

TOP TEN HMA PROGRAM GUIDANCE CHANGES

1. Advanced Assistance

- FEMA allows the advance of up to 25 percent of the HMGP ceiling for a maximum of \$10 million to applicants that can be used to develop mitigation strategies as well as obtain data to prioritize, select, and develop complete HMGP applications in a timely manner.
- This is beneficial to the Applicants as it allows for sufficient resources early in disaster recovery process to pursue hazard mitigation opportunities.

2. Biggert-Waters Flood Insurance Reform Act of 2012 related changes to FMA

- The Biggert-Waters Flood Insurance Reform Act of 2012 eliminated the Repetitive Flood Claims (RFC) and Severe Repetitive Loss programs (SRL).
- Elements of these flood grant programs have been incorporated into FMA.
- The FMA program now allows for additional cost share flexibility:
 - Up to 100-percent Federal cost share for severe repetitive loss properties;
 - Up to 90-percent Federal cost share for repetitive loss properties, and,
 - Up to 75-percent Federal cost share for NFIP insured properties.

3. HMA Efficiencies- Minimum criteria for complete applications

- Incomplete project applications and placeholder applications do not contain sufficient information that FEMA can use to make program eligibility determinations.
- Applications and subapplications that do not satisfy eligibility and completeness requirements will be considered incomplete and cannot be funded.
- To help address this issue, FEMA has developed an Eligibility and Completeness (E&C) checklist which identifies the minimum information required for FEMA to initiate a project application review.
- The development of the E&C checklist provides a greater level of consistency and transparency in FEMA's review.

4. HMA Efficiencies- Industry cost guides for estimates and design and construction standards

- FEMA will accept cost estimates that the Grantee certifies were established using nationally published or local cost estimating guides to support budget and benefit cost analyses.
- This change streamlines the cost review process.

5. HMA Efficiencies- Request For Information (RFI) Process

- FEMA may use a stepwise process to request additional information or documentation from the Applicant to obtain needed information.
- FEMA will work with the Applicant and subapplicant to determine available options (e.g., Technical Assistance) in order to develop a viable project.
- This change provides a greater level of consistency and transparency in FEMA's RFI process.

6. Period Of Performance (POP) for the Program

- The Period of Performance (POP) for the Programs begins with the opening of the application period and ends no later than 36 months from the close of the application period.
- All requests to extend the grant POP beyond 12 months from the original grant POP termination date must be approved by FEMA Headquarters.
- This change facilitates the timely closing of the POP for the Program.

7. HMGP Lock In

- The 6-month estimate is no longer the floor or a guaranteed minimum funding for HMGP. The 12-month lock-in is the maximum amount available.
- Prior to 12 months, total obligations will be limited to not more than 75 percent of any current estimate without concurrence of the Regional Administrator or Federal Coordinating Officer with Disaster Recovery Manager Authority and the Office of Chief Financial Officer (OCFO).
- This change provides a greater level of consistency and transparency in the HMGP lock-in process and allows FEMA and the OCFO to better manage the DRF.

8. Strategic Funds Management

- Strategic Funds Management is a concept of fiscal program management designed to provide funds as they are needed to implement approved HMGP activities.
- FEMA will be able to anticipate obligation needs and manage the Disaster Relief Fund (DRF) more efficiently.

9. Extraordinary Circumstances exception extended to PDM and FMA

- In addition to HMGP, the Region may apply extraordinary circumstances for PDM and FMA project subgrants when justification is provided and with concurrence from FEMA Headquarters (Risk Reduction and Risk Analysis Divisions) prior to granting an exception.
- This change allows HMA projects to continue to be developed and processed while simultaneously the local or Indian Tribal mitigation plan is being developed.

10. Mitigation Planning-Related Activities

- For HMGP only, FEMA has expanded eligible mitigation planning activities to include incorporating new data into a risk assessment and updating the mitigation strategy to reflect current disaster recovery goals and other community planning initiatives.
- Also it can incorporate climate adaptation, green building, or smart growth principles into the risk assessment or mitigation strategy.
- This change allows for the expanded use of mitigation plan funding under HMGP and allows mitigation planning to be more fully incorporated into comprehensive land use planning.