	148,308,502
South Carolina	IV	147,945,615
Alabama	IV	137,509,405
Florida	IV	121,961,283
Missouri	VII	116,280,805
Wisconsin	V	115,849,685
Indiana	V	104,041,429
West Virginia	III	100,322,247
Kentucky	IV	95,077,277
Mississippi	IV	80,929,297
Colorado	VIII	79,164,491
Georgia	IV	77,397,631
Massachusetts	I	70,452,076

State	Region	Total (\$)
Puerto Rico	II	58,237,566
Oklahoma	VI	57,607,547
South Dakota	VIII	55,503,363
Arkansas	VI	54,859,658
California	IX	46,917,730
Rhode Island	I	38,831,216
Mariana Islands	IX	34,281,445
American Samoa	IX	32,242,550
Connecticut	I	30,878,096
Vermont	I	30,362,291
Virginia	III	26,530,586
Washington	X	13,450,309
Alaska	X	11,386,310
Montana	VIII	6,634,838
Nebraska	VII	6,160,220
Minnesota	V	5,532,091
Hawaii	IX	4,082,910
Wyoming	VIII	3,029,312
Maryland	III	2,649,629
Nevada	IX	1,893,834
New Hampshire	I	1,260,630
Maine	I	1,229,976
Virgin Islands	II	2,136
Total		8,610,481,911

Source: GAO analysis of Federal Emergency Management Agency data. | GAO-18-366

^aTable includes actual obligations made from the time of the declaration to March 2017. In accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

FEMA Regions Varied in How They Considered IA Regulatory Factors and Did Not Consistently Obtain and Document Information on All Elements of These Factors

FEMA Regions Varied in Their Consideration of the IA Regulatory Factors Based on Disaster Circumstances

Six of FEMA's 10 regional offices reported using all six regulatory factors when evaluating states' or tribes' IA declaration requests. Officials from the other 4 regions reported using five of the six factors, with the exception being the average amount of individual assistance by state factor. These officials noted that they do not use this factor because FEMA considers the factor to be outdated or they consider all of the factors holistically.²⁵

Officials from FEMA's regional offices also generally reported that the extent to which they consider the six IA regulatory factors equally in all cases varies, depending on the circumstances of the related disaster. Specifically, officials from 7 of the 10 regions stated that they use the regulatory factors on a case-by-case basis as certain factors are more relevant than others based on the disaster. For example, if a tornado hits a rural community and completely destroys all properties within the community with no death or injury, then the regulatory factor for trauma may not be as applicable, while the concentration of damages regulatory factor would have greater relevance. On the other hand, if a tornado hits

²⁵FEMA headquarters officials indicated that the table titled "Average Amount of Assistance per Disaster by Size of State" contained within 44 C.F.R. § 206.48(b)(6) is considered outdated and is no longer relevant to the declaration process. FEMA officials stated that they evaluate the total number of homes destroyed and suffering major damage (as well as the accessibility and habitability of the dwellings and the community) to satisfy this factor.

the center of a town resulting in damages with death and injuries, then the trauma regulatory factor would become more important to consider.

Additionally, officials in 3 of the 10 regions reported that in addition to the six regulatory factors, they also take into account institutional knowledge and staff experience when evaluating the regulatory factors. For example, officials in one region stated that their staff have more than 10 years of IA declaration experience, and as such, they are familiar with the extent of the information needed and collect the information accordingly.

FEMA Regions Did Not Consistently Obtain and Document Information on All Elements of the IA Regulatory Factors in RVARs

Based on our analysis of RVARs from July 2012 through December 2016 used to recommend approving or denying IA requests, FEMA regional offices did not consistently obtain and document information on all elements of the IA regulatory factors. As described earlier, FEMA regions are to use the RVAR to document information on the IA factors and to recommend to the FEMA administrator whether a disaster should be declared.

According to FEMA headquarters officials, FEMA developed the RVAR template in June 2012 to help ensure consistency across regions when making recommendations to headquarters on IA declaration requests. Officials stated that prior to the template, information on the six factors was mainly provided in narrative format. The new template listed the various elements found within each of the six regulatory factors, guiding the regional offices to provide information based on those elements. For example, instead of providing a general narrative on the trauma factor, the new template listed the elements to be provided under trauma, such as the number of injuries and deaths, as well as information on power outages and disruption of other community functions and services. Also, instead of summarizing the concentration of damages factor, the template allowed regional offices to categorize the damage concentration as low, medium, high, or extreme. Furthermore, the template also provided a uniform format to present quantitative information such as the number of homes destroyed; whether home damages are major or minor; the number of homes affected; and level of home ownership. See appendix III for a sample RVAR template.

We analyzed 81 RVARs developed by the 10 FEMA regions from July 2012 through December 2016 and found that regions did not consistently obtain and document information on all elements related to each of the

six regulatory factors in their RVARs.²⁶ As shown in table 6, all 81 RVARs had at least some elements documented but not all for each of the IA regulatory factors. For example, for the IA concentration of damages regulatory factor, the six elements to be addressed include the number of homes destroyed, damaged or affected, damage concentration, and damage to critical facilities. While 44 of the 81 RVARs documented all of the six elements, 37 documented some but not all of the elements. Similarly, for the trauma regulatory factor, the four elements to be addressed include injuries, death, power outages, and disruption of community functions. While 30 of the 81 RVARs documented all of the four elements, 51 documented some but not all of the elements. For the insurance coverage factor, while five RVARs documented all of the elements, 73 RVARs documented some but not all of the elements. Elements under this factor include home ownership, insurance, and flood insurance, when applicable.²⁷ None of the six regulatory factors were fully documented across all RVARs. See appendix IV for detailed information on the extent to which all of the elements of the six regulatory factors were documented in the RVARs from July 2012 through December 2016.

Table 6: Analysis of 81 Regional Administrator’s Validation and Recommendations (RVAR) by Element Pertaining to Each Individual Assistance (IA) Regulatory Factor Documented from July 2012 through December 2016

IA regulatory factor	All elements documented	Some elements documented	No elements documented
Concentration of Damages	44	37	0
Trauma	30	51	0
Special populations	72	8	1
Voluntary agency assistance	76	5	0

²⁶As mentioned earlier, the RVAR template contains 28 elements, most of which pertain to the six IA factors based on 44 C.F.R. § 206.48(b). For example, the concentration of damages factor contains 6 elements (e.g., homes destroyed, homes with major damage, homes with minor damage, homes affected, damage to critical facilities, and damage concentration); trauma (e.g., injuries, death, power outages, and disruption of community functions/services) and special populations (e.g., low-income, poverty, disabled, and elderly) contain 4 elements; insurance has 3 elements (e.g., home ownership, insurance, and flood insurance [if applicable]); and voluntary agency assistance (e.g., hazard mitigation measures and level of volunteer assistance) and average amount of IA by state (e.g., recent disasters in the past 12 months and impact and frequency of prior disasters) have 2 elements.

²⁷The flood insurance element is only applicable when the disaster type is flood related.

IA regulatory factor	All elements documented	Some elements documented	No elements documented
Insurance Coverage	5	73	3
Average amount of IA by state	11	66	4

Source: GAO analysis of Federal Emergency Management Agency's RVAR. | GAO-18-366

FEMA headquarters officials acknowledged that information related to all the elements for each of the IA regulatory factors were missing from the RVARs. They stated that they had not collected all information on all factors because one factor may have more weight than another based on the specific incident that has occurred. However, they also indicated that they do not fully know and have not evaluated all of the reasons why a region may have omitted information on an element of a factor. FEMA headquarters officials agreed that having complete information on all elements of the regulatory factors in the RVARs would assist in their recommendation process.

Standards for Internal Control in the Federal Government suggest that agencies should establish and operate monitoring activities to ensure that internal controls—such as the documentation of all of the elements of the IA regulatory factors FEMA regions considered—are effective, and to take corrective actions as appropriate.²⁸ Because it is unclear why regions are not completely documenting all elements related to the current six regulatory factors, such an evaluation could help FEMA identify whether any corrective steps are needed. Doing so could help FEMA ensure it is achieving its stated goals in providing consistency in the evaluation process and in the types of factors it considers.

²⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

FEMA and States Reported Challenges in the IA Declaration Process, and FEMA Is Revising the Regulatory Factors Used to Assess Declaration Requests

FEMA and State Officials Reported Both Positive Relationships and Some Challenges in the IA Declaration Process

Officials we interviewed in 9 of the 10 FEMA regions and state emergency management offices in all 11 states reported the positive relationship they maintain with each other as a strength in the IA declaration process.²⁹ For example, both FEMA regional officials and state emergency management officials stated that they have a good working relationship and are in regular communication via telephone or in-person meetings with each other. Also, state emergency management officials we spoke to stated that whenever they are in need of assistance, they know they can reach out to FEMA regional officials for assistance. However, FEMA regional and state emergency management officials we spoke to also reported various challenges with the process. These include the subjective nature of the IA regulatory factors given the lack of eligibility thresholds, the lack of transparency in the decision-making process, and difficulty gathering information on IA regulatory factors.

Subjective nature of the IA factors and lack of eligibility thresholds. Officials from 9 of 10 FEMA regions stated the subjective nature of the IA program is a challenge; and officials in 6 of the 10 regions also said they found the lack of eligibility thresholds a challenge. An official in one region stated that unlike FEMA's Public Assistance program, which has minimum thresholds for eligibility, it is unclear when states should apply for IA funds. Under the Public Assistance program, for example, for states or tribes to qualify for assistance, they must demonstrate that they have sustained a minimum of \$1 million in damages and the impact of

²⁹The remaining one regional office did not make any comment on the FEMA and state relationship. We conducted interviews with all 10 FEMA regions and 11 states, including California, Illinois, Indiana, Kentucky, Mississippi, Missouri, New York, Ohio, Oklahoma, South Dakota, and Virginia.

damages must amount to \$1.00 per capita in the state.³⁰ An official in another region explained that although the subjectivity of the IA factors provides flexibility in determining the type of IA program needed, having some quantifiable criteria could help officials explain to states why their requests were denied or approved.

Similarly, officials we interviewed in 7 of the 11 states said they found the subjective nature of the factors with no threshold to be a challenge. A state emergency management official in one state said this subjectivity makes it difficult to determine whether or not the state should make an IA request. A state emergency management official in another state reported that the subjectivity can cause the IA declaration process to be inconsistent, and it is not always clear how or why certain declarations were approved and others were not. Further, a state emergency management official in an additional state also pointed to the subjective nature of the factors with no threshold as a reason for not being able to provide a more detailed rationale behind a declaration denial.

To illustrate this, table 7 shows how four states requested IA declarations related to the same tornado in 2012 and varied in what they reported across the six IA factors, such as the levels of damages incurred, special populations among their residents, and insurance coverage. Two of these four states—Kentucky and Indiana—received IA declarations and the other two—Ohio and Illinois—were denied.

Table 7: Example of Regional Administrator’s Validation and Recommendations Information on the Individual Assistance Regulatory Factors for Four States Affected by the Same Disaster in 2012

Region	V	V	V	IV
State	Ohio	Illinois	Indiana	Kentucky
Disaster period	March 2	February 29-March 2	February 29-March 3	February 29-March 3
Type of disaster declaration request	Major disaster declaration	Major disaster declaration	Major disaster declaration	Expedited disaster declaration ^a
Type of disaster	Tornadoes			
Factors				
Damage concentration				
Homes destroyed	19	104	187	510
Homes with major damage	23	50	85	244
Homes with minor damage	25	139	107	Not provided

³⁰See 44 C.F.R. § 206.48(a).

Region	V	V	V	IV
State	Ohio	Illinois	Indiana	Kentucky
Homes affected	78	133	89	Not provided
Damage to critical facilities	Not provided	Yes	Yes	Not provided
Damage concentration	Provided	Provided	Provided	Provided
Trauma				
Injury	Not provided	100	Not provided	300
Death	3	6	13	21
Power outages	Yes	Yes	Yes	Yes
Disruption of community functions/services	Not provided	Yes	Yes	Yes
Special population				
Poverty (%)	9.3	16.90	12.6	18.40
Elderly (%)	11.8	17.90	13.75	12.90
Low-income (%)	1	1	24.7	29.30
Disabled (%)	Not provided	Not provided	Not provided	23.7
Voluntary agency assistance				
Hazard mitigation measures	Yes	Yes	Yes	Yes
Level of voluntary assistance	Provided	Provided	Provided	Provided
Insurance				
Insurance (%)	97	20	47	Not provided
Flood insurance (if applicable) ^b	Not applicable	Not applicable	Not applicable	Not provided
Home ownership (%)	99	65	93	Not provided
Average amount of individual assistance by state^c				
Recent disasters in the past 12 months	Yes	Yes	Yes	Yes
Impact and Frequency of prior disasters	Not provided	Not provided	Not provided	Yes
IA declaration request granted	No	No	Yes	Yes

Source: GAO analysis of Federal Emergency Management Agency information. | GAO-18-366

^aExpedited disaster declaration requests are not required to provide all the information related to the regulatory factors.

^bFlood insurance element is only applicable when the disaster type is flood related.

^cAccording to FEMA headquarters officials, the average amounts of individual assistance per disaster identified in the average amount of individual assistance by state regulatory factor, are considered outdated and they are no longer relevant to the declaration process. Instead, FEMA officials stated that they evaluate the total number of homes destroyed and suffering major damaged to satisfy this factor.

Lack of transparency. Another challenge reported by FEMA regional and state emergency management officials was the lack of transparency in how FEMA evaluates and provides a recommendation to the President

on whether a declaration is warranted. For example, officials we interviewed in 4 of 10 regions indicated the lack of transparency as a challenge. A FEMA official in one region stated that the region would like more transparency regarding what FEMA headquarters recommends to the President and whether the President's decision aligns with FEMA's recommendation. State emergency management officials we interviewed in 10 of 11 states also reported that lack of transparency with the IA process is a challenge. For example, an emergency management official in one state said it is not clear how or if FEMA considers all of the factors. Also, an emergency management official in another state reported that it was unclear to him why his state's declaration request was denied while the requests of other states with similar incidents were declared.

Difficulty gathering information on IA regulatory factors. Officials in 4 of 10 FEMA regions reported difficulty gathering information, such as income or insurance coverage, as a challenge. An official in one region stated that it is difficult to obtain information related to IA factors from states. For example, the official said that calculating the concentration of damages is difficult absent technical guidance from FEMA headquarters, as the current guidance only accounts for the number of structure damage but not the impact of damage. Further, officials in two FEMA regions stated that states lack a dedicated IA official, making it difficult for state officials, who play multiple roles, to provide the necessary information related to the IA factors in their IA declaration request. Additionally, a state emergency management official in one state also reported that lack of staff resources in her state makes it difficult to verify all the local damage assessments prior to making a declaration request.

FEMA Is Taking Steps to Revise the IA Regulatory Factors

Pursuant to the Sandy Recovery Improvement Act of 2013, in November 2015, FEMA issued a Notice of Proposed Rulemaking to revise the six current IA regulatory factors to the following proposed factors:

- state fiscal capacity and resource availability;
- uninsured home and personal property losses;
- disaster-impacted population profile;
- impact to community infrastructure;
- casualties; and

- disaster-related unemployment.³¹

According to FEMA headquarters officials, the revisions aim to provide more objective criteria, clarify the threshold for eligibility, and speed the declaration. The officials said the proposed rule also seeks to provide additional clarity and guidance for all the established factors.³² Table 8 shows FEMA’s description of current and proposed IA factors.

Table 8: Federal Emergency Management Agency’s (FEMA) Description of Current and Proposed Individual Assistance Regulatory Factors

Current Factors	Proposed Factors
Concentration of Damage	State Fiscal Capacity and Resource Availability
Trauma	Uninsured Home and Personal Property Losses
Special Populations	Disaster-Impacted Population Profile
Voluntary Agencies	Impact to Community Infrastructure
Insurance	Casualties
Average Amount of Individual Assistance by State	Disaster Related Unemployment

Source: GAO analysis of FEMA information. | GAO-18-366

FEMA received public comments from 14 states in the Federal Register during the comment period for the proposed rule and proposed guidance.³³ The 14 states expressed concern about the proposed factor

³¹80 Fed. Reg. 70,116 (proposed Nov. 12, 2015); see Pub. L. No. 113-2, § 1109, 127 Stat. at 47 (directing the Administrator of FEMA to, in cooperation with representatives of state, tribal, and local emergency management agencies, review, update and revise through rulemaking the individual assistance factors in order to provide more objective criteria for evaluating the need for assistance to individuals, clarify the threshold for eligibility, and speed a declaration of major disaster or emergency).

³²In September 2016, FEMA also published and made available for comment a draft Individual Assistance Declarations Guidance, which is meant to be proposed companion guidance to accompany the proposed rule. See 81 Fed. Reg. 65,369 (published Sept. 22, 2016). In the draft guidance, FEMA describes how it plans to evaluate a governor’s request for a major disaster declaration authorizing Individual Assistance, including a general description of each proposed factor, why it is important, and the data sources in the proposed factor.

³³FEMA received 58 comments on the proposed rule of which one was withdrawn. As a result, in total, 57 comments were submitted by 24 state and county government employees representing 14 states, 5 congressional members’ offices, 8 public and private organizations, and 20 individuals.

for state fiscal capacity and resource availability, including the reliability and relevance of data sources such as total taxable resources. These states expressed concern that the data collection necessary to meet the new requirements would fall upon them, adding to the cost burden of completing an IA disaster declaration request. They also explained that the use of total taxable resources and other similar data is not an effective way to assess a state's current ability to provide resources following a disaster. Also, these states indicated that the data points such as total taxable resources and per capita personal income that would be used to evaluate state fiscal capacity are outdated and inaccurate and would be an inefficient way to evaluate a state's true fiscal capacity to respond to a disaster.

Regarding the other five proposed factors, several states in their comments raised questions about ambiguities in interpreting the factors or the feasibility and cost of gathering related data. For example, in regards to the factor on disaster impacted population, five states expressed concern that the data required for the disaster-impacted population factor would be a cost burden to the state or that the data would be inappropriate for evaluation. Additionally, two states said unemployment related to a disaster incident for the disaster-related unemployment factor would be hard to quantify in the first 30 days following a disaster. They stated that this was especially an issue given that states work to submit an IA disaster declaration request as soon as possible following a disaster.

According to the Office of Management and Budget's Office of Information and Regulatory Affairs website, the projected date for finalization of the proposed rule is September 2018; however, as of April 2018, FEMA officials stated that they were not certain whether that timeframe would be met. Until the proposed rule is finalized, we will not know the extent to which the various challenges FEMA regions and state officials raised in our interviews and in comments on the proposed rule will be addressed.

Conclusions

FEMA has obligated over \$8.6 billion nationwide in IA from calendar years 2008 through 2016, highlighting the importance of FEMA's evaluation of states' and tribes' IA declaration requests. FEMA's regional offices evaluate the request and make a regional recommendation through the Regional Administrator's Validation and Recommendation, which documents information on all relevant IA regulatory factors. FEMA has developed the Regional Administrator's Validation and

Recommendation to ensure regions consistently obtain and document the information needed by FEMA to make a disaster declaration recommendation to the President based on the IA regulatory factors. However, FEMA's regional offices do not consistently obtain and document information on all elements of the current IA regulatory factors. Because it is unclear why regions are not always documenting all of the elements related to these factors, evaluating the reasons why could help FEMA identify if any corrective steps are needed. Doing so could also help FEMA ensure it is meeting its stated goals in providing consistency in the evaluation process and in the types of factors it considers.

Recommendation for Executive Action

We recommend that the Administrator of FEMA evaluate why regions are not completing the Regional Administrator's Validation and Recommendations for each element of the current IA regulatory factors and take corrective steps, if necessary.

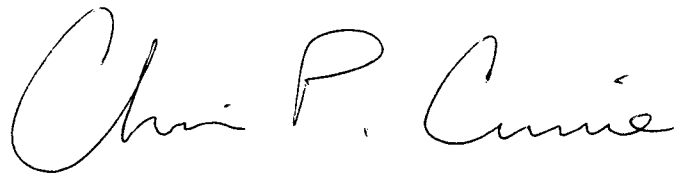
Agency Comments and Our Evaluation

We provided a draft of this report to DHS for its review and comment. DHS provided written comments, which are summarized below and reproduced in full in appendix V. DHS concurred with the recommendation and described planned actions to address it. In addition, DHS provided written technical comments, which we incorporated into the report as appropriate.

DHS concurred with our recommendation that FEMA evaluate why regions are not completing the Regional Administrator's Validation and Recommendations for each element of the IA regulatory factors and take corrective steps, if necessary. DHS stated that a FEMA working group consisting of headquarters stakeholders will draft survey questions for FEMA region officials to identify the common reasons why an element of an IA regulatory factor may not be addressed within a RVAR. According to DHS, the working group will also analyze, assess, and present the findings of the survey responses to FEMA senior leadership, and if needed, FEMA will develop and send a memorandum to the regions with additional guidance regarding the appropriate preparation of RVARs. DHS stated that the estimated completion date is in the fall of 2018. These actions, if implemented effectively, should address the intent of our recommendation.

We will send copies of this report to the Secretary of Homeland Security, the FEMA Administrator, and the appropriate congressional committees.

If you or your staff have any questions about this report, please contact me at (404) 679-1875 or curriec@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VI.

A handwritten signature in black ink that reads "Chris P. Currie". The signature is written in a cursive style with a large initial "C" and a distinct "P" and "C".

Chris P. Currie
Director, Homeland Security and Justice

Appendix I: Individual Assistance Declarations Requested, Declared, and Denied, Calendar Years 2008-2016

Table 9 provides the total number of Individual Assistance declaration requests made, declared, and denied, by region, state, and tribe for disaster declarations requested from calendar years 2008 through 2016.¹

Table 9: Individual Assistance Requested, Declared, and Denied, by Region, State, and Tribe for Disaster Declarations Requested from Calendar Years 2008 through 2016^a

Region	State	Requested	Declared	Denied
I		15	13	2
	Connecticut	4	3	1
	Massachusetts	3	3	0
	Maine	1	1	0
	New Hampshire	2	1	1
	Rhode Island	2	2	0
	Vermont	3	3	0
II		18	10	8
	New Jersey	6	3	3
	New York	7	4	3
	Puerto Rico	3	3	0
	U.S. Virgin Islands	2	0	2
III		26	13	13
	Washington, D.C.	1	0	1
	Maryland	4	1	3
	Pennsylvania	3	2	1
	Virginia	6	2	4
	West Virginia	12	8	4
IV		69	53	16
	Alabama	9	6	3
	Florida	11	7	4
	Georgia	7	6	1
	Kentucky	12	10	2
	Mississippi	15	12	3
	North Carolina	5	4	1
	South Carolina	3	2	1

¹Throughout this report, and in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

**Appendix I: Individual Assistance Declarations
Requested, Declared, and Denied, Calendar
Years 2008-2016**

Region	State	Requested	Declared	Denied
	Tennessee	7	6	1
V		32	16	16
	Bad River Band of Chippewa	1	0	1
	Illinois	11	6	5
	Indiana	8	5	3
	Michigan	3	1	2
	Minnesota	5	2	3
	Ohio	2	0	2
	Wisconsin	2	2	0
VI		59	32	27
	Arkansas	11	9	2
	Louisiana	14	5	9
	Navajo Nation	1	0	1
	New Mexico	1	0	1
	Oklahoma	17	9	8
	Texas	15	9	6
VII		25	13	12
	Iowa	3	3	0
	Missouri	16	8	8
	Nebraska	6	2	4
VIII		18	8	10
	Colorado	5	2	3
	Fort Peck Indian Reservation	1	0	1
	Montana	1	1	0
	North Dakota	2	2	0
	Oglala Sioux Tribe	1	1	0
	South Dakota	6	1	5
	Utah	1	0	1
	Wyoming	1	1	0
IX		18	6	12
	American Samoa	2	1	1
	Arizona	1	0	1
	California	8	2	6
	Guam	2	0	2
	Hawaii	3	1	2
	Northern Mariana Islands	1	1	0

**Appendix I: Individual Assistance Declarations
Requested, Declared, and Denied, Calendar
Years 2008-2016**

Region	State	Requested	Declared	Denied
	Nevada	1	1	0
X		14	4	10
	Alaska	5	2	3
	Colville Reservation	1	0	1
	Oregon	3	0	3
	Spokane Tribe	1	0	1
	Washington	4	2	2
Total		294	168	126

Source: GAO analysis of Federal Emergency Management Agency data. | GAO-18-366

³Throughout this report, and in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

Appendix II: Individual Assistance Actual Obligations for Declarations Made, Calendars Years 2008-2016

Table 10 provides Federal Emergency Management Agency's (FEMA) Individual Assistance (IA) actual obligations for declarations made from calendar years 2008 through 2016 by state and type of disaster.¹

¹Throughout this report, actual obligations refer to funds obligated by FEMA and are not adjusted for inflation. Also, in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendar Years 2008-2016**

Table 10: Federal Emergency Management Agency’s Individual Assistance (IA) Actual Obligations by State and Type of Disaster for Declarations Made from Calendar Years 2008 through 2016^a

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
Alaska	X	Flood	11,324,269.69	37,577.00	21,263.78	3,200.00	IA program not identified ^b	11,386,310.47
Alabama	IV	Severe storm(s)	121,080,077.04	5,759,053.27	480,242.64	5,343.20	10,184,689	137,509,405.37
Arkansas	VI	Severe storm(s); Tornado	54,433,043.84	92,880.11	333,733.60	0.00	IA program not identified	54,859,657.55
		Severe storm(s)	52,041,604.92	70,191.77	324,075.94	0.00	IA program not identified	52,435,872.63
		Tornado	2,391,438.92	22,688.34	9,657.66	0.00	IA program not identified	2,423,784.92
American Samoa	IX	Earthquake	30,934,621.19	1,077,116.70	230,409.00	403.26	IA program not identified	32,242,550.15
California	IX	Fire; Earthquake	44,243,382.00	1,522,770.73	1,151,577.00	0.00	IA program not identified	46,917,729.73
		Fire	33,179,542.09	1,522,770.73	1,151,577.00	0.00	IA program not identified	35,853,889.82
		Earthquake	11,063,839.91	IA program not identified	IA program not identified	IA program not identified	IA program not identified	11,063,839.91
Colorado	VIII	Severe storm(s); Fire; Flood	68,635,065.72	7,224,031.50	711,567.62	25,753.85	2,568,072.15	79,164,490.84
		Severe storm(s)	360,885.29	457,605.11	22,640.27	0.00	IA program not identified	841,130.67
		Fire	No IA program identified	1,337,442.37	197,096.49	No IA program identified	No IA program identified	1,534,538.86
		Flood	68,274,180.43	5,428,984.02	491,830.86	25,753.85	2,568,072.15	76,788,821.31

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
Connecticut	I	Severe storm(s); Hurricane; Snow	30,397,368.44	IA program not identified	55,704.00	,314.64	423,708.48	30,878,095.56
		Severe storm(s)	5,189,469.42	IA program not identified	11,373.00	0.00	IA program not identified	5,200,842.42
		Hurricane	25,207,472.56	IA program not identified	44,331.00	1,314.64	423,708.48	25,676,826.68
		Snow	426.46	IA program not identified	IA program not identified	IA program not identified	IA program not identified	426.46
Florida	IV	Severe storm(s); Hurricane	117,901,516.08	2,596,762.51	1,051,045.81	5,000.00	406,958.67	121,961,283.07
		Severe storm(s)	88,608,589.22	2,163,480.51	523,617.81	0.00	406,958.67	91,702,646.21
		Hurricane	29,292,926.86	433,282.00	527,428.00	5,000.00	IA program not identified	30,258,636.86
Georgia	IV	Severe storm(s); Hurricane; Severe ice storm	76,554,929.43	467,614.73	375,087.29	0.00	IA program not identified	77,397,631.45
		Severe storm(s)	69,951,478.43	350,807.73	252,015.29	0.00	IA program not identified	70,554,301.45
		Hurricane	6,595,983.00	116,807.00	123,072.00	0.00	IA program not identified	6,835,862.00
		Severe ice storm	7,468.00	IA program not identified	IA program not identified	IA program not identified	IA program not identified	7,468.00
Hawaii	IX	Flood	3,480,427.34	595,972.17	6,510.86	0.00	IA program not identified	4,082,910.37
Iowa	VII	Severe storm(s); Flood	197,796,561.25	3,987,439.72	8,737,371.45	4,769.19	IA program not identified	210,526,141.61
		Severe storm(s)	193,012,743.41	3,467,467.04	8,640,905.13	4,769.19	IA program not identified	205,125,884.77

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Flood	4,783,817.84	519,972.68	96,466.32	0.00	IA program not identified	5,400,256.84
Illinois	V	Severe storm(s); Flood; Tornado; Snow	621,025,781.84	141,055.45	633,950.63	0.00	IA program not identified	621,800,787.92
		Severe storm(s)	455,030,045.67	23,421.00	469,600.01	0.00	IA program not identified	455,523,066.68
		Flood	163,462,430.37	IA program not identified	109,197.20	0.00	IA program not identified	163,571,627.57
		Tornado	2,530,838.68	117,634.45	55,153.42	0.00	IA program not identified	2,703,626.55
		Snow	2,467.12	IA program not identified	IA program not identified	IA program not identified	IA program not identified	2,467.12
Indiana	V	Severe storm(s)	102,526,308.44	1,195,111.95	319,921.63	87.20	IA program not identified	104,041,429.22
Kentucky	IV	Severe storm(s); Flood; Severe ice storm	93,515,969.88	576,468.33	581,384.81	0.00	403,453.69	95,077,276.71
		Severe storm(s)	89,711,214.12	576,468.33	490,548.81	0.00	403,453.69	91,181,684.95
		Flood	3,798,728.88	IA program not identified	90,836.00	IA program not identified	IA program not identified	3,889,564.88
		Severe ice storm	6,026.88	IA program not identified	IA program not identified	IA program not identified	IA program not identified	6,026.88
Louisiana	VI	Hurricane; Flood	1,917,500,829.58	31,530,368.43	7,448,139.15	21,420.63	46,743,951.16	2,003,244,708.95
		Hurricane	619,027,722.59	19,686,788.74	4,735,827.00	14,127.27	6,858,970.00	650,323,435.60
		Flood	1,298,473,106.99	11,843,579.69	2,712,312.15	7,293.36	39,884,981.16	1,352,921,273.35
Massachusetts	I	Severe storm(s); Tornado; Hurricane	68,363,204.51	1,452,287.62	423,365.91	335.00	212,882.76	70,452,075.80
		Severe storm(s)	58,317,381.21	676,775.41	114,375.91	0.00	IA program not identified	59,108,532.53

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Tornado	4,375,854.67	775,512.21	263,580.00	335.00	212,882.76	5,628,164.64
		Hurricane	5,669,968.63	IA program not identified	45,410.00	0.00	IA program not identified	5,715,378.63
Maryland	III	Hurricane	2,581,835.21	IA program not identified	67,794.00	0.00	IA program not identified	2,649,629.21
Maine	I	Flood	1,220,974.02	IA program not identified	9,002.00	IA program not identified	IA program not identified	1,229,976.02
Michigan	V	Flood	148,199,521.59	IA program not identified	108,980.00	0.00	IA program not identified	148,308,501.59
Minnesota	V	Severe storm(s); Flood	5,302,057.10	0.00	230,034.00	0.00	0.00	5,532,091.10
		Severe storm(s)	2,395,457.10	IA program not identified	230,034.00	IA program not identified	IA program not identified	2,625,491.10
		Flood	2,906,600.00	IA program not identified	IA program not identified	IA program not identified	IA program not identified	2,906,600.00
Missouri	VII	Flood; Severe storm(s)	103,143,107.28	6,062,101.51	971,188.62	5,000.00	6,099,407.32	116,280,804.73
		Flood	15,988,361.87	1,348,262.56	80,939.81	5,000.00	2,603,773.00	20,026,337.24
		Severe storm(s)	87,154,745.41	4,713,838.95	890,248.81	0.00	3,495,634.32	96,254,467.49
Mississippi	IV	Severe storm(s); Hurricane; Flood	80,123,535.08	17,617.62	638,572.83	3,195.00	146,376.91	80,929,297.44
		Severe storm(s)	33,219,800.59	17,617.62	356,286.05	3,195.00	146,376.91	33,743,276.17
		Hurricane	24,432,367.39	IA program not identified	73,137.78	0.00	IA program not identified	24,505,505.17
		Flood	22,471,367.10	IA program not identified	209,149.00	0.00	IA program not identified	22,680,516.10
Montana	VIII	Severe storm(s)	6,610,866.31	IA program not identified	23,972.00	IA program not identified	IA program not identified	6,634,838.31

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
Nebraska	VII	Severe storm(s); Flood	5,777,326.34	292,823.51	90,070.50	0.00	IA program not identified	6,160,220.35
		Severe storm(s)	1,502,256.34	IA program not identified	13,561.50	IA program not identified	IA program not identified	1,515,817.84
		Flood	4,275,070.00	292,823.51	76,509.00	0.00	IA program not identified	4,644,402.51
New Hampshire	I	Hurricane	1,236,236.91	IA program not identified	24,393.00	IA program not identified	IA program not identified	1,260,629.91
New Jersey	II	Severe storm(s); Hurricane	626,445,681.49	10,808,355.17	7,493,369.94	0.00	11,586,610.46	656,334,017.06
		Severe storm(s)	16,534,228.93	IA program not identified	33,164.00	0.00	IA program not identified	16,567,392.93
		Hurricane	609,911,452.56	10,808,355.17	7,460,205.94	0.00	11,586,610.46	639,766,624.13
Nevada	IX	Severe storm(s)	1,893,834.06	IA program not identified	IA program not identified	IA program not identified	IA program not identified	1,893,834.06
New York	II	Hurricane; Severe storm(s)	1,190,712,765.04	54,528,126.89	17,719,931.04	269.68	46,907,949.83	1,309,869,042.48
		Hurricane	1,127,960,708.68	51,892,473.89	16,721,106.79	269.68	45,692,130.83	1,242,266,689.87
		Severe storm(s)	62,752,056.36	2,635,653.00	998,824.25	0.00	1,215,819.00	67,602,352.61
North Carolina	IV	Severe storm(s); Hurricane; Mud/ Land Slide	165,714,736.18	1,683,795.10	2,523,839.68	5,000.00	4,521,340.58	174,448,711.54
		Severe storm(s)	14,125,060.36	986,839.61	183,754.82	0.00	IA program not identified	15,295,654.79
		Hurricane	151,589,675.82	696,955.49	2,340,084.86	5,000.00	4,521,340.58	159,153,056.75
		Mud/ Landslide	0.00	IA program not identified	IA program not identified	IA program not identified	IA program not identified	0.00
North Dakota	VIII	Severe storm(s); Flood	194,977,101.05	2,009,270.33	3,898,889.69	5,000.00	IA program not identified	200,890,261.07

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Severe storm(s)	8,216,818.62	IA program not identified	1,337,457.60	0.00	IA program not identified	9,554,276.22
		Flood	186,760,282.43	2,009,270.33	2,561,432.09	5,000.00	IA program not identified	191,335,984.85
Northern Mariana Islands	IX	Typhoon	30,764,794.87	1,136,694.74	697,013.00	5,000.00	1,677,942.40	34,281,445.01
Oklahoma	VI	Severe storm(s); Fire; Tornado	51,131,095.99	2,547,961.19	388,873.33	5,000.00	3,534,616.00	57,607,546.51
		Severe storm(s)	27,896,658.64	1,451,811.43	191,232.33	IA program not identified	3,534,616.00	33,074,318.40
		Fire	8,945,183.13	IA program not identified	23,000.00	0.00	IA program not identified	8,968,183.13
		Tornado	14,289,254.22	1,096,149.76	174,641.00	5,000.00	IA program not identified	15,565,044.98
Pennsylvania	III	Hurricane; Flood	162,245,344.66	801,143.93	1,895,308.00	0.00	544,836.71	165,486,633.30
		Hurricane	41,084,124.81	IA program not identified	147,840.00	0.00	IA program not identified	41,231,964.81
		Flood	121,161,219.85	801,143.93	1,747,468.00	0.00	544,836.71	124,254,668.49
Puerto Rico	II	Hurricane; Severe storm(s)	52,532,483.18	5,659,880.22	45,202.15	IA program not identified	IA program not identified	58,237,565.55
		Hurricane	30,299,140.51	2,079,175.92	39,309.00	IA program not identified	IA program not identified	32,417,625.43
		Severe storm(s)	22,233,342.67	3,580,704.30	5,893.15	IA program not identified	IA program not identified	25,819,940.12
Rhode Island	I	Hurricane; Severe storm(s)	36,689,593.97	1,786,157.00	355,464.54	0.00	IA program not identified	38,831,215.51
		Hurricane	410,938.22	78,724.00	17,294.88	IA program not identified	IA program not identified	506,957.10

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Severe storm(s)	36,278,655.75	1,707,433.00	338,169.66	0.00	IA program not identified	38,324,258.41
South Carolina	IV	Hurricane; Flood	128,587,779.98	6,802,962.20	1,107,267.00	5,000.00	11,442,606.00	147,945,615.18
		Hurricane	39,663,704.61	2,175,297.41	173,462.00	5,000.00	4,553,144.00	46,570,608.02
		Flood	88,924,075.37	4,627,664.79	933,805.00	0.00	6,889,462.00	101,375,007.16
South Dakota	VIII	Flood; Severe storm(s)	55,416,328.60	IA program not identified	87,034.10	0.00	IA program not identified	55,503,362.70
		Flood	4,753,534.43	IA program not identified	69,252.45	0.00	IA program not identified	4,822,786.88
		Severe storm(s)	50,662,794.17	IA program not identified	17,781.65	IA program not identified	IA program not identified	50,680,575.82
Tennessee	IV	Severe storm(s); Fire	194,654,226.96	3,919,165.75	866,622.14	7,935.66	IA program not identified	199,447,950.51
		Severe storm(s)	190,690,926.96	3,797,041.75	866,622.14	2,935.66	IA program not identified	195,357,526.51
		Fire	3,963,300.00	122,124.00	IA program not identified	5,000.00	IA program not identified	4,090,424.00
Texas	VI	Hurricane; Flood; Severe storm(s); Fire	1,104,762,457.87	17,201,156.42	10,175,299.36	10,000.00	17,480,757.00	1,149,629,670.65
		Hurricane	887,157,346.07	7,300,332.39	8,384,537.36	0.00	IA program not identified	902,842,215.82
		Flood	128,976,403.78	3,611,909.01	586,328.00	10,000.00	10,271,993.00	143,456,633.79
		Severe storm(s)	73,113,228.76	5,803,009.18	840,459.00	0.00	7,208,764.00	86,965,460.94
		Fire	15,515,479.26	485,905.84	363,975.00	0.00	IA program not identified	16,365,360.10
Virginia	III	Hurricane; Earthquake	26,453,711.38	68,664.15	8,210.61	0.00	IA program not identified	26,530,586.14

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Hurricane	6,026.88	IA program not identified	IA program not identified	IA program not identified	IA program not identified	6,026.88
		Earthquake	16,566,971.42	68,664.15	1,346.61	0.00	IA program not identified	16,636,982.18
Virgin Islands	II	Hurricane; Severe storm(s)	2,136.07	IA program not identified	IA program not identified	IA program not identified	IA program not identified	2,136.07
		Hurricane	656.07	IA program not identified	IA program not identified	IA program not identified	IA program not identified	656.07
		Severe storm(s)	1,480.00	IA program not identified	IA program not identified	IA program not identified	IA program not identified	1,480.00
Vermont	I	Hurricane; Severe storm(s)	26,557,306.49	1,087,593.46	494,750.04	0.00	2,222,641.00	30,362,290.99
		Hurricane	23,398,923.48	1,087,593.46	469,905.03	0.00	2,222,641.00	27,179,062.97
		Severe storm(s)	3,158,383.01	IA program not identified	24,845.01	0.00	IA program not identified	3,183,228.02
Washington	X	Flood; Mud/ Landslide	10,964,235.08	269,573.00	2,215,653.00	848.15	IA program not identified	13,450,309.23
		Flood	9,240,849.30	IA program not identified	1,620,153.00	848.15	IA program not identified	10,861,850.45
		Mud/ Landslide	1,723,385.78	269,573.00	595,500.00	0.00	IA program not identified	2,588,458.78
Wisconsin	V	Severe storm(s)	113,491,654.91	2,015,907.43	342,123.00	0.00	IA program not identified	115,849,685.34
West Virginia	III	Hurricane; Flood; Severe storm(s)	91,090,572.42	3,117,356.85	292,845.73	0.00	5,821,472.00	100,322,247.00
		Hurricane	52,093.97	IA program not identified	IA program not identified	IA program not identified	IA program not identified	52,093.97
		Flood	52,939,896.68	2,660,395.92	219,479.00	0.00	5,821,472.00	61,641,243.60

**Appendix II: Individual Assistance Actual Obligations for
Declarations Made, Calendars Years 2008-2016**

State	Region	Disaster type	Individuals and Households Assistance (\$)	Crisis Counseling (\$)	Unemployment Assistance (\$)	Legal Services (\$)	Disaster Case Management (\$)	Total (\$)
		Severe storm(s)	38,098,581.77	456,960.93	73,366.73	0.00	IA program not identified	38,628,909.43
Wyoming	VIII	Flood; Severe storm(s)	2,737,976.80	222,519.00	68,816.00	0.00	IA program not identified	3,029,311.80
		Flood	2,736,003.04	222,519.00	68,816.00	0.00	IA program not identified	3,027,338.04
		Severe storm(s)	1,973.76	IA program not identified	IA program not identified	IA program not identified	IA program not identified	1,973.76
Grand total								8,610,481,911.13

Source: GAO analysis of FEMA data. | GAO-18-366

^aTable includes actual obligations made from the time of the declaration to March 2017. Throughout this report, and in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

^b"IA program not identified" refers to those programs that were not identified in the Integrated Financial Management Information System obligations costs data.

Appendix III: Regional Administrator's Validation and Recommendation Template

As part of the Federal Emergency Management Agency's (FEMA) declaration process, FEMA's regional offices are to evaluate states' or tribes' declaration requests, including the IA declaration request, and make a recommendation called the Regional Administrator's Validation and Recommendation (RVAR) and submit the RVAR to FEMA headquarters. In June 2012, FEMA headquarters issued a template for FEMA regional offices to use in developing the RVAR as identified in figure 3.¹

¹Throughout this report, and in accordance with the Stafford Act, "state" means any state of the United States, the District of Columbia, Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. See 42 U.S.C. § 5122(4).

Figure 3: Federal Emergency Management Agency's (FEMA) Regional Administrator's Validation and Recommendation Template

REGIONAL ADMINISTRATOR'S VALIDATION AND RECOMMENDATION
MAJOR DISASTER/EMERGENCY DECLARATION REQUEST
DATE

MEMORANDUM FOR: [REDACTED]
Acting Associate Administrator
Office of Response and Recovery

FROM: Regional Administrator's Name
Region //

SUBJECT: Regional Administrator's Validation and Recommendation
State of //

Please find my validation of the key elements contained in Governor //''''s form and cover letter dated /// //, ///, and my recommendation for *approving/denying* the request.

The Governor's form, including attachments satisfies legal requirements for emergency and major disaster declaration requests under 42 U.S.C. 5170 and 5191, respectively, as implemented at 44 C.F.R 206.35 and 206.36.

Provide a brief description of the event that led to the need for a joint federal, state, territory, tribal, and local government Preliminary Damage Assessment (PDA). Any additional information regarding the area or incident, such as terrain or other unusual items that would give a better understanding of the situation should be included.

The Congressional Representation for the requested counties is as follows:

Senators /// **last name (/-//) party affiliation and two letter state abbreviation** and /// (/-//) and Representatives /// (/-//) and /// (/-//) represent the affected areas.

VALIDATION KEY ELEMENTS

• Summary of event	Refer to Section / of Request Form & Cover Letter
• Execution of State EM Plan	Refer to Section / of Request Form & Cover Letter
• State of Emergency	Refer to Section / of Request Form
• HM Plan	Refer to Section / of Request Form
• Damage to critical facilities	Refer to Section / of Request Form & Cover Letter
• Health and safety concerns	Refer to Section / of Request Form & Cover Letter
• Joint PDAs requested and dates	Refer to Section / of Request Form
• Severity and magnitude	Refer to Section / of Request Form
• Areas Requested	Refer to Section / of Request Form
• State and local resources	Refer to Section / of Request Form & Cover Letter
• Preliminary estimates	Refer to Enclosures of Cover Letter
• OFA estimated requirements	Refer to Enclosure C of Cover Letter
• Certification to cost share	Refer to Section / of Request Form
• DFA and debris assurances	Refer to Section / of Request Form

**Appendix III: Regional Administrator's
Validation and Recommendation Template**

- SCO designation Refer to Section / of Request Form
- Legal sufficiency review Name of Regional Counsel

CHART: Complete only the applicable sections and remove shading before finalizing.

*Green – All requests
Yellow – IA requests
Blue – PA requests*

Type of Disaster	<i>*Specify incident type as it should appear in the declaration letter</i>
Programs Requested	IA, PA, & HM
PDA Period	IA Dates:
	PA Dates:
Total Estimated Federal Obligation	\$////
Recent Disasters in Same Area	<i>*Provide the State's disaster history within the last 12 months.</i>
Trauma	<i>*Indicate deaths, injuries, power outages, and disruption of other community functions and services.</i>
Damage Concentration	Low/Medium/High/Extreme <i>*Provide information on the concentration of damages to individuals and households.</i>
Homes Destroyed	///
Homes Major Damage	///
Homes Minor Damage	///
Homes Affected	////
Ownership	//.%
Insurance	//.% <i>*Provide percentage of applicable insurance coverage depending on the type</i>

**Appendix III: Regional Administrator's
Validation and Recommendation Template**

	<i>of damage such as such as, homeowners, flood, earthquake, etc...</i>
Flood Insurance (if applicable)	<i>//.% *For flood disasters, include the percentage of National Flood Insurance Program (NFIP) coverage in the affected areas.</i>
Low Income	<i>//.%</i>
Median Household Income	<i>\$/</i>
Poverty	<i>//.%</i>
Disabled	<i>//.%</i>
Elderly	<i>//.%</i>
SBA Assistance	<i>*Provide the estimates obtained from SBA for the number of residential and business loans expected and the estimated total cost.</i> <i>SBA officials reported that under the Agency's disaster loan programs, (number) residential loans might be available for a total program cost of \$(amount) and (number) business loans estimated at a total cost of \$(amount).</i>
Level of Volunteer Assistance	<i>None/Scarce/Moderate/Robust</i>
Volunteer Agency Assistance	<i>*Describe voluntary agency assistance provided to the community in anticipation of or as a result of the event. (including but not limited to activities taken by the American Red Cross (ARC), Salvation Army, Southern Baptists, and Voluntary Organizations Active in Disaster; voluntary agency and/or municipal shelter information, including the number of shelters open, the peak population, total number of overnight stays, and when the shelters closed; number of mental health contacts made by voluntary agencies; number of ARC cases open and closed; number of clean up kits provided; number</i>

**Appendix III: Regional Administrator's
Validation and Recommendation Template**

	<p><i>of meals served; number of fixed and/or mobile feeding sites; level of ARC operation (I-V); and any other type of assistance that was provided by voluntary organizations).</i></p> <p>The American Red Cross opened // shelters housing /// individuals. All individuals are back in their homes, staying with friends, or have been placed in hotels. All shelters are now closed.</p>
Statewide Per Capita	\$////
Countywide Per Capita/s	////// County (\$////), etc....
Localized Impacts	<p><i>*Indicate if any local communities have sustained significant damage and have incurred extremely high per capita impacts, provide that information, especially if the localized damage is in the tens or even hundreds of dollars per capita.</i></p>
Insurance Coverage in Force	<p>--describe--</p> <p>Infrastructure damage known to be insured is not included in the total eligible Public Assistance cost estimate.</p>
Hazard Mitigation Measures	<p><i>*Indicate date of State Mitigation Plan (SMP) approval, and type of SMP (Standard or Enhanced), and corresponding percentage for HMGP calculation (15%) OR (20%).</i></p> <p><i>*Describe State and local government measures that contributed to the reduction of disaster damages for the disaster under consideration.</i></p>
Other Federal Assistance Available	<p><i>*Provide information about damage to public facilities eligible under authorities other than the Stafford Act, such as, Federal-aid-system roads (Federal Highway Administration [FHWA]), water control facilities (U.S. Army Corps of</i></p>

	Engineers [USACE] or Natural Resource Conservation Service [NRCS]).
--	---------------------------------------------------------------------

INDIVIDUAL ASSISTANCE

Provide a brief description of the impact of the event on individuals and households in the affected areas, including evaluating trauma, concentration of damage, impact on populations with greater need, and other available assistance. Provide information from the Individual Assistance Preliminary Damage Assessment (PDA), including method of assessment, areas surveyed, number of homes affected, degree of residential damage, ownership, insurance, low-income, and any other significant needs. For flood disasters, provide the percentage of homes affected that are in the Special Flood Hazard Area (SFHA), the number of homes that are subject to a obtain and maintain flood insurance requirement, and number of flood insurance claims filed if available. Discuss unmet needs and requirements for assistance. Provide justification to support recommendation to approve or deny the Individual Assistance program(s). Provide clear explanation of the methodology for determining the extent of damage and level of insurance coverage when recommending Individual Assistance for expedited requests.

PUBLIC ASSISTANCE

Provide a brief description of the impact of the event on public facilities and eligible private nonprofits, as well as the costs associated with eligible debris removal and emergency protective measures. Provide a brief analysis of infrastructure damage by category, including the cost estimates for each category and the percentage of the total eligible Public Assistance cost estimate. Include in your discussion significant impacts to specific areas. Provide justification to support recommendation to approve or deny the Public Assistance program.

Category A (Debris Removal) – /////.

Category B (Protective Measures) – /////.

Category C (Roads and Bridges) – /////.

Category D (Water Control Facilities) – /////.

Category E (Buildings and Equipment) – /////.

Category F (Utilities) – /////. *(Please include confirmation that there is no private utility involvement and if there is please note and separate the private and public utilities impacted.)*

Category G (Other (recreation, etc.)) – /////. *(Please confirmation that these are municipal/publicly owned.)*

**Appendix III: Regional Administrator's
Validation and Recommendation Template**

RECOMMENDATION

(Please include any pre-decisional information or comments in this section only)

- I recommend the Governor's request be granted.
- I recommend an incident period of ///.

The incident type and period should be stated as it will appear in the declaration. It may vary somewhat from the information in the Governor's form and letter. If there is a great disparity, state why and provide NWS Summary. If the event is continuing at the time this report is being prepared, the closing date may be left open and closed later.

- In the event of a declaration, I recommend that *Individual Assistance* and *Public Assistance* be made available in the following jurisdictions:

The counties of ///, ///, ///, ///, ///, ///, ///, ///, ///, and /// for Individual Assistance. /// County is not recommended for Individual Assistance.

The counties of ///, ///, ///, ///, ///, ///, and /// for Public Assistance.

The counties of ///, ///, ///, and /// are not recommended for Public Assistance.

I recommend direct federal assistance.

- In the event of a declaration, the Hazard Mitigation Grant Program would be available *statewide OR list specific areas*, in accordance with the State's request and subject to Local Mitigation Plan requirements identified at 44 C.F.R. § 206.434(b).
- In the event of a declaration, I recommend /// be designated as the Federal Coordinating Officer.

ATTACHMENTS

State Map: Please send as a separate pdf attachment with a map, indicating the requested areas and programs. *See pdf map example below, containing a legend of the requested counties and programs

PDA Spreadsheet: Please note that the PA dollar amounts and Category totals may vary somewhat from the dollar amounts in the Governor's spreadsheet. If there is any disparity in the dollar amounts, please explain the disparity in the narrative portion of the RVAR. Some examples may include ineligible, insurable, or unverifiable costs that were backed out.

Source: FEMA. | GAO-18-366

Appendix IV: Information on the Elements of the Six Individual Assistance Regulatory Factors

Tables 11 through 16 provide information on each element of the 6 Individual Assistance (IA) regulatory factors documented in the Regional Administrator's Validation and Recommendation (RVAR) from July 2012 through December 2016 by the Federal Emergency Management Agency region.

Table 11: Information on Concentration of Damages by Element Found in Regional Administrator's Validation and Recommendation (RVAR) from July 2012 through December 2016

Factor: Concentration of Damages		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARs	2016 RVARs
Damage to critical facilities	Documented	6	13	3	11	12
	Not documented	1	0	11	11	13
Damage concentration	Documented	7	12	14	22	25
	Not documented	0	1	0	0	0
Homes destroyed	Documented	7	12	14	22	24
	Not documented	0	1	0	0	1
Homes with major damage	Documented	7	12	14	22	24
	Not documented	0	1	0	0	1
Homes with minor damage	Documented	7	12	14	22	24
	Not documented	0	1	0	0	1
Homes affected	Documented	7	12	14	22	24
	Not documented	0	1	0	0	1
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency's RVAR. | GAO-18-366

Table 12: Information on Trauma by Element Found in Regional Administrator's Validation and Recommendation (RVAR) from July 2012 through December 2016

Factor: Trauma		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARs	2016 RVARs
Death	Documented	7	10	13	20	23
	Not documented	0	3	1	2	2
Injuries	Documented	4	7	11	17	10
	Not documented	3	6	3	5	15
Power outage	Documented	6	9	13	13	16
	Not documented	1	4	1	9	9
Disruption of community functions/ services	Documented	5	12	11	14	20
	Not documented	2	1	3	8	5
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency's RVAR. | GAO-18-366

Appendix IV: Information on the Elements of
the Six Individual Assistance Regulatory
Factors

Table 13: Information on Special Populations by Element Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016

Factor: Special Populations		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARs	2016 RVARs
Low income	Documented	7	10	14	21	22
	Not documented	0	3	0	1	3
Poverty	Documented	7	12	14	22	25
	Not documented	0	1	0	0	0
Disabled	Documented	6	10	14	22	25
	Not documented	1	3	0	0	0
Elderly	Documented	6	12	14	22	25
	Not documented	1	1	0	0	0
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency’s RVAR. | GAO-18-366

Table 14: Information on Voluntary Assistance by Element Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016

Factor: Voluntary Assistance		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARs	2016 RVARs
Hazard mitigation	Documented	5	13	13	21	25
	Not documented	2	0	1	1	0
Level of volunteer assistance	Documented	7	13	14	21	25
	Not documented	0	0	0	1	0
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency’s RVAR. | GAO-18-366

Table 15: Information on Insurance Coverage Found in Regional Administrator’s Validation and Recommendation (RVAR) from July 2012 through December 2016

Factor: Insurance Coverage		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARs	2016 RVARs
Home ownership	Documented	0	3	0	1	3
	Not documented	7	10	14	21	22
Insurance	Documented	6	10	13	18	24
	Not documented	1	3	1	4	1
Flood insurance (if applicable)	Documented	6	7	11	11	15
	Not documented	1	1	3	9	6
	Not applicable ^a	0	5	0	2	4
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency’s RVAR. | GAO-18-366

**Appendix IV: Information on the Elements of
the Six Individual Assistance Regulatory
Factors**

^aFlood insurance is not applicable if the disaster type is flood related.

Table 16: Information on Average Amount of Individual Assistance by State Found in Regional Administrator’s Validation and Recommendations (RVAR) from July 2012 through December 2016

Factor: Average Amount of Individual Assistance by State		2012 RVARs	2013 RVARs	2014 RVARs	2015 RVARS	2016 RVARs
Recent disasters in the same area in past 12 months	Documented	7	13	10	21	25
	Not documented	0	0	4	1	0
Impact and frequency of prior disasters	Documented	2	2	1	5	2
	Not documented	5	11	13	17	23
Total number of RVARs by year		7	13	14	22	25

Source: GAO analysis of Federal Emergency Management Agency’s RVAR. | GAO-18-366

Appendix V: Comments from the Department of Homeland Security

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



**Homeland
Security**

May 18, 2018

Chris P. Currie
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management's Response to Draft Report GAO-18-366, "FEDERAL DISASTER ASSISTANCE: Individual Assistance Requests Often Granted, but FEMA Could Better Document Factors Considered"

Dear Mr. Currie:

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

The Department is pleased to note GAO's positive recognition related to the Federal Emergency Management Agency's (FEMA) development of the Regional Administrator's Validation and Recommendation (RVAR) to ensure FEMA regions consistently obtain and document the information needed to make disaster declaration recommendations to the President based on Individual Assistance (IA) factors. FEMA is committed to enhancing the overall quality and completeness of documentation relating to the IA declaration process, as appropriate.

It is also important to note that while FEMA is aware its regions do not always address each element in the RVAR template, generally, when this occurs, there are valid reasons. For example, a particular element may not be addressed within an RVAR due to a lack of sufficient documentation or information available within the time constraints pertaining to an event. In addition, certain elements may not be addressed within an RVAR if other elements addressed within the RVAR provide sufficient information for a particular declaration request to be duly considered. Every disaster is different, and the factors considered will vary based on considerations such as size and scale of the event, state and local capability, and the specific assistance programs requested. As such, not every

element in the RVAR template may be necessary for the consideration of a declaration request.

The draft report contained one recommendation, with which the Department concurs. Attached find our detailed response to the recommendation. Technical comments were previously provided under a separate cover.

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

Sincerely,



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

Attachment

**Attachment: Management Response to Recommendations
Contained in GAO-18-366**

GAO recommended that the Administrator of FEMA:

Recommendation 1: Evaluate why regions are not completing the RVARs for each element of the current IA regulatory factors and take corrective steps, if necessary.

Response: Concur. A working group of FEMA headquarters stakeholders (including a representative from the Office of Response and Recovery's [ORR] Declarations Section) will draft survey questions for response by FEMA region officials to identify the common reasons why an element of an IA regulatory factor may not be addressed within an RVAR. The working group will analyze the survey responses and assess whether additional action is necessary to address why FEMA regions are not always addressing all elements in the RVAR template. The working group will then present its findings to FEMA senior leadership and if leadership concludes that additional action is necessary, ORR will prepare and send a memorandum to the regions with additional guidance regarding the appropriate preparation of RVARs. Estimated Completion Date: October 15, 2018.

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Chris P. Currie, (404) 679-1875 or curriec@gao.gov

Staff Acknowledgments

In addition to the contact named above, Aditi Archer (Assistant Director), Su Jin Yon (Analyst-In-Charge), Hiwotte Amare, Eric Hauswirth, Susan Hsu, Jun S. (Joyce) Kang, Christopher Keisling, Heidi Nielson, Hadley Nobles, Anne Rhodes-Kline, and Jerome (Jerry) Sandau made significant contributions to this report.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<https://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <https://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7470

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707 U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548



Please Print on Recycled Paper.