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March 28, 2022

Department of Homeland Security  
Federal Emergency Management Agency  
Attn: Public Comments  
P.O. Box 10055  
Hyattsville, MD 20782-8055

**Re: Agency Information Collection Activities: Proposed Collection; Comment Request; Generic Clearance for Civil Rights and Equity**

Dear Ms. Deanne Criswell,

On behalf of the National Network for Arab American Communities (NNAAC), a national consortium of 29 Arab American community-based organizations across 12 different states, I am humbled to submit this public comment regarding the proposed data collection activities of the Federal Emergency Management Agency (FEMA).

NNAAC welcomes FEMA's effort to ensure compliance with their Federal anti-discrimination and equity requirements. In issuing this public comment, we intend to assist FEMA ensure that the proposed data collection activities are both necessary for the proper performance of FEMA and of high quality, utility, and clarity. Community-based organizations within NNAAC serve individuals from the Middle East or North Africa (MENA) region through linguistically and culturally appropriate services and programs. When MENA community members are faced with an instance of discrimination, our membership is oftentimes the first entity they contact.

Given the proposed construction of information collection activities, our comments dovetail around a principal concern that the proposed construction of information collection activities maintains existing barriers to assessing discrimination of MENA communities. Our public comment includes a specific request: NNAAC implores FEMA to include a category for individuals of "Middle Eastern or North African" (MENA) descent to identify among the list of racial and ethnic group categories into which they disaggregate demographic data collected under this information collection activity.

**In theory, the proposed data collection is necessary and practically useful. However, unless it allows for FEMA to assess disparities in the distribution of resources with respect to MENA communities, it will be an insufficient step toward compliance with civil rights laws and policies.**

Pursuant to Statistical Policy Directive Number 15 of the Office of Management and Budget (OMB), most federal information collection forms, including the Census, disaggregate demographic data into five racial and ethnic group categories: White; Black or African American; Asian American; American Indian or Alaska Native; and Native Hawaiian or Pacific Islander; and ethnicities of Hispanic or Not Hispanic. There is currently no designation for the MENA subgroup.

The MENA community is spread out across the United States, mostly in dense enclaves—areas that are often hardest hit by natural disasters. For instance, Dearborn, MI has been ravaged by floods over the past years. For instance, during a case of severe flooding in Dearborn, MI, 12,000 out of 34,000 homes in Dearborn were impacted by severe floods.<sup>1</sup> In other Arab American-populated areas we have seen additional flooding, severe storms, wildfires, and other natural disasters. MENA communities report a lack of quality disaster and emergency assistance from FEMA.

Since FEMA has not specified that they would include a MENA category in the proposed information collection, they cannot sufficiently “evaluate whether any disparities in eligibility determinations appear to impact vulnerable communities” and “determine how to improve service delivery for all survivors” – their evaluation and determination necessarily excludes MENA communities. The simple and efficient way to enhance the quality, utility, and clarity of the information to be collected is to further disaggregate the data to include a separate MENA category. Doing so would provide fairness and opportunity for those from the MENA region, who are socially disadvantaged individuals that comprise an underserved racial and ethnic minority group population.

**The agency’s estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used, would be enhanced by a MENA category.**

FEMA expects a “burden of no more than 5 minutes per registration to answer the additional questions.” Without a data collection category with which they can self-identify, the information collection is increasingly confusing for many members of MENA communities.

Further, 42 U.S.C. 2000d includes a prohibition on denial of benefits based on national origin. However, since FEMA does not disaggregate their data regarding individuals from the MENA region, they are unable to assess whether they have effectively denied benefits to individuals based on MENA origin. To show that these individuals are not being denied benefits because of their national origin, we must show their actual region of origin, which can only be done through disaggregation of data. With this, we ensure Americans are not being denied specific benefits to which they are entitled.

42 U.S.C. 5179(a) provides that, because of a major disaster, the president is authorized to distribute food to low-income households through the Secretary of Agriculture. Thirty-two percent of MENA residents live under 125 percent of the poverty level, and 29 percent are on public insurance<sup>2</sup>. There is no way to know any information about who is receiving this funding—aside from locations. If we were to disaggregate this type of data collection, FEMA could better understand the cultural and linguistic barriers between low-income households and receipt, as well as effective utilization, of disaster

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<sup>1</sup> City of Dearborn, “Previous Updates on Flood Response Summer 2021” (2021)  
<<https://cityofdearborn.org/articles/2249-previous-flood-response-summer-2021-updates?highlight=WyJyYWluLiwiZ2FyZGVuLiwicmFpbiBnYXJkZW4iXQ==>>

<sup>2</sup> ACCESS, “Arab Americans: A Community Portrait” (2015)

assistance. MENA inclusion in this sense would additionally allow FEMA to learn about their target audience before the next natural disaster.

We implore FEMA to include a MENA category among the list of racial and ethnic group categories into which they disaggregate demographic data collected under this information collection activity. MENA individuals have suffered for too long under antiquated data practices. While our population is growing in both size and scope, we continue to be excluded from statistical recognition. The effects of this statistical exclusion are myriad. They are especially significant in the case of FEMA policies and practices, which ultimately determine the allocation of disaster relief, recovery, and resilience funds.

**For questions, contact Adam Beddawi at [ABeddawi@accesscommunity.org](mailto:ABeddawi@accesscommunity.org)**

Respectfully submitted,

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Federal Policy Manager