

FOUNDATIONS WORKSHOP

Disaster Civil Rights Investigation & Resolution Model

DCRIM

A structured, trauma-informed, legally defensible approach to identifying and resolving civil rights failures in disaster recovery systems.



Workshop Objectives

Enforcement standards

Understand civil rights enforcement standards that govern disaster recovery programs.

Pattern recognition

Recognize discriminatory practices and the systemic failures that produce them.

The DCIRM sequence

Apply the investigative sequence from trigger through monitored resolution.

Defensible practice

Strengthen trauma-informed, legally defensible investigative practice.

Why Civil Rights Matter in Disaster Recovery

Disasters don't create inequity — they expose it. Civil rights enforcement protects:

Access

Who can reach the system at all

Eligibility

Who is judged to qualify for help

Prioritization

Whose need is treated as urgent

Appeals

Who can meaningfully contest a decision

Long-term recovery

Who is still supported months later



The Disaster Recovery Ecosystem

Key actors, each with different authorities, timelines, and pressures.

FEMA

Federal individual and public assistance;
national coordination.

HUD

Long-term recovery funding, housing
programs, CDBG-DR.

State & local agencies

Program administration, intake, and
eligibility decisions.

Contractors

Inspections, damage assessment, and case
management delivery.

Community partners

Outreach, navigation, and trusted access for
affected residents.

Where Civil Rights Failures Occur

Pressure points where patterns signal systemic issues, not isolated mistakes.

Intake & registration

Barriers at the front door of the recovery system.

Eligibility determination

Inconsistent or unexplained qualification decisions.

Damage assessments

Uneven inspection quality and undervalued property.

Language access

Missing translation, interpretation, and outreach.

Disability accommodations

Inaccessible processes, facilities, and communications.

Appeals & reconsiderations

Unclear, inaccessible, or unequally applied review.

Civil Rights Enforcement Standards

Protected classes

Race, color, national origin, religion, sex, age, disability, familial status.

Disparate treatment

Intentional difference in how similarly situated people are handled.

Disparate impact

Neutral policies producing disproportionate harm to protected groups.

Retaliation

Adverse action against those who complain or participate.

Reasonable accommodation

Required modifications so programs are usable by people with disabilities.

Evidence in Disaster Investigations

Testimonial

Interviews and statements that supply narrative and context.

Documentary

Files, correspondence, and policies that give structure.

Digital

System records and metadata that establish timelines.

Administrative

Program-level data that reveals patterns across cases.

Comparative

Evidence of how similarly situated people were treated.

Trauma-Aware Investigation



Survivors are navigating loss, instability, and bureaucratic complexity. Five principles keep the record accurate.

Safety

Physical and emotional security throughout contact

Choice

Meaningful control over participation and pacing

Collaboration

Shared decisions rather than extraction

Trustworthiness

Transparency about process and limits

Empowerment

Building on strengths, not deficits

INTRODUCING DCIRM

A structured model for fair, defensible, systemic investigation

Equitable investigations

Consistent method applied to every complaint and pattern.

Legally defensible findings

Evidence-based conclusions that withstand review.

Systemic corrective action

Fixes that prevent recurrence, not just close a file.



01

Trigger Identification

Where an investigation begins — formal and informal signals alike.

Complaints

Direct allegations from survivors, advocates, or staff.

Data anomalies

Denial or award rates that diverge across groups or areas.

Program audits

Internal and external reviews flagging irregularities.

Community reports

Patterns surfaced by trusted local organizations.

02

Jurisdiction & Legal Basis

Confirm the footing of the investigation before fact-finding begins.

Authority

Your office's legal power to investigate this entity.

Protected class

The basis on which harm is alleged or observed.

Program coverage

Whether the program falls within the relevant obligations.

Applicable statutes

The specific laws and regulations that govern conduct.

03

Intake & Triage

Triage is a fairness tool — speed without losing accuracy.

Clarify allegations

Define precisely what is alleged and against whom.

Identify immediate risks

Flag housing loss, health, safety, and deadline exposure.

Prioritize cases

Sequence by severity of harm and urgency of remedy.

Assign investigators

Match skills, language capacity, and capacity to caseload.

04–05

Fact Development & Evidence Collection

Building an investigative record that holds up under scrutiny.

Plan interviews

Sequence witnesses intentionally; prepare trauma-informed protocols.

Request documents

Issue early, specific requests with clear preservation duties.

Analyze comparative data

Test consistency across similarly situated claimants.

Evaluate credibility

Apply clear, documented criteria to every account.

06–07

Findings & Resolution

Findings must be clear, neutral, and evidence-based.

Determine violation

Apply the legal standard to the developed factual record.

Draft findings

Write neutral, evidence-linked conclusions that stand alone.

Recommend corrective action

Remedy the individual harm and the underlying practice.

Monitor compliance

Verify follow-through so the correction actually holds.

CLOSING SEGMENT

Scenario Lab & Closing

01

Apply DCIRM to a real scenario

Walk the full sequence: trigger, jurisdiction, triage, fact development, evidence, findings, resolution.

02

Identify one practice to implement

Name a single change you will carry back into your casework this month.

03

Q&A and commitments

Open discussion of unresolved questions, followed by each participant naming their commitment aloud.

Systemic fairness becomes real only when correction is monitored.