

AMERICAN SOCIETY OF ADAPTATION PROFESSIONALS

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March 23, 2022

The Honorable Deanne Criswell
Administrator
Federal Emergency Management Agency
500 C St., SW
Washington, DC 20472

Submitted to the Federal eRulemaking Portal FEMA-regulations@fema.dhs.gov

RE: Request for Information on Agency Information Collection Activities: Proposed Collection; Comment Request; Generic Clearance for Civil Rights and Equity, [Docket ID FEMA-2022-0006](#)

Dear Administrator Criswell,

Thank you for the opportunity to provide comments on the Federal Emergency Management Agency's (FEMA) proposed collection of demographic data to improve the implementation and performance of disaster assistance programs. These comments were compiled and refined by the members of the American Society of Adaptation Professionals (ASAP). ASAP supports and connects climate adaptation professionals to advance innovation in the field of practice. With over 900 individual adaptation professionals - and 35 organizational members collectively employing over 100,000 people - ASAP's members offer expertise covering all facets of this rapidly evolving field including risk management, community-based resilience planning and implementation, economic revitalization, and disaster preparedness. ASAP members bring to their work the highest professional and ethical standards.

ASAP strongly supports FEMA collecting demographic information from those who apply for benefits. As climate change leads to increasingly worse disasters, FEMA benefits are critical to help individuals and communities rebuild to withstand stronger storms and floods or to move out of harm's way. People and communities who are both highly exposed to climate risks because of the places they live and have fewer resources, capacity, safety nets, or political power to respond to those risks because of widespread discrimination include Black people, Indigenous Peoples, people of color, people with low incomes and from low income backgrounds as well as other individuals and communities such as immigrants, those

at-risk of displacement, old and young people, people experiencing homelessness, outdoor workers, incarcerated people, renters, people with disabilities, and chronically ill or hospitalized people. Unless FEMA understands applicants' demographics, it will not be possible to ensure that FEMA benefits are equitably distributed and helping those who need it most.

Tracking this data is crucial to ensuring that FEMA is delivering on its mandate, especially since there's ample data showing that FEMA has been falling short on ensuring that its benefits are equitably distributed (see FEMA National Advisory Council Report to the FEMA Administrator FEMA NAC report - https://www.fema.gov/sites/default/files/documents/fema_nac-report_11-2020.pdf)

To fix the problem, FEMA needs a much more precise understanding of who is receiving benefits. If FEMA does not gain this understanding, they will risk worsening structural inequities that cause specific people and communities to face disproportionate climate impacts and have lower adaptive capacity.

Thank you for your time and consideration,

A handwritten signature in black ink, appearing to read "Beth Gibbons". The signature is fluid and cursive, with the first name "Beth" being more prominent than the last name "Gibbons".

Beth Gibbons
Executive Director
American Society of Adaptation Professionals
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