



Jordan Corbitt

Shareholder

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Jordan Corbitt has extensive experience navigating the legal and regulatory framework governing eligibility for federal grant funding, including disaster recovery and mitigation assistance.

Mr. Corbitt has significant experience with the laws, regulations, and administrative procedures governing eligibility for federal disaster and mitigation assistance. He regularly advises state and local governments, non-profit utilities, and other non-profit entities on compliance with federal grant requirements, with a particular focus on the Federal Emergency Management Agency's (FEMA) Public Assistance and Hazard Mitigation Assistance programs.

Mr. Corbitt assists clients throughout the full lifecycle of federally funded disaster recovery projects, including pre disaster compliance planning, emergency work substantiation, procurement and contracting for long-term recovery efforts, cost and work eligibility, documentation, audit readiness, and administrative appeals and arbitrations before the Civilian Board of Contract Appeals (CBCA).

FEMA Public Assistance Program – Dispute Resolution

Mr. Corbitt has represented numerous clients in first- and second-level FEMA appeals and in arbitration proceedings before the CBCA. In response to an adverse FEMA determination, applicants are entitled to first and second appeals to challenge FEMA's decision. Mr. Corbitt has drafted more than 50 first and second appeals on behalf of clients nationwide to ensure clients are able to maximize federal reimbursement consistent with FEMA guidance.

Congress amended the Stafford Act in 2018 to establish a separate arbitration process in lieu of a second appeal for events declared on or after January 1, 2016. Mr. Corbitt has participated in more than 20 arbitration proceedings, including drafting briefs, preparing witness testimony, cross-examining FEMA fact and expert witnesses, and presenting oral arguments. Mr. Corbitt's experience in administrative appeals and arbitrations ensure clients are well-positioned to respond to adverse FEMA determinations.

Representative Matters

- Secured a favorable outcome for a non-profit organization in North Carolina at arbitration before the Civilian Board of Contract Appeals, focused on FEMA's "primary use" analysis for non-profits with facilities that provide various services.
- Represented a city in Florida throughout extended arbitration proceedings, securing approximately 95 percent of claimed costs for the city's debris removal work.
- Favorably settled an arbitration before the Civilian Board of Contract Appeals for a facility owned by a city in Texas, resulting in an agreement with FEMA to fully fund the disputed costs.
- Secured a multimillion-dollar award for a non-profit house of worship in Tennessee through the first appeal process and cost estimation by the United States Army Corps of Engineers.
- Represented a large county in Florida in arbitration before the Civilian Board of Contract Appeals, including presentation of expert pavement and engineering witnesses and cross-examination of a FEMA expert witness during a virtual hearing.
- Negotiated an agreement with FEMA to withdraw an adverse determination for a housing authority project in Texas and consider the applicant's Alternative Project Request on the merits.

- Assisted with representation of a large non-profit in California in arbitration before the Civilian Board of Contract Appeals, including presenting opening argument and fact witnesses, resulting in a favorable eligibility determination.
- Briefed an arbitration request for a Florida county that resulted in a favorable eligibility determination for a bridge impacted by high-velocity water following a hurricane.
- Successfully secured all costs at issue on second appeal for a non-profit utility impacted by a tornado.
- Assisted in developing arguments in first appeals for a large county in Texas, securing a FEMA decision confirming that eligible and reasonable costs were incurred under a valid contract for COVID-19-related expenses.
- Represented a major county in California on multiple first appeals regarding eligibility of emergency work and costs following the Palisades Fire.
- Navigated FEMA procurement and contracting requirements for a group of Florida cooperatives to ensure a disaster-related power restoration contract complied with FEMA rules.
- Represented a non-profit hospital system in Kentucky throughout arbitration proceedings, including oral argument, regarding eligibility of COVID-19 expenses.
- Reviewed emergency purchase orders, requests for proposals, contracts, procurement policies, and written standards of conduct for compliance with FEMA procurement regulations for a large city in Texas.
- Ensured that a large county in Hawaii adequately documented emergency work and complied with procurement and contracting requirements for long-term recovery projects following the 2023 wildfires.
- Provided local government entities with around-the-clock procurement compliance advice for various solicitations, contracts, and purchase orders, consisting of both competitive and non-competitive procurements for multiple disasters, including COVID-19.
- Prepared numerous construction contracts for a United States territory to ensure compliance with FEMA contracting rules and regulations.
- Prepared procurement compliance checklists and memoranda for various government entities to facilitate compliance with FEMA procurement regulations in advance of disasters requiring work eligible for Federal Public Assistance funding.
- Represented a large Texas city in a procurement and contracting audit by the Department of Homeland Security Office of Inspector General, resulting in a finding that the client's procurement and contracting policies adequately protected the use of federal funding.
- Navigated procurement and contracting compliance questions from multiple cooperatives in Florida and Georgia following Hurricanes Helene and Milton.
- Formulated and presented a compliance presentation for a large state-owned electrical power authority, focusing on non-competitive procurements and detailed solicitations.
- Reviewed and analyzed national contractor construction agreements to ensure compliance with Texas law for eligible work performed under FEMA.
- Briefed a second appeal regarding de-obligation of more than \$2 million based on the reasonableness of equipment costs for a large metropolitan government entity.



Professional Honors & Activities

- Listed in *Best Lawyers: Ones to Watch® in America* for Administrative/Regulatory Law and Government Relations Practice (2021 – 2026); Municipal Law (2023 – 2026)
- Member – CHIME, Central Houston Partnership
- Member – American Bar Association, Standing Committee on Disaster Response & Preparedness



Publications

- "2024 Hurricane Season: Top Ten Tips," republished in *Texas Lawyer* (July 2024)
- "Direct Result of a Disaster" (December 2021)
- "Anatomy of a FEMA Appeal" (December 2021)



Speaking Engagements

- Presenter – "Disaster Preparedness and Recovery," Georgia Municipal Attorney Annual Convention (June 2025)
- Panelist – "FEMA's 50% Rule," Disaster Resilience Symposium, Stetson University Law School (March 2025)
- Co-presenter – "Preparing for Hurricane Season: Updates to FEMA's Program and Procurement Rules," Florida Electric Cooperatives Association (June 2021)
- Co-presenter – "Obtaining and Keeping Your FEMA Reimbursement: Procurement and Documentation Requirements," Florida Municipal Electric Association (May 2020)
- Co-presenter – "The Disaster Recovery Reform Act: A Texas-Sized Bill," HGACBuy 2019 Inaugural Conference and Expo (October 2019)
- Co-presenter – "Finding FEMA 'Friendly' Funding," HGACBuy 2019 Inaugural Conference and Expo (October 2019)
- "Disaster Obligations of Healthcare Providers and Available Assistance for Recovering Afterwards," Houston Bar Association Health Law Section (September 2018)
- Panelist – "Emergency Preparedness & Hurricane Response in Senior Living," Seven Acres Jewish Senior Care Services (June 2018)
- Panelist – "Resiliency, Disaster Planning and Response," American Bar Association, Section of State and Local Government Law, 2018 Spring Conference (April 2018)
- "Executive Borders," Memorial Exchange Club (April 2017)



Webinars

- Key Considerations for FEMA's COVID-19 Emergency Protective Measures (February 2022)
- Preparing for Hurricane Season: Updates to FEMA's Program and Procurement Rules (June 2021)



Education

- South Texas College of Law, J.D., 2016, summa cum laude
 - *South Texas Law Review*
- Texas A&M University, B.B.A. in Management, 2012



Admissions

- Texas, 2016
- U.S. District Court for the Southern and Western Districts of Texas