

# Guidance for Stakeholder Engagement

## Due Process Phase

May 2016



Requirements for the Federal Emergency Management Agency (FEMA) Risk Mapping, Assessment, and Planning (Risk MAP) program are specified separately by statute, regulation, or FEMA policy (primarily the Standards for Flood Risk Analysis and Mapping). This document provides guidance to support the requirements and recommends approaches for effective and efficient implementation. Alternate approaches that comply with all requirements are acceptable.

For more information, please visit the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage ([www.fema.gov/guidelines-and-standards-flood-risk-analysis-and-mapping](http://www.fema.gov/guidelines-and-standards-flood-risk-analysis-and-mapping)). Copies of the Standards for Flood Risk Analysis and Mapping policy, related guidance, technical references, and other information about the guidelines and standards development process are all available here. You can also search directly by document title at [www.fema.gov/library](http://www.fema.gov/library).

## Document History

Affected Section or Subsection	Date	Description
First Publication	May 2016	Initial version of new transformed guidance. The content was derived from <u>Operating Guidance 04-11</u> , <u>Risk MAP Meetings Guidance</u> . It has been reorganized and is being published separately. It also addresses requirements resulting from the Biggert-Waters Flood Insurance Reform Act of 2012, as amended by the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA), and FEMA organizational changes, and it reflects enhanced stakeholder engagement practices in place as a result of increased investment in community engagement and risk communication.

# Table of Contents

1.0	Introduction .....	1
1.1	Due Process Phase Overview .....	2
1.2	Stakeholder Engagement Goals for Due Process Phase .....	4
1.3	Coastal and Levee Accreditation Project Considerations .....	5
1.4	Tribal Considerations .....	6
1.5	Key Terms Defined .....	7
1.6	Impact of NFIP Reform Legislation .....	9
2.0	Documenting Outreach and Engagement Activities .....	9
2.1	Review and Update of Stakeholder Engagement Plan .....	10
2.2	Evaluating Key Influencer Roles and Responsibilities .....	11
3.0	Engaging Stakeholders .....	11
3.1	Engagement with Communities and Other External Stakeholders .....	12
3.1.1.	Engaging Community Officials .....	12
3.1.2.	Engaging Regional Entities .....	13
3.1.3.	Engaging State Partners and Other State Agencies .....	14
3.1.4.	Engaging Federal Agency Partners and Other Federal Agencies .....	14
3.1.5.	Engaging Federal and State Elected Officials .....	15
3.1.6.	Engaging Private-Sector Organizations .....	16
3.1.7.	Engaging the Media .....	18
3.2	Engagement with Internal Partners and Programs .....	19
3.2.1.	Engagement with Federal Insurance and Mitigation Administration Offices .....	19
3.2.2.	Engagement with Other Regional Offices .....	20
3.2.3.	Engagement with Risk MAP Providers .....	20
3.3	Potential Tools and Techniques to Support Stakeholder Engagement .....	21
4.0	File Maintenance .....	23
5.0	CCO Meetings and Flood Risk Open Houses .....	23
5.1	Meeting Timing .....	24
5.2	Meeting Attendees .....	24
5.3	Meeting Objectives .....	25
5.4	Meeting Messages .....	26

5.5	Meeting Activities.....	27
5.6	Flood Risk Open House Meeting Best Practices – Working With Local Officials .....	28
5.7	Post-Meeting Activities .....	28
5.8	No CCO Meeting(s) or Flood Risk Open House(s) Held - Best Practices .....	29
6.0	Appeal Period Engagement Activities .....	29
6.1	Appeal Period Messaging.....	30
6.2	Media Engagement to Educate Property Owners .....	30
6.3	Appeal Period Best Practices – Working With Local Officials .....	31
7.0	Adoption/Compliance Period Engagement Activities .....	31
7.1	Adoption/Compliance Period Objectives .....	32
7.2	Adoption/Compliance Period Best Practices .....	32
8.0	Outcomes.....	33

## List of Figures

Figure 1: Risk MAP Project Lifecycle.....	3
---	---

# Guidance for Stakeholder Engagement: Due Process Phase

## Document Outline

### 1.0 Introduction

This guidance document has been prepared to expand on, and therefore supersede, Risk Mapping, Assessment, and Planning (Risk MAP) program guidance provided in portions of Section 1 and Subsection 6.3 of Federal Emergency Management Agency (FEMA) Operating Guidance (OG) 04-11, Risk MAP Meetings Guidance, dated June 30, 2011. Specifically, this guidance document addresses stakeholder engagement during the Due Process Phase (formerly referred to as the Due Process and Path Forward Phase in OG 04-11) of the Risk MAP project lifecycle.

The primary objective of the Due Process Phase is to carry out the statutory requirements of the National Flood Insurance Act of 1968, as amended – and the regulations promulgated to implement those statutory requirements – which ensure that community officials or owners or lessees of real property within the community are afforded the opportunity to review and comment on new or updated flood hazard information and products developed by FEMA before the information and products become effective for floodplain management and flood insurance requirements and rating. The Due Process Phase also provides a 6-month adoption/compliance period during which communities must adopt new or updated local floodplain management ordinances in order to join or remain eligible to participate in the National Flood Insurance Program (NFIP).

While carrying out these statutory objectives during the Due Process Phase, FEMA and the Project Teams that carry out flood risk studies need to undertake stakeholder engagement activities that will accomplish the following:

1. Empower communities to share information with local citizens about the communities' flood hazards and associated risks, proposed flood hazard determinations and how they may be appealed, how other comments may be submitted and addressed, mitigation actions taken and planned, and individuals' responsibility to manage their own risks.
2. Encourage communities to identify short- and long-term efforts to progress toward increasing flood risk awareness and management.

The primary audiences for this guidance document are staff from the 10 FEMA Regional Offices, FEMA Headquarters (HQ), and the Project Teams that are formed to carry out flood risk study projects in support of the Regional Offices. (Potential Project Team members are identified in Subsection 1.5.) However, this guidance document is also intended for Risk MAP providers that may not be actively involved in individual flood risk studies, but may be called on to support activities during the Due Process Phase as “internal stakeholders.” (See Subsection 3.2.3.)

The guidance in this document is consistent with the Risk MAP program vision. The Risk MAP program vision includes collaborating with local, State, and Tribal entities throughout a watershed to deliver quality data that increases public awareness and leads to mitigation actions that reduce risk to life and property. To achieve this vision, FEMA transformed its traditional flood hazard

identification and mapping efforts into a more integrated process of identifying, assessing, communicating, planning, and mitigating flood-related risks. The goals of the Risk MAP program are:

- Goal 1: Address gaps in flood hazard data to form a solid foundation for flood risk assessments, floodplain management, and actuarial soundness of the National Flood Insurance Program (NFIP).
- Goal 2: Ensure that a measurable increase of the public's awareness and understanding of risk management results in a measurable reduction of current and future vulnerability to flooding.
- Goal 3: Lead and support States, communities, and Tribes to effectively engage in risk-based mitigation planning that results in sustainable actions that reduce or eliminate risks to life and property from natural hazards.
- Goal 4: Provide an enhanced digital platform that improves management of limited Risk MAP resources, stewards information produced by Risk MAP, and improves communication and sharing of risk data and related products to all levels of government and the public.
- Goal 5: Align Risk Analysis programs and develop synergies to enhance decision-making capabilities through effective risk communication and management.

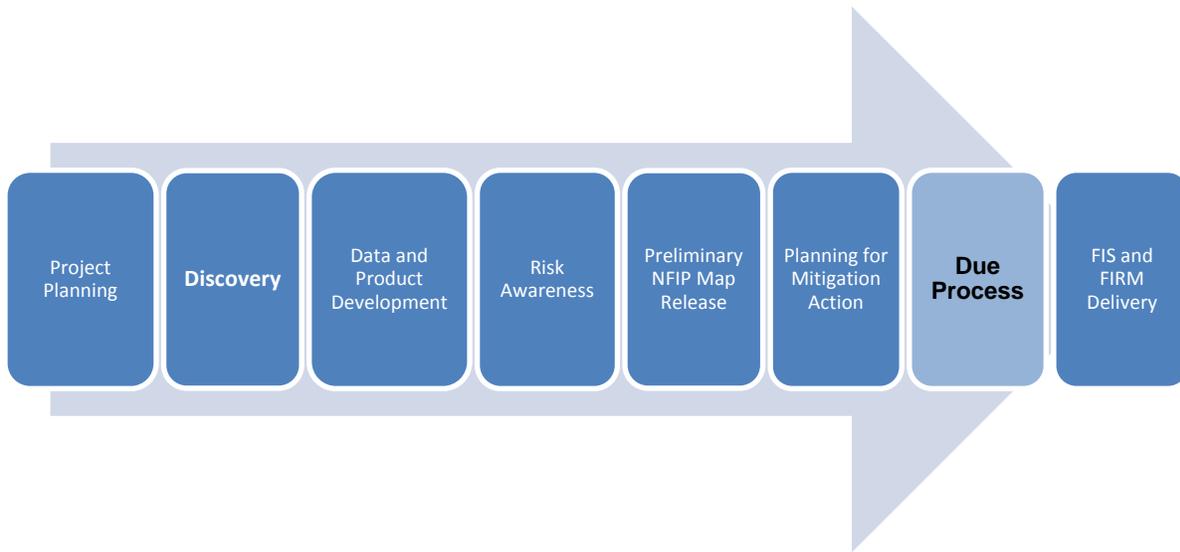
To achieve these goals, stakeholder coordination and engagement is necessary throughout the Risk MAP project lifecycle. Engagement is important during the Due Process Phase to further educate community officials, key influencers (defined in Subsection 1.5), and other stakeholders about available data and products and the processes to change the data and products and to seek guidance that may impact stakeholder engagement activities.

As mentioned at the beginning of this document, the guidance, context, and other information in this document is not required unless it is codified separately in a statute, regulation, or policy. Alternate approaches that comply with all requirements are acceptable. Each Regional Office has an Action Strategy that will inform the engagement support and activities performed during the Due Process Phase; the FEMA Project Officer will identify the required level of support.

## **1.1 Due Process Phase Overview**

As shown in Figure 1, the Due Process Phase is the seventh phase in the Risk MAP project lifecycle.

**Figure 1: Risk MAP Project Lifecycle**



Activities that occur during this phase of the lifecycle for which stakeholder engagement may be needed include the following as appropriate:

- Hold Consultation and Coordination Officer (CCO) Meetings with community officials and Flood Risk Open Houses for the public to share Preliminary versions of new or revised Flood Insurance Rate Maps (FIRMs), Flood Insurance Study (FIS) reports, and related products.
- Administer the statutory 90-day appeal period(s).
- Review and resolve appeals and comments.
- Produce Revised Preliminary versions of FIRMs and FIS reports as needed based on comments and appeals.
- Administer the 6-month adoption/compliance periods.
- Manage Letter of Map Change (LOMC) Revalidation activities.
- Assist communities in developing mitigation action item lists for continued progress toward watershed resiliency.
- Deliver the final versions of the products identified in the project scope, including the FIRM(s), FIS report(s), Summaries of Map Actions (SOMAs), FIRM database, and identified Flood Risk Products and Flood Risk Datasets.

FEMA HQ and Regional Office staff use the Key Decision Point (KDP) process to document decisions to move forward with a flood risk project at six distinct points in the project lifecycle and to document the rationale for these decisions. The KDP process adds a level of formality to the existing Risk MAP planning and decision-making processes already in use and provide a system of record for these decisions.

The KDPs document the answers to the following questions:

- KDP 0: Is FEMA ready to initiate this flood risk project?
- KDP 1: Is FEMA ready to continue this flood risk project?
- KDP 2: Is FEMA ready to develop a Preliminary FIRM and FIS report for this flood risk project?
- KDP 3: Is FEMA ready to issue the Preliminary FIRM and FIS report to the community for this flood risk project?
- KDP 4: Is FEMA ready to initiate an appeal period for this flood risk project?
- KDP 5: Is FEMA ready to issue the Letter of Final Determination (LFD) for this flood risk project?

The Due Process Phase includes KDP 4 and KDP 5. Information captured during KDP 4 is used to understand if communities impacted by the regulatory FIRM have been properly engaged through community meetings and other information-sharing approaches and all process requirements have been addressed. Information captured during KDP 5 is used to understand the level of community engagement that has occurred, ensure that all comments and appeals have been addressed, and appropriate Congressional coordination has taken place.

For information on the expectations and actions required at each of the six KDPs and the process FEMA HQ and the Regional Offices follow to document, review, and approve each KDP, see Guidance Document No. 35, [Key Decision Point \(KDP\) Process Guidance](#). Guidance Document No. 35 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

## **1.2 Stakeholder Engagement Goals for Due Process Phase**

As with earlier project phases, stakeholder engagement during the Due Process Phase should be flexible and may not look the same for all projects, as each FEMA Regional Office, each watershed or study area, each Project Team, and each stakeholder group to be engaged will vary. The stakeholder engagement activities that FEMA-led Project Teams might conduct during the Due Process Phase are intended to accomplish the following:

- Continue implementation of the previously developed community and stakeholder engagement plan.
- Communicate with community officials and other key influencers before, during, and after the CCO Meetings.
- Communicate with property owners and other public- and private-sector stakeholders about the Preliminary FIRM(s), FIS report(s), FIRM database, and SOMAs before, during, and after the Flood Risk Open House(s).
- Explain how and why the flood hazard information shown on the Preliminary FIRM and FIS report is different from the flood hazard information shown on the effective FIRM and FIS report.

- Explain the procedures and processes that are available to community officials to change the FIRM and FIS report (i.e., appeal process, revisions process, LOMC process).
- Explain the statutory and procedural requirements of the 90-day appeal period.
- Explain the activities that take place during the 6-month adoption/compliance period.
- Hold a Resilience Meeting with community officials and other key stakeholders to continue to build local capacity for implementing priority mitigation activities/actions within the watershed. (Note: Resilience Meeting timing is at FEMA Project Officer discretion, and the Resilience Meeting(s) may have been conducted earlier in the Risk MAP project lifecycle. For additional information on Resilience Meetings, refer to Guidance Document No. 63, [Guidance for Stakeholder Engagement: Risk Awareness Phase](#), which is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage).
- Continue to build community officials' understanding of, confidence in, and ownership of the Preliminary FIRM(s), FIS report(s), FIRM database, and SOMA(s), and the process being followed.
- Improve key stakeholders' (i.e., those that have been actively involved in the project throughout the process) knowledge about and acceptance of the Preliminary FIRM(s), FIS report(s), FIRM database, and SOMA(s).
- Enhance and expand the relationships with stakeholders developed during earlier project phases, especially relationships with previously identified key influencers.
- Establish clear roles and responsibilities for key influencers in communicating about Preliminary FIRM(s), FIS report(s), FIRM database, and SOMA(s); appeals and map revisions processes; and adoption/compliance process.
- Continue to provide transparency into the Risk MAP process.
- Help encourage adoption of higher floodplain management standards into local floodplain management ordinances.
- Help ensure adoption of compliant floodplain management ordinances before the FIRM effective date.
- Help increase a community's propensity, or likelihood, to prioritize, plan, and take mitigation actions to reduce risk.

Continuous engagement with both internal and external stakeholders is a necessity during the Due Process Phase and will be needed to achieve success.

### **1.3 Coastal and Levee Accreditation Project Considerations**

All newly initiated Risk MAP projects must be watershed-based, with the exception of coastal projects and small-scale projects related to levee accreditation status. Coastal projects and levee projects may have longer timelines than flood risk projects for watersheds, separate prioritization protocols, widely varying stakeholder audiences, as well as other differences. For example, levee projects require the formation of a Local Levee Partnership Team that includes a diverse group of stakeholders.

Project Team members involved in flood risk projects involving coastal analyses or levees should refer to separate guidance related to coastal projects and levee projects provided on the FEMA website. Additional resources related to coastal analyses and mapping are available from [www.fema.gov/coastal-flood-risks-achieving-resilience-together](http://www.fema.gov/coastal-flood-risks-achieving-resilience-together). Additional resources related to levee analysis and mapping are available from the FEMA Levee Resources Library at [www.fema.gov/fema-levee-resources-library](http://www.fema.gov/fema-levee-resources-library).

## 1.4 Tribal Considerations

When Tribal lands are included in a watershed/project area, consultation with Tribal entities may be appropriate and is to be coordinated with the Regional Office Tribal Liaison. During the Discovery Phase, the affected Tribal entities should have been consulted by the Regional Office Tribal Liaison on whether they wanted to be included in other planned engagement efforts and Risk MAP meetings, or if separate engagement efforts or meetings with them would be more appropriate. This will depend on established working relationships between the Regional Office Tribal Liaisons and the Tribal entities within each Region and other factors. For instance, if a Tribal entity participates in a multijurisdictional Hazard Mitigation Plan, it might be appropriate for them to participate in the Resilience Meetings held for the entire watershed or geographic area that is the focus of the flood risk project. (For information on Resilience Meetings for flood risk projects, see Guidance Document No. 63, [Guidance for Stakeholder Engagement: Risk Awareness Phase](#), which is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.)

Even if the FEMA Regional Office determines that a Tribe does not have the land use authority needed to implement the requirements of the NFIP, the Discovery process might have provided an opportunity to inform the Tribe about the NFIP, Risk MAP program, and other mitigation activities, such as the benefit of developing Hazard Mitigation Plans. Before the end of the Discovery Phase, the Regional Office usually will have an understanding, in coordination with Tribal entity, on whether the Tribe meets the NFIP definition of a community and how the Tribal entity should be included in the flood risk project. The FEMA Regional Office Tribal Liaison will continue to work with the Tribal entity after the Discovery Phase has ended, as appropriate.

Only the FEMA Regional Office Tribal Liaison or other approved Regional Office staff members are to work directly with federally recognized Tribes and Tribal entities. Therefore, if a Tribal entity contacts a Project Team member about participation in the NFIP or participation in the ongoing project, that Project Team member is to notify the FEMA Project Officer and the Regional Office Tribal Liaison immediately.

As during earlier phases of the project lifecycle, FEMA and the Project Team may need to consider Tribal entities as external stakeholders during the Due Process Phase; therefore, the Regional Office may need to consider the potential impacts that additional engagement will have on project budget considerations during the Due Process Phase. In this document, the term “communities” includes Tribes/tribal entities that have chosen to participate actively in a study.

## 1.5 Key Terms Defined

The terms listed below are key terms that will be used in this guidance document and other stakeholder engagement guidance documents.

- *Adoption/Compliance Period* – The period, usually lasting 6 months, that begins with the issuance of an LFD and ends when a new or revised FIRM becomes effective, during which a community must enact and adopt new or revised floodplain management ordinances required for participation in the NFIP
- *Appeal* – A formal objection to proposed or proposed modified flood hazard determinations (i.e., addition or modification of Base Flood Elevations [BFEs], base flood depths, Special Flood Hazard Areas [SFHAs], flood insurance risk zone designations, and/or regulatory floodways) submitted by a community official or an owner or lessee of real property within the community during the 90-day appeal period. An appeal must be based on data that show the proposed or proposed modified flood hazard determinations are scientifically or technically incorrect
- *Appeal Period* – The 90-day period, beginning on the date of the second publication of FEMA’s proposed flood hazard determination notice in a local newspaper with wide circulation, during which community officials or owners or lessees of real property within the community may submit formal objections to proposed flood hazard information (i.e., new or modified BFEs, base flood depths, SFHAs, flood insurance risk zone designations, and/or regulatory floodways) shown on new or revised FIRM panels and/or new or revised FIS report materials by submitting data to show that the proposed flood hazard information is scientifically or technically incorrect
- *Chief Executive Officer (CEO)* – The official of a community who has the authority to implement and administer laws, ordinances, and regulations for that community
- *CCO* – The individual on the FEMA Regional Office staff who is responsible for coordinating with a community on NFIP-related activities
- *CCO Meeting* – The term used to describe a formal meeting with community officials and select stakeholders for flood risk studies carried out under the FEMA Risk MAP program. The CCO Meeting focuses on the release of the Preliminary version of the FIRM and FIS report and the process for reviewing and adopting the FIRM before the FIRM effective date.
- *Comment* – A formal objection to a change to the FIRM that is not directly related to proposed or proposed modified flood hazard determinations and/or does not satisfy the requirements for an appeal under Part 67 of the NFIP regulations (44 CFR Part 67). While not provided with the same status as appeals, comments generally are addressed by FEMA before the affected FIRM panels and FIS report materials are finalized. Comments would include changes to road names and configurations, corporate limits boundaries, and requests that changes effected by LOMC be incorporated.

- *Flood Elevation Determination Docket (FEDD)* – The file established and maintained for each community affected by a flood risk project to assist FEMA in meeting the requirements of Section 67.3 of the NFIP regulations. The FEDD file includes all correspondence between FEMA and the community concerning a flood risk study; reports of meetings held among FEMA representatives, community representatives, the State NFIP Coordinator, private citizens, FEMA and community contractors, or other interested parties; relevant publications (e.g., newspaper notices, flood hazard determination notices published in the FEDERAL REGISTER); LFD; and copies of the FIRM and FIS report.
- *Floodplain Administrator (FPA)* – The community official who is responsible for operating a floodplain management program in a community in accordance with NFIP regulatory standards
- *Flood Risk Open House* – The term used to describe the public open house held after the CCO Meeting with community officials and select stakeholders, to familiarize the public with the flood risk study and resulting FIRM and FIS report
- *Flood Risk Products* – Non-regulatory resources that help community officials and the public assess, visualize, and communicate local flood risk. Flood Risk Products include Flood Risk Maps, Flood Risk Reports, and Flood Risk Databases.
- *Key Influencers* – The term used to describe public- or private-sector organizations and individuals who have direct or indirect power to affect the decisions of others because of their real or perceived authority, knowledge, position, or relationship
- *Local Outreach Team* – A group of community residents that serves as the face and voice of resilience in the watershed. This group can be supported by the Community Engagement and Risk Communication (CERC) provider team through technical assistance, ongoing counsel, training, and template materials.
- *Mitigation* – A sustained action taken to reduce or eliminate long-term risk to people and property from flood hazards and their effects. Mitigation distinguishes actions that have a long-term impact from those are more closely associated with preparedness for, immediate response to, and short-term recovery from specific events
- *Outreach* – The activity, process, or channel used to engage or communicate to others
- *Project Management Team* – The term used to describe the individuals who will manage a project for its entire lifecycle. The Project Management Team includes: FEMA Risk Analysis Branch staff member who is the FEMA Project Officer for a project; project manager or senior-level staff from the Cooperating Technical Partners (CTPs) and/or Risk MAP providers who are participating on the Project Team; the State NFIP Coordinator; and the FEMA Regional Office Contracting Officer
- *Project Team* – The term used to describe the team of individuals and organizations who will execute a project over its lifecycle. In addition to the FEMA Project Officer for the project, the Project Team can include management and staff from the CTP(s) and/or Risk MAP provider(s) who are participating in the project; the State NFIP Coordinator and State Hazard Mitigation Officer (SHMO); other Federal agencies; and others, such as regional planning agencies and water management districts.

- *Regulatory Products* – The term used to collectively refer to the FIRM, FIS report, and FIRM database
- *Resilience Meeting* – The term used to describe a formal meeting with community officials and other key stakeholders during a flood risk project. The Resilience Meeting focuses on building local capacity for implementing priority mitigation activities.
- *Risk MAP Providers* – The term used to collectively refer to the teams of private-sector companies that support the Risk MAP program under contract to FEMA; i.e., the Customer and Data Services (CDS), CERC, Production and Technical Services (PTS), and Program Management (PM) providers
- *Stakeholder Engagement* – The process by which an organization involves people or organizations that may be affected by the decisions it makes or can influence the implementation of those decisions
- *Summary of Map Actions (SOMA)* – A list, generated by FEMA and delivered to the community, that summarizes the Letters of Map Amendment, Letters of Map Revision Based on Fill, and Letters of Map Revision that are or will be affected by the physical update to the effective FIRM that results from the performance of a flood risk study

## 1.6 Impact of NFIP Reform Legislation

Through enactment of the Biggert-Waters Flood Insurance Reform Act of 2012 (BW-12) and the Homeowner Flood Insurance Affordability Act of 2014 (HFIAA), the U.S. Congress established a number of mapping-related requirements on FEMA. For a complete breakdown of the new requirements, visit the Flood Insurance Reform portion of the FEMA website ([www.fema.gov/flood-insurance-reform](http://www.fema.gov/flood-insurance-reform)). Some of the new legislative requirements from Section 216 of BW-12 are addressed in Subsections 3.1, 6.2, and 6.3.

As part of the reform legislation, the U.S. Congress also required the establishment of a new Technical Mapping Advisory Council (TMAC) to advise FEMA on certain aspects of the national flood mapping program. Additional information on the TMAC is accessible through the FEMA website at [www.fema.gov/technical-mapping-advisory-council](http://www.fema.gov/technical-mapping-advisory-council).

FEMA continues to work with TMAC on fully implementing the NFIP reform legislation and the recommendations from TMAC. As new FEMA standards for the Due Process Phase are established, FEMA will update and re-issue this guidance document.

## 2.0 Documenting Outreach and Engagement Activities

The Project Team should have documented all outreach and engagement activities in an implementable written plan earlier in the project lifecycle. Such plans are required for all flood risk projects.

The plan may have been referred to as a communications plan, outreach plan, or community engagement plan. For the purposes of this document, the plan that will be used to document engagement activities during the Due Process Phase will be referred to as a stakeholder engagement plan.

## 2.1 Review and Update of Stakeholder Engagement Plan

At the beginning of the Due Process Phase, Project Team members will need to review the existing version of the stakeholder engagement plan to determine whether it is accurate based on contractual arrangements made with CTPs and Risk MAP providers. They also will need to determine whether the plan is consistent with the latest guidance from FEMA HQ. Project Team members also will need to verify that the plan includes information on the following, at a minimum:

- Environment/background in which the outreach and engagement will take place
- Engagement goals and objectives
- Roles and responsibilities of Project Team members, which will include some combination of the following groups:
  - FEMA Risk Analysis Branch, Floodplain Management and Insurance Branch, and Hazard Mitigation Assistance Branch staff
  - CTP staff
  - State NFIP Coordinator
  - SHMO
  - PTS provider staff
  - CERC Team
  - CTP contractor staff
  - Other Federal agency staff
- Roles and responsibilities of non-Project Team members, such as staff from the following groups:
  - Regional Office of External Affairs
  - Other FEMA Regional Offices and HQ offices
  - CTP(s)
  - Risk MAP providers
  - Other Federal agencies
- Audiences to be engaged, including external (public- and private-sector) stakeholders, internal (FEMA and Risk MAP provider) stakeholders, and key influencers
- Outreach and engagement strategies and tactics
- Key message content and format
- Engagement tools and techniques to be used
- Activities timeline
- Expected outcomes
- Potential barriers to success
- Monitoring plan and proposed solutions

If specific information had been included in the existing stakeholder engagement plan regarding Due Process Phase activities, the Project Team should verify that the information is still correct and make appropriate changes to ensure the document continues to be useful to the team. This should be done at the beginning of the phase or as decisions are made, in order to address

changing conditions or new information. If no information has been provided for the Due Process Phase, the Project Team should amend the plan to include appropriate information.

The Project Management Team will decide which Project Team member should lead the effort to update the stakeholder engagement plan.

Once the plan has been updated, it would likely be beneficial for the Project Management Team to distribute the updated plan and emphasize to Project Team members the importance of carrying out the documented activities and responsibilities. It also may benefit the Project Management Team to establish or reiterate the process for amending the plan later in the Due Process Phase if amendments become necessary to meet the changing needs of the project. If a Local Outreach Team is in place, it would be beneficial for the Project Team to involve this group in making changes and updates to the plan. It would likewise be beneficial to provide the Local Outreach Team with relevant and appropriate elements of the plan.

The stakeholder engagement plan should be considered a “living” document.

## **2.2 Evaluating Key Influencer Roles and Responsibilities**

During the earlier phases of the project lifecycle, Project Team members may have identified organizations or individuals that are, or have the potential to be, key influencers. For the purposes of this document, key influencers are public- or private-sector individuals or organizations that have the direct or indirect power to affect the decisions of others because of their real or perceived authority, knowledge, position, or relationship.

These individuals or organizations are trusted sources of information. They may be individuals who traditionally have a role in emergency management, floodplain management, hazard mitigation, and mapping. It is important not to overlook others who may represent civic organizations, businesses, or groups that have a standing in the community.

Additional information on key influencers is provided in Subsection 3.2 of FEMA Guidance Document No. 61, [Guidance for Stakeholder Engagement: Data and Product Development Phase](#). Guidance Document No. 61 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

The names or titles of the key influencers and their roles and responsibilities should have been included in the stakeholder engagement plan. If appropriate information on key influencers was not included, the Project Team should determine who the key influencers are moving forward and update the plan to include this information. The Project Team may also determine that information on key stakeholders has been included in the existing stakeholder engagement plan, but must be updated based on their more recent experience with these individual and organizations or their knowledge about the individuals’ or organizations’ roles in the watershed.

## **3.0 Engaging Stakeholders**

Engagement with a variety of stakeholders – both external and internal – at each phase of a flood risk project is vital for a project to be completed successfully. Information on potential external stakeholders to be engaged during the Due Process Phase is provided in Subsection 3.1, while

information on potential internal stakeholders (i.e., FEMA HQ, FEMA Regional Offices, Risk MAP providers not represented on Project Teams) to be engaged is provided in Subsection 3.2.

Project Team members should refer to a separately published document, the CERC Playbook, for additional information about stakeholder engagement during the Due Process Phase and links to examples, tools, and templates. The CERC Playbook can be accessed through the password-protected Risk MAP Program Portal or by contacting the FEMA Project Officer.

### **3.1 Engagement with Communities and Other External Stakeholders**

Engagement with a variety of external stakeholders will enable the FEMA Regional Office staff and other Project Team members to do the following:

- Further educate community officials and other stakeholders about the types of data and products that will be provided and the processes and procedures available to change the data and products.
- Maintain relationships with Federal and State agency partners.
- Continue to work closely with key influencers who can help deliver Risk MAP products and related messages to community officials.
- Increase the propensity of communities and individuals to take mitigation actions that result in reduced flood risk.

The following stakeholder groups, which are typically engaged during the Due Process Phase, are discussed in Subsections 3.1.1 through 3.1.7:

- Community officials
- Regional entities
- State partners and other State agencies
- Federal agency partners and other Federal agencies
- Federal and State elected officials
- Private-sector organizations, including affinity groups such as professional associations, business groups, and faith-based and social organizations whose members may have a vested interest in the long-term safety and stability of the community
- Media

#### **3.1.1. Engaging Community Officials**

Continuous engagement with community officials should be a top priority. Through the earlier phases of the project, the Project Team should have established and maintained a consistent level of engagement with local officials in the watershed or geographic area that is the focus of the project.

Potential local officials (county and community) with whom the Project Team may want to engage during the Due Process Phase include, but are not limited to, the following:

- CEOs
- FPAs
- Emergency managers
- Engineers
- Planners
- Building officials and other code enforcement officials
- Geographic Information Systems (GIS) managers/coordinators/specialists
- Hazard mitigation planners and officials involved in implementation
- Metropolitan planning and transportation entities

The Project Team should keep contact information for community officials (particularly CEOs and FPAs) current throughout the lifecycle of a flood risk project. One source of this information is the FEMA Community Information System (CIS). If the Project Management Team determines that the CIS should be the primary source of the community contact information, the Project Team may find it beneficial to check the CIS periodically and notify the FEMA Project Officer when information is out of date to help assure timely and accurate delivery of correspondence to CEOs and FPAs. This may be especially beneficial for flood risk projects that take several years to complete. If the community contact information is kept separate from the CIS, all Project Team members should have access to it.

The Project Team may need to work with community officials to help FEMA meet the following requirements of Section 216 of BW-12:

- Educating property owners regarding the flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Educating property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost Preferred Risk Policies (PRPs)

### **3.1.2. Engaging Regional Entities**

Representatives of some regional entities in the watershed or geographic area may already be active Project Team members. Potential regional entities with whom the Project Team may want to engage during the Due Process Phase are listed below. Engagement with regional entities is particularly important if representatives of any of these entities have been identified by the Project Team as key influencers.

- Planning districts and authorities
- Flood control, water management, and water conservation districts and authorities
- Economic development commissions, councils, boards, authorities, and agencies

- Transportation planning organizations

The Project Team may need to work with regional entities to help FEMA meet the following requirements of Section 216 of BW-12:

- Educating property owners regarding the flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Educating property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost PRPs

### **3.1.3. Engaging State Partners and Other State Agencies**

State CTP(s), State NFIP Coordinators, SHMOs, and their staff will likely already be active Project Team members. Project Teams may want to engage, or continue engagement with, the State agencies listed below and other State agencies because they also may be able to help communicate about flood risk and support flood risk reduction activities in the watershed. As with regional entities, this is particularly true if representatives of any of these agencies have been identified by the Project Team as key influencers.

- State mitigation planners
- Community Rating System (CRS) coordinators and Insurance Services Office specialists
- State and Federal agencies that own and/or operate levees or dams
- State historic preservation offices
- State dam safety officials
- State transportation departments

The Project Team may need to work with the State NFIP Coordinator, SHMO, and other State agencies to help FEMA meet the following requirements of Section 216 of BW-12:

- Educating property owners regarding the flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Educating property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost PRPs

### **3.1.4. Engaging Federal Agency Partners and Other Federal Agencies**

Some existing Federal agency partners and their staff also may be active Project Team members. Depending on the participation of the Federal agency partners in previous phases of the project, Project Teams may want to continue to engage with the agencies listed below because they may be able help to communicate about flood risk and support flood risk reduction activities in the watershed. As with regional entities and State agencies, this is particularly true if representatives of any of these agencies have been identified by the Project Team as key influencers.

- National Oceanic and Atmospheric Administration National Weather Service and Office for Coastal Management
- Natural Resources Conservation Service
- U.S. Army Corps of Engineers District, Division, and/or Flood Risk Management Program representatives
- U.S. Bureau of Indian Affairs
- U.S. Bureau of Reclamation
- U.S. Department of Housing and Urban Development
- U.S. Economic Development Administration
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Geological Survey

### **3.1.5. Engaging Federal and State Elected Officials**

Engagement with the following elected officials and their staff would likely be beneficial during the Due Process Phase to obtain their cooperation in minimizing disruptions or delays in the flood risk study process that could be caused by local misunderstandings of processes, procedures, or technical findings; to obtain their support for study findings and for products; or to obtain their support for mitigation projects that community officials would like to undertake.

- U.S. Senators
- U.S. Representatives
- State Senators
- State Representatives
- Governor

In enacting the reform legislation, the U.S. Congress placed some specific requirements on FEMA with regard to notifying congressional delegations about an upcoming issuance of a “preliminary map.” Specifically, requires FEMA to notify the U.S. Senators for each State affected and each member of the U.S. House of Representatives for each congressional district affected in writing at least 30 days before issuance of a preliminary map about the estimated schedule for the following:

- Estimated schedule for:
  - Community meetings regarding the preliminary map (i.e., CCO Meetings, Flood Risk Open Houses)
  - Publication of notices regarding the preliminary map in local newspapers
  - Commencement of the appeals process regarding the map

- Estimated number of homes and businesses that will be affected by changes contained in the preliminary map, including how many structures that not previously located in an area having special flood hazards will be located within such an area under the preliminary map

The requirements regarding notifications about the estimated schedule are being addressed through sending standardized reports to congressional delegations via email transmittal. The reports are also accessible online through the FEMA Document and Resource library and they are archived by year.

Any other engagement with these elected officials would need to be carried out by, or with the approval of, the Regional Office of External Affairs. For example, it may be appropriate for the Regional Office of External Affairs staff and the Project Team to provide elected officials with materials they can use to help with the following additional requirements of the reform legislation:

- Educating property owners regarding the flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Educating property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost PRPs

### **3.1.6. Engaging Private-Sector Organizations**

The Project Team also may have initiated engagement activities with state and local affiliates of the professional associations and organizations listed below as well as other nongovernmental organizations (NGOs) and nonprofit organizations (NPOs) during earlier phases of the project. This may have been done because the members of these organizations, by and large, are embedded in the community; have routine interactions with, and often can influence, Federal, State, and local elected officials and other decision-makers; and have daily interactions with local citizens and the media. Many of these affiliates – particularly those associated with lending, insurance, real estate, and business/commerce – are likely to become more active during the Due Process Phase. The Project Team may have already identified representatives of these organizations as key influencers.

#### Professional Associations

- American Congress of Surveying and Mapping
- American Planning Association
- American Public Works Association
- American Society of Civil Engineers
- American Water Resources Association
- Association of State Floodplain Managers
- Association of State Wetland Managers
- National Association of Flood and Stormwater Management Agencies
- National Association of Counties

- National Association of Home Builders
- National Association of Realtors
- National Emergency Management Association
- National Flood Determination Association
- National League of Cities
- Natural Hazard Mitigation Association

#### NGOs and NPOs

- American Rivers
- American Shore and Beach Preservation Association
- Coastal Conservation Association
- Institute for Business and Home Safety
- Nature Conservancy
- U.S. Chamber of Commerce

If they have not already done so, Project Team members may also want to initiate engagement activities with influential civic organizations and affinity groups such as business groups and faith-based and social organizations whose members may have a vested interest in the long-term safety and stability of the community

If any of these organizations have issues with the project and/or the data and products being produced, it would benefit the Project Team to know about the issues so they may address them, in whole or part, before the data and products are delivered to community officials at the end of the Due Process Phase. Many of these affiliates – particularly those associated with lending, insurance, real estate, and business/commerce – are likely to be active during the Due Process Phase.

Federal Insurance and Mitigation Administration (FIMA) Communication and Outreach staff formulate a National Partnership Network as a platform for thought leaders who have a complementary disaster resiliency perspective. The CERC provider is providing support on this effort. If they have not already engaged with participants in the National Partnership Network earlier in the project lifecycle, the FEMA Project Officer or a Project Team member designated by the FEMA Project Officer may want to initiate this engagement by coordinating with the CERC provider.

It will likely be appropriate for the Regional Office of External Affairs staff and the Project Team to provide NGOs, NPOs, and the media with materials they can use to help with the following requirements of Section 216 of BW-12:

- Educating property owners regarding the flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Educating property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost PRPs

### **3.1.7. Engaging the Media**

The other key private-sector stakeholder group with whom the Project Team will need to engage during the Due Process Phase is the media. Engagement with the media – which would consist primarily of working with the media planners, reporters, editorial boards, or other staff of newspapers, television stations, and radio stations in the watershed or geographic area covered by the project – should be carried out under the leadership of the appropriate staff in the Regional Office of External Affairs.

Depending on the watershed or geographic area covered, the print and broadcast media (newspapers,) are likely to be very active in communicating to the general public, covering most, if not all, of the stakeholder groups discussed in this subsection. Getting the media to provide accurate information may be labor-intensive, but it is definitely worthwhile even before the CCO Meeting(s) and Flood Risk Open House(s) are held.

The Project Team, under the leadership of the Regional Office of External Affairs, should support the education of property owners about proposed flood map changes and the process available for property owners to appeal proposed flood hazard determinations and comment on other aspects of the FIRM and FIS report through community officials. This Project Team support may include developing notifications that are sent to local newspapers and radio and television stations on or around the preliminary map release date or in advance of the CCO Meetings and Flood Risk Open Houses. Templates that may be used as part of this effort were discussed in Subsection 3.1 of this document.

As discussed in Subsection 3.1.7 of Guidance Document No. 62, [Guidance for Stakeholder Engagement: Preliminary National Flood Insurance Program Map Phase](#), it may be appropriate for Project Team members to contact local media outlets 1 to 2 months before the CCO Meeting(s) and Flood Risk Open House(s) to establish points of contact and procedures to assure a smooth notification process once the meeting dates are set. Guidance Document No. 62 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage

Although Section 216 of BW-12 does not mention other flood hazard information that is subject to appeal, any engagement with the media also would need to include requirements for appeals of other flood hazard determinations (i.e., base flood depths, SFHAs, flood insurance zone designations, regulatory floodways) and comments on other information on the FIRM and in the FIS report. Additional information on this statutory requirement is provided in Subsections 6.2 and 6.3.

## **3.2 Engagement with Internal Partners and Programs**

In addition to coordinating with external stakeholders, Project Teams may need or want to continue their engagement with internal partners. The primary internal partners for the Project Team to continue engagement with are as follows:

- FIMA offices at FEMA HQ;
- FEMA Regional Offices that are not represented on the Project Team; and
- Risk MAP providers that are not represented on the Project Team (i.e., CERC provider, CDS provider, PTS providers).

### **3.2.1. Engagement with Federal Insurance and Mitigation Administration Offices**

FIMA is charged with integrating the efforts of teams that oversee individual programs within its organization to ensure that resources are better leveraged and steps are taken to reduce duplication of effort and better achieve complementary goals and objectives. The FIMA management and staff – in particular, the Risk Management Directorate, Federal Insurance Directorate, Mitigation Directorate, Fund Management Directorate, Office of Environmental Planning and Historic Preservation, Customer Experience office, and Integration Office – are uniquely positioned to accomplish this because of the natural synergies among the staff and the programs they oversee. Periodic engagement with staff from individual divisions and branches within these directorates and offices will likely be appropriate during the Due Process Phase for Project Team members to obtain the following:

- Latest information on existing programs and initiatives
- Latest mitigation planning guidance and outreach materials
- Information on near-term and longer term initiatives that are in progress or planned and that are expected to have a positive impact on stakeholder engagement during the Due Process Phase
- Support for answering community questions regarding existing programs and initiatives and any newly implemented programs and initiatives
- Support for responding to inquiries from U.S. Congress and State legislature

For example, engagement with Risk Management Directorate and Mitigation Directorate staff should be very natural for the Project Team as close coordination is required as part of administering both the appeal and adoption/compliance periods.

The Project Team may also find it beneficial to engage with another key internal FIMA stakeholder group, the Office of the Flood Insurance Advocate (OFIA). As a result of their day-to-day activities, the Flood Insurance Advocate and OFIA staff may have information and documentation that can help the Project Team identify problems or concerns regarding the area of study that were not raised during earlier project phases. Therefore, the Project Team may want to engage with OFIA staff to obtain their insights, which may assist the Project Team with fine-tuning the engagement plan and carrying out documented activities. In addition, the Flood Insurance Advocate and OFIA staff may have developed specific recommendations regarding regional mapping outreach and education that the Project Team needs to implement during the Due Process Phase.

The two-way communication that takes place during engagement may be equally beneficial to the Flood Insurance Advocate and OFIA staff. The Flood Insurance Advocate and OFIA staff will be able to obtain project-related information for areas that may be the subject of, or pertinent to responding to, a particular inquiry.

### **3.2.2. Engagement with Other Regional Offices**

Where a watershed abuts or crosses regional boundaries, continued engagement by the FEMA Project Officer and the Project Team with the FEMA Project Officer(s) and Project Team(s) in the adjoining Region(s) is vital. Such engagement will help to ensure that the flood hazard and risk information presented to community officials on the FIRM(s), FIS report(s), and FIRM database and related messaging are consistent. This engagement also should help the Project Team ensure that Flood Risk Datasets, Flood Risk Products, and related messaging are consistent and that community and State officials' planning and implementation of mitigation activities is well coordinated across community, county, and State boundaries

Engagement with other Regional Offices that do not have a geographic stake in the project might be carried out by the FEMA Project Officer or Project Team members to obtain information on lessons learned and best practices developed for similar projects or situations.

### **3.2.3. Engagement with Risk MAP Providers**

As mentioned earlier in this document, some Risk MAP provider staff may participate actively on the Project Team. When Risk MAP provider staff members are not actively involved, periodic Project Team engagement with the providers could prove valuable and should be considered. Some potential benefits of this engagement are summarized below.

- Engagement with the CDS provider may be appropriate to obtain recent email messages and telephone records from the FEMA Map Information eXchange (FMIX) map specialists and to provide FMIX map specialists with information they can use to answer incoming flood risk study-related questions.
- Engagement with the CERC-L and Mitigation Champion (if not a Project Team member) and other CERC provider staff that are not Project Team members may be appropriate for the following:
  - Obtain summaries of recent congressional correspondence and summaries from media monitoring activities.
  - Obtain information on capacity for, interest in, and likelihood of taking mitigation action.
  - Arrange for assistance in responding to inquiries from, or preparing presentations for, Federal, State, and local elected officials and the media.
  - Obtain the latest community engagement and risk communication materials related to regulatory products, Changes Since Last FIRM, and other flood risk products that might be used during the CCO Meeting and/or Flood Risk Open House.
  - Facilitate partnership identification and relationship building.
  - Arrange for professional meeting facilitation or dispute resolution support.
  - Arrange for support of training on community engagement and risk communication-related topics.

- Engagement with the PTS provider that does not have members on the Project Team may be appropriate to share information when a watershed abuts or crosses regional boundaries and to obtain information on lessons learned and best practices.

### 3.3 Potential Tools and Techniques to Support Stakeholder Engagement

Project Team members may want to consider a number of tools and techniques when determining how to engage effectively with both internal and external stakeholders during the Due Process Phase. Several potential techniques and tools that Project Teams may consider are listed below.

- **Facilitated Conference Calls:** Facilitated conference calls can be a very effective form of engagement to minimize travel costs.
- **Facilitated Webinars:** Properly facilitated webinars using Adobe Connect or a similarly capable platform can be very effective when in-person meetings cannot be held and when it is appropriate to meet simultaneously with multiple communities. Depending on the platform used, these sessions can also be recorded, allowing participants to review sessions at a later date or direct other stakeholder staff to listen to the recording. It may be necessary to have planning sessions with community officials and key stakeholders requiring delivery of a volume of information before the CCO Meeting(s) and Flood Risk Open House(s) are held. As with the meetings/sessions discussed in Guidance Document No. 62, Guidance for Stakeholder Engagement: Preliminary National Flood Insurance Program Release Phase, this could include Preliminary FIRMs, FIS reports, FIRM databases, and SOMAs; Flood Risk Products that may be discussed; and template materials to support community outreach efforts related to the CCO Meeting(s) and Flood Risk Open House(s). The webinar format also may be appropriate to allow additional FEMA, State, and provider staff to participate remotely in the CCO Meeting(s) in support of the FEMA and Project Team staff attending the meeting(s) onsite.
- **In-Person Meetings:** In-person meetings are invaluable opportunities for the Project Team to engage with key influencers and other stakeholders. In-person CCO Meetings with community officials and key stakeholders regarding the Preliminary FIRMs, FIS reports, FIRM databases, and SOMAs are preferred for improving their understanding, acceptance, and ownership of the products being delivered and the process being followed. In-person meetings may also be preferred when there is the potential for contentiousness among the attendees or between the attendees and the Project Team. In-person Flood Risk Open Houses also are the preferred method for delivering products and related information to the public.
- **Correspondence:** Before or after a facilitated conference call, webinar, or in-person meeting, tailored project- or community-specific letters and email messages are an effective way to keep stakeholders engaged. Email messages are also effective for delivering updates regarding upcoming meetings, for distributing key materials before and after meetings, and for soliciting general feedback from community officials and other stakeholders.

- **Fact Sheets, Flyers, and Brochures:** Project Teams have, for many years, relied on fact sheets, flyers, brochures, and other print-type publications to communicate information. These tools are most effective as a means of communicating information one way. However, a Project Team can use them effectively as an integral part of engagement efforts to announce webinars, meetings, conferences, and workshops. They also can be effective as “leave-behinds” at in-person meetings, as digital attachments to email messages, as attachments for webinars, or as content posted to partner or Regional Office websites to enhance stakeholder understanding, acceptance, and ownership of products and processes and to minimize misinterpretation/confusion about content presented at meetings/workshops.
- **Newsletters, Listservs, or Other Means of Maintaining General, Ongoing Engagement:** If the Project Team has already used newsletters, Listservs, or other means of monthly or bimonthly engagement with Federal and State partners, regional entities, and local communities, this type of engagement could be continued during the Due Process Phase.
- **Templates:** To assist Project Teams with engaging Federal and State partners, professional associations, and other NGOs, FEMA, FEMA partner, and Risk MAP provider staff have developed templates for letters, email messages, newsletter articles, and communication tracking purposes. These template materials have been, and can continue to be, modified to fit Project Team needs. Project Team members should consult with the FEMA Project Officer about the availability of previously developed templates that may be appropriate for the project, including template materials developed to address the requirements of Section 216 of BW-12 as discussed in Subsection 6.2.
- **Websites/Web Content:** If a CTP is a member of the Project Team, a project-dedicated website may have already been established or project-related information may have been posted to webpages controlled by the CTP. Where resources are available, chat rooms or other two-way communication vehicles hosted on websites may be effective.

Where Regional Offices already have established websites, these sites also could be used to announce webinars, meetings, conferences, and workshops or for posting of project-related fact sheets, flyers, and brochures. Before establishing new websites, however, Regional Office staff should confer with the FEMA HQ Office of External Affairs.

- **Social Media and Shareable Content:** Social media is an increasingly important channel for receiving and sharing information. Project Teams may want to explore channels such as Facebook and Twitter for sharing messaging on resilience and mitigation action. These platforms can also be used to post information about when and where Flood Risk Open House(s) will be held. Project Teams should coordinate with FEMA Regional External Affairs staff for coordination, approval, and execution of social media outreach on FEMA-owned platforms.

Social media platforms owned by communities, partners, and other stakeholders also can be used for information sharing. Facebook posts, Tweets, newsletter articles, and web content can be prepared by the Project Team and shared with stakeholder groups for their use.

The Project Team will need to consult with Regional Office of External Affairs staff for approvals, counsel on content, and possible coordination with public information officers from stakeholder organizations.

#### **4.0 File Maintenance**

To be compliant with Section 66.3 of the NFIP regulations (44 CFR 66.3), the Project Team needs to maintain community files for the communities affected by the project. The required community files for all affected communities should have been set up during the Discovery Phase following protocols established by the Regional Office. Therefore, the Project Team should place records of engagement activities (e.g., letters, email messages, memorandums, meeting notes, delivery tracking information and signatures, call logs) during the Due Process Phase in the previously established community files. This would include any documentation related to working with the media to educate property owners about the appeals process and procedures.

To be compliant with Section 67.3 of the NFIP regulations (44 CFR 67.3), the Project Team also should establish a FEDD file for each affected community. The requirements for the correspondence and other standard documents to be included in the FEDD file are provided in Guidance Document No. 56, [Guidance for Flood Risk Analysis and Mapping: Post-Preliminary Due Process](#). Guidance Document No. 56 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

Any non-standard correspondence or other documentation generated by the Project Team during the Due Process Phase should be included in the FEDD file for each affected community.

#### **5.0 CCO Meetings and Flood Risk Open Houses**

Two distinct sets of official meetings are held following the release of the Preliminary FIRM and FIS report: CCO Meetings and Flood Risk Open Houses. CCO Meetings are in-person meetings held by the Project Team for the local officials in communities receiving Preliminary versions of new or updated FIRMs, FIS reports, and related products. The purpose of the CCO Meeting(s) is to review the Preliminary FIRM panels, FIS report, SOMA, and supporting data with community officials, key influencers, and other identified stakeholders before presenting the information to the public. A primary goal of Risk MAP is to promote community ownership of risk and, in turn, risk reduction and mitigation. To promote this goal, the Project Team should use the CCO Meeting(s) to provide resources and information to community officials to prepare them to more effectively share risk reduction messages and information with the public.

Flood Risk Open Houses are held by community officials with the support of the Project Team and other key influencers. The objectives of the Flood Risk Open Houses are to present the Preliminary FIRM, FIS report, and other products to the public and provide detailed information on appeals and map revisions processes and procedures.

The Project Team should work with community officials (primarily, CEOs and FPAs) to hold this set of meetings as soon as possible after the release of the Preliminary FIRM and FIS report.

For some flood risk projects that are limited in scope or the number of communities/residents affected by flood hazard changes is small, FEMA and the affected community officials may decide that CCO Meetings and/or Flood Risk Open Houses are not needed for the project. When this occurs, the Project Team should refer to Section 6 for best practices that should be followed.

The open-house format has been selected as the most appropriate for the presentation of the Preliminary FIRM, FIS report, and associated products to the public. However, the FEMA Project Officer may determine, in cooperation with community officials and other stakeholders, that another format may be more appropriate for conveying information effectively to the affected communities. In addition, communities actively involved in the mitigation planning process can use the regulatory and non-regulatory products to update or validate their risk assessment, and possibly meet public participation requirements inherent in the plan development, maintenance, and update processes.

Tools and template documents are available to support Regional implementation of CCO Meetings and Flood Risk Open Houses. Because each Region is different, the Project Team will need to consult with the FEMA Project Officer regarding Regional needs and preferences for these documents. Before the CCO Meetings, it also may be beneficial for the Project Teams to review the document titled “Answers to Tough Questions at Public Meetings”, which may help new Project Team members prepare for answering questions related to flood insurance, flood hazard mapping, and other related topics.

Stakeholder engagement guidance related to planning for CCO Meetings and Flood Risk Open Houses – coordination and communication with community representatives, site selection, and site requirements – is covered in Guidance Document No 62, [Guidance for Stakeholder Engagement: Preliminary National Flood Insurance Program Map Release Phase](#). Guidance Document No. 62 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

Additional information about CCO Meetings and Flood Risk Open Houses, tools, and examples are available in the CERC Playbook. The Project Team can access the CERC Playbook through the password-protected Risk MAP Program Portal or by contacting the FEMA Project Officer.

## **5.1 Meeting Timing**

The CCO Meeting(s) and Flood Risk Open House(s) occur during the Due Process Phase, closely following Preliminary NFIP Map Release Phase. For most flood risk projects, the CCO Meetings are held immediately before the Flood Risk Open Houses.

## **5.2 Meeting Attendees**

The following attendees are appropriate to invite to the CCO Meeting(s) and Flood Risk Open House(s):

- Community CEOs, FPAs, and any other community officials interested in viewing the Preliminary FIRM(s) and FIS report(s) from impacted communities
- FEMA Insurance Specialists (if not already members of the Project Team)

- Individuals included in the Discovery Meeting(s), Flood Risk Review Meeting(s), and Resilience Meeting(s) (if these meetings are held for the project) from impacted communities
- Key influencers identified in the stakeholder engagement plan for the project
- General public from impacted communities (Flood Risk Open House(s) only)
- U.S. and State Senators and Representatives and their staff, as appropriate
- Other State and Federal agencies with a vested interest in the project as identified in the stakeholder engagement plan for the project
- Media, as appropriate

For special considerations regarding conducting CCO Meetings and Flood Risk Open Houses with Tribal entities, see Subsection 1.4 of this document.

### **5.3 Meeting Objectives**

The objectives of this set of meetings are firmly rooted in the results of the study as depicted on the Preliminary FIRM and accompanying FIS report. Specifically, the meeting objectives are to:

- Present the Preliminary FIRM, FIS report, FIRM database, and other products to meeting attendees.
- Provide a brief explanation of the scientific methods (i.e., hydrologic analyses, hydraulic analyses, coastal analyses, alluvial fan analyses, shallow flooding analyses) that went into determining the flood hazards and depicting the results of the analyses on the FIRM.
- Review changes in flood hazard information from the effective FIRM(s).
- Review 90-day appeal period requirements and the definitions of appeals and comments.
- Explain how community officials should submit appeals and other comments on the Preliminary FIRM and FIS report.
- Help community officials explain how the public can submit appeals or other comments on the Preliminary FIRM and FIS report.
- Explain the data and documentation needed to support appeals and comments.
- Explain the Scientific Resolution Panel and its role in the appeal resolution process
- Discuss FIRM and FIS report maintenance after the effective date through LOMCs and the FEMA Coordinated Needs Management Strategy.
- Discuss alternatives for appropriate outreach methods for the public to review the Preliminary FIRM and FIS report and engage in the mitigation planning process.
- Explain the process and timeline for adopting the FIRMs in the community floodplain management ordinances.
- Discuss the impact of the FIRM on, and the benefit of, insurance purchase requirements, including grandfathering and the PRP extension.

- Prepare community officials to share information with local citizens about the communities' flood hazards and risks, new proposed maps, actions taken and planned, the status of mitigation planning activities, and the individual's responsibility to manage their own risks during the Flood Risk Open Houses.
- Discuss LOMC Revalidation and LOMC submission processes and the timeline associated with the submission of LOMC application requests by the public.
- Turn over the Preliminary FIRM, FIS report, and related products to the communities officially.

## 5.4 Meeting Messages

The key messages that the Project Team is to share with attendees of the CCO Meeting(s) and Flood Risk Open House(s) include the following:

- While FEMA was preparing the Preliminary FIRM and FIS report, we shared the results with you and listened to your comments and concerns regarding potential revisions. This is another opportunity to submit comments/concerns regarding the revisions made to the FIRM and FIS report.
- Teamwork is vital to our collective success of identifying the risk through the mapping process, communicating the risk within the community, and making informed decisions about how to address the risk.
- It is up to everyone, including residents and property owners, to know their risk, know their role, and take action to reduce their flood risk.
- Take note of your flood insurance status. It may benefit you to purchase flood insurance before the revised FIRM and FIS report become effective. In addition, a lower-cost policy may be available.
- As a result of changes reflected in the flood hazard information shown on the Preliminary FIRM:
  - Some buildings, for the first time, may be included in the SFHA, which is also referred to as the 1-percent-annual-chance-flood hazard area. If, based on the Preliminary FIRM, the building is in the SFHA (flood zones beginning with "A", "AE", "V," or "VE") and is mortgaged through a federally regulated and insured lender, the property owner will be required to carry flood insurance after the FIRM goes into effect.
  - Some buildings will be shown in the Preliminary FIRM as being in a different SFHA (e.g., from Zone AE to Zone VE) or may have the BFE in the area of the building may increase or decrease.
  - Some structures (or buildings) may be removed from the mapped SFHA. If the building is currently mapped in an SFHA, but on the new FIRM it is mapped into a moderate-to-low-risk flood area (labeled Zone X), flood insurance is no longer federally required. However, the mortgage holder/lender may still require flood insurance.
  - Homeowners and renters with properties in areas mapped as outside the SFHA are still encouraged to maintain flood insurance; lower rates are offered to policyholders in buildings located outside the SFHA.

- Each community has three main areas of responsibility for the review of its Preliminary FIRM and FIS report:
  1. The community should review the Preliminary FIRM and FIS report, make corrections, and submit comments and appeals, as needed.
  2. The community is primarily responsible for outreach to residents affected by the changes on the FIRM.
  3. The community must eventually adopt a new floodplain management ordinance that meets NFIP and State requirements to avoid suspension from the NFIP.
- Tell us how the Project Team can best support your efforts in communicating the release of the Preliminary FIRM and FIS report and other outreach efforts outside of the Flood Risk Open House meeting.
- Information in the FIRM [and, if applicable, Flood Risk Products] can be incorporated into Hazard Mitigation Plan updates.
- Participation in the CRS can benefit residents and business owners through reduced flood insurance costs. Community officials should take the opportunity to find out more and determine if CRS is right for their community.
- Tell us how the Project Team can best support your efforts in adopting the FIRMs and FIS report.
- FEMA is a committed long-term partner to your community, and we will continue to work with you to address your priorities and provide information, technical support, and counsel on floodplain management, mitigation planning and action, and information about the NFIP.

## **5.5 Meeting Activities**

Activities that will likely take place during the CCO Meeting(s) and Flood Risk Open House(s) include those listed below.

- Help community officials and property owners locate their residences or businesses on the FIRM using digital means.
- Present or discuss an overview of revisions to FIRM panels and FIS report materials, including (if applicable) the Changes Since Last FIRM product (if not already presented during an earlier meeting with community officials).
- Provide individual stations where attendees can obtain the information that meets the objectives detailed in Subsection 5.3, including a station where appeal, comment, and map revision requirements and processes may be discussed in detail and where fact sheets and other information may be distributed.
- Explain how revised FIRM panels may impact flood insurance premiums, including grandfathering options and PRP extension.

- Explain how the FIRM, FIS report, and Flood Risk Products can be used as part of the mitigation planning process and coordinated with other planning activities related to future development, beneficial uses of the floodplain, and protecting sites of cultural, historic, and religious significance.
- Provide citizens an opportunity to communicate in person with FPAs and other local officials regarding property-specific issues.
- Discuss outreach and risk communication tools available to the affected communities via the fema.gov website or other source.
- Further identify community mitigation actions and fill in the Risk MAP Action Measure Fact Sheet, which captures the extent to which Risk MAP communities are moving down the path to taking mitigation action to reduce risk from flooding.

## **5.6 Flood Risk Open House Meeting Best Practices – Working With Local Officials**

Local county and community officials within the watershed/project area are encouraged to work with FEMA to arrange, advertise, and coordinate the Flood Risk Open House. This will help ensure that residents in affected areas are fully aware of the Flood Risk Open House and maximize the number attendees. As discussed in Subsection 5.0 of Guidance Document No. 62, Guidance for Stakeholder Engagement: Preliminary National Flood Insurance Program Map Release Phase, the Project Team will host an advance planning call or webinar with local officials to discuss the format of the Flood Risk Open House, identify the best location, and plan for a date and time. Guidance Document No. 62 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage

To assist local officials with their outreach efforts related to the Flood Risk Open House and to assure maximum attendance, it is advisable to provide customizable templates they can use to advertise the meeting in advance to residents in affected areas through direct mailing, the Internet, and print and social media. Templates have been developed by FEMA to assist the Project Team with outreach related to the Flood Risk Open House. Project Team members may download the “Flood Risk Open House Meeting Announcement” and other templates from the “Templates and Other Resources” section of the online FEMA Library. Project Team members should confer with the FEMA Project Officer to determine whether a Region-specific version of a template is available before providing the template to the community.

Additional information about Flood Risk Open Houses is available in the CERC Playbook. The CERC Playbook can be accessed through the password-protected Risk MAP Program Portal or by contacting the FEMA Project Officer.

## **5.7 Post-Meeting Activities**

A key followup for the CCO Meetings and Flood Risk Open Houses is documentation that captures participant reactions to the products presented. The Project Officer or other Project Team member may also post a summary along with other CCO Meeting and Flood Risk Open House-related documents to a FEMA, CTP, or project-specific website, as appropriate. The Project Officer also may determine that it would be appropriate to hold an additional public meeting or webinar after the LFD has been issued following the appeal period when a significant

amount of time has passed since the CCO Meeting(s) and Flood Risk Open House(s) were held. Project Team members will also follow up with community officials as appropriate to determine progress toward FEMA Risk MAP metrics.

### **5.8 No CCO Meeting(s) or Flood Risk Open House(s) Held - Best Practices**

On occasion, the FEMA Project Officer, in close coordination with local officials from the affected communities, may decide to forego CCO Meetings and/or Flood Risk Open Houses for small-scale map revision projects. This scenario is most applicable to community-initiated projects resulting in Physical Map Revisions (PMRs). The Project Team needs to document this decision in writing.

FEMA has developed a letter template, “PMR\_No\_CCO Letter”, to assist the Project Team. Project Team members may download this and other templates from the “Templates and Other Resources” section of the online FEMA Library. Project Team members should confer with the FEMA Project Officer to determine whether a Region-specific version of the template is available. The Project Team also will need to communicate about the decision with key influencers and other stakeholders that have been involved with the project, especially when previous communications with these individuals and organizations indicated that the CCO Meeting(s) and/or Flood Risk Open House(s) would be held.

## **6.0 Appeal Period Engagement Activities**

When the Project Team determines new or modified flood hazards are to be proposed for a community, a 90-day appeal period is required. FEMA initiates the appeal period by

- Publishing a proposed Flood Hazard Determination (FHD) notice in the FEDERAL REGISTER
- Notifying the CEO of the community by sending the appeal start letter
- Publishing the News Release and proposed FHDs twice in a prominent local newspaper during the 10-day period immediately following notification of the community CEO

The proposed FHD News Release is typically published in the legal advertisements or classified portion of the newspaper. Although it is not required, FEMA encourages community officials to provide an even wider distribution of the information to ensure that residents, property owners, and other interested stakeholders are aware of the proposed determinations, where the maps can be viewed, and how to submit comments and appeals.

Immediately before and during the appeal period for the project, it will be important for the Project Team to engage community officials, key influencers, and other stakeholders to share resources such as template press releases and fact sheets and encourage them to play an active role in publicizing and explaining the appeal period and the appeals and map revision processes to as many residents and other stakeholders as possible.

Guidance regarding the appeals process is provided in Guidance Document No. 26, [Guidance for Flood Risk Mapping and Analysis: Appeal and Comment Processing](#). Guidance Document No. 26 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

## 6.1 Appeal Period Messaging

The key pieces of information that should be communicated with local officials and residents immediately before and during the appeal period are listed below. It will be important for the Project Team to encourage community officials to publicize this information through their own channels (e.g., websites, social media, print flyers, newspaper advertisements) to affected residents to ensure they are more fully aware of the appeal period and how it affects them.

- The scope of the flood hazard changes as depicted on the Preliminary FIRM and FIS report and related products
- Where the FIRM and FIS report are available for review both online (through the FEMA Flood Map Service Center, partner website, community website) and in hard copy form at the local Community Map Repository
- An explanation of the statutory 90-day appeal period, including:
  - Why it is required
  - Definitions of appeals and comments and how they are different
  - The timeframe of the appeal period for the project
  - Who can submit an appeal or comment
  - What scientific and technical data and documentation is required to support of an appeal
  - What data and documentation are required to support a comment
  - How/where (physical address or digital location) appeal/comment information is to be submitted
  - What to expect as part of the appeal/comment resolution process
- When it is appropriate for community officials to request a Scientific Resolution Panel and the steps required to do so

## 6.2 Media Engagement to Educate Property Owners

In accordance with Section 216 of BW-12, the Project Team, under the leadership of the appropriate staff in the Regional Office of External Affairs, will need to engage with the media in an effort to educate property owners about flood map revisions and the process available to such owners to appeal proposed changes in flood elevations through their community. Section 216 specifically requires including local radio and television stations in this education effort. Although Section 216 of BW-12 does not mention other flood hazard information that is subject to appeal, any engagement with the media also would need to include requirements for appeals of other flood hazard determinations (i.e., base flood depths, SFHAs, flood insurance zone designations, regulatory floodways) and comments on other information on the FIRM and FIS report.

Project Team members may have consulted with local media outlets during earlier project phases to establish points of contact and procedures for disseminating information. FEMA has developed templates to assist the Project Team with communicating with the media. Project Team members may access the “Preliminary Issuance and Appeal Process Press Release Template for Media” and other templates from the “Templates and Other Resources” section of the FEMA Document and Resource Library. Project Team members should confer with the FEMA Project Officer to

determine whether a Region-specific version of a template is available before providing the template to the community.

### **6.3 Appeal Period Best Practices – Working With Local Officials**

As noted above, FEMA publishes the FHD notice in the FEDERAL REGISTER and in the local legal or classified section of the local community newspaper. This information is often overlooked and often fails to reach those most in need of the information.

In light of the legislative requirements in the Section 216 of BW-12, as amended by HFIAA, to assist local officials with their outreach efforts related to the appeal period to maximize property owner awareness, the Project Team should provide the community officials with customizable templates they can use to advertise the appeal process to property owners and other residents through direct mail, the Internet, print, and social media. A template that may be used as part of this effort is the “Preliminary Issuance and Appeal Process Press Release Template for Media.” Project Team members may access this template and other templates from the “Templates and Other Resources” section of the FEMA Resource and Document Library. Project Team members should confer with the FEMA Project Officer to determine whether a Region-specific version of a template is available before providing the template to the community.

### **7.0 Adoption/Compliance Period Engagement Activities**

As a participating community in the NFIP, the community is responsible for making sure that their floodplain management regulations meet the minimum requirements of the NFIP. As documented in Guidance Document No. 56, [Guidance for Flood Risk Analysis and Mapping: Post-Preliminary Due Process](#), following the 90-day appeal period, FEMA resolves all appeals and comments and finalizes all changes to the FIRM and FIS report. Guidance Document No. 56 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

Once all appeals and comments have been addressed in accordance with the procedures documented in Guidance Document No. 26, [Guidance for Flood Risk Analysis and Mapping: Appeal and Comment Processing](#), an LFD is issued for each affected community. The LFD establishes the final flood hazard data and the effective date of the new FIRM and FIS report. The LFD also initiates the 6-month adoption/compliance period during which the community must adopt new or amend existing floodplain management regulations to reference the new FIRM and FIS report as appropriate. During the 6-month adoption/compliance period, where appropriate, FEMA sends two letters, referred to as 90- and 30-day suspension letters, notifying the community that it must have approved floodplain management regulations in place before the effective date of the FIRM or face suspension from the NFIP. Guidance Document No. 26 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

Guidance regarding the this portion of the Due Process Phase is provided in Guidance Document No. 56, [Guidance for Flood Risk Analysis and Mapping: Post-Preliminary Due Process](#) and Guidance Document No. 73, [Guidance for Flood Risk Analysis and Mapping: Letter of Final Determination](#). Document No. 73 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

Two other resources that the Project Team may use or reference in engagement with stakeholders are FEMA 495, Adoption of Flood Insurance Rate Maps by Participating Communities, and FEMA 496, Joining the National Flood Insurance Program. Both resources are accessible through the FEMA Resource and Document Library.

## **7.1 Adoption/Compliance Period Objectives**

The stakeholder engagement activities to be performed by the Project Team during the adoption/compliance period include efforts to:

- Help ensure that communities have the support they need to adopt or amend their local floodplain management ordinances in a timely manner, including knowledge of the appropriate level of regulations to adopt (44 CFR 60.3) and where to access State Model ordinances and obtain assistance.
- Help ensure that communities begin the compliance/adoption process in a timely fashion and allow adequate time for review and approval of the submitted ordinances by State NFIP Coordinator and/or FEMA staff. The objective is to avoid suspending communities for failure to adopt.
- Encourage communities to adopt floodplain management ordinances that exceed NFIP and State minimum standards.
- Help communities and property owners understand the LOMC Revalidation process.
- Educate property owners regarding the benefits and costs of maintaining or acquiring flood insurance, including, where applicable, lower-cost Preferred Risk Policies (PRPs) for such properties and the contents of such properties.

## **7.2 Adoption/Compliance Period Best Practices**

At the discretion of the FEMA Project Officer, the Resilience Meeting(s) may be held before or after the issuance of the Preliminary FIRM, FIS report, and related products. However, the Resilience Meeting(s) may be held again or for the first time after issuance of the LFD.

During this meeting, which is organized by the Project Team, community officials will have the opportunity to discuss the FIRM, FIS report, Flood Risk Datasets, and Flood Risk Products and how they can be leveraged to increase risk awareness and community resilience. The meeting also provides a great avenue for the discussion of higher floodplain management standards, mitigation strategies, and the benefits of joining CRS.

Guidance related to the planning and conduct of Resilience Meetings – timing, invitees and attendees, objectives, messages, and activities – and the activities to be undertaken following the meeting(s) are covered in Guidance Document No. 63, Guidance for Stakeholder Engagement: Risk Awareness Phase. Guidance Document No. 63 is accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage.

During the adoption/compliance period, the Project Team may distribute fact sheets, brochures, public service announcements, videos, and other tools and materials to educate property owners about:

- Flood risk and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement.
- The benefits and costs of maintaining or acquiring flood insurance, including, grandfathering rules, and where applicable, lower-cost PRPs.

Templates that may be used as part of this effort include the fact sheets and content on the above topics found on the [floodsmart.gov](http://floodsmart.gov) website. In addition, new fact sheets and templates on two topics, when developed, will be accessible through the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage or through the “Templates and Other Resources” section of the FEMA Resource and Document Library: (1) LOMC Revalidation process; and (2) Adopting Higher NFIP Floodplain Management Standards.

## **8.0 Outcomes**

Successful stakeholder engagement during the Due Process Phase should result in the following outcomes:

- Improved community official understanding of, confidence in, and ownership of the Preliminary FIRM, FIS report, FIRM database, and SOMA and how/why they are different from the effective FIRM, FIS report, and FIRM database or other previously provided NFIP products
- Improved community official understanding and ownership of the Risk MAP process, particularly the planning and implementation of the Flood Risk Open Houses following the CCO Meetings, appeals and map revisions processes, and adoption/compliance process
- Improved stakeholder knowledge about and acceptance of the Preliminary FIRM, FIS report, FIRM database, and SOMA
- Improved property owner awareness and understanding of the appeals, map revision, and adoption/compliance processes
- Enhanced relationships with community officials, key influencers, and other stakeholders
- Reduced amount of misleading or incorrect information disseminated by media and other stakeholders
- More communities considering adopting floodplain management ordinances that exceed the NFIP or State minimum standards
- Increased compliance with the requirements of BW-12, as amended by HFIAA
- Greater transparency into the Risk MAP process
- Increased propensity for community and local officials to commit resources to meaningful mitigation and risk-reduction actions

- Improved education for property owners regarding flood risks and reduction of this risk in their community, including the continued flood risks to areas that are no longer subject to the flood insurance mandatory purchase requirement
- Improved education for property owners regarding the benefits and costs of maintaining or acquiring flood insurance