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Effectiveness and Costs of FEMA's Disaster Housing Assistance Program

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Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the strengths and weaknesses of the Federal Emergency Management Agency's Disaster Housing Assistance Program. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

Matt Jadacki
Assistant Inspector General
Office of Emergency Management Oversight

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Abbreviations

DHAP	Disaster Housing Assistance Program
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
HCV	Housing Choice Voucher
HUD	Department of Housing and Urban Development
IAA	interagency agreement
IHP	Individuals and Households Program
NDRF	National Disaster Recovery Framework
OMB	Office of Management and Budget
OIG	Office of Inspector General
PHA	Public Housing Authority

Executive Summary

The Federal Emergency Management Agency needs to better manage interagency agreements with the Department of Housing and Urban Development concerning the two Disaster Housing Assistance Programs after hurricanes Katrina and Rita and hurricanes Gustav and Ike. The first program was intended to provide rental housing assistance and case management services to move participants toward self-sufficiency. Although this 2007 pilot program cost more than $550 million by its expiration in August 2009, there were neither adequate self-sufficiency nor cost-effectiveness data to evaluate this pilot program compared with other temporary housing programs.

Without addressing the concerns of the initial pilot program, FEMA entered into a second interagency agreement with the Department of Housing and Urban Development to provide the same services for survivors of hurricanes Gustav and Ike in 2008. Again, the agreement did not require the Department of Housing and Urban Development to maintain program data to determine whether the program was successful in attaining its self-sufficiency goal or was cost competitive with other housing options, such as the Federal Emergency Management Agency's own Individual and Households Rental Assistance Program. The Disaster Housing Assistance Program for hurricanes Gustav and Ike cost the Federal Emergency Management Agency an estimated $15 million in administrative fees paid to the Department of Housing and Urban Development for households that did not participate.

We recommend that Federal Emergency Management Agency not enter into additional agreements for Disaster Housing Assistance Programs until reliable program effectiveness and cost information has been developed and the program has been compared with other possible options. If future programs are deemed appropriate, we recommend requiring additional program and cost-effectiveness data; and evaluation of program administrative and case management fees, which make up more than 40% of the program costs, for possible cost reduction.

Background

The Disaster Housing Assistance Program (DHAP) is a joint pilot initiative undertaken by the Federal Emergency Management Agency (FEMA) and the Department of Housing and Urban Development (HUD). DHAP provided temporary housing rental assistance and case management services for disaster survivors displaced by hurricanes Katrina and Rita and, subsequently, by hurricanes Gustav and Ike. This was accomplished through two separate interagency agreements (IAAs) between FEMA and HUD.

DHAP Katrina, a pilot housing program for survivors of hurricanes Katrina and Rita, began in July 2007, 23 months after the disaster was declared, when the President determined that housing assistance would be transitioned to HUD, and continued through August 2009. DHAP Katrina was intended to provide rental housing for survivors in need of long-term housing assistance and to prepare these families for the future by promoting self-sufficiency through case management services. To assist in the implementation of DHAP Katrina, the Office of Management and Budget (OMB) provided FEMA a waiver of OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*, and OMB Circular A-102, *Grants and Cooperative Agreements with State and Local Governments*, and allowed DHAP to be operated under HUD's Housing Choice Voucher (HCV) financial management controls.

Following hurricanes Ike and Gustav in 2008, FEMA entered into another IAA with HUD to provide rental assistance and case management services for hurricane survivors. DHAP Ike began in November 2008, 1 month after the disaster was declared. According to FEMA, an oral OMB waiver was granted for DHAP Ike, allowing it to be operated under HUD's HCV financial management controls. The DHAP Ike IAA was designed, implemented, and administered by HUD in coordination with, and on behalf of, FEMA. As stated in the accompanying *Federal Register* notice, the goal of DHAP Ike was to provide disaster survivors with rental assistance and case management services. It currently has a revised end date[1] of September 30, 2011.

To participate in either of the DHAPs, disaster survivors had to apply to FEMA for assistance; eligible applicants were referred to HUD, which used its existing network of local Public Housing Agencies (PHAs) to administer and implement the program. PHAs

[1] The original end date was March 13, 2010, but DHAP Ike has been extended four times.

have local market knowledge and the expertise to assist families through tenant-based subsidy programs. The PHAs place disaster survivors into housing units and make rental assistance payments on behalf of eligible families to participating landlords. After several months of full subsidy, families are required to pay a portion of the rent, starting at $50 per month and gradually increasing their contributions, to encourage and help prepare them to assume full responsibility for their housing costs at the end of DHAP participation. The PHAs are also responsible for administering case management services, such as identifying nondisaster supported housing solutions, assisting participants in securing employment, and connecting them to the public benefits for which they are eligible.

As of November 2010, DHAP Katrina had provided housing to 36,818 households at a cost of $552.8 million, and DHAP Ike had provided housing to 25,316 households at a cost of $281.3 million.

Results of Audit

Data Needed To Determine the Success of the DHAP Self-Sufficiency Goal

The case management services for DHAP Katrina and DHAP Ike, which were featured in the programs' respective *Federal Register* notices, were intended to assist survivors in transitioning toward self-sufficiency[2]. These services, which had not been part of FEMA's prior temporary housing programs, were unique to this program. However, the IAAs crafted by FEMA were missing specifics concerning the intended goal of participant self-sufficiency through case management and how this goal would be tracked. FEMA did not require HUD or the PHAs to report on the extent of case management services or their effectiveness in transitioning disaster survivors toward self-sufficiency.

The HUD quarterly management reports required by the IAAs were of limited use to FEMA because they were missing information about the participants' progress. For example, FEMA officials were unaware of the case management needs of participant families or their rate of progress as they proceeded through the program. As a result, FEMA was unable to quantify whether DHAP case management services met the self-sufficiency goal. FEMA housed 36,818 households through DHAP Katrina without an agreement on how this program should lead program participants toward self-sufficiency and how its successes should be measured.

HUD officials provided documentation showing that 14,192 (39%) households moved on to their HCV program prior to, or at the conclusion of, DHAP Katrina, and 22,626 (61%) of households left DHAP Katrina for reasons such as voluntarily ending program participation, violation of family obligations,[3] evictions, or death. Although 61% of households ended their participation, FEMA does not have accurate information on the number of participants who attained self-sufficiency.

As of November 2010, DHAP Ike had provided housing to 25,316 households. Currently, at least 5,850 households (23%) continue to need assistance. During the audit, HUD and PHA officials said that these families will most likely transition to the HCV program. Once again, FEMA was unable to use the information to determine the number of participants who attained self-sufficiency.

[2] During the course of our audit, the Federal Emergency Management Agency and the Department of Housing and Urban Development did not have a unified definition for "self-sufficiency."

[3] A violation of family obligations is a HUD term defined in 24 CFR Part 982.551. Overall, the HUD regulation outlines the program participation terms for families in the HCV housing program.

We tested 1,547 DHAP Katrina and Ike participant files to determine whether the self-sufficiency goal was attained. Approximately 50% of all tested records for DHAP Katrina and Ike were missing evidence to determine participant self-sufficiency. However, the records that did have evidence disclosed the following data:

- DHAP Katrina—106 of 340 (31.2%) households were designated as self-sufficient.

- DHAP Ike—100 of 341 (29.3%) households to date are designated as self-sufficient.

Data Needed To Determine the Cost-Effectiveness of DHAP

Although DHAP Katrina cost more than $550 million by its expiration in August 2009 and DHAP Ike has cost more than $280 million (table 1), FEMA was unable to use the data to compare actual costs of these programs with other possible temporary housing options, such as the FEMA Individuals and Households Rental Assistance Program (IHP), which provides up to 18 months of short-term housing. In addition, FEMA officials said that with the OMB waivers, they did not follow their standard grants management requirements but relied heavily on HUD's framework of oversight, program integrity, and financial management.

Table 1. Cost Breakdowns for DHAP Katrina and Ike as of November 5, 2010

Costs	Katrina	Ike
Fees	$164,439,446	$98,576,688
Case Management Fees	$61,666,525	$29,256,400
Deposits	$0	$25,326,631
Housing Assistance	$326,669,542	$128,155,684
Total Costs for each DHAP	**$552,775,513**	**$281,315,403**
Total Costs of DHAPs	**$834,090,916**	

Our analysis showed that the rental cost per household over the life of the program was $8,872 for DHAP Katrina and, to date, $7,302 for DHAP Ike. However, these numbers cannot be used as meaningful cost-of-housing figures because data were not available showing the length of time that participants resided in program housing. Without such information, we were unable to determine any cost-effectiveness measures. Participants who might have stayed in the program's housing for only 1 month are not adequately differentiated from those who stayed in the housing for a year or more in the determination of this average rental cost. In addition, the average rental costs do not account for the administrative and case management costs of more than $353 million paid

to HUD and the PHAs, which adds more than 40% to the program costs and should be considered part of the housing costs.

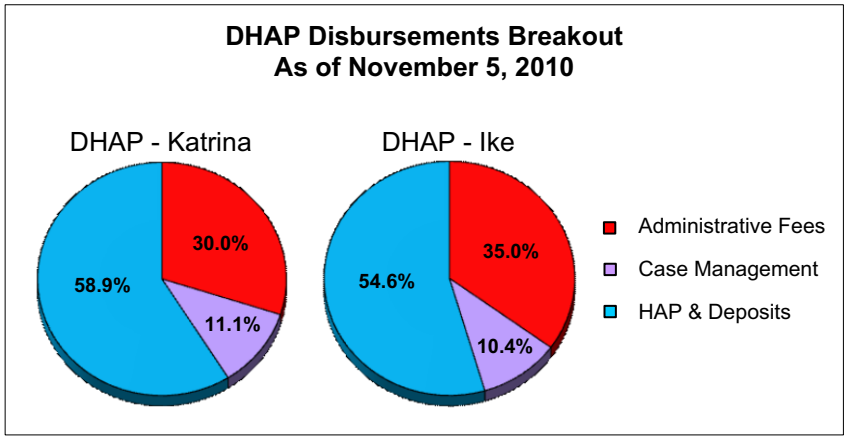
Cost Reduction Considerations for Future Programs

The two DHAPs differed significantly in the way FEMA was charged administrative fees for participants who were referred to HUD, thereby affecting FEMA's cost. For DHAP Katrina, only individuals identified by FEMA with a continuing need for housing at the closeout of FEMA's IHP program were referred to HUD. According to the *DHAP Katrina Operating Requirements*, PHAs received $92 per month for each household referred until the family exited the program or the program ended. Of the 46,937 households that FEMA referred to HUD, 10,119 ultimately declined to participate in DHAP Katrina. Although there are no data that detail how many months passed before the families declined participation in DHAP Katrina, the cost to FEMA for these families would have been $930,948 per month.

Under DHAP Ike, FEMA referred to HUD all disaster survivors who qualified for FEMA IHP rental assistance, and agreed to pay the PHAs an administrative fee of $1,000 for each of the 40,140 families referred, regardless of their participation. However, 14,824 of those households declined to participate in DHAP Ike, costing FEMA $14,824,000. FEMA would have saved $14,824,000 if it had referred to HUD only those families that agreed to participate.

In addition to the fees paid upon each applicant's referral to the PHAs, FEMA paid the PHAs administrative fees based on a percentage of each participant's estimated Housing Assistance Payments. For DHAP Katrina, the percentage was 15%; for DHAP Ike, it was 14%. Overall, administrative fees accounted for 30% of DHAP Katrina costs and 35% of DHAP Ike costs. Figure 1 shows the high-level breakdown of DHAP costs. Appendix C provides a detailed breakdown of DHAP rental, administrative, and other costs.

Figure 1. DHAP Cost Breakdown



Conclusions

More than $830 million has been spent on the DHAP efforts under two IAAs without FEMA obtaining program and cost-effectiveness data that could be used to measure the success of key aspects of the program or to compare the program with other possible alternatives. Although FEMA did not have adequate analysis of the success or cost-effectiveness of the first DHAP, FEMA officials entered into a second IAA for a DHAP for survivors of hurricanes Ike and Gustav. This IAA was also deficient in its requirement for tracking and reporting costs and program effectiveness.

FEMA should not enter into another DHAP agreement without determining how successful and cost-effective the program has been to date. If FEMA does determine that another DHAP is warranted, then it should determine whether the agreement should be developed in accordance with HCV program guidance requirements. In either case, the IAA needs to require the participating agencies to define, track, and report meaningful data on success in promoting self-sufficiency and on costs per month per household of housing the served population.

In addition, given the federal funds at risk, FEMA needs to reduce the administrative costs of future DHAPs and ensure that service fees are paid only for households that receive housing services.

Recommendations

We recommend that the Assistant Administrator, Recovery:

Recommendation #1: Conduct a cost-benefit analysis for DHAP and renew the program only if the analysis demonstrates the program to be the same as or superior to other housing program options available to FEMA.

Recommendation #2: If it is determined that future DHAPs are warranted:

A. Implement needed FEMA program, financial management, and oversight policies, procedures, and framework into DHAP Interagency agreements.

B. Establish requirements for cost and program effectiveness data to be maintained and reported to FEMA on a regular basis.

C. Identify the areas of administrative fees being charged under DHAP, evaluate their benefits, and, if appropriate, negotiate an appropriate reduction in fees.

Management Comments and OIG Analysis

FEMA concurs with Recommendation 1, Recommendation 2 B, and Recommendation 2 C. When the DHAP Ike program ends on September 30, 2011, FEMA will conduct a cost-benefit analysis. FEMA will consider the results in determining whether it makes economic and programmatic sense to continue DHAPs.

Since this analysis will take some time to complete, FEMA needs the interim flexibility to use the DHAP if it is deemed essential for housing disaster survivors. FEMA and HUD are working on an IAA that will provide DHAP housing assistance and will address FEMA's need for increased reporting frequency, increased specific family and program data, and increased financial data to run the program and analyze its effectiveness. FEMA is also addressing the administrative fees and negotiating a new fee structure for this agreement. In addition, a Computer Matching Agreement is being developed to enable the two agencies to safely share data.

FEMA continues to work with HUD to develop the National Disaster Recovery Framework (NDRF). When finalized, the NDRF will organize support for communities, including housing. HUD will serve as a coordination point when assistance is requested to address housing issues after disasters.

We agree with the actions that FEMA has taken and is taking to address these issues. We believe the cost-benefit analysis will provide FEMA officials with a sound basis for decision-making on future DHAPs. We agree with FEMA's need to continue efforts to provide housing assistance through DHAP in the interim and to work with HUD to develop the NDRF. The additional reporting requirements and efforts to address and

renegotiate the administrative fee structure will improve the cost-effectiveness of any interim DHAP. We will determine the status of these recommendations once we receive the detailed corrective action plan in FEMA's 90-day letter.

FEMA did not concur with Recommendation 2 A, as previously written. FEMA said that it cannot comment on the program integrity, financial management, or oversight framework used by HUD to administer DHAP.

FEMA is correct that commentary on HUD's program finance, and oversight would be inappropriate. The intent of our recommendation was to address FEMA's need for its specific program, financial, and oversight requirements to be included in the implementation of any future DHAP. The inclusion of FEMA's requirements will allow enhanced decision-making and oversight. In light of FEMA's response, we reworded the recommendation to convey this message. We will determine the status of this part of the recommendation once we receive the detailed corrective action plan in FEMA's 90-day letter.

The purpose of this audit was to determine whether FEMA has adequate information to determine if DHAP has achieved its desired outcome of participant self-sufficiency or independence, and if the program is cost-effective in comparison with other possible emergency housing programs.

We interviewed officials from FEMA's Individual Assistance Division and Virginia National Processing Service Center, and HUD's Office of Public and Indian Housing and Office of Inspector General on the creation, goals, and implementation of DHAP.

We examined 1,547 DHAP participant files to determine to what extent DHAP participants moved toward self-sufficiency. During our initial fieldwork site visits, we tested 1,435 DHAP participant files sampled from the top six Public Housing Authorities that housed DHAP disaster survivors. One of the PHAs visited was able to provide records for DHAP Ike participants but not for DHAP Katrina participants. We consulted with HUD officials to resolve this issue, and arranged for the PHA to provide all DHAP Katrina participant files for our review. In our second site visit, we tested an additional 112 files to ensure that the PHA had all DHAP Katrina participant files to satisfy our testing methodology.

Our analysis is based on direct observation, review of applicable documentation, and interviews. We conducted this performance audit between May and December 2010, pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

U.S. Department of Homeland Security
Washington, DC 20472

FEMA

JUL 06 2011

MEMORANDUM FOR: Matt Jadacki
Assistant Inspector General
Office of Emergency Management Agency

FROM: David J. Kaufman
Director
Office of Policy and Program Analysis

SUBJECT: Response to Office of Inspector General (OIG) Draft Report, *Effectiveness and Costs of FEMA's Disaster Housing Assistance Program*

Thank you for the opportunity to review and provide comments on your Draft Report, *Effectiveness and Costs of FEMA's Disaster Housing Assistance Program* (OIG Project #10-014-EMO-FEMA). Your report explained the actions taken by your office to review the Disaster Housing Assistance Pilot Program (DHAP) and identified measures that the Federal Emergency Management Agency (FEMA) could take to improve the program's overall effectiveness. Our response to the two recommendations outlined in the Draft Report report follows.

Background:
DHAP refers to two pilot grant programs developed through a partnership between FEMA and the Department of Housing & Urban Development (HUD) to provide temporary housing assistance and housing service connection assistance to eligible individuals and households. DHAP is intended to provide a tool to FEMA for those situations where the Agency's traditional temporary housing assistance programs could be bolstered by the use of HUD's Public Housing Agencies (PHAs). The DHAP programs are administered through HUD's existing infrastructure of PHAs to help FEMA facilitate the transition of disaster survivors to non-disaster housing.

Under DHAP, HUD provides resources through PHAs for rental assistance, security and utility deposits, and housing service connection for households that are eligible for FEMA housing assistance under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (42 U.S.C. 5174). PHAs execute Disaster Rent Subsidy Contracts (DRSCs) with participating landlords to provide rental assistance directly to landlords on behalf of those disaster survivors referred to HUD by FEMA. To participate in DHAP, each participating household must agree to participate in DHAP Service Connection programs, wherein PHAs refer households to case management providers and other social services for any identified disaster-related unmet needs. Due to the severity of Hurricanes Katrina & Rita in 2005 and Gustav & Ike in 2008, abnormally large numbers of individuals and households required temporary housing and were expected to need long-term housing assistance.

As a result, FEMA and HUD executed an Interagency Agreement (IAA) to implement DHAP for each of these combined events. The IAAs were developed at different stages in the disaster. The first, DHAP-Katrina, was implemented more than two years after the disaster occurred, while DHAP-Ike was implemented less than two months after the disaster was declared.

FEMA's Response to OIG's Recommendations:
Recommendation 1: Conduct a cost-benefit analysis for DHAP and renew the program only if the analysis demonstrates the program to be the same as or superior to other housing program options available to FEMA.

FEMA's Response: FEMA concurs with the recommendation to conduct a cost-benefit analysis of DHAP and will begin that analysis following conclusion of the DHAP Ike program which is scheduled to end September 30, 2011. It will take some time for the cost-benefit analysis to be completed, and during this interim period FEMA needs the flexibility to utilize the DHAP program should it be essential to meet the housing needs of disaster survivors. FEMA and HUD are currently working on an Inter-Agency Agreement (IAA) for use in such an event should it become necessary. Once the cost-benefit analysis is completed, FEMA will consider the results in determining whether or not it makes economic and programmatic sense to continue having the DHAP program available to meet FEMA's mission requirements and disaster survivors' housing needs.

Recommendation 2 (includes parts A, B, and C): If it is determined that future DHAP programs are warranted:

A. Determine whether they should be administered in accordance with the Housing Choice Voucher (HCV) Programs integrity, financial management and oversight framework.

FEMA Response: FEMA non- concurs with this recommendation. As the HCV Program is managed by HUD, FEMA cannot comment on the program's integrity, financial management or oversight framework. FEMA continues to partner with HUD on exploring additional options for addressing the housing needs of disaster survivors through the National Disaster Housing Task Force (NDHTF) and the National Disaster Recovery Framework (NDRF). While not yet finalized, the NDRF will organize support for communities through Recovery Support Functions (RSFs) which are delineated along sector lines, including Housing. The Housing RSF, which is led by HUD, will not direct any jurisdiction to implement specific housing solutions, but will serve as a coordination point when requested for assistance to address housing issues after disasters.

B. Establish requirements for cost and program effectiveness data to be maintained and reported to FEMA on a regular basis.

FEMA Response: FEMA concurs with this recommendation. As discussed above, FEMA and HUD are in the process of developing an IAA which would address the need to increase reporting frequency, increase and specify family/program data, and increase financial data required to run the program and analyze its effectiveness. Learning from the Katrina/Rita and Ike/Gustav pilots, changes may be implemented which would allow the program to operate in a more expedient and fiscally prudent manner. Although FEMA expects to sign this IAA before

the completion of the cost-benefit analysis, FEMA will incorporate findings from that analysis into the document, as appropriate. Additionally, FEMA and HUD are developing a Computer Matching Agreement (CMA) which would enable each agency to safely share data in a more timely and effective manner.

C. Identify the areas of administrative fees being charged under DHAP, evaluate their benefits, and, if appropriate, negotiate an appropriate reduction in fees.

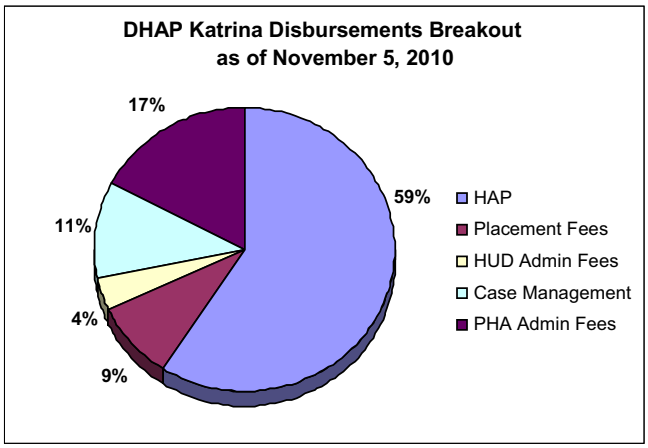
FEMA Response: FEMA concurs with this recommendation. In the current efforts to develop a new DHAP IAA, FEMA has been actively engaged in discussions with HUD regarding the administrative fees associated with DHAP. As a result of those discussions, FEMA has a clearer understanding of the rationale for the administrative fees and is currently in the process of negotiating a new fee structure. Once the cost-benefit analysis is completed, FEMA will also take those results into consideration and will modify the IAA as needed.

Again, we thank you for the opportunity to review and provide comments on your Draft Report. Please feel free to contact Bradley Shefka; Chief, FEMA GAO/OIG Audit Liaison Office; regarding any questions or concerns.

Appendix C
Disaster Housing Assistance Program Cost Breakdown

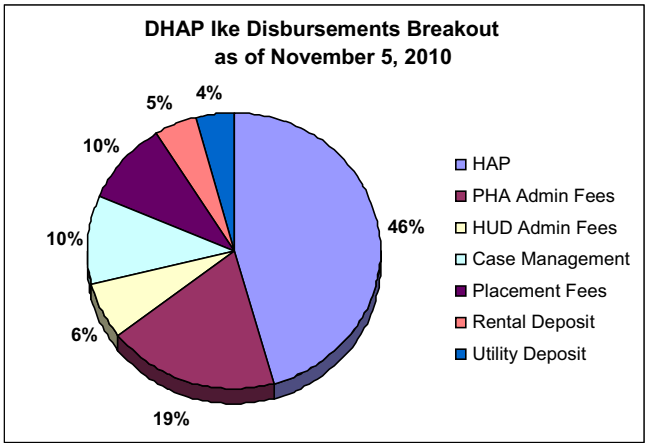
DHAP Katrina

DHAP Katrina Cost Breakout as of November 5, 2010		
Cost	**Amount**	**Percentage**
Housing Assistance Payment	$326,669,542	59.10%
PHA Admin Fees	$95,586,660	17.29%
HUD Admin Fees	$19,622,736	3.54%
Case Management	$61,666,525	11.16%
Placement Fees	$49,230,050	8.91%
Cumulative	**$552,775,513**	**100.00%**



DHAP Ike

DHAP Ike Cost Breakout as of November 5, 2010		
Type	**Amount**	**Percentage**
Housing Assistance Payment	$128,155,684	45.56%
PHA Admin Fees	$53,242,836	18.93%
HUD Admin Fees	$18,267,876	6.49%
Case Management	$29,256,400	10.40%
Placement Fees	$27,065,976	9.62%
Rental Deposit	$13,655,914	4.85%
Utility Deposit	$11,670,717	4.15%
Cumulative	**$281,315,403**	**100.00%**



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