

GAO

Report to the Chairman, Committee on
Commerce, Science, and Transportation,
U.S. Senate

September 1995

DISASTER ASSISTANCE

Information on Declarations for Urban and Rural Areas





United States
General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-261931

September 14, 1995

The Honorable Larry Pressler
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate

Dear Mr. Chairman:

When disasters such as floods, tornadoes, or earthquakes strike, state and local governments are called upon to help citizens cope. Assistance from the Federal Emergency Management Agency (FEMA) and/or the Small Business Administration (SBA) may be provided if requested by state governors. FEMA's assistance is triggered if the President declares that an emergency or disaster exists and that federal resources are required to supplement state and local resources. A presidential "disaster declaration" authorizes federal assistance in the affected state(s); FEMA determines which counties within the state will receive assistance and the type(s) of assistance. Federal assistance authorized by the President includes assistance from other federal agencies, including SBA. In the absence of a presidential declaration, the SBA Administrator may declare that counties struck by disasters are eligible to receive some types of assistance from SBA.

Concerned about potential differences in the federal government's treatment of disaster declaration requests for rural areas as compared with requests for urban areas, you asked us to provide information on the disaster declaration process. Specifically, you asked us to (1) determine if FEMA's and SBA's disaster declaration policies and procedures differ for requests for rural, as compared with urban, areas; (2) compare the length of time taken for each agency to respond to requests for rural and for urban areas; (3) compare the proportion of requests for rural areas that were granted with the corresponding proportion for urban areas; and (4) perform a limited number of case studies to identify factors that influence the length of time taken for the disaster declaration process.

Results in Brief

Neither FEMA's nor SBA's disaster declaration policies differ with respect to whether the affected area is rural or urban.¹ Both agencies use criteria such as measures of damage to homes, businesses, and public facilities to assess requests for disaster declarations and to help determine whether or not to grant assistance. Neither agency's criteria include a measure of population density.

For requests received in calendar 1993 and 1994, the time that elapsed between the governors' requests and the declaration decisions by the President or SBA was longer for rural and very rural counties than for urban or very urban counties.² For example, the median processing time for requests to FEMA for very rural counties was 11 days, and for very urban counties, it was 7 days. Similarly, the time that elapsed between the occurrence of a "disaster incident" and the governor's request for a disaster declaration was longest for very rural counties and shortest for very urban counties (medians of 10 days and 4 days, respectively, for requests made to the President).

In disasters declared by the President, FEMA made a greater proportion of very rural counties (93 percent) eligible for assistance than any other type of county. In contrast, SBA declared a greater proportion of urban and very urban counties (58 percent and 70 percent, respectively) eligible for assistance than rural and very rural counties.

In the cases we reviewed,³ various factors affected the time required for the declaration process. One factor affecting the length of time between a disaster incident and a gubernatorial request for a declaration was how quickly damage assessments could be made. Among the factors that affected the length of time between a gubernatorial request and a declaration decision was the extent to which the damage was documented in the governor's request.

¹For this report, we categorized U.S. counties using classifications suggested to us by the Census Bureau that are based on population density. The categories are "very rural" (less than 10 persons per square land mile), "rural" (10 to 49.9 persons), "urban" (50 to 249.9 persons), and "very urban" (at least 250 persons). A declaration request may cover more than one county, and the counties included in one request may vary by population density category.

²We selected requests received by both FEMA and SBA in calendar 1993 and 1994 because they were the most recent requests and the best documented.

³We reviewed four requests for presidential disaster declarations (handled by FEMA) and four requests for SBA's disaster declarations. These eight requests covered seven incidents. The cases were judgmentally chosen on the basis of the length of time that elapsed during the declaration process, the type of disaster, the disaster's geographical distribution, and other factors.

Background

SBA and FEMA have independent authorities for providing disaster assistance. State governors' requests for SBA's assistance are directed to the SBA Administrator through SBA's regional offices. Under the Small Business Act, the Administrator is authorized to make or guarantee loans to victims of sudden physical disaster. The loans are made to repair or replace damaged property. In fiscal 1994, SBA obligated about \$4.2 billion for disaster assistance.

Under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 and following), a state governor may request the President to declare that an "emergency" or "major disaster" exists in the state. The scope of authorized assistance for emergencies is smaller than that for major disasters. The act provides that requests for declarations (and therefore federal assistance) shall be based on a finding that the incident "is of such severity and magnitude that effective response is beyond the capabilities of the State and the affected local governments and that federal assistance is necessary." FEMA gathers and analyzes information and recommends to the President whether or not federal assistance is warranted.

In the event of a presidential declaration, FEMA directly supplies some assistance and coordinates the overall federal effort. The types of assistance provided include money (grants and loans), equipment, supplies, housing, and personnel. FEMA's public assistance grants help state and local governments and eligible private nonprofit organizations to fund repairs to damaged public facilities and address health and safety threats. Individual assistance grants to individuals and families to help them recover from the effects of disaster-related damage include housing and unemployment assistance. In fiscal 1994, FEMA obligated about \$5.4 billion for disaster assistance.

Agencies' Policies and Procedures Do Not Differentiate Between Rural and Urban Counties

Neither SBA's nor FEMA's disaster declaration policies and procedures differ with respect to whether the affected area⁴ is considered rural or urban. Both agencies employ a process of assessing postdisaster conditions and using a set of factors, or criteria, to determine whether or not to grant assistance. Neither agency's factors include any measure of population density. (App. I shows the steps in each agency's declaration process.)

⁴While this report focuses on the county level, both FEMA and SBA consider the impacts of an incident on the state government as well as on local governments.

SBA's Disaster Declarations

SBA's declaration process and criteria are published in the Code of Federal Regulations. The criteria provide that assistance from SBA may be provided if, as a result of disaster-related damage to a county,

- at least 25 homes or businesses have sustained uninsured losses of at least 40 percent of their replacement value or
- at least three businesses have sustained uninsured losses of at least 40 percent of their replacement value and, as a direct result of the disaster, at least 25 percent of the workforce in the community would be unemployed for at least 90 days.

To determine the extent of the damage, SBA, state, and local officials jointly assess conditions in the affected counties following a governor's request. SBA's policy is to suspend action on the requests it receives if the governor has requested a presidential declaration that includes individual assistance. SBA does not act on such requests until the President has made a decision on the governor's request.

In hearings before the 103rd Congress, the incoming SBA Administrator noted that all disaster declaration requests to SBA are handled in the same manner. Also, SBA's Associate Administrator for Disaster Assistance stated that SBA treats all of the requests from states the same, whether the disaster area is rural or urban.

Presidential Disaster Declarations

The Stafford Act establishes the disaster declaration process. The act does not prescribe specific criteria to guide FEMA's recommendation or the President's decision. As a prerequisite to federal disaster assistance under the act, a governor must take "appropriate response action" and provide information on the nature and amount of state and local resources committed to alleviating the results of the disaster. (FEMA may conduct a preliminary damage assessment, along with state, local, and/or other federal officials, before the governor requests assistance.) The President then decides whether federal assistance is needed to supplement state and local resources.

The Stafford Act does not identify criteria for evaluating governors' requests. According to the Chief, Program Policy Branch, Response and Recovery Directorate, FEMA generally considers some or all of the following factors in making a recommendation to the President:

- The number of homes destroyed or sustaining major damage.

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- The number of homes sustaining minor damage.
 - The extent to which the damage is concentrated or dispersed.
 - The estimated cost of repairing the damage.
 - The demographics of the affected areas (e.g., income levels, unemployment, and concentrations of the elderly).
 - The extent to which the damage is covered by insurance.
 - The extent to which the disaster area is traumatized.
 - The extent of disaster-related unemployment.
 - The level of assistance available from other federal agencies (e.g., SBA's home and business loans).
 - The state and local governments' capabilities for dealing with the disaster.
 - The level of assistance available from voluntary organizations (e.g., the American Red Cross).
 - The availability of rental housing.
 - The extent of health and safety problems.
 - The extent of damage to facilities providing essential services (e.g., medical, utilities, police, etc.).

While these factors do not explicitly take into account the urban/rural status of an affected area, they include factors that could vary with measures of population density. For example, the number of homes destroyed or sustaining major damage might be expected to be larger in more densely populated areas than in less densely populated areas.

According to the Branch Chief, these factors serve as guidelines for FEMA staff who evaluate disaster declaration requests. Staff are encouraged to apply the factors consistently, but there is no formula for applying them quantitatively.⁵ FEMA officials stated that FEMA relies most heavily on how the assessment of a state's capability compares with the costs entailed by the disaster. However, they acknowledged that "capability" is not precisely defined and that determining a state's capability is subjective.

The flexibility and generally subjective nature of FEMA's criteria have raised questions about the consistency and clarity of the disaster declaration process. FEMA's Inspector General reported in 1994 that (1) neither a governor's findings nor FEMA's analysis of capability is supported by standard factual data or related to published criteria and (2) FEMA's process does not always ensure equity in disaster decisions because the agency does not always review requests for declarations in the context of previous declarations. We previously reported that

⁵A 1988 amendment to the Stafford Act (P.L. 100-707) provided that "no geographic area shall be precluded from receiving assistance under this Act solely by virtue of an arithmetic formula or sliding scale based on income or population."

disclosing the process for evaluating requests would help state and local governments determine the circumstances that warrant federal assistance.⁶

Several attempts have been made to address these concerns, and FEMA is currently negotiating a partnership agreement with each state, designed in part to clarify the conditions under which FEMA's assistance will be available.

Average Time From Disaster Incident to Decision Was Greater for Rural Counties

The disaster declaration process can be divided into two intervals: (1) the time between the disaster's "incident date"⁷ and the gubernatorial request and (2) the time between the gubernatorial request and a declaration decision. The latter interval covers the period when federal agencies are actually processing disaster declaration requests. In addition, FEMA and SBA frequently help assess damages and/or advise state emergency personnel before a governor requests assistance.

During calendar 1993 and 1994, FEMA received 120 gubernatorial requests for presidential declarations covering 2,157 counties.⁸ As shown in figure 1, the median⁹ number of days that elapsed during both intervals was greater for rural and very rural counties than for urban and very urban counties.

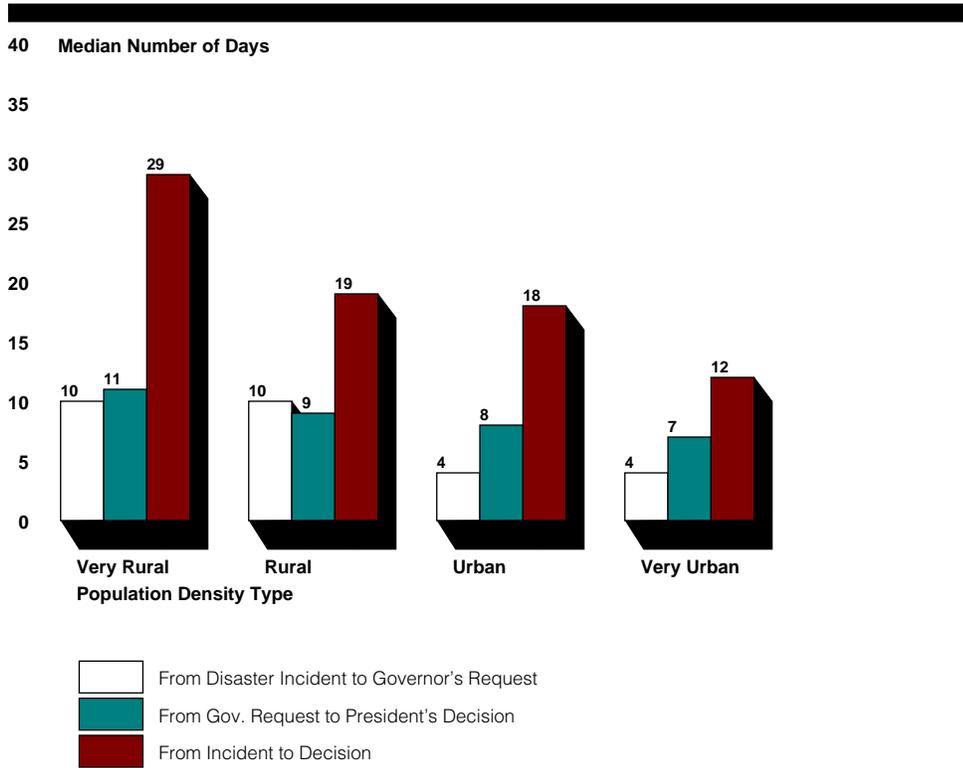
⁶Requests for Disaster Assistance Need Better Evaluation (GAO/CED-82-4, Dec. 7, 1981).

⁷We defined incident date as the first day of the incident period as determined by FEMA. For example, a storm may have started on January 1 and lasted through January 3; in this case, we defined the incident date as January 1.

⁸We counted each county each time it was included in a request for a presidential declaration. In addition to the 2,157 counties included in such requests, governors asked FEMA to make 717 counties eligible for assistance subsequent to presidential declarations. Information on these "add-on" counties is in app. II.

⁹The median is the midpoint in a sequentially ordered list; in this case, half of the requests are below the median number of days, and half are above. Because the sizes of the intervals vary widely among the requests, the median may be a more useful representation of the "typical" number of elapsed days than the mean.

Figure 1: Median Decision Times for Presidential Disaster Declaration Requests, 1993 and 1994

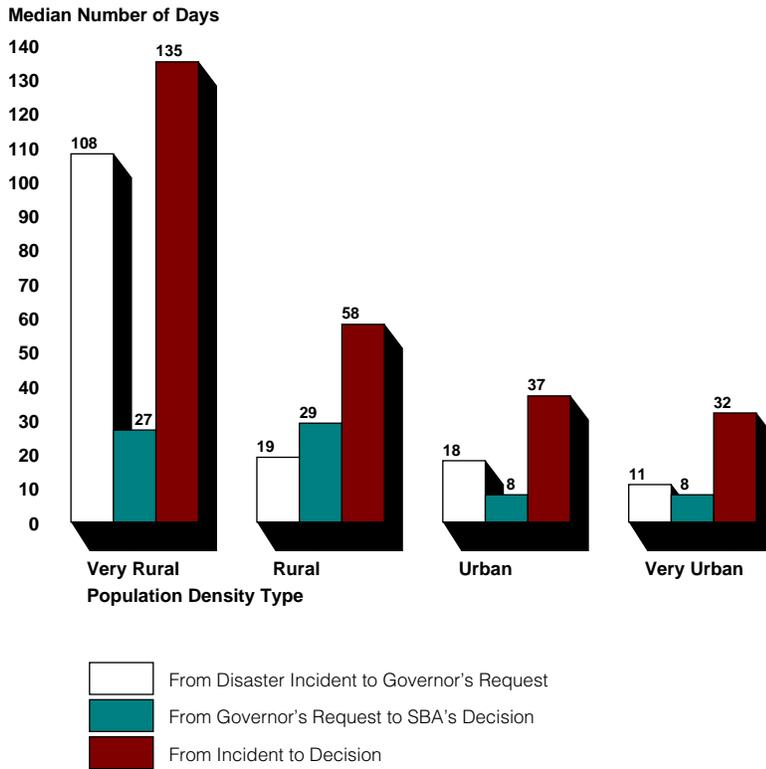


Note: Figure excludes add-on counties.

Source: GAO's analysis of FEMA's data.

During calendar 1993 and 1994, SBA received 73 requests covering 179 counties. Figure 2 shows that the number of days that elapsed during both intervals was generally greater for rural and very rural counties than for urban and very urban counties.

Figure 2: Median Decision Times on Requests for SBA’s Disaster Assistance, 1993 and 1994



Source: GAO’s analysis of SBA’s data.

Governors’ requests for SBA’s assistance may be made directly to SBA or may be included in a request for a presidential declaration. SBA’s policy is to suspend action on the latter type of requests until a presidential declaration decision is made. For the requests that were made directly to SBA during calendar 1993 and 1994 (covering 124 counties), the median number of days between the gubernatorial request and SBA’s decision was 7, or 34 days less than for requests that had been included in a request for a presidential declaration.

For all requests made to FEMA and SBA, in addition to computing the medians, we also computed the mean number of days for each interval. The results showed the same general pattern: The mean times tended to be

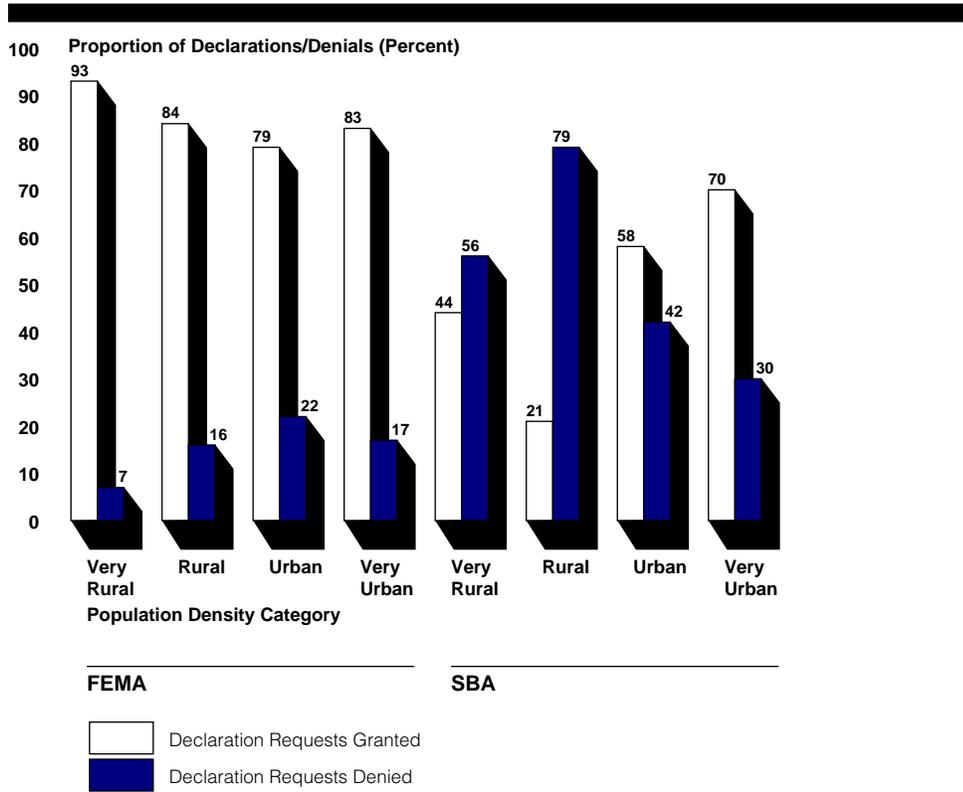
longer for rural and very rural counties. (See app. II for more details on the processing times for disaster declaration requests.)

As noted above, neither FEMA's nor SBA's factors for assessing requests for disaster declarations and helping determine whether or not to grant assistance include any measure of population density. Therefore, while the data show a general pattern of smaller median and mean elapsed times as county population density increases, they should not be interpreted as demonstrating that population density determines the length of elapsed time from request to declaration.

Proportion of Requests Approved Differed Between Urban and Rural Counties

As shown in figure 3, a greater proportion of requests for very rural counties resulted in presidential disaster declarations than did requests for counties in the other categories. SBA, on the other hand, denied a greater proportion of requests for rural and very rural counties than for urban and very urban counties.

Figure 3: Proportion of Requests Granted and Denied, by Population Density Category



Source: GAO's analysis of FEMA's and SBA's data.

Similar to the data on elapsed time, the data on the proportion of requests approved and denied should not be interpreted as demonstrating that population density determines the approval/denial decision.

Various Factors Affect Timing of Disaster Declaration Process

FEMA and SBA officials stated that many factors can affect the time that elapses during the declaration process. For example, according to the FEMA Branch Chief, it generally takes longer to travel to remote areas to assess damages.

We reviewed (1) selected requests for disaster declarations by the President and SBA that were processed more quickly or more slowly than the median number of days between the incident date and the

gubernatorial request and (2) additional selected requests for the time elapsed between the gubernatorial request and the declaration decision. The results are summarized below and detailed in appendix III.

Period Between Incident and Gubernatorial Request

One factor affecting the length of time between a disaster incident and a gubernatorial request for a declaration was how quickly a preliminary damage assessment could be made. For example, when a severe winter storm struck 44 counties in Virginia in 1994, preliminary damage assessments were not made immediately because (1) federal, state, and local emergency personnel were still responding to a severe winter storm that had struck the same counties less than 1 month previously, (2) it was difficult to differentiate the damages from the two storms, and (3) the storm made travel to some areas difficult. Furthermore, the situation was not life threatening. The governor waited until the damage assessments were completed for most of the affected counties before asking for a declaration.

Conversely, a preliminary damage assessment was completed more quickly than usual following a 1993 earthquake in a very rural Oregon county. The speed with which the assessment was completed contributed to the governor's requesting a disaster declaration from SBA in less-than-average time.

Another factor affecting the timing of requests to SBA is whether or not the governor first requests a presidential declaration for the same disaster incident. For example, following 1994 floods and tornadoes in North Carolina, the governor first requested a presidential disaster declaration. The same day that FEMA denied this request, the governor requested a declaration from SBA—more than 4 weeks after the disaster incident.

Period Between Gubernatorial Request and Declaration Decision

The factors that affected the length of time between a gubernatorial request and a declaration decision included (1) the extent of documentation in the governor's request and (2) in the case of requests for SBA's assistance, whether or not the request was included in a request for a presidential declaration.

Gubernatorial requests that are well documented generally can be processed more quickly, while missing documentation can contribute to delays, as in the following example. South Dakota experienced severe storms and flooding from March through July 1994, and in June the

governor requested a disaster declaration from SBA. SBA required additional documentation showing that the incident was “sudden” (the Small Business Act does not authorize assistance for “gradual” incidents), lengthening the time required before reaching a decision.

Conversely, state officials credited the clarity of SBA’s criteria for the agency’s relatively quick decision on a request for assistance following a 1994 flood in a very urban Pennsylvania county. Because the criteria were clear, the governor could clearly address them in the disaster declaration request. Also contributing to SBA’s quick declaration was that the damage occurred in a concentrated area, and it is easier to evaluate damage when it is concentrated than when it is more widely dispersed.

The time that elapses between a governor’s request and SBA’s decision can be affected by whether or not the governor has requested a presidential declaration for the same disaster incident. As noted above, SBA’s policy is to suspend action on requests it receives if the governor has requested a presidential declaration that includes individual assistance.

Agency Comments

We provided a draft of this report for comment to the FEMA Director and received comments from the Associate Director, Response and Recovery Directorate. We also provided a draft to the SBA Administrator and received comments from the Associate Administrator for Disaster Assistance. (SBA’s written comments and our responses are in app. IV.) FEMA generally concurred with the information presented in the draft report. FEMA suggested minor revisions to clarify our description of the disaster declaration process, and we incorporated those changes as appropriate. (App. V contains FEMA’s written comments.)

The SBA Associate Administrator stated that the draft report contained four points that could be misleading without further explanation. First, he suggested that we clarify that the time that elapses between a request for SBA’s assistance and SBA’s decision may be influenced by whether the request is made directly to SBA or is included in a request for a presidential declaration. To address this point, we added clarifying language as well as tables II.4 and II.5 (see app. II), which show the elapsed time for those requests included in a request for a presidential declaration and those made directly to SBA, respectively.

SBA’s second point was that because gubernatorial requests are made on a state basis, analyzing response time to disasters on a county-by-county

basis could “skew” the overall results. SBA suggested using the state as the unit of analysis. Our unit of analysis was the county because that enabled us to better distinguish between “rural” and “urban” areas. Accordingly, our analysis treats each county in a request equally, and our computed median times reflect the effects of the number of counties in each population density category and the length of time that elapsed between the request and SBA’s decision. We do not believe that using states as the unit of analysis would allow us to distinguish between the experiences of rural and urban areas.

The third point SBA raised was that for the gubernatorial request date, we used the date of the governor’s request for assistance rather than the actual receipt of the governor’s letter by SBA. SBA provided a sample of requests showing, on average, a 2-day difference between the date of the governor’s letter and the actual date SBA received the request. We used the date of the letter to ensure consistency with FEMA’s data set. We included SBA’s sample in the final report.

SBA’s fourth comment was that the report should clarify that in those cases in which SBA denied the governor’s request for a declaration, the requests were denied because they did not meet the agency’s criteria. Because our draft report stated that SBA relies on its criteria to determine eligibility for a declaration, we did not revise the final report.

To respond to your request, we reviewed relevant legislation and FEMA’s and SBA’s regulations for requests for disaster assistance and interviewed cognizant officials at each agency. Using copies of gubernatorial requests for disaster declarations and other documents from both FEMA and SBA and automated data provided by FEMA, we compiled a database to analyze the timing of events and the proportion of requests approved for each category of county. For the case studies, we interviewed federal headquarters and regional office personnel and state emergency management officials and obtained relevant documentation. We performed our work between February and July 1995 in accordance with generally accepted government auditing standards. (See app. VI for further details on our scope and methodology.)

We are sending copies of this report to the Administrator, SBA; the Director, FEMA; appropriate congressional committees; and other interested parties. Should you or your staff have any questions, you can

reach me at (202) 512-7631. Major contributors to this report are listed in appendix VII.

Sincerely yours,

A handwritten signature in cursive script that reads "Judy A. England-Joseph". The signature is fluid and elegant, with the first letters of each name being capitalized and prominent.

Judy A. England-Joseph
Director, Housing and Community
Development Issues

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Abbreviations

FEMA	Federal Emergency Management Agency
PDA	preliminary damage assessment
SBA	Small Business Administration

Disaster Declaration Processes

Although the two agencies operate under separate authorities, the Federal Emergency Management Agency (FEMA) and the U.S. Small Business Administration (SBA) follow similar processes for federal disaster declarations.

FEMA's Process

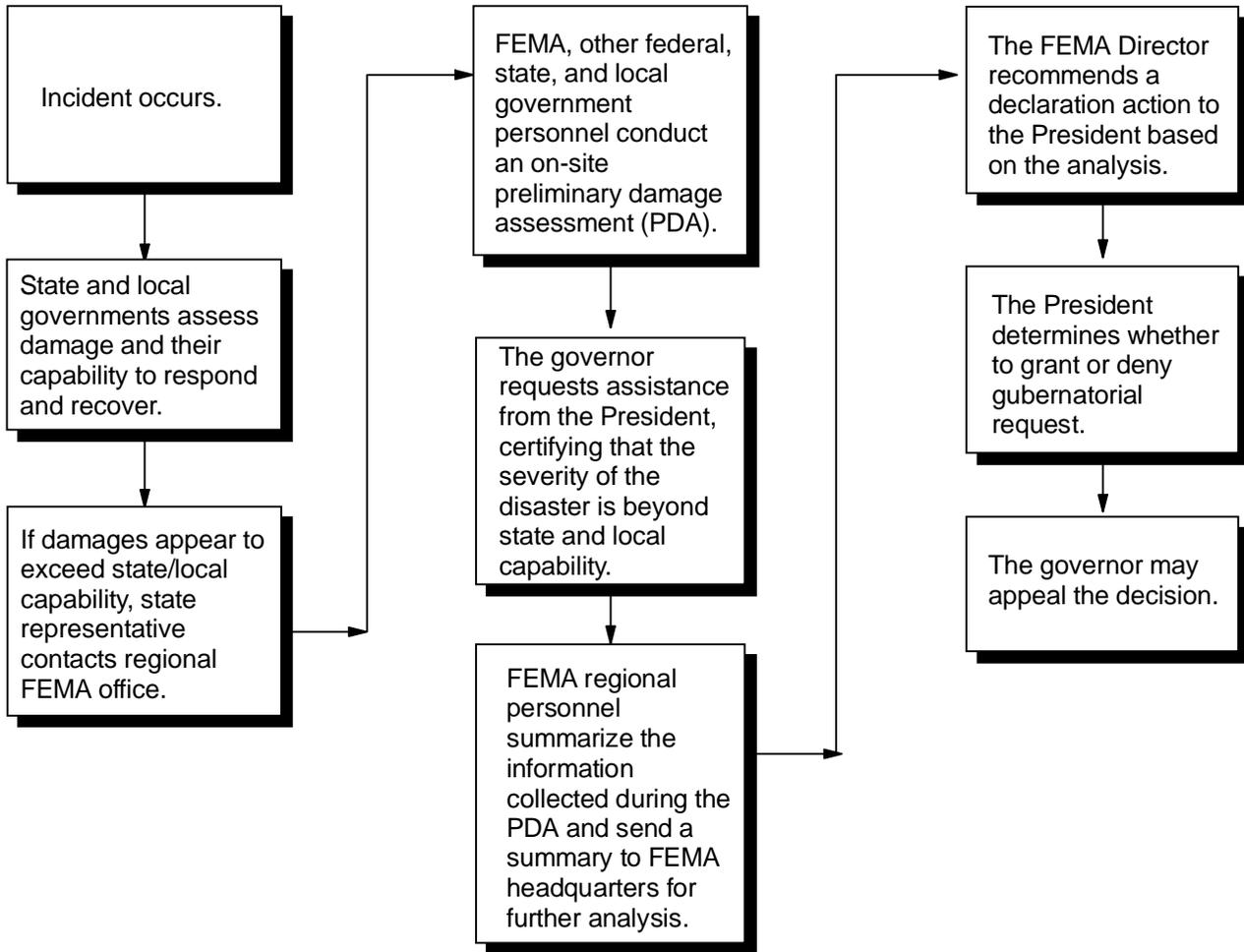
The Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 and following) authorizes the President to declare that an emergency or major disaster exists in a state, if requested by the governor of the state, and to make federal assistance available to supplement state and local resources. Figure I.1 shows the steps generally involved in the disaster declaration process.

The preliminary damage assessment (PDA) is a mechanism used to determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and the community as a whole. Information collected is used by the state in preparing the governor's request and by FEMA in making a recommendation to the President about whether and what type(s) of assistance is warranted.

A presidential declaration authorizes federal assistance (which may be public assistance, individual assistance, or both) in the affected state(s) after a governor's request.¹ The federal assistance authorized by the President includes assistance from other federal agencies, including SBA. The President delegates authority to FEMA to determine which counties within the state will receive assistance and the type(s) of assistance to be provided. At any point after the governor's initial request letter, the governor may request that additional counties be made eligible and/or that additional types of assistance be provided, as part of the same disaster declaration. These requests are submitted to FEMA's regional offices.

¹Section 501(b) of the Stafford Act authorizes the President to provide emergency assistance in certain instances without a gubernatorial request.

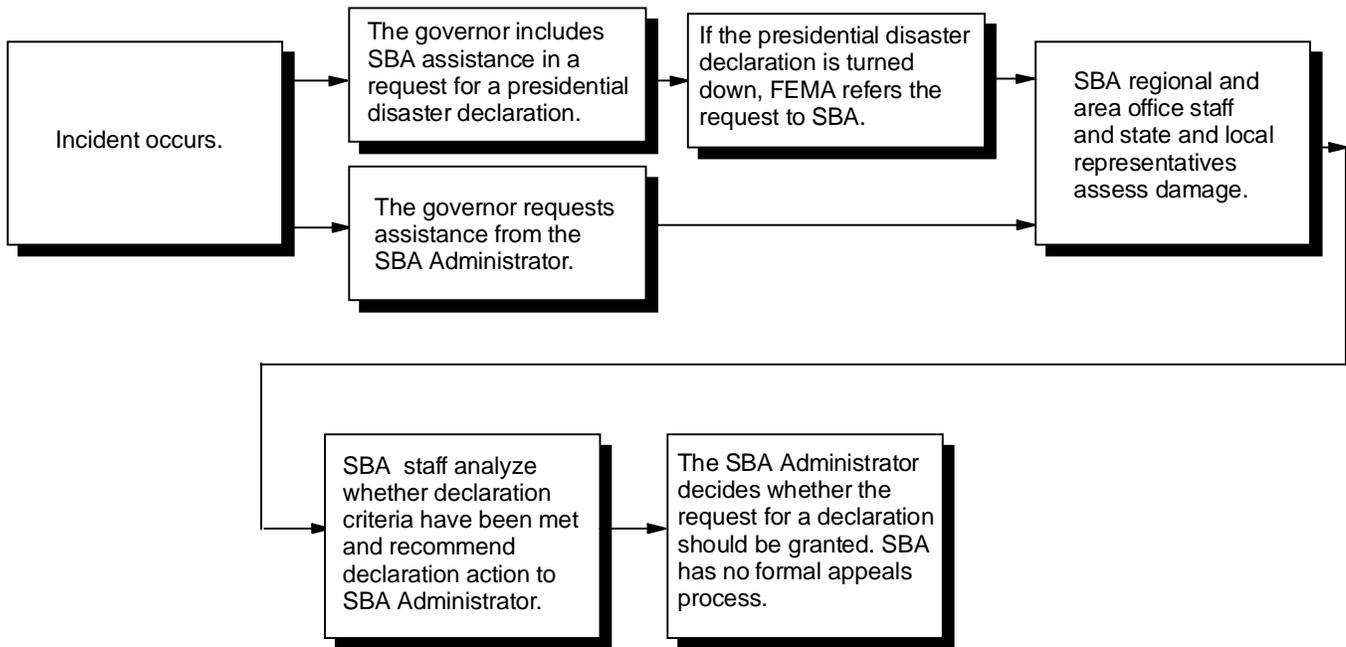
Figure I.1: Presidential Disaster Declaration Process



SBA's Process

Under the provisions of the Small Business Act, the SBA Administrator is authorized to make or guarantee loans to victims of sudden physical disaster if requested by the governor of a state. Figure I.2 shows the steps involved in the SBA declaration process.

Figure I.2: SBA's Disaster Declaration Process



Processing Times for Disaster Declaration Requests

With some exceptions, the times taken for governors to request a presidential or SBA disaster declaration and the times taken for the President or SBA Administrator to reach a decision were longer for rural and very rural counties. Consequently, the overall times from disaster incidents to decisions on federal aid were longer for these counties than for urban or very urban counties.

Requests for Presidential Declarations

To determine the amount of time that the declaration process takes for requests to the President through FEMA, we reviewed all counties for which emergency and/or major disaster declarations were requested in calendar 1993 and 1994. These totaled 2,874 counties, divided as follows: (1) 2,157 counties that were included in original gubernatorial requests (“initial” counties) and (2) 717 counties that governors subsequently asked FEMA to make eligible for assistance (“add-on” counties).¹ Because FEMA does not maintain centralized records of add-on counties that were turned down, the add-on counties for which we obtained information are limited to those that were declared eligible for federal assistance.

The total time that elapses between a disaster incident and a decision on federal aid depends on how quickly a governor asks for assistance, as well as how quickly federal officials act on the request. Accordingly, for each initial county we computed the numbers of days that elapsed from the disaster incident to the gubernatorial request; from the gubernatorial request to the date that a declaration decision was made; and the total time that elapsed from incident to declaration decision. As shown in table II.1, the number of days that elapsed both before and after gubernatorial requests generally tended to be shorter for initial counties as county population density increased.

¹Governors may request declarations for counties that were not included in the original request for various reasons, such as more detailed damage information becoming available.

**Appendix II
Processing Times for Disaster Declaration
Requests**

**Table II.1: Time Required to Process
Presidential Disaster Declaration
Requests, Initial Counties**

Number of days	County population density category				
	Very rural (157)	Rural (827)	Urban (837)	Very urban (336)	All (2,157)
From incident to governor’s request:					
Median	10	10	4	4	4
Mean	29.1	12.8	10.6	9.1	12.6
Minimum	0	0	0	0	0
Maximum	129	114	114	87	129
From governor’s request to decision:					
Median	11	9	8	7	8
Mean	13.0	14.7	13.8	12.7	13.9
Minimum	0	0	0	-1	-1
Maximum	88	134	134	134	134
From incident to decision:					
Median	29	19	18	12	18
Mean	42.1	27.6	24.4	21.8	26.5
Minimum	2	1	1	0	0
Maximum	153	188	188	151	188

Notes: Numbers in parentheses are numbers of counties for which requests were made in the category. “0” indicates that the two actions occurred on the same day. “-1” represents a case (the Northridge earthquake) in which the governor orally requested an expedited declaration which the President authorized. The written request was dated and submitted the day following the actual declaration.

Source: GAO’s analysis of FEMA’s data.

As noted above, for the “add-on” counties, FEMA does not maintain centralized information; therefore, we were able to compute only the total times elapsed between disaster incidents and declaration decisions. As table II.2 shows, while there is somewhat more variation, the overall pattern was the same as for initial counties: The number of days that elapsed generally tended to be smaller as county population density increased.

**Appendix II
Processing Times for Disaster Declaration
Requests**

**Table II.2: Time Required to Process
Presidential Disaster Declaration
Requests, Add-on Counties**

From incident to decision:	County population density category				
	Very rural (107)	Rural (393)	Urban (161)	Very urban (56)	All (717)
Median	44	42	34	36	40
Mean	63.2	51.0	40.9	39.0	49.6
Minimum	10	3	2	4	2
Maximum	140	153	206	98	206

Note: Numbers in parentheses are numbers of counties for which requests were made in the category.

Source: GAO's analysis of FEMA's data.

A greater proportion of add-on counties fell into the “very rural” or “rural” categories than did initial counties. According to FEMA officials, it typically takes longer to obtain accurate damage reports from more remote areas where the extent of damages may not be apparent as quickly.

**Requests for SBA
Declarations**

For requests to SBA, we reviewed those counties for which physical disaster loan² requests had been made during calendar 1993 and 1994; these totaled 179. Similar to our treatment of presidential declarations, for each county we computed the number of days that elapsed from the disaster incident to the gubernatorial request; from the gubernatorial request to the date that a declaration decision was made; and the total time that elapsed from incident to declaration decision.

In addition, we separately analyzed requests to SBA that (1) were referred by FEMA and (2) were made directly by governors. Governors may explicitly request SBA's assistance as part of their request to FEMA for a presidential disaster declaration. If the request is granted, then SBA may provide assistance without a separate SBA declaration. If such requests for presidential declarations are turned down, then FEMA refers the requests to SBA. FEMA does not refer to SBA turned-down requests in which a governor

²We did not review requests for economic injury disaster loans, nor did we review assistance provided under presidential declarations. We reviewed only SBA declaration requests. Furthermore, SBA, upon granting a declaration, deems automatically eligible those counties that are contiguous to the affected county(ies). We did not include contiguous counties in our analysis.

**Appendix II
Processing Times for Disaster Declaration
Requests**

has not explicitly requested SBA assistance; therefore, in those cases, the governor must request a declaration directly from SBA.

Table II.3 shows that for all requests for SBA disaster assistance, the number of days that elapsed before and after a gubernatorial request generally tended to be smaller as county population density increased.

Table II.3: Time Required to Process SBA's Disaster Assistance Requests

Number of days	County population density category				
	Very rural (16)	Rural (52)	Urban (66)	Very urban (45)	All (179)
From incident to governor's request:					
Median	108	19	18	11	17
Mean	83.1	26.7	27.2	15.4	29.1
Minimum	10	2	2	0	0
Maximum	108	108	287	54	287
From governor's request to decision:					
Median	27	29	8	8	9
Mean	24.5	27.5	13.0	14.7	18.6
Minimum	6	0	1	1	0
Maximum	41	56	56	58	58
From incident to decision:					
Median	135	58	37	32	42
Mean	107.6	54.2	40.2	30.0	47.7
Minimum	16	9	3	1	1
Maximum	135	135	306	64	306

Notes: Numbers in parentheses are numbers of counties for which requests were made in the category. "0" indicates that the two actions occurred on the same day. Fifteen of the 16 very rural counties were included in one declaration.

Source: GAO's analysis of FEMA's data.

Tables II.4 and II.5 present the time elapsed for SBA disaster assistance requests (1) referred by FEMA and (2) made directly to SBA, respectively. The tables show a similar overall pattern: The number of days that elapsed before and after a gubernatorial request generally tended to be smaller as county population density increased, whether the requests were referred by FEMA or made directly to SBA. The tables also show that the median and

**Appendix II
Processing Times for Disaster Declaration
Requests**

mean processing times were somewhat greater for requests referred by FEMA.

**Table II.4: Processing Times for SBA's
Disaster Declaration Requests
Referred by FEMA**

Number of days	County population density category				
	Very rural (1)	Rural (30)	Urban (13)	Very urban (11)	All (55)
From incident to governor's request to FEMA:					
Median	17	17	6	4	17
Mean	17.0	15.1	12.5	7.3	12.9
Minimum	17	3	3	2	2
Maximum	17	19	44	17	44
From governor's request to FEMA turn-down decision:					
Median	35	34	24	23	34
Mean	35.0	33.1	27.5	28.5	30.9
Minimum	35	19	7	19	7
Maximum	35	50	50	54	54
From FEMA turn-down decision to SBA decision:					
Median	6	7	7	6	7
Mean	6.0	6.7	7.0	6.8	6.8
Minimum	6	3	3	1	1
Maximum	6	10	10	10	10
From incident to SBA decision:					
Median	58	58	58	35	58
Mean	58	54.9	46.9	42.5	50.6
Minimum	58	32	23	32	23
Maximum	58	60	60	64	64

Source: GAO's analysis of SBA's data.

**Appendix II
Processing Times for Disaster Declaration
Requests**

**Table II.5: Processing Times for
Disaster Declaration Requests Made
Directly to SBA**

Number of days	County population density category				
	Very rural (15)	Rural (22)	Urban (53)	Very urban (34)	All (124)
From incident to governor's request:					
Median	108	30	30	13	30
Mean	87.5	42.5	30.9	18.0	36.3
Minimum	10	2	2	0	0
Maximum	108	108	287	54	287
From governor's request to decision:					
Median	27	7	7	7	7
Mean	23.4	10.7	7.7	8.0	10.2
Minimum	6	0	1	1	0
Maximum	27	27	19	16	27
From incident to decision:					
Median	135	37	37	20	37
Mean	110.9	53.2	38.6	26.0	46.5
Minimum	16	9	3	1	1
Maximum	135	135	306	62	306

Source: GAO's analysis of SBA's data.

Factors Affecting Timing of Declaration Process

To identify factors that may influence the time that elapses during the disaster declaration process, we reviewed selected cases of disaster declaration requests at FEMA and SBA. (We defined a “case” as a request to either the President or the SBA Administrator for a declaration in a state for one disaster incident; details on our selection criteria are in app. V.) We selected a total of eight cases, four dealing with the time period between disaster incident and gubernatorial request and four dealing with the time period between gubernatorial request and declaration decision. These eight cases represent seven disaster incidents (one incident resulted in a request for a presidential disaster declaration that was turned down, and a subsequent request for a declaration from the SBA Administrator).

The following provides descriptive information about each case, citing factors that may have affected the time that elapsed in each case. However, because the cases were not randomly selected, they should not be viewed as representative of all disaster declaration requests.

Time Between Incident and Gubernatorial Request

The cases we reviewed suggest that a principal factor affecting the length of time between a disaster event and a gubernatorial request for a declaration was how quickly preliminary damage assessments (PDA) could be made. A number of variables can affect the speed with which PDAs are conducted. A second factor that affected requests to SBA was whether or not the governor had requested a presidential disaster declaration for the same disaster event.

Severe Winter Storm in Virginia

Virginia experienced a severe winter ice storm on March 1-5, 1994. The situation was not considered life threatening. The governor requested a presidential declaration of a major disaster on March 15. The governor asked for public assistance for 44 counties, about half of which were rural.

The storm came on the heels of an earlier (February 8-12) severe winter storm that struck generally the same areas of Virginia. (The President had declared a major disaster following the earlier storm.) Damage survey teams composed of federal, state, and local personnel were still on the scene responding to the earlier storm when the later storm hit.¹ This situation created a dilemma: The survey teams are generally composed of the same personnel who conduct PDAs and often, in rural areas, include volunteers. One option was for the survey teams to interrupt their work to

¹Damage survey teams are responsible for a detailed analysis of the damage after a presidential declaration has been made.

conduct PDAS for the second storm. However, federal and state officials determined that it would be more efficient to concurrently conduct surveys for the first storm and PDAS for the second storm.

Therefore, the principal contributing factor to a prolonged period between the incident date and the gubernatorial request was that the PDAS were not conducted immediately following the storm. Officials thought it was prudent to delay the assessments since the request was for “cleaning up” rather than saving lives and because a delay would allow more efficient use of the limited and exhausted human resources available.

Other factors that contributed to the length of time between the incident and the governor’s request:

- The governor did not submit the request until most of the PDAS were complete. Frequently, governors will request a declaration once it is established that at least some counties are eligible and that the state lacks the capability to respond to the incident. Federal and state officials noted that for this storm, waiting until most of the PDAS had been completed enabled them to obtain a clearer understanding of the extent of the damage, and as a result, FEMA was able to process the request with few questions about eligibility.
- The PDAS were more difficult to conduct since differentiating the damages caused by the two storms was difficult.
- The nature of the storm—ice accompanied by 3 inches of snow, winds of 50-60 miles per hour, and subsequent flooding—made travel to conduct the assessments challenging.

As a result of the second storm, the President declared a major disaster for Virginia, and FEMA determined that 33 of the 44 counties requested by the governor would be designated as eligible for public assistance grants.

Severe Winter Storm in Utah

Utah experienced a severe winter storm from January 2 through January 11, 1993, that affected five counties—Salt Lake County, another very urban county, one urban county, and two very rural counties. Up until January 8, when the storm intensified, the state and local governments were able to respond to the storm. The governor declared a state of emergency on January 11 after a record-breaking snowfall and on January 16 requested a presidential emergency declaration. The PDA indicated that snow debris removal was the most significant need. The request was denied on the grounds that the situation was not deemed to be

beyond the combined capabilities of the state and local governments. Utah unsuccessfully appealed the denial.

One factor contributing to our computed longer-than-average time is the incident date recorded by FEMA. FEMA's records show the incident date as January 2; however, a more accurate incident date might be later because the storm intensified starting January 8. The event period was never fully defined because the request was denied.

A second potential factor was the nature of the incident. The request was unique because it was the first snow-removal request FEMA had received in nearly 15 years. FEMA's "snow" policy had become inactive, and confusion prevailed over matters such as determining which costs were eligible. A third factor was that the record-breaking snow levels made communications between the localities and the state difficult, delaying the state's ability to obtain critical information on the extent of storm damage.

Flooding in North Carolina

North Carolina experienced damage caused by floods and tornadoes on August 16 and 17, 1994. SBA and FEMA personnel as well as state and local officials conducted a PDA of several counties on August 22-24. The governor requested a presidential declaration for 14 counties, mostly urban, on August 30; the request was denied on September 21. On that same day—more than 4 weeks after the incident—the governor requested assistance from SBA. On September 27, the SBA Administrator declared 2 of the 14 counties eligible for SBA assistance. Another eight counties were eligible for assistance because they were contiguous to the two declared counties.

Much of the time that elapsed between the disaster incident and the governor's request to SBA can be attributed to processing the presidential request. While SBA made a decision 6 days after receiving the request, over 6 weeks had already elapsed before the governor requested SBA assistance.

Earthquake in Oregon

Klamath County, Oregon (a very rural county), experienced an earthquake on September 20, 1993. On September 27-29, FEMA and SBA jointly conducted a damage assessment to determine the extent of the damage. On September 30, the governor requested an SBA disaster declaration for the county. On October 1, the governor requested a presidential major disaster declaration for public assistance.

According to state officials, a principal factor that may have contributed to a gubernatorial request in less-than-average time for very rural counties was the prompt damage assessment, which was conducted before the governor's official request for assistance.

Time Between Gubernatorial Request and Declaration Decision

On the basis of the cases we reviewed, factors that affected the length of time between a gubernatorial request and a declaration decision included (1) the extent of documentation of the damage in the governor's request and (2) whether the damage occurred in a concentrated or more widely dispersed area.

Flooding in South Dakota

South Dakota experienced severe storms and flooding from March through July 1994. On June 6, the governor requested a presidential major disaster declaration primarily to repair road and bridge damage for 15 counties (11 very rural and 4 rural counties). The President made the declaration on June 21, and FEMA designated all 15 counties. The governor subsequently requested that FEMA designate an additional six counties, and FEMA did so.

FEMA officials explained that because the land is flat and water subsidence takes longer than in less flat areas, flooding incidents often—as in this case—last longer in South Dakota as well as North Dakota where the topography is similar. Therefore, subsidence of the flood waters to determine the extent of damage took longer than subsidence in less flat areas. Also, the Dakotas are not highly populated and contain relatively more public facilities that are less expensive to repair and replace than do more densely populated areas—for example, gravel roads, which are common in the Dakotas, are less expensive to repair than highways.

Also, the overriding factor that FEMA employs in determining eligibility for a disaster declaration is state and local capability. Since the road and bridge repair costs incurred by this disaster appeared to be relatively inexpensive, FEMA, in determining state and local government capability, scrutinized the request more closely than events with more obvious and expensive damage. FEMA officials noted that although the costs may be less, they recognized that the impact was not necessarily less.

In addition to the request to the President for public assistance, the governor requested an SBA declaration for assistance to households and businesses in the same 15 counties as requested in the presidential

request. The gubernatorial request was made on June 17; and on July 14, the SBA Administrator declared two counties eligible for SBA assistance. (Six other counties, because they were contiguous to the two declared counties, became eligible for assistance.) SBA's records indicate that the gubernatorial request did not establish that the flooding was a "sudden" physical event. Because the Small Business Act prohibits providing assistance for gradual events, SBA required additional information and adequate documentation that the event was sudden, lengthening the declaration process. Also, SBA did not receive the gubernatorial request letter until 6 days after the date of the letter.

Flooding in Pennsylvania

Philadelphia County, Pennsylvania (a very urban county), experienced widespread urban flooding due to thunderstorms and heavy rain on July 14, 1994. On August 3, the governor requested SBA assistance. On August 4, SBA personnel along with state and local officials conducted a survey to determine the extent of the damage caused by the flooding. On August 8, the SBA Administrator declared the county eligible for SBA assistance.

State officials suggested that SBA's processing of disaster declaration requests is expedited because SBA provides clearly detailed criteria and instructions for evaluating whether the criteria have been met. They noted that by closely following the instructions and carefully addressing the criteria in the gubernatorial request, the declaration is usually forthcoming.

Also, SBA officials explained that the flooding occurred in a concentrated area. It is easier to evaluate the extent of damage when it occurs in a geographically concentrated area than when the damage is more widely dispersed. Therefore, SBA was able to quickly assess the damage.

Severe Winter Storm in Tennessee (and Other Eastern and Mid-Atlantic States)

From March 13 through March 17, 1993, Tennessee (as well as 16 eastern and mid-Atlantic states and the District of Columbia) experienced a severe winter storm with excess snowfall.² The states and the District requested that the President declare an emergency and requested public assistance for cleaning up the storm-related damages. The time from the governor's request to the presidential decision was shorter than average for all 18 requests received.

²While we selected the state of Tennessee for our analysis, the same storm hit the other states, and the declaration process was similar for all.

Appendix III
Factors Affecting Timing of Declaration
Process

FEMA officials explained that the overriding factor in considering the 18 declaration requests was the storm's "crippling" impact. The requirement to conduct PDAS was waived, and the decision to provide emergency assistance was made more quickly than usual. FEMA policy is to waive PDAS (i.e., expedite processing) only for disasters of the greatest magnitude, such as Hurricane Andrew. FEMA expedited the processing of gubernatorial requests for this storm. In addition to waiving the PDA requirement, FEMA provided a draft request letter to the affected states and drafted a snow-removal policy. The states and the District requested public assistance only.

Comments From the Small Business Administration

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416



Date: July 31, 1995

To: David Wood, Assistant Director
Carole Buncher, Senior Evaluator
General Accounting Office

From: Associate Administrator
for Disaster Assistance

Subject: Response to GAO Report on Declarations for Urban and Rural Areas

The report to Chairman Pressler, Committee on Commerce, Science, and Transportation, United States Senate contains statements which can be misleading without further explanation.

The first concern deals with Presidential requests. The figures in the report negatively skew SBA's response time because GAO's analysis of SBA data includes the number of days it takes to act on a Governor's request for a Presidential declaration. SBA is apparently being penalized for this period of time. In order to avoid confusion and duplicate work with the disaster victim, SBA waits until a decision is made on the Presidential request. While SBA provides the same assistance in a Presidential or an SBA declaration, many additional forms of assistance are available to victims in a Presidential declaration, all coordinated by FEMA. If SBA were to declare an Agency declaration prior to the final decision for a Presidential, a disaster applicant would have to reapply with FEMA for the additional assistance after already applying with SBA for assistance on an Agency declaration.

As an example, in the recent Louisiana flooding disaster, FEMA registered 67,900 disaster victims, but only referred 36,039 victims to SBA for loan assistance. In this flooding disaster, FEMA to-date has referred 53% of disaster victims to SBA for loan decisions and 47% for grant assistance (e.g., temporary housing, IFG program, disaster unemployment) at the registration stage without SBA interviewing these disaster victims. If SBA were to declare an Agency declaration ahead of the decision on the Presidential request, SBA would have interviewed an additional 31,900 disaster victims. After the Presidential declaration, these victims would then have had to register with FEMA, resulting in confusion to the victims and duplicate and unnecessary workload for SBA. In Presidential declarations, victims who register with FEMA are automatically sent SBA loan applications, as appropriate.

In the sample provided, on thirteen Presidential decline disasters which represent 61 of the 178 counties, the median response time was 24 days to decline the Governor's request for a Presidential declaration and SBA's median response time was 8 additional days for either an approval or decline. The overall median response time from the date of the Governor's request



See comment 1.

**Appendix IV
Comments From the Small Business
Administration**

for Presidential assistance (which was subsequently declined) to SBA's decision was 32 days. We reiterate our position that it is misleading to add the 24 days it took to decline the Governor's request for a Presidential request to the actual 8 day response time for the SBA declaration.

See comment 2.

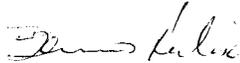
The second concern is that the report considers response time to disaster requests on a county by county basis instead of on a State by State basis. The Governor's request are made on a state basis, not county by county. SBA treats all state requests the same regardless if the disaster area is rural or urban. A Governor's request may be multi county and include many more rural than urban counties which can artificially skew the overall results. For example, a disaster area may constitute ten counties of which nine are rural and one is urban. In this scenario if SBA declined the declaration, the results would skew negatively towards rural areas because 90% of the disaster counties are rural, even though the major portion of the damage might be in the urban county. We feel it would be more appropriate to analyze disaster areas on State basis rather than on a county basis.

See comment 3.

A third concern deals with using the date of the Governor's request for assistance instead of the actual receipt of the Governor's letter by SBA. In the sample size of 49 disasters where a Governor requested SBA assistance only, there is a two day difference on average (with a range of up to 6 days) between the date of the Governor's letter and the actual date we received the request. SBA can not act on any request until it is received by mail or by facsimile.

See comment 4.

Fourth, it is misleading to say that SBA declined declarations for any county, rural or urban without adding the fact that the uninsured damage in any declined county did not meet the Agency's published criteria, nor was it contiguous to a county that met the criteria.



Bernard Kulik

**Appendix IV
Comments From the Small Business
Administration**

Presidential Declines

SBA Decl. No.	No. Counties	Date of Governor's Request	Date of FEMA's Decline	Date of SBA's Decision
2645	14	3/15	4/27 (43)*	5/13 (16)**
2649	1	5/11	6/09 (29)	6/10 (1)
2678	3	8/10	8/31 (21)	9/10 (10)
2717	13	4/01	4/25 (24)	5/03 (8)
2722	3	4/29	5/23 (24)	5/26 (3)
2739	1	8/19	9/02 (14)	9/08 (6)
2741	1	8/24	9/14 (21)	9/19 (5)
2742	3	8/23	9/15 (23)	9/20 (5)
2744	14	8/30	9/21 (22)	9/27 (6)
2747	1	8/26	9/23 (28)	10/06 (13)
2750	2	8/31	9/23 (23)	10/26 (33)***
2754	4	10/07	11/23 (47)	11/29 (6)
2757	1	11/21	11/28 (7)	12/06 (8)

**Number in parenthesis indicates the number of days between Governor's request and FEMA's decline*

***Number in parenthesis indicates the number of days between FEMA's decline and SBA's decision*

****The Governor appealed the initial FEMA decline. His appeal was declined 10/20/94. The SBA declaration was signed 10/26/94, only 6 days after the decline of the appeal.*

The following are GAO's comments on the Small Business Administration's letter dated July 31, 1995.

GAO Comments

1. SBA's first comment was that for requests for SBA disaster assistance, our data on median elapsed times did not distinguish between (1) requests that are made directly to SBA and (2) requests that are referred by FEMA in cases in which requests for a presidential disaster declaration have been turned down. Our draft report stated that SBA's policy is to suspend action on requests it receives if the governor has requested a presidential declaration that includes individual assistance and that SBA does not act on such requests until the President has made a decision on the request for a presidential declaration.

To respond to SBA's comment, we disaggregated requests for SBA assistance between (1) requests that are made directly to SBA and (2) requests that are referred by FEMA. We then computed the median and mean elapsed times for each group and included these data in appendix II. Among other things, the data show that for the requests that were made directly to SBA during 1993 and 1994, the median number of days between the gubernatorial request and SBA's decision was 7, or 34 days fewer than the median of 41 days for requests referred by FEMA. We added language to the letter noting this distinction.

2. SBA's second comment was that we used counties rather than states as the units of analysis and that governors' requests are on a "state basis." We used counties because doing so enabled a somewhat better distinction between "rural" and "urban" areas. Our report noted that (1) in cases of requests for a presidential disaster declaration, FEMA determines which counties within a declared state will receive assistance and (2) in the absence of a presidential declaration, the SBA Administrator may declare that counties struck by disasters are eligible to receive some types of SBA assistance. Our analysis treats each county in a request equally. Our computed median times reflect the effects of the number of counties in each population density category and the length of time that elapsed between the request and SBA's decision. We do not believe that using states as the unit of analysis would allow us to distinguish between the experiences of rural and urban areas.

3. SBA's third comment concerned our definition of "date of governor's request" for SBA assistance. We used the dates that appeared on the governors' letters to ensure a data set consistent with FEMA's records. Our

draft report noted that according to SBA officials, a gubernatorial request letter may not necessarily be mailed on the date of the letter and that any delays in mailing would help account for the time lapse between a gubernatorial request and an SBA decision, as shown by our analysis. We added the figures cited in SBA's comments to the final report.

4. SBA's fourth comment was that the report should clarify that any counties that were denied SBA assistance did not meet the agency's published criteria. Our draft report stated that SBA uses criteria, published in the Code of Federal Regulations, to determine whether or not a county is eligible for disaster assistance; therefore, we do not believe any change is necessary on the basis of this comment.

Comments From the Federal Emergency Management Agency



Federal Emergency Management Agency

Office of Inspector General
Washington, D.C. 20472

August 10, 1995

Carol Buncher
General Accounting Office
820 First Street, NE
Washington, D.C. 20002

Dear Ms. Buncher:

Enclosed is the original copy of FEMA's response to the General Accounting Office draft report entitled "Disaster Assistance Information on Declarations for Urban and Rural Areas". A copy of the response was faxed to your office on August 8, 1995.

Should you have any questions, please call Russ Symons of my staff on 202-646-3904.

A handwritten signature in cursive script, appearing to read "R. Skinner".

Richard Skinner
Assistant Inspector General
for Audit

Enclosure



Federal Emergency Management Agency

Washington, D.C. 20472

August 8, 1995

MEMORANDUM TO: Richard L. Skinner
Assistant Inspector General for Audit

FROM: 
Richard W. Krimm
Associate Director, Response and Recovery Directorate

SUBJECT: GAO Draft Report Entitled *Disaster Assistance Information on
Declarations for Urban and Rural Areas*

Thank you very much for the opportunity to review the subject General Accounting Office (GAO) draft report. Overall, I found the account to be a very clear narrative of the disaster declaration processes for both the Federal Emergency Management Agency (FEMA) and the U.S. Small Business Administration (SBA). I do have a number of comments, however, which I believe need to be considered in the report to ensure that the subject is treated appropriately. These are as follows:

Now on pp. 1 and 18.

- **Page 1, Paragraph 1; also Page 20, Paragraph 4:** This paragraph is a brief narrative stating what FEMA and SBA can do in the event of a disaster. One sentence refers to a disaster declaration authorizing Federal assistance in the affected State(s). It should go on to say that the Federal assistance authorized by the President includes assistance from other Federal agencies, including SBA. By making this statement, it will clarify the first paragraph on page 6, which discusses SBA's suspended processing when a Governor requests assistance directly from SBA and FEMA simultaneously.
- **Page 7, Paragraph 1:** This paragraph begins to detail the factors that are used to evaluate requests for assistance. It is important that a sentence be added to clarify that while this audit focuses on the *county* level, FEMA focuses on the impacts of the entire event on both the State and local governments.
- **Page 10, Paragraph 2; also Page 23, Paragraph 2:** GAO mentions in the report that 2,157 counties were included in gubernatorial requests for Presidential disaster declarations. It is important, however, to keep this number in perspective with the FEMA process, which looks at States as well as individual counties. GAO should include the actual number of requests associated with 2,157 counties (for example, "... FEMA received 75 requests for presidential declarations, covering 450 counties....").
- **Page 25, Table II.1:** Under the section titled *From Governor's Request to Decision*, under the

Now on p. 3.

Now on p. 6.

Now on p. 23.

Appendix V
Comments From the Federal Emergency
Management Agency

column head *Very Urban*, a negative numeric representation is shown (reportedly to account for the Northridge Earthquake, according to Carol Buncher from GAO). In the case of Northridge, Governor Wilson verbally requested that President Clinton declare the disaster. The written request was received from the State the following day. Since GAO used the Governor's request letter date and the disaster declaration date to develop the numeric representation shown in the chart, it naturally resulted in a negative number. This needs to be footnoted in the report to ensure it is understood. Some suggested language follows:

This represents the Northridge Earthquake. Governor Wilson verbally requested an expedited declaration which the President authorized. The official written request was submitted and dated the day following the actual declaration. As a result, calculations based on the actual date of the Governor's request versus the declaration date will generate a negative response.

Now on p. 30.

- **Page 32-33, Paragraph 4:** In the discussion of the flooding in North Carolina, GAO indicated that the President denied the request. The sentence should read "The request was denied on September 21", without reference to the President, since he/she does not make the denial announcement.
- **Page 38, Paragraph 2:** In the discussion of the audit methodology, GAO indicates that each time a county was included in a request, it was counted for purposes of this report. Page 10 is the first reference to the number of counties included in the 1993 and 1994 requests. For clarity, GAO should make reference to this point of the audit methodology at page 10.

Now on p. 6.

Scope and Methodology

To determine if FEMA's and SBA's disaster declaration policies and procedures differ for requests for rural, as compared with urban, areas, we reviewed the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 and following), the Small Business Act, and FEMA's and SBA's procedures as outlined in the Code of Federal Regulations. We also interviewed FEMA and SBA officials responsible for administering the disaster declaration process and obtained and reviewed guidance used in evaluating disaster declaration requests at each agency.

To compare the length of time each agency took to respond to requests for rural and urban areas and to compare the proportion of requests for rural areas that were granted with the corresponding proportion for urban areas, we developed a database using FEMA's and SBA's disaster declaration request records and Bureau of the Census' county and state information. We did not verify the accuracy of these records. The database included all counties that were included in requests for "emergency" or "major disaster" declaration requests under the Stafford Act, or for SBA physical disaster assistance, received during calendar 1993 and 1994. We counted each county each time it was included in a request. We limited the scope of our review to calendar 1993 and 1994 because those were the years for which the best information was available. FEMA and SBA officials told us that these years were not atypical.

We used county population and land area data from the 1990 U.S. census to compute a measure of population density for each county. We then used the Bureau of the Census' population density categories to classify each of the counties as very rural, rural, urban, or very urban, as shown in table VI.1.

Table VI.1: County Population Density Categories

Census Bureau population density (persons/sq. mile)	Category
Less than 10	Very rural
10-49.9	Rural
50-249.9	Urban
At least 250	Very urban

Using FEMA's and SBA's records, we included for each county the dates of (1) the disaster incident, (2) the gubernatorial request, and (3) the decision by the President or SBA Administrator.

For Presidential declaration requests:

- We obtained the disaster incident dates from FEMA’s automated information system and notices published in the Federal Register. In cases in which an incident spanned more than 1 day, we used the first day of the period.
- We used the dates on the governors’ request letters for the gubernatorial request dates.
- For the decision date, we used the date of the declaration as published in the Federal Register if the request was granted. Requests that are turned down do not result in a Federal Register notice. When all counties included in requests were turned down, we obtained the date from FEMA’s automated information system. However, FEMA does not centrally maintain records of add-on counties that were denied eligibility for assistance. Therefore, we excluded those counties in our timing calculations.

We disaggregated requests for SBA assistance between (1) requests that were made directly to SBA and (2) requests that were referred by FEMA. For all requests, we obtained the disaster incident dates and SBA decision dates from SBA’s files. For requests made directly to SBA, we defined the “gubernatorial request date” as the date of the governor’s letter.¹ For requests referred by FEMA, we used the FEMA “turn-down” date—the date that FEMA announced that a governor’s request for a presidential declaration had been denied—as the date of the request to SBA.

We used this information to compute the median and mean number of days that elapsed, for each county, between the disaster incident and the gubernatorial request, and between the gubernatorial request and the decision. We also included information on whether each county was granted assistance or was turned down. For the “add-on” counties, FEMA does not maintain centralized records showing the gubernatorial request dates; therefore, we were able to compute only the total time elapsed from disaster incident to a declaration decision.

For each county population density category, we computed the median and mean numbers of days for each of the two time periods, the proportion of requests that resulted in assistance being granted, and the proportion that were turned down.

¹SBA officials noted that a gubernatorial request letter may not necessarily be mailed on the date of the letter; any delays in mailing would help account for the time lapse between gubernatorial request and an SBA decision, as shown by our analysis. For example, according to SBA’s Associate Administrator for Disaster Assistance, in a sample size of 49 disasters for which a governor requested SBA assistance only, there was a 2-day difference on average, with a range of up to 6 days, between the date of the gubernatorial request and the date SBA actually received the request. SBA does not act on any request until it is received by mail or by facsimile.

To select the case studies used to identify factors that influence the length of time taken for the disaster declaration process at each agency, we selected the cases that took approximately 25 percent more than the median time between the disaster incident and gubernatorial request and the cases that took approximately 25 percent less. Similarly, at each agency we selected the cases that took approximately 25 percent more than the median time between gubernatorial request and a disaster declaration decision and the cases that took approximately 25 percent less. We judgmentally selected cases that were diverse, differing by such characteristics as type and size of disaster, geographic location, type of declaration requested (presidential emergency, presidential major disaster, or SBA), and outcome (request granted or turned down).

We interviewed relevant agency and state officials to identify the factors in each case that appeared to affect the time intervals. We used the cases to illustrate what happened in a few instances to speed up or slow down the disaster declaration process. The cases are not necessarily representative of all disaster declaration requests, and they should not be interpreted as explaining all variation in time elapses among requests.

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