

March 28, 2022

National Emergency Management Association  
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444 North Capitol Street NW,  
Suite 401  
Washington, DC 20001

**Reference Docket ID: FEMA-2022-0006**  
**OMB No. 1660-NW133**

**AGENCY: Federal Emergency Management Agency, Department of  
Homeland Security**

Federal Emergency Management Agency  
500 C Street, SW,  
Washington, DC 20472

Dear OMB,

The National Emergency Management Association (NEMA) appreciates the opportunity to provide Public Comment on **Reference Docket ID: FEMA–2022–0006 (Request for Information on Agency Information Collection Activities: Proposed Collection; Comment Request; Generic Clearance for Civil Rights and Equity)**. The response to this public comment was coordinated by NEMA’s newly established Diversity and Equity Committee which monitors and provides feedback on Federal efforts to integrate equity into emergency management policies and programs to better support marginalized and underserved communities.

NEMA understands the need of a FEMA effort to collect demographic information to ensure compliance with Federal civil rights requirements and the equitable implementation of emergency management policies and programs; however, there does need to be further discussion in how such data will be used post collection and incorporated in grant timelines. Research has found that emergency management policies and programs do not fully support the needs of marginalized communities, including communities of color. These findings combined with the realization that disasters disproportionately impact communities of color who live in more vulnerable areas requires data to inform the development and implementation of equitable emergency management policies and programs.

NEMA and the nation’s State emergency management directors are committed to working with FEMA and other Federal agencies to better support historically marginalized communities by addressing equity issues in emergency management policies and programs. NEMA and the Diversity and Equity Committee welcome opportunities to review equity-related data and make policy and program recommendations prior to its final issuance. Data collection and analysis with a focus on equity is a first, but important step to make changes to build resilience and improve disaster outcomes in historically marginalized communities.

We appreciate this opportunity to provide public comment. If you have any additional questions, please do not hesitate to contact Jessica Byrski, NEMA Sr. Policy Analyst. Thank you.