



Whereas there are systemic problems with FEMA's Individuals & Households Program, lacking consistency and transparency;

Whereas FEMA inspectors are not required to have any training. The only requirement is that they pass a background check (Fact 66)*;

Whereas when FEMA audited random inspections during Hurricane Dolly, the auditors found "egregious" errors 24% of the time (Fact 85)*;

Whereas FEMA rules often prohibit proper inspection of the damaged area. For example, FEMA inspectors are forbidden from using ladders to look at and inspect roofs. FEMA will often deny that damage exists to a roof, even though they have no way of inspecting it. FEMA also doesn't allow inspectors underneath houses, inhibiting their ability to gauge damage to plumbing, piers and/or foundations;

Whereas FEMA claims to have no standard on how to categorize damage to homes with pre-existing conditions. This opens up the process to inspector bias and inconsistency in the process;

Whereas FEMA often uses unpublished rules to make decisions affecting eligibility and award value:

- In 2008, FEMA had a secret rule that denied requests for re-inspection when there was damage to the roof (Fact 29)*;
- FEMA denied some appeal inspections because they lacked a detailed estimate from a contractor, even though FEMA merely stated that this was an example of evidence that could be supplied (Fact 108)*;
- FEMA uses an automated computer system to compute the award value based on the price of certain materials and labor. These values are secret (Fact 88)*;



Whereas FEMA denial and award letters lack any details on how the decision is made. This makes it nearly impossible to know how to appeal the decision (Fact 93). Additionally, while disaster victims may request their file to help them appeal, there is no requirement that FEMA give them the file before their appeal deadline (Fact 100)*;

Whereas FEMA's Appeal process is illusory. Of the 2,125 appeals from Hurricane Dolly, only 11 appeals changed the benefits awarded (Fact 113)*;

Whereas disaster victims lack any way to appeal FEMA's decision to a neutral party. Their only appeal of FEMA's decision is to have a second opinion by FEMA. That second decision is final and cannot be appealed to a court or other neutral party; and

Whereas without proper rules and oversight, low-income disaster victims and those who are politically isolated are left to suffer. FEMA ordinarily sees a 6% denial rate, but for Hurricane Dolly there was an almost 50% denial rate (Fact 125)*;

Now therefore be it **resolved**, that the Lower Rio Grande Valley Development Council supports the Rio Grande Valley Equal Voice Network Housing Working Group's action at the federal level with our Valley Congressional representatives to rectify the above issues.

*Plaintiffs' Proposed Findings of Fact, *La Union del Pueblo Entero v. Fed. Emergency Mgmt. Agency*, 141 F. Supp. 3d 681 (S.D. Tex. 2015) (No. 162-2).