

PART 2 – ENHANCED STATE MITIGATION PLANS

An Enhanced State Mitigation Plan documents the State’s demonstrable and sustained commitment to the objectives of hazard mitigation. This designation recognizes the State as a proactive leader in implementing a comprehensive statewide program. The enhanced status acknowledges the extra effort a State has made to reduce losses, protect its resources, and create safer communities. For mitigation plans to receive this designation, the State must obtain a “Satisfactory” score on all of the Standard State Plan requirements as described in Part 1 of this manual. In addition, it must receive a “Satisfactory” score on each of the Enhanced State requirements.

[The June 2007 revisions to this Guidance provide important new information regarding compliance with the Standard State Mitigation Plan requirements as discussed at 44 CFR 201.5\(b\). This change applies to both new and updated Enhanced State Mitigation Plans.](#)

The sections covered in Part 2 – Enhanced State Mitigation Plans include:

- Prerequisite
- Comprehensive State Hazard Mitigation Planning Program

PART 2 - ENHANCED STATE MITIGATION PLANS

PREREQUISITE

The State submitting a mitigation plan for designation as an Enhanced State Mitigation Plan must meet the following prerequisite before FEMA can approve the plan.

1. COMPLIANCE WITH STANDARD STATE PLAN REQUIREMENTS

Requirement §201.5(b): Enhanced State Mitigation Plans must include all elements of the Standard State Mitigation Plan identified in §201.4

Explanation: In order to be considered for Enhanced Plan status, the plan **must** contain all the elements of the Standard Plan (per §201.4), in addition to meeting all the requirements listed in §201.5. All the elements required for the Standard Plan **must** receive a score of “Satisfactory” before the plan is reviewed for compliance with the Enhanced State requirements.

(Rev. June 2007)

All Enhanced State Mitigation Plans submitted for FEMA’s approval on or after January 1, 2008, **must** include a current update of their Standard Plan elements. Each State should submit its draft Mitigation Plan to FEMA’s Regional Office early enough to allow sufficient time for:

1. Region’s review of all required elements (Standard and Enhanced portions);
2. Region’s review of the State’s program management capability;
3. National Evaluation Panel’s review;
4. State completion of any required revisions to the plan; and
5. Adoption of the plan by the State and approval by FEMA before the existing plan expires.

Plan Update: If the Enhanced elements of the State Mitigation Plan are not approved prior to the expiration of the existing plan, but the Standard requirements have been met, the FEMA Region may approve the plan as a Standard Plan. This will ensure continued program eligibility for the State, while still allowing the Enhanced review process and any required revisions to be completed. The approved Plan will be held to the initial three-year approval timeframe, and will not be extended as a result of any additional time needed for review, revision or approval of the Enhanced portion of the plan. This requirement is intended to ensure that (1) all plans are based on the most current information and (2) that there is a single approval date for each State Mitigation Plan.

To provide consistency between the Standard and Enhanced sections of the plan, the updated Enhanced portion of the Plan **must** be revised as necessary to be consistent with all updates to the Standard portion of the Plan.

PART 2 - ENHANCED STATE MITIGATION PLANS

Resource: For more information on preparing and implementing a mitigation plan, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 3.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

PART 2 - ENHANCED STATE MITIGATION PLANS

COMPREHENSIVE STATE HAZARD MITIGATION PLANNING PROGRAM

44 CFR §201.5 addresses Enhanced State Mitigation Plans. This is FEMA's effort to recognize those States that go above and beyond the minimum mitigation requirements by making them eligible to receive an increased amount of mitigation grant funding. Strong State and local mitigation planning processes and comprehensive mitigation program management at the State level are important elements in reducing vulnerability to future disaster losses. It is hoped that the Enhanced Plan option will encourage more States to take their planning to a higher level. For the Enhanced State Plan, States must meet all of the requirements of the Standard Plan, plus be able to demonstrate that the State already has a comprehensive mitigation program, demonstrate that they effectively use available mitigation funding, and demonstrate that they are capable of managing the increased funding.

The plan update process provides States the opportunity to revisit the information they originally provided to demonstrate these capabilities. Any improvement, reduction, or other changes to these capabilities should be noted in the plan.

This section includes the following six subsections:

- Integration with Other Planning Initiatives
- Project Implementation Capability
- Program Management Capability
- Assessment of Mitigation Actions
- Effective Use of Available Mitigation Funding
- Commitment to a Comprehensive Mitigation Program

PART 2 - ENHANCED STATE MITIGATION PLANS

2. INTEGRATION WITH OTHER PLANNING INITIATIVES

**Requirement
§201.5(b)(1):**

[An Enhanced Plan must demonstrate] that the plan is integrated to the extent practicable with other State and/or regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans) and FEMA mitigation programs and initiatives that provide guidance to State and regional agencies.

Explanation:
(Rev. June 2007)

This requirement is similar to §201.4(b) for the Standard Plan, which is discussed previously in *Program Integration* (page 1–11), except that it also requires the State to detail how the Enhanced Plan is specifically integrated into other State, regional, and FEMA initiatives that provide primary guidance for hazard mitigation-related activities.

States might demonstrate that they have integrated the plan with planning initiatives that provide guidance by describing such activities as coordinating with developers of State plans (e.g., statewide economic development, capital improvement, or public works plans) to incorporate hazard mitigation priorities; passing State laws or regulations that mandate integration of mitigation considerations with other planning initiatives at the State level; and/or working with Regional Planning Authorities or Councils of Government.

When applying this requirement, reviewers should keep in mind the differences in planning conditions among States. For example, in States with extensive planning resources, integration with other plans may be more comprehensive. However, States with limited resources and little tradition of collaboration across agencies should receive credit for demonstrating measurable progress towards integration of efforts.

Examples of demonstrated integration with State and/or regional planning initiatives could include:

- How the State currently influences or coordinates with other State and regional agencies to incorporate hazard mitigation into their own programs, regulations and activities.
- How other agencies incorporate mitigation data or resources into their planning initiatives;
- How other State or regional agencies' planning initiatives are linked to or support specific hazard mitigation strategies;
- How other State or Regional planning initiatives promote mitigation as part of their authorities and responsibilities.

Examples of demonstrated integration with FEMA programs and initiatives that provide guidance to State and Regional agencies could include FEMA mitigation grant programs, as well as:

- Use of HAZUS within the State Plan and/or a description of how the State encourages or supports the use of HAZUS in the development of local mitigation plans;

PART 2 - ENHANCED STATE MITIGATION PLANS

- Discussion of how the mitigation plan is linked to Flood Map Modernization activities within the State;
- How the State utilizes information provided in FEMA technical documents related to building construction, codes and standards to incorporate mitigation into retrofitting existing buildings and/or strengthening new development;
- How the Enhanced Plan guides activities funded by Emergency Management Program Grants (EMPG); and/or
- How the Enhanced Plan encourages and supports local government participation in the Community Rating System (CRS) of the National Flood Insurance Program (NFIP).

Plan Update: States **must** demonstrate continued integration of the mitigation plan with other state and/or regional planning initiatives as well as FEMA mitigation programs. The update **must** include any planning initiatives that have been established since approval of the previous plan and describe how those initiatives help achieve progress toward the overall goals and objectives of mitigation planning.

Resource: For more information on integrating hazard mitigation activities in other initiatives, see:

- ✓ *Getting Started* (FEMA 386-1), Step 1.
- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

Examples:



Original Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(1)		<ul style="list-style-type: none"> ▪ While it is encouraging that the HMC created a subcommittee to explore integration with other planning initiatives, a strategy to promote integration has not yet been developed.

Required Revisions:

The submittal must explain the steps that the planning committee has

taken or intends to take to integrate hazard mitigation.



Revised Submittal:

Integration with Other Planning Initiatives

In furthering the concept and practice of hazard mitigation across the State, the Hazard Mitigation Committee (HMC) created a subcommittee to explore the feasibility of integrating State hazard mitigation planning with other statewide planning initiatives such as the State Smart Growth initiative and the State economic development plan. **The subcommittee developed the following strategy to further this work:**

- **The State Hazard Mitigation Officer met with the Director and Assistant Director of the State Economic Development Agency to discuss integration of hazard mitigation concepts into economic development initiatives. The meeting produced a commitment from the Director to invite HMC representatives to participate in upcoming strategic planning sessions. The strategic plan is to be completed before the next budget cycle.**
- **The Governor's Authorized Representative, who co-chairs the HMC, has agreed to have the Governor's office develop an executive order directing State agencies to work with the HMC to integrate hazard mitigation concepts into State operations where feasible.**
- **The HMC is developing a presentation and training program to educate State workers about the need for hazard mitigation and the ways that mitigation can be integrated into everyday operations.**
- **The State Smart Growth Office, a strong supporter of hazard mitigation, and with representation on the HMC, has developed a new position, Hazard Reduction Policy Coordinator. The Coordinator is the first paid hazard mitigation employee hired by the State who is outside the State Office of Emergency Preparedness.**

These new initiatives will create a comprehensive approach to reducing losses in the State. The State's CRS and FMA programs have been in place since these programs were created. Additionally, the State received PDM funding for all planning and project grant applications it submitted in fiscal year 2004.

3. PROJECT IMPLEMENTATION CAPABILITY

<p>Requirement §201.5(b)(2)(i) and (ii):</p>	<p>[The Enhanced Plan must document] the State’s project implementation capability, identifying and demonstrating the ability to implement the plan, including:</p> <ul style="list-style-type: none"> ▪ Established eligibility criteria for multi-hazard mitigation measures. ▪ A system to determine the cost effectiveness of mitigation measures, consistent with OMB Circular A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs, and ▪ [A system] to rank the measures according to the State’s eligibility criteria.
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Explanation:
(Rev. June 2007)

These requirements build on §201.4(c)(3)(ii), which is discussed in the sections on State and local capability assessment on pages 1-37 through 1-42. However, while §201.4(c)(3)(ii) requires that the State demonstrate its capabilities to implement policies and programs to mitigate hazards, §201.5(b)(2)(i) requires that States identify their eligibility criteria for mitigation actions during the planning process.

Development of such criteria was formerly undertaken during the *grant application process*. These eligibility criteria should be integral to developing a State’s mitigation strategy where, ideally, mitigation actions would be categorized by short, medium, and long-term timeframes and then further prioritized as high, medium, or low.

Per §201.5(b)(2)(ii), States **must** also describe their approach to evaluating the cost-effectiveness of identified actions and explain or demonstrate how this approach is consistent with OMB Circular A-94. The description should include the agency and staff responsible for conducting benefit-cost analyses, reviews, or any other assessment method used.

For all State and FEMA mitigation programs, the plan **must** describe how the State ranks mitigation measures according to its eligibility criteria. The system **must** include a process for prioritizing projects among jurisdictions and among proposals that address different or multiple hazards. The system does not have to be a point system or grading scale but should clearly explain how projects are prioritized.

Plan Update:

The documentation of project implementation capability **must** explain any changes to eligibility criteria, including any that have been added or eliminated since the approval of the previous plan, and any changes to the system of determining the cost effectiveness of mitigation measures consistent with OMB Circular A-94.

States **must**, at a minimum, ensure their Mitigation Plan includes eligibility criteria and a system for cost effectiveness determination for **all** State and FEMA mitigation grant programs (HMGP, FMA, PDM, SRL, RFC). Project implementation procedures for HMGP may be directly included in the State Mitigation Plan or referenced back to the HMGP

PART 2 - ENHANCED STATE MITIGATION PLANS

Administrative Plan.

Resource: For information on prioritizing actions and determining eligibility, and for a discussion about methods to determine cost effectiveness, see respectively:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Step 2.
- ✓ *Mitigation Benefit Cost Analysis (BCA) Toolkit Compact Disc (CD)*.
- ✓ *OMB Circular A-94: See*
<http://www.whitehouse.gov/omb/circulars/a094/a094.html>

Examples:



Original Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. These criteria were initially developed for the HMGP application and have been revised.

Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the timeframe for implementation.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2) (i) and (ii)		<ul style="list-style-type: none"> ▪ The plan does not list the eligibility criteria, the method used to determine cost effectiveness, or the system for ranking actions.

Required Revisions:

The plan must list its eligibility criteria and address how cost-benefit analysis, review, or other methods were used to determine cost effectiveness of actions. It must also describe the system for ranking eligible actions.



Revised Submittal:

During the formation of its Mitigation Strategy, the State developed eligibility criteria for determining how hazard mitigation projects will be addressed. ~~These criteria were initially developed for the HMGP~~

PART 2 - ENHANCED STATE MITIGATION PLANS

~~application and have been revised.~~ This was done through the State Hazard Mitigation Planning Committee in regular meetings with the Counties. The eligibility criteria requires projects to:

- Be cost effective.
- Address repetitive loss properties.
- Be located in the most vulnerable areas identified in the State Hazard Mitigation Plan.; and
- Have local matching funds (including in-kind contributions).

~~Each County within the State provided a prioritized list of mitigation projects for their municipalities. These projects included such things as buyouts for repetitive flood loss properties, the building of tornado shelters, the application of certain communities to the CRS program, and the development of new routes for the transportation of hazardous materials. The State then categorized these projects by their priority to the County, their cost, and the time frame for implementation.~~

The State helped the Counties apply a cost-benefit analysis to their proposed mitigation projects. The Counties used this analysis to prioritize their projects. Projects were prioritized by such items as frequency of the disaster being mitigated, financial impact to the community, human losses, and timeframe for completion. For example, flooding is the biggest concern in certain areas of the State, whereas in the “flats” tornadoes are the major concern. Each County has a different prioritization for hazard mitigation projects within its jurisdiction (see Appendix XX for a list of criteria provided by County).

The State is then responsible for prioritizing each of the County’s projects with respect to how much and when State help will be available. The State takes the number one priority for each County and then ranks these projects by giving a certain number of points to as follows:

- Cost effectiveness (i.e., those projects that demonstrate that they are the most cost effective) (20 to 35 points).
- Listing on the Repetitive Loss Property List (40 points).
- Location within the most vulnerable areas in the State (10 to 25 points).

In addition to funding, the State provides support to the Counties in several ways, including actual project implementation, seeking additional funding, project support, public involvement activities, and the provision of additional information (see Appendix XX for a list of ranked projects).

The State Hazard Mitigation Committee (HMC) tracks when and how projects are being implemented, as well as how their funding is being used (see Section XX of the plan for more details). If there is a problem or conflict with a project, the State acts as a mediator to resolve the problem as quickly and efficiently as possible. The State

PART 2 - ENHANCED STATE MITIGATION PLANS

also conducts “lessons learned” meetings with Counties as necessary. As projects are completed, the State makes note of this in each County’s file and maintains records on every project.

4. PROGRAM MANAGEMENT CAPABILITY

<p>Requirement §201.5(b)(2)(iii A-D):</p>	<p>[The Enhanced Plan must demonstrate] that the State has the capability to effectively manage the HMGP as well as other mitigation grant programs, [and provide] a record of the following:</p> <ul style="list-style-type: none"> ▪ Meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation; ▪ Preparing and submitting accurate environmental reviews and benefit-cost analyses; ▪ Submitting complete and accurate quarterly progress and financial reports on time; and ▪ Completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation.
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Explanation:
(Rev. June 2007)

Because approval of an Enhanced Plan results in increased HMGP grant funding, this section requires States to demonstrate their capabilities to effectively manage the HMGP and other mitigation grant funds, including funds from the Pre-Disaster Mitigation (PDM), Flood Mitigation Assistance (FMA) and Repetitive Flood Claims (RFC) programs, they have previously received. FEMA Regional offices will evaluate and certify that the State has the capability to effectively manage FEMA mitigation grant programs. The State is currently not required to document this in their plan.

The criteria that are used for this evaluation are currently being refined and will be revised with State input. FEMA has been utilizing an *Enhanced State Multi-Hazard Mitigation Plan Program Information Worksheet*, dated May 2005, to evaluate the requirements under §201.5(b)(2)(iii A-D). This worksheet will continue to be utilized until the revised criteria are issued. The revised criteria will not be implemented immediately upon release, but will be effective a sufficient interval of time after publication to allow the State to demonstrate capability under the revised criteria.

Plan Update:

Any update of this element will be successfully met through the State's continued demonstration that, for the past 3-year period, it has maintained the capability to effectively manage the HMGP as well as other mitigation grant programs. FEMA regional offices will re-evaluate and re-certify that, for the past 3-year period, the State has demonstrated the capability to effectively manage the HMGP and other mitigation grant programs.

5. ASSESSMENT OF MITIGATION ACTIONS

Requirement §201.5(b)(2)(iv):	[The Enhanced Plan must document the] system and strategy by which the State will conduct an assessment of the completed mitigation actions and include a record of the effectiveness (actual cost avoidance) of each mitigation action.
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Explanation: §201.5(b)(2)(iv) builds on §201.4(c)(5)(ii) and (iii), which were discussed previously in *Monitoring Progress of Mitigation Activities* (page 1-59). States **must** describe how they would assess the effectiveness of each completed mitigation action, what agency or agencies will be involved in the assessment, and indicate the timeframe for carrying out this assessment. The results of this assessment will be necessary during the next plan update to verify achievement of the plan’s goals and objectives, and to fine-tune or revise the mitigation strategy.

The State **must** describe how it will track potential losses avoided for each action taken (e.g., by developing a database or GIS system) since, in many cases, losses avoided cannot be accurately determined until a disaster occurs and damages are assessed.

Plan Update: States **must** describe how they assessed, and how they will continue to assess, the effectiveness of completed mitigation actions, including discussion of those agencies whose involvement was initially proposed and those who actually participated in the assessment, and the timeframe required to complete the assessment.

The State **must** describe how it tracked, and will continue to track, potential losses avoided for each action taken. Where disasters have occurred since the approval of the previous plan, the update **must** include a record of the actual cost avoidance of each completed mitigation action.

FEMA recognizes that there may be unforeseeable situations where, due to the timing, magnitude of one or more disaster(s) and/or the large number of completed mitigation actions for which losses avoided must be assessed, it is impracticable for the State to complete the assessment of losses avoided within the timeframe by which the updated plan must be submitted to FEMA for approval. If such a situation exists, the plan **must**:

- Include a discussion of the unforeseeable circumstances (including timing of the event or events and the number of mitigation actions for which losses avoided must be assessed);
- The system or approach that will be used to assess losses avoided, and
- A proposed timeframe for completing this work.

Resource: For information on how to evaluate the effectiveness of mitigation actions see:
Bringing the Plan to Life (FEMA 386-4), Step 3.

PART 2 - ENHANCED STATE MITIGATION PLANS

Examples:



Original Submittal:

The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed various cost-benefit analyses to help communities decide which mitigation activities to implement.

Several of the State's communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(2)(iv)		<ul style="list-style-type: none"> ▪ The State is active in trying to assess the effectiveness of its mitigation actions; however, no specifics are given. ▪ It is not clear what agency or agencies will be responsible for developing and implementing the economic modeling analyses or how the local communities will benefit.

Required Revisions:

The plan must provide specific information about how the effectiveness of mitigation actions will be assessed. Specific agency or agencies must be mentioned and a timeframe for conducting these assessments must be developed.



Revised Submittal:

~~The State has established a method to determine the effectiveness of mitigation actions being undertaken in the State. During the preparation of the State Hazard Mitigation Plan, the State partnered with the State University to develop several economic analysis models to determine the economic feasibility of various past mitigation actions. One of these models considered reductions in physical damages and financial losses that helped determine the effectiveness of mitigation actions by showing the resulting reduction in damages and losses. Other models showed~~

PART 2 - ENHANCED STATE MITIGATION PLANS

~~various cost-benefit analyses to help communities decide which mitigation activities to implement.~~

As part of the State Hazard Mitigation Plan, the State Office of Economic Development partnered with the State University to develop several economic models to assess the losses avoided by various mitigation actions. These models used hazard data from recent events to determine the likely damages to structures *had mitigation actions not taken place*. The models then used the probability of the event to calculate the avoided damages based on the net present value of the benefits.

~~Several of the State's communities currently have hazard mitigation plans in place. The economic models can be applied to those existing plans as well as help communities who are in the process of developing hazard mitigation plans. The State will provide help to the local communities in running and analyzing the economic models.~~

The Office of Economic Development is working with local communities to help them apply these analyses. A majority of the State's communities already have implemented some mitigation actions, and these models can be applied to quantify the benefits of mitigation activities identified in previous mitigation plans. The State Office of Planning is working with the remainder of the communities to develop hazard mitigation plans, whereupon economic feasibility analyses can be applied to specific mitigation strategies.

Following hazard events in the areas receiving mitigation action, communities will be required to show what damages and losses have been avoided (e.g., structural damages prevented, business inventory damages prevented, rental income losses avoided, personal property losses prevented) by implementing their mitigation strategies. The communities are allowed discretion in determining how they will track losses avoided (e.g., utilizing GIS or database technology).

The Office will review these analyses and provide feedback to the communities. The Office of Economic Development will conduct yearly checks on the communities to ensure that they are using these analyses effectively. It is recognized that non-economic factors are a major consideration and are difficult to incorporate into economic modeling.

PART 2 - ENHANCED STATE MITIGATION PLANS

6. EFFECTIVE USE OF AVAILABLE MITIGATION FUNDING

Requirement §201.5(b)(3): [The Enhanced Plan must demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.

Explanation: In order for FEMA to increase the amount of HMGP funding available to a State in subsequent disasters, it is important that the State document that it has fully and effectively made use of FEMA and other funding already at its disposal. States **must** demonstrate how they have taken advantage of FEMA programs, such as FMA, HMGP, PDM, SRL and RFC to fund mitigation actions. If States have used other FEMA and non-FEMA funding to support mitigation, they *should* include this documentation as well. *The State should also discuss how it leveraged its own funds (i.e., to provide match or cost share) with FEMA or other federal programs to implement mitigation.*

(Rev. June 2007)

If the State has not made full use of existing mitigation programs, the plan **must** explain the reasons why. Acceptable reasons include, but are not limited to, unavailable non-federal match, uninterested property owners, or insufficient program funds to implement prioritized mitigation actions. Limited staff resources is not considered an acceptable reason, and would invalidate §201.5(b)(2)(iii) that requires the State to demonstrate program management capability (see pages 2-12 and 2-13, Part 1, items A.1. through A.4.).

In addition to describing actions and projects that have been implemented, the plan **must** link the projects to specific State goals and objectives and assess the effectiveness of the projects in achieving the goals.

The plan *should* also describe the State's strategy for ensuring continued effective use of resources (e.g., forming partnerships to leverage funding).

Plan Update: The updated plan **must** document how the State has fully made use of funding available through FEMA mitigation programs, including the HMGP, PDM, FMA, SRL and RFC programs.

The updated plan **must** also document how the State effectively uses existing mitigation programs to achieve its mitigation goals.

Resource: For information on how to evaluate the effectiveness of mitigation actions in achieving the plan's goals, see:

✓ *Bringing the Plan to Life* (FEMA 386-4), Step 3.

Examples:



Original Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI).

PART 2 - ENHANCED STATE MITIGATION PLANS

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(3)		<ul style="list-style-type: none"> ▪ The plan needs to explain <i>how</i> the State has taken advantage of all of the hazard mitigation opportunities currently available to them.

Required Revisions:

The revised plan must explain how the State uses Federal and State hazard mitigation funds and programs to achieve its goals, including the possible combination of two or more funding programs.



Revised Submittal:

The State uses a variety of funds and programs to achieve its mitigation goals, including the Flood Mitigation Assistance Program (FMA), the Hazard Mitigation Grant Program (HMGP), and the State Hazard Mitigation Assistance Initiative (HMAI). **These are described below:**

Flood Mitigation Assistance Program (FMA): The State has facilitated the use of FMA funds by local governments for the development of local hazard mitigation plans and projects. The State Hazard Mitigation Grant Coordinator visits each County yearly to develop local project applications and provides project management oversight for the grant. The State's goal is to have one-quarter of its communities using FMA project, planning, or technical assistance funds each year to help fund planning initiatives, projects, or flood hazard studies.

Hazard Mitigation Grant Program (HMGP): The State has facilitated the use of HMGP funds for post-disaster hazard mitigation projects. Because HMGP funds are post-disaster funds and their availability from year to year is uncertain and limited, the State only allows funding for local projects that are captured in existing local hazard mitigation strategies. Also, the State uses its 5% HMGP set-aside to help fund State technical assistance to local governments.

State Hazard Mitigation Assistance Initiative (HMAI): The State can provide up to 12.5% matching funds through the HMAI to help fund local hazard mitigation projects implemented through HMGP or FMA. These funds are provided to localities based first on need (i.e., there are few local resources to meet the 25% match requirement for Federal grants), and then on a competitive basis that compares benefit-cost analyses, environmental compatibility and justice, and political viability across jurisdictions.

PART 2 - ENHANCED STATE MITIGATION PLANS

7. COMMITMENT TO A COMPREHENSIVE MITIGATION PROGRAM

Requirement
§201.5(b)(4)(i-vi):

[The Enhanced Plan must demonstrate] that the State is committed to a comprehensive state mitigation program, which might include any of the following:

- A commitment to support local mitigation planning by providing workshops and training, State planning grants, or coordinated capability development of local officials, including Emergency Management and Floodplain Management certifications.
- A Statewide program of hazard mitigation through the development of legislative initiatives, mitigation councils, formation of public/private partnerships, and /or other executive actions that promote hazard mitigation.
- The State provides a portion of the non-Federal match for HMGP and/or other mitigation projects.
- To the extent allowed by State Law, the State requires or encourages local governments to use a current version of a nationally applicable model building code or standard that addresses natural hazards as a basis for design and construction of State sponsored mitigation projects.
- A comprehensive, multi-year plan to mitigate the risks posed to the existing buildings that have been identified as necessary for post-disaster response and recovery operations.
- A comprehensive description of how the State integrates mitigation into its post-disaster recovery operations.

Explanation:

The intent of this requirement is to allow States to describe mitigation-related activities that do not necessarily have a basis in a program or regulation. These activities truly show State commitment to reducing losses from hazards. States may demonstrate this commitment by describing how they have successfully implemented programs or projects that have reduced their exposure to hazards and how they will build on these past successes. Each State's mitigation strategy may include, but is not limited to, any of those elements mentioned above. Other actions that go "above and beyond" the requirements of the Standard Plan will be considered. If a State has no previous experience with mitigation initiatives, then the plan may only contain the various elements that the State proposes to implement. In either case, States *should* provide a timeframe for implementing these initiatives.

If the documentation to satisfy this plan requirement is not included in its own section of the plan, the plan review crosswalk accompanying the plan *should* identify where in the plan these various commitments are described.

PART 2 - ENHANCED STATE MITIGATION PLANS

Plan Update: The plan update process includes the review of those mitigation-related initiatives identified in the previously approved plan. The update **must** demonstrate progress in implementing a comprehensive state mitigation program. Any additional mitigation initiatives that have been developed and/or implemented in the intervening period **must** be described in the updated plan.

Special Considerations: Although the Rule requirements do not specifically mention the development of a statewide risk assessment as a means to facilitate better coordination and detail in local mitigation planning, carrying out such an activity is a good way to meet this particular requirement.

Resource: For information on implementing a hazard mitigation program, see:

- ✓ *Bringing the Plan to Life* (FEMA 386-4), Step 2.

For ideas and examples of mitigation programs, policies, and projects, see:

- ✓ *Developing the Mitigation Plan* (FEMA 386-3), Steps 1 and 2.

Examples:



Original Submittal:

The State has developed a program by which it provides hazard mitigation training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop.

REVIEWER'S COMMENTS

RULE SECTION	LOCATION IN THE PLAN	REVIEWER'S COMMENTS
§201.5(b)(4) (i-vi)		<ul style="list-style-type: none"> ▪ The description of providing assistance is very brief; it does not include such details as the duration of the workshops, the staff or agencies providing training, or sources of funding.

Required Revisions:

The plan must document in detail the process by which the State implements its hazard mitigation programs and initiatives. If the program has been in place for some time, the plan should provide details about the results or performance of the program.



Revised Submittal:

The State has developed a program by which it provides hazard mitigation

PART 2 - ENHANCED STATE MITIGATION PLANS

training workshops for local governments. The State advertises the availability of the program through a brochure mailing that details the procedures for requesting the workshop. **After a local government requests the training workshop, the State coordinates the logistical details with the local government for holding the workshop.**

The following State HMC representatives have been trained and authorized to conduct training for local governments on hazard mitigation planning:

- **The State Hazard Mitigation Officer, State Office of Emergency Preparedness**
- **The Hazard Reduction Policy Coordinator, State Smart Growth Office**
- **The Environmental Stewardship Officer, State Division of Environmental Protection**

Funding for the two-day workshop is provided through the State Hazard Mitigation Assistance Initiative (HMAI) and local funds. Each County government receives up to \$1,500 to arrange the location, audio/visual equipment, invitations to interested staff and other local interested parties, and food. Any shortfall is made up through local funds. Since the training workshop program's initiation in 1999, five workshops have been conducted, and each of these localities has submitted a compliant hazard mitigation plan within one year of the workshop, as required.