



May 12, 2025

Re: Docket ID No. DHS-2025-0013

To Whom It May Concern:

Thank you for the opportunity to provide input to the FEMA Review Council. The following responses reflect the experiences of Charlotte County staff across multiple departments who work directly with FEMA before, during, and after federally declared disasters. Our feedback is based on firsthand involvement in emergency management, fiscal oversight, damage assessment, human services, and recovery coordination. We appreciate FEMA's role as a critical partner in disaster response and recovery and hope these insights will support efforts to improve the timeliness, clarity, and effectiveness of FEMA programs for impacted communities.

1. Describe your experience with FEMA's response to your request for assistance. Was FEMA's response timely and efficient to assist in your recovery?

Our experience with FEMA's response has been mixed—marked by both timely assistance in some areas and significant inefficiencies in others.

On the positive side, FEMA has demonstrated a commendable ability to quickly deploy field personnel and begin coordination following a disaster. FEMA's quick deployment of personnel and their willingness to engage with the community through town halls and outreach events are commendable. FEMA personnel serving as the primary EOC point of contact conduct themselves professionally and try to provide timely responses. Program Delivery Managers (PDMGs) are generally responsive, knowledgeable, and helpful. Program concepts like Intergovernmental Recovery Coordination (IRC) also show promise in fostering stronger recovery partnerships.

However, the broader FEMA response structure has frequently slowed recovery efforts due to bureaucratic complexity and interdivisional disconnects. Many inquiries—whether related to program eligibility, policy interpretation, or project status—must navigate through multiple layers of FEMA's organizational structure (Joint Field Office, Regional, and Headquarters), leading to substantial delays and inconsistent messaging. EOC point of contact staff often lack sufficient training or access to internal resources necessary to deliver prompt and accurate answers. The nature of contract staff reduces the depth of knowledge at some levels and slows recovery as new staff must take time to familiarize themselves with ongoing projects.

ADMINISTRATION

One notable example of inefficiency involves Project 705702, where our county submitted a request related to insurance reimbursement. Despite repeated efforts—including multiple formal requests to meet directly with FEMA insurance specialists—it took over 18 months to receive even a partial response. This kind of delay severely undermines our ability to plan and execute recovery strategies in a timely manner. Had direct communication with a knowledgeable FEMA specialist been allowed, much of this delay could have been avoided, and the number of Requests for Information (RFIs) reduced.

Additionally, divisional silos—particularly within FEMA’s Environmental and Historic Preservation (EHP), Consolidated Resource Center (CRC), and Insurance teams—contribute to redundancy. Often, documentation already submitted must be resubmitted, and project reviews stall as different divisions operate without coordination. This results in unnecessary delays and frustration, not just for local agencies but for the residents and communities depending on these resources.

While individual FEMA staff are often professional and eager to assist, systemic inefficiencies frequently slow down the recovery process and diminish the overall effectiveness of FEMA’s support.

2. Describe your overall experience with FEMA. Was your interaction with FEMA positive or negative? Please fully explain your experience.

The overall interaction with FEMA is often hindered by organizational inefficiencies and communication breakdowns:

- Inconsistent guidance and contradictory information from different FEMA representatives—particularly at Disaster Recovery Centers and the 1-800 assistance hotline—frequently frustrate disaster survivors. Our Emergency Management office regularly fields calls from residents who have been given unclear or conflicting directions.
- Information flow is heavily siloed, with inquiries related to programs, staffing, and policy having to pass through multiple layers before receiving a response. This structure slows down decision-making and limits local access to critical information.
- Staff turnover, especially in key roles (example: Voluntary Agency Liaisons), disrupts continuity and creates confusion during long recovery periods.
- Our floodplain management and damage assessment teams observed that while FEMA teams conducting Preliminary Damage Assessments (PDAs) are typically quick and efficient a significant amount of time is taken in explaining processes surrounding more complex tasks—such as Substantial Damage Determinations and code enforcement processes—to FEMA staff, largely due to the need for staff with specialized knowledge of Florida’s complex regulatory environment.
- Survivors face difficulties navigating Individual Assistance programs, which are often too complex and result in high rates of denial without adequate support or explanation.

While we recognize and appreciate the dedication of FEMA’s field staff and preparedness personnel, the broader system lacks the cohesion and flexibility needed to support efficient, long-term recovery. Ultimately, this leads to an experience that is frustrating for all parties—especially when communities are trying to recover quickly and efficiently from disaster impacts.

3. By what means did you apply for benefits—was it online, in person, or over the phone? Did you encounter any difficulties?

Residents primarily applied for FEMA assistance online, by phone, or in person at Disaster Recovery Centers. While these application methods were accessible, many individuals found the process confusing and difficult to navigate. A significant number were denied assistance without clear explanations or guidance on how to appeal or resolve issues, which led to frustration and increased calls to local offices for support.

4. Were local or state authorities or private groups able to provide assistance in a more timely or efficient way than FEMA? Please fully describe your experience.

As with other categories, this answer is nuanced.

When it comes to zoning, permitting, and environmental compliance, local groups lack understanding of complex regulations and can end up hindering recovery.

In specific areas—such as support for individuals experiencing homelessness—local governments and nonprofits were forced to fill a critical gap. FEMA’s policy of only assisting those who lost housing directly due to the disaster excludes homeless individuals who also suffer severe impacts, leaving local agencies to manage emergency shelter capacity and rehouse vulnerable populations without federal support.

Additionally, when communication or coordination issues arose within FEMA, state agencies often stepped in to help bridge gaps—but their ability to do so was frequently constrained by bandwidth, funding delays, and unclear federal guidance.

5. What recommendations would you like the Council to make?

To improve the efficiency and overall effectiveness of FEMA’s disaster response and recovery operations, we make the following recommendations:

1. Improve Coordination and Continuity

- End the cycle of rotating contract staff, particularly in key roles, to maintain continuity throughout the recovery process.
- Improve coordination between FEMA divisions (e.g., Insurance, CRC, EHP) to reduce duplication, delays, and contradictory guidance.

2. Streamline Processes and Establish Standardized Guidance

- Standardize and centralize information and documentation requests through a user-friendly electronic portal.
- Communicate clear timelines for when FEMA will complete each phase of project review (EHP, CRC, Insurance, etc.). Expedite the review process where possible and provide more user-friendly portals to review items in the process.
- Allow jurisdictions to use their own Scope and Cost summaries without FEMA recreating them, especially during the Damage Description and Dimensions (DDD) process.

- Create clear standards for damage assessment and floodplain management procedures to reduce delays and confusion across jurisdictions.
- Address technical issues with systems like the FEMA Grants Portal, including extending session timeouts.

3. Simplify Oversight and Auditing

- Use sample-based audits rather than full documentation reviews to reduce administrative burden. Reduce levels of monitoring and review for organizations with other monitoring methods in place – example: debris management contracts with built in monitoring.
- Release funding based on established milestones or criteria (e.g., expedited projects or Florida Recovery Obligation Calculation [F-ROC] approvals).
- Align state and FEMA auditing procedures to avoid duplicative review processes.
- Provide direct contact methods (e.g., hotlines or email addresses) for local jurisdictions to reach FEMA specialists authorized to make decisions.

4. Address Policy Gaps for Individual Assistance

- Develop a more balanced policy approach to support individuals experiencing homelessness post-disaster.
- Simplify the Individual Assistance application process and provide clearer guidance to applicants, especially those who are denied.

5. Continue the National Flood Insurance Programs (NFIP)

- The continuation of the National Flood Insurance Programs (NFIP) is a key component of a community's resiliency to flooding and its speedy recovery. The four components of the NFIP - Mapping, Regulations, Insurance and Mitigation - are equally important in: allowing communities and their citizens to understand their flood risk, ensuring structures are built in such a way to be able to withstand flooding events, giving citizens the ability to utilize insurance to quickly recover from flooding events, and taking advantage of programs to mitigate their future risks and become more resilient.
- The private insurance market makes up only one of these components – insurance – and is in no way capable of assuming the millions of policies currently covered through the NFIP. Elimination of this program would leave millions of home and business owners without the ability to obtain insurance coverage for their most valuable asset from the increasing risk of flooding.

Implementing these changes would significantly reduce delays, increase transparency, and ensure communities can recover more quickly from future disasters.

Thank you,



Hector Flores,

County Administrator