



Individual Assistance Symposium

After-Action Report

February 2022



FEMA

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Executive Summary

On January 20, 2022, the Federal Emergency Management Agency's (FEMA) Individual Assistance (IA) Division, Office of Regional Field Coordination (ORFC), coordinated and hosted an IA Symposium. There were over 300 attendees from state, local, tribal, and territorial (SLTT) partners, other federal agencies, non-governmental organizations (NGO), and FEMA personnel. The IA Division includes a range of programs and functions that are implemented during each stage of the recovery life cycle and impact Regional, State and NGO partners. The IA symposium sought to engage FEMA and its IA stakeholders in topics identified to be important to the IA community.

This symposium's goal was to provide attendees the platform to collaborate and learn so that there is a shared understanding of FEMA's capability to respond to and recover from disasters. Presentations were provided by IA leadership and the Federal Insurance Directorate (FID). Due to COVID-19, the summit was held virtually using the GoToWebinar platform.

Summit Presenters

The Office of Response and Recovery, Individual Assistance (IA) Division invited multiple participants to discuss the topics identified by the IA community. Those participants are listed below:

- Kevin M. Sligh, Director, Individual Assistance Division, Office of Response and Recovery
- Matthew Redding, Deputy Director, Individual Assistance Division, Office of Response and Recovery
- Freda Copeland, Chief, Direct Service Agent Branch, Federal Insurance Directorate

Individual Assistance Symposium: Topic Review

1. Individual Assistance Division Director Welcome

The Individual Assistance (IA) Division has undertaken many efforts to implement equity-driven programs consistently and systematically through its policies and rules. This symposium was the first of four symposiums scheduled to be held during 2022, where the IA Division can share, collaborate, and update federal, regional, and state, local, tribal, and territorial (SLTT) partners on some of the exciting new programs

1.1. Background

Following [President Biden's Executive Order On Support for Underserved Communities](#), FEMA evaluated the equity of its programs and processes to ensure assistance is accessible to the people and communities we serve. This led the IA Division to amend its policies and practices to provide greater flexibility and increased access to assistance for disaster survivors through:

- Policy expansions,
- Streamlined assistance, and
- Acknowledgment that growth in IA programs is vital for equitable outcomes for survivors.

We are working every day to provide equitable access to federal assistance for those who need our help. FEMA is always looking for ways, within legal authorities, to simplify the disaster assistance process. Many changes that have taken place over the past year have been survivor-driven based on feedback that is received from the regions and SLTT partners.

1.2. Individual Assistance Updates

The IA Division has taken many steps to ensure recovery assistance can be delivered as quickly and effectively as possible, especially to those areas that may have been historically underserved or disadvantaged. In doing so, IA has begun to think ahead and stage inspectors and employees pre-disaster to ensure there will not be any lapse of response and assistance when the disaster is activated. This has been done through using a mix of in-field and hybrid or virtual deployment for our disaster survivor assistance (DSA) staff and has helped:

- Set up Disaster Recovery Centers (DRC) quicker and more efficiently;
- Initiate inspections and boots-on-the-ground effectively; and

- Coordination with SLTT and other government agency (OGA) partners to effectively come up with solutions that benefit the disaster survivors for that specific disaster.

In addition, IA is finalizing a guide that will give stakeholders a clearer understanding of how IA Programs are developed.

2. FEMA State Agreement General Programmatic Data Sharing Addendum Improvements

Streamlining and standardizing data sharing with SLTT partners is vital to providing effective disaster recovery assistance. In doing so, FEMA has developed pre-approved Information State Access Agreement (ISAA) templates that all states, territories, and tribal governments can utilize. This will make sharing FEMA collected information more effective and quicker.

2.1. Background

A key component to accomplishing FEMA's mission is sharing information with its partners. Often this includes survivor data, including personally identifiable information (PII). This PII is very sensitive and is subject to identity theft and fraud on behalf of some of the Nation's most vulnerable people during a very difficult part of their lives if not handled correctly.

When looking at the data sharing agreements that were in place, it was discovered that rapid and actionable means to share data with the states, tribes, and territories had taken place that wasn't entirely compliant with federal privacy laws or the regulations set forth at the federal level. In order to address these concerns, IA executed an eight-week project that revalidated the method and intent behind sharing data. The IA Division worked with FEMA privacy experts to create a new template for regions to begin to employ with their states for future events.



Question Posed: "Is this data sharing effort similar to the one being done with voluntary agencies?"

FEMA Response: "It is. We share data in different scenarios with a lot of NGOs such as Team Rubicon, The Red Cross, and The Salvation Army. In some cases, NGOs perform official functions on behalf of the states in disaster case management, casework, or community services role, so we are able to share data with them. Similarly, these templates exist to be able to share data with these organizations if they are not working with the states. We are able to branch out from the FEMA-State Agreement and engage in data sharing with authorized NGOs in order to facilitate FEMA's missions. We do share data outside of official government channels at a jurisdictional level, but those are structured much the same way and have the same legal requirements and cyber protection requirements that any governmental agency would have. We're not allowed to share any data with people who can't protect it."

2.2. Risks Previously Identified With the FEMA State Agreement -Based Personally Identifying Information (PII) Sharing Activities

A major finding across all Regions was that the FEMA State Agreement General Programmatic Addendum (FSA-GPA) was insufficient in five key areas of PII sharing:

1. The agreement did not state the explicit purpose for sharing information;
2. The agreement did not state an end date to sharing;
3. The agreement did not explicitly state the data elements being shared;
4. The agreement did not state explicit language that limits the use of the shared PII to the purpose for which it is collected or authorized by law; and
5. The agreement did not include language that protects against loss, unauthorized access or use, destruction, modification, or improper disclosure of PII.

2.3. Data Sharing Risk Reduction Efforts

Reducing risk is not only reducing the risk of survivor data being compromised, but it is also an attempt to help SLTT entities understand that privacy law is a function of operations.

Commencing in late September 2021, FEMA undertook an Information Sharing Sprint to achieve the following outcomes to transform and improve FEMA's FSA-based data sharing activities:

- Development of Privacy coverage framework that streamlines the sharing process
- Acceptance of FSA as formal information sharing and access agreement document
- Development of program Privacy Compliance Coverage documentation including programmatic Privacy Threshold Analyses (PTA), ISAA PTAs, and ISAAs for PII sharing under major disaster-related regional programs (IA and Hazard Mitigation Assistance (HMA)/National Flood Insurance Program (NFIP))
- Revision of the FSA-GPA template to an easy-to-fill-out PDF that streamlines how to share data and for what purpose.

During the blue-sky days in these winter months, FEMA can, through its regions, reach out to states and ask people to begin having a data sharing risk discussion while updating their administrative plans and planning for the next disaster.



Question Posed: “What is the blue-sky calendar time?”

FEMA Response: “Tongue and cheek, there is no blue-sky anymore. That is the classic throwback to the days when hazards were limited to seasonal effects. We are living in a very dangerous world, and that is the whole point of recognizing the link between the need to share data. If you look at the recent winter tornadoes in Kentucky, Arkansas, Tennessee, and Missouri or the wildfire followed by ice in Colorado, the immediate need to share survivor data with states and the appropriate jurisdictions is crucial. That is why we have executable templates ready to go now, and the formal rollout will begin shortly.”

2.4. Improvement Outcomes

While there has not been a grand rollout yet, IA has FEMA legal concurrence and DHS-level legal and privacy concurrence and is now employing these approved templates for existing and emergent disasters in order to share data with the states.



Question Posed: “Will there be a separate agreement developed for the Disaster Case Management (DCM) Program? If so, would this be a separate agreement between the disaster case managers and the state, or will it be between the DCM managers, the state, and FEMA?”

FEMA Response: “The DCM program statement of record and notification just posted to the federal register. This has been outside of privacy law for some time and is now compliant with privacy law. It will depend on how the state structures those program elements and how the state designs its data sharing elements to enable disaster case management in the future.”

2.5. Benefits

- Enabling the regions to rapidly share data with the SLTTs in order to administer critical disaster response programs;
- Establishing an “eighty percent solution” for data sharing needs with states, tribes, and territories (STT) for presidentially-declared disasters and emergencies using the FSA-GPA;
- Ensuring that FEMA achieves its mission of providing much-needed services to disaster survivors while protecting their privacy.



Question Posed: “Can the template be modified to meet any disasters specific needs? For example, data points that are not in all types of disasters such as wells vs. septic and furnace replacement repair and data points to fill into those templates.”

FEMA Response: “To some degree. If there is a requirement for that type of data, it can be added in or appended into the existing template. If it does not fall into that 80% solution across the last four years of disasters, there might need to be some slight modifications. The purposes of sharing the data and protecting the survivors’ identity (name, social security number, FEMA registration, address) are the center lane privacy concerns. If we are sharing data that isn’t PII, that is not as constrained. We can share planning data and GIS information because it does not contain survivor information, so that hasn’t been impacted in any way. If there are specific programmatic links in the mitigation world (such as the elevation of heaters and so forth) that are part of the grant or award to the survivor, then those types of data elements can be appended to the existing template.”

2.6. Question and Answer Session



FEMA Response: “Yes, to both. I am personally aware that in some cases, these sharing agreements took weeks to be signed after a declaration. We believe that using this templated approach and the time we have from today moving forward during blue sky calendar time will allow us to familiarize and make people aware that this is a way to immediately begin sharing data. We will be able to sign them quicker and have a greater understanding of what data needs to be shared based on the type of event. It also gives us the ability to adapt if there do need to be some edits to these types of arrangements while minimizing the amount of legal and other reviews at the federal level to make sure we are still within the parameters of the privacy law. We should be able to see immediate declarations made and data sharing from the beginning, which should reduce the time it takes for the ISAA templates to be signed between FEMA and the states.”



Question Posed: “Often, the FSA is with state entities, and parishes need substantial damage data for Community Development Block Grant Disaster Recovery (CDBG-DR) funds and must initiate ISAA, which takes a while. Will this effort include parishes or counties?”

state agreement to the final jurisdiction for use inside that community. We believe that this is going to help frame that type of arrangement. It depends on how the state develops its data sharing strategy during their planning and preparedness cycle and how they work that strategy through the region headquarters. There is a bit of variance across the country, and different states do different things with their parishes, counties, and sub-jurisdictions. The agreement can be tailored to meet the needs of the state since this is a standard template, and you can enter in “county,” “parish,” and “city of” for the end-user of the data.”



Question Posed: “Are there procedures across agencies and NGOs to look at the outcome for each survivor based on their recovery needs? If so, is it nested with SBA, Department of Housing and Urban Development (HUD), or another agency?”

FEMA Response: “The short answer is that we aspire to that. That is the holy grail question that we are seeking, and it’s a whole different topic. In a future topic, we can address our investment in customer experience and how the federal government and the executive order on federal customer and survivor experience is being addressed. I think that will help folks realize that we understand that there are overlapping federal authorities, and we want to optimize the survivor’s journey through a shelter, to housing that’s appropriate, and then ultimately on the path to recovery using SBA, HUD, FEMA, and Department of Agriculture assets. I think there is a lot of work to do in the mid to latter part of the recovery journey. We look forward to discussing this topic in fuller detail at a future virtual IA Symposium.”



FEMA Response: “I think so because these new templates are compliant with privacy laws that DHS and FEMA have, and I think it allows for the renewal and continuation of agreements beyond the templated timeline in them. I think we have attempted to mitigate much of that. We understand there are very old events that are currently going on between FEMA and its SLTT entities. The intent is not to retroactively impose these templates on those. When we get to the end of that event’s existing FSA, we will update them with these new templates and on-ramp these new templates into current events.”

Federal insurance has had a long-standing relationship with IA and our coordinated efforts on the Group Flood Insurance Policy (GFIP). This policy cannot be purchased directly by the public but is offered as a result of a presidentially declared disaster due to flooding.

3.1. GFIP Background

IHP applicants who do not have a flood insurance policy who are owners or tenants of a residential building and have incurred damages to their home and/or personal property may be eligible to receive a GFIP.

The GFIP is a three-year policy and will begin 60 days after the declared disaster. IA will provide a list of those individuals who do not have active flood policies to the National Flood Insurance Program (NFIP) Direct Servicing Agent (NFIP Direct) contractor, along with appropriate premium funds of \$2400 per submitted policy.

Upon receipt of the eligible award recipients, the NFIP Direct then has an additional 30-day waiting period before the policy can be made active. This is according to insurance requirements, as stated in the standard flood insurance policy.

3.2. GFIP Overview

GFIP certificates are equal to the determined IHP limit for the year of the declared disaster in which it was awarded. Currently, the certificate amount is \$75,800 with a \$200 deductible.

Federal Insurance collaborates with IA on the GFIP process. However, four states (Texas, Maryland, Pennsylvania, and Washington) work with the NFIP Direct under the Other Needs Assessment (ONA) Program. These states will provide the necessary information to the NFIP Direct to set up a GFIP.

It should be noted that regardless of if the GFIP is received from IA or one of the ONA states, it cannot be canceled. However, a standard flood insurance policy (SFIP) may be purchased. Once a policy is purchased, the GFIP must be voided, as duplicate coverage is not allowed.

3.3. GFIP Eligibility

Not all grant recipients can receive a GFIP. There are eligibility requirements that must be met:

- Properties must be located in a Special Flood Hazard Area (SFHA).
- The damaged property is in an NFIP participating community and is eligible for NFIP coverage.
- There was not a previous requirement to maintain flood insurance on the damaged property.
- U.S. Small Business Administration denied an application for a disaster loan, or FEMA did not require an application for a disaster loan, thus making them eligible for ONA provided as part of IHP.

Those requirements and other IA guidance can be found in the [Individual Assistance Program and Policy Guide \(IAPPG\)](#).



Question Posed: “Are there any lessons learned or best practices you could share about how new property owners could be made aware of any GFIP requirements as a result of an IA award to the previous owner? For example, recording it with a deed?”

FEMA Response: “The advice is up to states to tell whether or not a property is required to have flood insurance or flood history. Unfortunately, if it is not disclosed at the closing table or shared at the table, I don’t know if there is a penalty on that. Many people say that they couldn’t get assistance at the table because they weren’t aware of the maintain/obtain requirement on the property when they bought it. It is up to the state to decide if loss history on a property is a requirement. If people were advised of the requirement to obtain/maintain when they purchase a property, then they would be in a better position.”



FEMA Response: “Flood insurance requirements are individualized and owned by the states. FEMA does not have a record of state requirements.”

Both owners and tenants of a property are eligible to receive GFIP. GFIP for owners may include coverage for both Real and Personal Property.

Owners who received a GFIP certificate are required to buy and maintain flood insurance after the expiration of the GFIP certificate to remain compliant with the National Flood Insurance Reform Act (NFIRA) for the life of the property, regardless of ownership. If the property is sold, the new owner is required to have flood insurance.

Flood insurance may be purchased through the NFIP Direct, one of the Program’s Write-Your-Own (WYO) insurance companies, or through private insurance. Any one of these options will satisfy the obtain/maintain requirement. Flood insurance must be purchased, at a minimum, in the amount of the grant that was received.

There are consequences if a flood insurance policy is not purchased. Suppose a GFIP has been issued, and after the three years, an SFIP is not issued. In that case, the recipient/policyholder may not receive further IA assistance for the repairs of their property or replacement of their contents.



Question Posed: “Can you discuss returning funds that will not place a requirement on flood insurance?”

FEMA Response: “If an applicant comes to the table and they get their grant award and then find out that they are required to get a GFIP and then have coverage for the life of their property, they can return their money. If they return their money, there is no obtain/maintain requirement because they did not accept any FEMA assistance. This normally happens prior to the GFIP coming over to the NFIP because no GFIP will ever be set up.”



FEMA Response: “We do it just like we do an SFIP. There is a 30-day grace period after the GFIP ends for you to purchase an SFIP.”



FEMA Response: “One thing about this is that standard flood insurance is different from homeowners insurance. Homeowners insurance wants you to be insured to your risk. With standard flood insurance, we just want you to get a flood policy. The one thing to remember here is that the requirement is that the minimum amount of insurance that a policyholder has to have is the amount they received from the grant. If a policyholder received \$10,000, then they need to have a \$10,000 flood insurance policy. They will not be penalized because their house is worth \$100,000. They will have a \$10,000 policy. The only thing they need to think about is how much is that \$10,000 going to cover in your home. The average flood claim insurance costs \$33,000. But yes, the minimum requirement is to purchase the amount of the grant that they received, so they could be underinsured.”

FEMA will purchase flood insurance under GFIP for renters who return or intend to return to their Damage Dwelling Address (DDA). In order to receive a GFIP, renters must advise FEMA of their intent to return to the damaged property within six months from the date of their earliest Personal Property (EPPZ) eligibility letter.

As the IA award pays for personal contents at the flood damage location for the tenant at the time of the disaster, it is not transferable to subsequent renters or a new rental address should they move.

3.6. GFIP Retention Statistics

Federal Insurance noted that in 2019, retention for GFIP rests slightly below 5%. This is a significantly low percentage based on the fact that there is an obtain/maintain requirement for GFIPs. Consequently, we focused on retention efforts over the last two years and increased that retention percentage to 13%.

Table 1 outlines the statistics regarding Group Flood Insurance Policies since 1996

<i>Group Flood Insurance Policy Count since 1996</i>	<i>Active Standard Flood Insurance Policy (SFIP) Count</i>	<i>Total number of GFIPs converted to SFIPs</i>	<i>% Active SFIP</i>	<i>Total percent of GFIPs converted to SFIPs</i>
132,617	17,353	31,860	13.09%	24.02%

Federal Insurance tends to see a purchase after the first year of GFIP expiration. Then the policy will lapse after that first year because SFIPs are only for one-year terms, and no further policies are purchased or the policyholder does not renew. Unfortunately, Federal Insurance is unable to know if a private flood insurance policy was purchased in its place as there is only visibility into those SFIPs purchased through the NFIP.



Question Posed: “Are there any statistics on the percentage of individuals who actually purchased flood insurance once the GFIP expires?”

FEMA Response: “Since 1996, we have had 132,617 GFIPs. Overall, historically there were 31,860 people who actually purchased an SFIP. That’s 24%. Today we only have 17,353 active SFIPs, so people have purchased them, but not anywhere where it needs to be.”

3.7. GFIP Retention Efforts

FID works on GFIP retention efforts to assist certificate holders with their obtain/maintain requirement. Some of the efforts take include:

- FY20
 - GFIP Buckslips – colorful buckslips are included with all GFIP communications over the three-year life of the policy.
 - Rollover Offer Initiative – mock renewal offers were extended to GFIP certificate holders that incurred a claim.
- FY21 & FY22

- Community-Based Flyers – provide information to GFIP communities on their 10- year loss history. FEMA would target these communities with the hope of bringing awareness of the potential of future flooding and the need for flood insurance.
- GFIP Certificate Holder Surveys – determine if, after one year of the expiration of a GFIP, the certificate holder purchased a standard flood policy through the NFIP Direct, WYO, or private flood insurance.
- GFIP Social Media presence on Twitter, LinkedIn, and Facebook – connecting with certificate holders and potential agents.

Additionally, GFIP certificate holders will receive a welcome packet, a letter at each anniversary, a reminder 45 days prior to the expiration of the GFIP, and a final notice once the policy expires. Each communication advises policyholders of the obtain/maintain requirement.



Question Posed: “Has other outreach occurred at home buying events or school events under the auspice of financial literacy and planning to increase understanding that flood insurance is not an option and is essential, especially in disaster-prone states?”

FEMA Response: “We are reaching out. We want people to know that in those prone areas, there is a large amount of GFIPs, such as in Texas, Louisiana, Florida, and the Carolinas. That is why we have social media and are working with marketing and outreach. We are working on flyers with our regional offices so that the regions can share them as hard copies or electronic soft copies with state coordinators and community officials. We want to get the word out. You need to have insurance.”



Question Posed: “Are there any considerations given to low-income households who would turn down FEMA assistance because they cannot afford to maintain an NFIP policy as an issue of equity?”

FEMA Response: “Unfortunately, on the insurance side, if someone were to turn down an award at the IA table, Federal Insurance wouldn’t even know who they were. We only know them if they end up with a GFIP. This is why we have a survey to ask why people did not purchase an SFIP. If we find out that it is because of a financial reason, then we need to find out what we can do. Our policy is based on paid premiums on the federal insurance side, so is there someone that we can collaborate with? Is there something we can do with IA, other areas in FEMA, or NGOs that could assist those policyholders in need and help them with the obtain/maintain requirement? I think the GFIP survey will assist us in knowing where people stand and why.”

3.8. Question and Answer Session



Question Posed: “Normal insurance policies allow monthly payments. Would it be possible for the NFIP to allow applicants to make monthly payments rather than requiring the whole premium upfront? This would increase retention rates.”

FEMA Response: “That would be great. However, because the SFIP under NFIP is statutory, regulatory, and has requirements under the Code of Federal Regulations (CFR), this is something that we are working on. There are discussions about payment plans or installments plans, but we are in the early stages of that. Further discussions and announcements will be made on that as we move along, but we have to go through regulations.”



Question Posed: “If NFIP could assist low-income families, would that be a grant that an agency could offer?”

FEMA Response: “It would be wonderful if there was an agency that could assist with purchasing flood insurance policies. We have had discussions with some of the states where they have had some funds and were looking to see if it was a possibility. They couldn’t have done it continually, but at least for a couple of years after the GFIP. There hasn’t been anything solid that has been put into play yet, but there have been discussions on that. The NFIP Direct is willing to work with an agency that is interested in purchasing flood insurance with GFIP certificate holders after their certificate expires.”

Next Steps

The IA Division is committed to providing symposiums that address topics identified as important by the regions and SLTT partners. Please work with your regional partners to identify any topics you would be interested in learning about or presenting to the IA community.

Additional IA symposiums are tentatively scheduled to be held in March, May, and July 2022. More information about these sessions will be available at a later date.

Thank you for your interest in FEMA's IA Symposiums. Please continue to engage with FEMA and participate in upcoming events. For questions or more information regarding upcoming events, please contact fema-hq-regional-field-coordination@fema.dhs.gov.