

Mitchell Berger Mazruia@hotmail.com March 1, 2022

Brian Thompson, Supervisory Emergency Management Specialist, Recovery Directorate, Federal Emergency Management Agency

Re: Agency Information Collection Activities: Proposed Collection; Comment Request; Generic Clearance for Civil Rights and Equity, <https://www.federalregister.gov/documents/2022/01/25/2022-01314/agency-information-collection-activities-proposed-collection-comment-request-generic-clearance-for>

Dear Mr. Thompson: I write to endorse FEMA's plans to collect additional demographic information, including race/ethnicity, from those applying for individual disaster assistance.¹ The announcement indicates FEMA plans to collect such data on such forms as Individuals and Households program registration, FF-104-FY-21-123 (formerly FEMA Form 009-0-1T (English)), Tele-Registration, Disaster Assistance Registration, FF-104-FY-21-125 (formerly FEMA Form 009-0-1Int (English)), internet, Disaster Assistance Registration, FF-104-FY-21-122 (formerly FEMA Form 009-0-1 (English)), Paper Application/Disaster Assistance Registration. In support of this collection, I make the following two suggestions.

First, on the Disaster Assistance Registration and Tele-registration forms, I would suggest separating the Cognitive/Developmental Disabilities/Mental Health categories into Cognitive/Developmental Disabilities and Mental Health/Behavioral Health. This would facilitate data collection about the type(s) of disabilities an individual seeking assistance may have. I also would suggest clarifying on all forms that an individual may select all disabilities or conditions that may apply (some forms were less explicit than others in stating an individual may select multiple conditions or disabilities).

Second, I suggest that FEMA include broad ranges of income among the demographic variables collected (e.g., <\$25,000, \$25,000-\$49,000 and so on). Responders should be free not to answer if they do not wish to provide this information. However, income data can help in along with race, ethnicity, gender and other data in assessing the impact and reach of FEMA's assistance.² In addition, FEMA may wish to ask about health insurance status (e.g., is this person/household covered by the following types of insurance or health coverage?).³ Along with income, this information could assist FEMA and other agencies in supporting enrollment into relevant programs such as Medicaid, the Marketplace or Medicare.

Thank you for consideration of these comments.

Sincerely,

Mitchell Berger Note: I am a federal employee. However, these comments reflect solely my personal views and should not be imputed to any public or private entities.

¹ <https://www.eenews.net/articles/fema-wants-to-track-race-of-disaster-victims-for-first-time/>

² <https://nlihc.org/resource/florida-fema-registrations-after-hurricane-irma-renters-disproportionately-affected>

³ <https://www.census.gov/programs-surveys/decennial-census/technical-documentation/questionnaires.html>; <https://www.census.gov/topics/health/health-insurance.html>; <https://www.healthcare.gov/sep-list/>; <https://www.macpac.gov/publication/medicaids-role-in-disasters-and-public-health-emergencies/>