

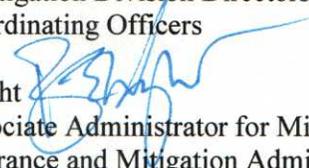
MAY 01 2013



FEMA

MEMORANDUM FOR: FEMA Regional Administrators
Regions I-X

ATTENTION: Regional Mitigation Division Directors
Federal Coordinating Officers

FROM: Roy E. Wright 
Deputy Associate Administrator for Mitigation
Federal Insurance and Mitigation Administration

SUBJECT: Hazard Mitigation Grant Program (HMGP) Streamlining

The Sandy Recovery and Improvement Act (SRIA) of 2013 directs FEMA to streamline Hazard Mitigation Grant Program (HMGP) activities and implement the program in a timelier manner. I previously shared with you two new initiatives - Program Administration by States and Advance Assistance – that will increase the collaboration between FEMA and the states and speed up the implementation of HMGP. During the past few months, Risk Reduction Division staff, regional mitigation staff and several state hazard mitigation officers reviewed the HMGP process and identified several areas that are opportunities to streamline the HMGP. Below are six other areas where FEMA and the states will collaborate to improve the efficiency and effectiveness of HMGP. These areas of opportunities are the first phase of our ongoing efforts to seek continuous improvements to HMGP. We will continue to incorporate efficiencies and best practices and encourage state partners, stakeholders and regional staff to identify additional actions as well. We will include these opportunities for improvement in the next version of the HMA guide, which will be released in the coming months.

1. Minimum criteria for complete applications

Incomplete project applications and placeholder applications delay project approval because they do not contain sufficient information that FEMA can use to make program eligibility determinations. To address this issue, FEMA has developed Eligibility and Completeness (E&C) checklists for acquisition, elevation, safe rooms and wind retrofit which identifies the minimum information required for FEMA to initiate a project application review. These checklists will be incorporated into the forthcoming Hazard Mitigation Assistance (HMA) Guidance update. FEMA will no longer accept incomplete and placeholder project applications.

2. Timeframes for review actions and decisions

Currently, there is no national standard for the time FEMA takes to review a project application, or for Grantees and applicants to respond to FEMA's request for information. The lack of a standard has resulted in delays in final review and approval of project applications. To address this issue, FEMA has established a standard of 60 days to review project applications. Once a project is submitted, FEMA will complete the eligibility review within 60 days, or will request additional information to make a determination. The Regional Administrator may extend this 60 day review timeframe for certain projects in extraordinary circumstances. The Table below describes recommended timeframes for requesting

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information, and suggested actions if the data is not provided. The Regional Administrator may extend the timeframes to allow applicants to develop or obtain data.

Request Format	Timeline
Informal-First Request	The Project Officer requests additional information. If the requested information is not received within 30 calendar days from the date of the request, FEMA will consider the application to be incomplete and not approvable. FEMA may provide technical assistance if requested, unless the HMA program is competitive. The applicant may consider phasing the project if it is feasible to do so.
Informal Second Request	The Hazard Mitigation Branch Chief requests additional information. If the requested information is not received within 14 calendar days from the date of the request, FEMA will consider the application to be incomplete and not approvable. FEMA may provide technical assistance if requested, unless the HMA program is competitive. FEMA, Grantee, and applicant staff should meet to resolve any open items within the allotted timeframe, if necessary.
Formal	The Regional Administrator requests additional information and will document previous requests. If the requested information is not received within 30 calendar days from the date of the request FEMA will consider the application to be incomplete and not approvable.
Formal	If the Regional Administrator does not receive the requested information within 30 days, he or she will determine the requested project application be ineligible for funding under HMGP. The second formal letter is a denial.

3. Phasing projects

Applicants may delay submitting project applications for complex projects because they require additional technical and financial resources to provide the complete information required for FEMA to make full eligibility determination. To assist the applicant in these circumstances, FEMA may approve and fund certain projects in phases. Hazard Mitigation Assistance (HMA) Guidance provides additional information for submitting a phased project.

4. Industry cost guides for estimates

Project application approval may be delayed because of the time FEMA takes to review cost estimates that the applicant provides. To streamline this part of the process, FEMA will accept cost estimates that the Grantee certifies were established using nationally published or local cost estimating guides to support budget and benefit cost analyses. If a cost estimate is based on a contractor's bid or historic costs from another activity, detailed documentation must be provided. The applicant must document actual costs for eligible activities at closeout.

5. Industry design and construction standards

For certain types of mitigation projects, FEMA performs a detailed review of the engineering design for compliance with relevant codes and standards. This may result in delays in approving projects. To address this issue, FEMA will accept, without detail technical review for feasibility determination, the

engineering design for a project if a registered professional engineer certifies that the design meets the appropriate code, or industry design and construction standards. For example, if a registered professional engineer certifies that design of a community safe room project meets or exceeds FEMA 361 standards for design and construction, FEMA will not perform a detailed design review to ensure compliance with the standard. This change should accelerate the FEMA's approval of certain types of projects.

6. Pre-calculated benefits

Although FEMA provides many tools to assist applicants in conducting benefit cost analyses of projects, FEMA continues to seek ways to reduce the benefit cost analysis burden on applicants. FEMA has pre-calculated the benefits associated with residential safe rooms for most counties in the country. FEMA is currently computing benefits for critical facilities and other types of activities. If the applicant submits a project with costs that are less than the pre-calculated benefits, the project is cost effective. No additional documentation is required to support the analysis. This should eliminate delays applicants experience in submitting project applications because of challenges with benefit cost analyses.

My staff will continue to work with our regional colleagues and state partners to develop tools for the above initiatives. The previously announced Program Administration by States and Advance Assistance pilots in conjunction with the above initiatives will improve the efficiency and effectiveness of HMGP. We appreciate the contributions your staff made, and continue to make, to improve the implementation of HMGP. We will work collaboratively with your staff to develop metrics to help us evaluate the efficacy of these efforts. We believe that reducing administrative burden, providing resources for project development and sharing program delivery responsibility will ultimately provide timely assistance to disaster survivors and will promote community resilience and sustainability.

Please share this information with the State Hazard Mitigation Officers in your states, and discuss with them how these and other streamlining actions they suggest can contribute to timely HMGP implementation. States are encouraged to submit applications early to initiate mitigation actions during recovery. FEMA will review projects as they are submitted, and fund eligible work based on state priorities. Strategic fund management will assist in managing incremental obligations to meet program needs. Webinars or meetings were held or are scheduled with regional mitigation staff and affected states to discuss these initiatives in more detail.

If you have further questions in the interim, please contact James Walke, Risk Reduction Division Director, at (202) 646-2751 or Franki Coons, Chief, Grants Implementation Branch, at (202) 646-3079.