November 12, 2026

Agency Information Collection Activities: Proposed Collection; Comment Request; Hazard Mitigation Grant Program (HMGP) Application Reporting

Taxpayers for Common Sense (TCS) appreciates the opportunity to submit comments to the Federal Emergency Management Agency (FEMA) on "Agency Information Collection Activities: Proposed Collection; Comment Request; Hazard Mitigation Grant Program (HMGP) Application Reporting" (Docket Number FEMA-2026-0694) published on September 17, 2026. Our comments address FEMA's request to "evaluate whether the proposed data collection is necessary for the proper performance of the agency" and "minimize the burden of the collection of information on those who are to respond."

Disasters are becoming more frequent, more expensive, and more complex. Mitigation is a cost-effective use of federal disaster dollars that can reduce future disaster losses.[1] The HMGP, which provides grants to state, local, and tribal governments to develop and adopt hazard mitigation plans and carry out mitigation projects after a disaster, is a critical disaster mitigation program.

As FEMA seeks comments regarding the requirements, grants management procedures, and implementation of grants awarded under HMGP, we urge policymakers to balance the need to protect program integrity with the need to simplify the federal disaster application and grant management system. These goals should reinforce each other. Clear, consistent requirements can provide the information FEMA needs to protect taxpayers while reducing the time and expense communities spend navigating the system.

Federal Disaster Application and Grant Management System

The people who are affected by disasters must navigate a confusing matrix of federal programs. Disaster application and grant management requirements— including a project narrative, benefit-cost determination, environmental review, quarterly progress reports, and other FEMA forms—require time, resources, and expertise. This highly complex

[1] National Institute of Building Sciences, *Mitigation Saves: Federal Grants Provide a $6 Benefit for Each $1 Invested*, 2019, pp. 1–2. https://nibs.org/wp-content/uploads/2025/04/ms_v3_federalgrants.pdf

application and grant management process can favor applicants with specialized skills or the resources to outsource application writing and management.[2]

While FEMA allows some disaster funds to be used for the cost of administering awards, applying for grants involves expenses that local communities must front in the hopes of receiving reimbursement if the grant is awarded. This can disadvantage smaller, low-income communities and potentially hinder projects that could provide a strong return for federal taxpayers and communities. Unnecessary spending on grant writing and management leaves fewer funds available for the on-the-ground work that actually protects communities and decreases future federal spending on disaster response.

In response to these concerns, TCS has called for policymakers to streamline coordination and reduce red tape, including through the creation of a universal FEMA application and improved survivor outreach and education. For HMGP, FEMA should apply this approach by reusing information already submitted where appropriate, eliminating duplicative requests, and providing clear instructions and technical assistance.

Our research on federal disaster assistance, including conversations with local emergency managers, has highlighted how much work communities face in applying for and managing grants. Communities may need outside consultants to navigate complex requirements, and requests for additional documentation can add to that expense. These findings raise an important question for this collection review. Do FEMA's burden estimates reflect the work communities actually perform to provide the required information?

FEMA estimates that this collection requires 56,499 hours annually at a cost of approximately $4.17 million to respondents.[3] FEMA should explain whether these estimates capture the full work required of local sub-applicants. That includes gathering documentation and responding to requests for clarification or resubmission. The agency should explain how it accounts for consultants' work and costs, particularly for smaller communities with limited staff. The burden estimate should cover the work needed to produce the information, not just the time spent completing forms.

FEMA should consult local sub-applicants to check these estimates and identify requirements that create unnecessary work. It should use those findings to simplify the process, including by reusing information communities have already submitted. This

---

[2] U.S. Government Accountability Office, "Disaster Resilience: FEMA Should Take Additional Steps to Streamline Hazard Mitigation Grants and Assess Program Effects," GAO-21-140, February 2, 2021. https://www.gao.gov/products/gao-21-140

[3] Federal Emergency Management Agency, "Agency Information Collection Activities: Proposed Collection; Comment Request; Hazard Mitigation Grant Program (HMGP) Application Reporting," *Federal Register*, vol. 91, no. 179, September 17, 2026, pp. 58910–58911. https://www.federalregister.gov/documents/2026/09/17/2026-19036/agency-information-collection-activities-proposed-collection-comment-request-hazard-mitigation-grant

review would help FEMA preserve information needed to evaluate projects and oversee spending while reducing the cost of providing it.

Protecting Program Integrity

Taxpayers have a vested interest in ensuring disaster programs are fiscally responsible and that mitigation dollars flow to projects and communities that deliver the strongest returns for taxpayers. Proper guardrails and reporting requirements help FEMA determine whether federal disaster spending is reducing risk. Lax requirements also leave room for mismanagement, waste, and fraud, all of which have a well-documented history in disaster spending.[4]

In response to these concerns, TCS has called for policymakers to implement clear standards to require resilient rebuilding, independent audits, and public reporting on outcome-based performance metrics such as risk reduced, dollars saved, and resilience gained. FEMA should begin with better use of information it already collects to evaluate and publicly report on these outcomes. FEMA should explain how the information collected informs project selection, identifies implementation problems, and guides program improvements, and use that review to identify requirements that can be simplified or eliminated. Any additional request should fill a clear information gap and use the least burdensome approach. Localities should not have to produce duplicative reports or undertake complex evaluations that FEMA is better positioned to conduct.

Precedent is not sufficient justification for continuing the current HMGP application and reporting requirements. TCS urges policymakers to retain information needed to evaluate projects and protect public funds while eliminating duplicative or low-value requirements. These improvements can support a responsible and effective federal disaster system that is in the best interest of federal taxpayers and local communities.

Thank you for the opportunity to submit comments and for your consideration. We look forward to continued engagement on these important issues.

Taxpayers for Common Sense

[4] U.S. Department of Housing and Urban Development, Office of Inspector General, "The State of Texas Did Not Follow Requirements for Its Infrastructure and Revitalization Contracts Funded With CDBG Disaster Recovery Program Funds," Report 2012-FW-1005, March 6, 2012, https://www.hudoig.gov/reports-publications/oae-report/state-texas-did-not-follow-requirements-its-infrastructure-and; U.S. Department of Justice, "AECOM to Pay $11.8 Million to Resolve False Claims Act Allegations in Connection with Hurricane Disaster Relief," October 24, 2023, https://www.justice.gov/archives/opa/pr/aecom-pay-118-million-resolve-false-claims-act-allegations-connection-hurricane-disaster