

Guidance for Stakeholder Engagement

Post-Preliminary Due Process

November 2019



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 (<https://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 <https://www.fema.gov/resource-document-library>.

Table of Revisions

The following summary of changes details revisions to this document subsequent to its most recent version in Month Year.

Affected Section or Subsection	Date	Description
First Publication	November 2019	<p>Initial version of streamlined stakeholder engagement guidance incorporates content from superseded Guidance Document No. 23, <u>Stakeholder Engagement Due Process Phase</u>; Guidance Document No. 86, <u>Stakeholder Engagement FIS and FIRM Delivery Phase</u>; and Guidance Document No. 87, <u>Stakeholder Engagement Planning for Mitigation Action Phase</u>.</p> <p>The initial transformed guidance was derived from Operating Guidance 04-11, <u>Risk MAP Meetings Guidance</u>, and subsequently revised to provide additional clarity on enhanced stakeholder engagement requirements resulting from Section 216 of the Biggert- Waters Flood Insurance Reform Act of 2012, as amended by the Homeowner Flood Insurance Affordability Act of 2014.</p>

Table of Contents

1.0	Introduction	1
1.1	Post-Preliminary Due Process Overview	1
1.2	Engagement Goals.....	2
1.3	Implementing Communication Standards	6
2.0	Coordinating with Mitigation Planning Activities and Local Hazard Mitigation Plans.....	6
2.1	Planning for Mitigation Action Phase	6
2.2	Review of Local Hazard Mitigation Plans.....	7
2.3	Due Process Phase.....	7
2.4	FIS and FIRM Delivery Phase	8
2.5	Mitigation Planning Activities and Engagement Outcomes	9
3.0	CCO Meetings and Flood Risk Open Houses.....	9
3.1	Meeting Objectives	10
3.2	Planning the Meetings	11
3.3	Flood Risk Open House Best Practices	12
3.4	Meeting Activities.....	12
3.5	Post-Meeting Activities and Products.....	13
3.6	Best Practices if CCO Meetings or Flood Risk Open Houses are not Held	13
4.0	Appeal Period Engagement Activities	13
4.1	Media Engagement and Communication Standards Implementation	14
4.2	Appeal Period Best Practices – Working with Community Officials	15
5.0	Adoption/Compliance Period Engagement Activities	15
5.1	Adoption/Compliance Period Objectives.....	15
5.2	Adoption/Compliance Period Best Practices.....	16
5.3	Outcomes of Adoption/Compliance Period Engagement	17
6.0	Final FIS Report and FIRM Delivery Phase Activities	18
6.1	Resilience Meetings	18
6.2	Mitigation Action Followup Meetings – Best Practice	18
6.3	Outcomes of Engagement During the FIS Report and FIRM Delivery Phase.....	20
7.0	File Maintenance	21

List of Figures

Figure 1: Risk MAP Project Lifecycle 1

List of Tables

Table 1: Post-Preliminary Due Process – Stakeholder Engagement Activities and Goals 3

Table 2: CCO Meeting and Flood Risk Open House Attendees 11

1.0 Introduction

This document is meant to guide Project Teams involved in Post-Preliminary Due Process for a Flood Risk Project under the Risk Mapping, Assessment, and Planning (Risk MAP) program. It describes the kinds of community and stakeholder engagement activities to consider during the three phases that make up this process, shown in Figure 1.

Figure 1: Risk MAP Project Lifecycle



The goal of the Post-Preliminary Due Process activities is to help community members understand their risk and become more resilient, using the newly available preliminary flood risk data and products. While the Flood Insurance Rate Map (FIRM) is a critical product delivered through Risk MAP, it is meant to be a tool for communities to use when evaluating their flood risk. All short-term goals for the Project Team and partners should support the overarching goal of resilience for each community in the watershed/project area. As such, Project Teams and partners should support communities as they develop mitigation actions personalized to their unique needs. Stakeholder engagement is a key ingredient for achieving these outcomes.

Additional guidance on interacting with stakeholders (in all phases of the Flood Risk Project process) is available in Guidance Document No. 105, [Guidance for Stakeholder Engagement: Introduction and Key Terms](#). It includes overviews of the following topics:

- Issues for Project Teams to consider during coastal or levee mapping projects
- Issues for Project Teams to consider when working with sovereign tribal nations
- Effects of National Flood Insurance Program (NFIP) reform legislation on flood mapping studies
- Federal policies related to flood mapping studies
- Supplemental resources to consider when engaging with stakeholders
- Definitions for common key terms

Additional guidance on the Post-Preliminary Due Process phases is available in Guidance Document No. 56, [Guidance for Flood Risk Analysis and Mapping: Post-Preliminary Due Process](#).

1.1 Post-Preliminary Due Process Overview

The three final phases of Post-Preliminary Due Process center on disseminating, accepting, and adopting the community's FIRM. These phases follow the stakeholder engagement and coordination activities associated with the release of preliminary versions of the FIRM, Flood Insurance Study (FIS) Report, FIRM database, and Summary of Map Actions (SOMA), as

documented in Guidance Document No. 103, Guidance for Stakeholder Engagement: Preliminary Production Process.

After holding the Consultation Coordination Officer (CCO) Meeting and Flood Risk Open Houses to present the preliminary FIRM, FIS Report, FIRM database, and SOMA, as discussed in Section 3.0, FEMA initiates a regulatory 90-day appeal period. During that time, community members (including property owners and lessees) may submit appeals and other comments about the new or updated flood hazard data. Appeals must be supported by technical/scientific data. Section 4.0 of this document discusses stakeholder engagement activities during the appeal period.

After addressing all appeals, FEMA issues a Letter of Final Determination (LFD) and begins the adoption/compliance period. This 6-month period gives a community time to update its local floodplain management ordinance. It also gives affected property owners and homeowners the chance to adjust to their updated depictions of risk (e.g., to purchase a flood insurance policy or update their existing one). Section 5.0 discusses stakeholder engagement activities during the adoption/compliance period.

At the end of the adoption/compliance period, the FIRM becomes effective, and FEMA delivers copies of the new FIRM panels and FIS Report to each community. Section 6.0 of this document discusses stakeholder engagement activities during this phase. Engagement and support for local mitigation actions should be continuous, and not end at this point. Project Team members should maintain the relationships they have developed and confirm that communities still have access to the resources and support they need to continue taking mitigation actions to reduce their risk.

In all phases of a Flood Risk Project, the Project Team should identify ways to link action items and future projects with existing planning efforts. This will streamline and strengthen a community's overall resilience. These planning avenues can include local Hazard Mitigation Plans (HMPs), as well as Emergency Response Plans. Specific suggestions on how to incorporate mitigation planning throughout the Post-Preliminary Due Process period are found in Section 2.0 of this document.

1.2 Engagement Goals

As in other phases of a Flood Risk Project, stakeholder engagement during Post-Preliminary Due Process should be flexible. It will not look the same for all projects, because each FEMA Regional Office, each watershed/project area, each Project Team, and each stakeholder group is unique. Engagement should be an ongoing activity, not one that is limited to any phase or to opportunities for formal meetings. Regular dialogue and touchpoints, even if they are limited to periodic emails or telephone calls, foster trust and confidence in the partnership between FEMA and a community. Engagement with both internal and external stakeholders is appropriate during all phases of this process and is needed to achieve success.

Table 1 lists the processes that occur during each Post-Preliminary Due Process phase. It describes specific engagement activities and goals appropriate to each phase.

Table 1: Post-Preliminary Due Process – Stakeholder Engagement Activities and Goals

Phase	Process	Stakeholder Engagement Activity	Stakeholder Engagement Goals
<p>Planning for Mitigation Action</p>	<ul style="list-style-type: none"> • Review the mitigation planning and documentation process and continue to emphasize the importance of advancing and reporting mitigation actions. • Identify relevant mitigation actions and best practices from other communities that could apply. • Document completed, scoped, in-progress, and planned mitigation actions to include in future updates to community Hazard Mitigation Plans. 	<ul style="list-style-type: none"> • Update and continue to implement the stakeholder engagement plan. • Continue to work with the community to determine the best ways to leverage community activities, assets, and concerns to remove barriers and create incentives for mitigation action. • Provide information on all relevant federal, state, and regional resources available to support mitigation actions. • Follow up on planned and in-progress mitigation actions that the community has discussed. 	<ul style="list-style-type: none"> • Provide a comprehensive view of the mitigation planning and mitigation options available to communities. • Share success stories and potential mitigation actions that communities can initiate. • Share the preliminary FIRM and FIS Report with communities. • Reinforce the use of Flood Risk Products and Flood Risk Databases. • Identify and continuously engage with community officials and other stakeholders to help them plan and carry out mitigation actions. Ultimately, make the required mitigation plan a more effective tool for achieving greater community resilience.

Phase	Process	Stakeholder Engagement Activity	Stakeholder Engagement Goals
<p>Due Process</p>	<ul style="list-style-type: none"> • Hold CCO Meetings with community officials and Flood Risk Open Houses with the public to share preliminary versions of new or revised FIRMs, FIS Reports, and related products. • Administer the statutory 90-day appeal period and review and resolve appeals and comments. • Produce revised preliminary versions of FIRMs and FIS Reports as needed. • Administer the 6-month adoption/compliance period. • Manage Letter of Map Change (LOMC) revalidation activities. • Deliver the final versions of the products identified in the project scope, including but not limited to the FIRM(s), FIS Report(s), SOMAs, FIRM database, Flood Risk Products, and Flood Risk Databases. 	<ul style="list-style-type: none"> • Educate the public on the appeal and map revision processes • Help communities develop lists of mitigation actions and connect them with resources to equip them for enacting these plans. • At the CCO Meetings, potentially share the following videos from the Flood Risk Communication Toolkit: <i>Introduction to Risk MAP, We have a Map, Now What?, and Collecting Data to Create the Maps.</i> * • At the Flood Risk Open Houses, potentially share the following videos from the Flood Risk Communication Toolkit: <i>Introduction to the NFIP, Flood Insurance and Communities, and Collecting Data to Create the Maps</i>* 	<ul style="list-style-type: none"> • Empower community officials to share the following information with the community: <ul style="list-style-type: none"> ○ Their communities' flood hazards and associated risks; ○ Proposed flood hazard determinations and how they may be appealed; ○ How to submit comments, and how they may be addressed; ○ Mitigation actions the community has taken and planned; ○ Individuals' responsibility to manage their own risks; and ○ Resources available to help manage risks. • Encourage communities to identify short- and long-term projects to increase flood risk awareness and management. • Improve community official awareness of how to adopt the latest consensus-based hazard-resistant building codes and standards and the benefits and costs of adopting them. • Improve community official awareness of Building Code Effectiveness Grading Schedule (BCEGS) ratings, the BCEGS rating process, and the tools available. • Improve community official understanding of the building code and floodplain management-related assistance and resources made available by FEMA in accordance with the Disaster Recovery Reform Act of 2018 (DRRA 2018) and Section 20606 of the Bipartisan Budget Act of 2018.

* The Flood Communication Toolkit videos can be found at https://www.youtube.com/playlist?list=PL720Kw_OoJlUw2bDc-On5MjQw13E6e

Phase	Process	Stakeholder Engagement Activity	Stakeholder Engagement Goals
<p>Final FIRM and FIS Report Delivery</p>	<ul style="list-style-type: none"> • Distribute paper copies of the final FIS Report(s) and FIRM(s). • Post the final FIS Report(s), FIRM(s), FIRM database, and other products to the FEMA Flood Map Service Center (MSC) Web Portal. • Outline engagement milestones throughout the Risk MAP Project Lifecycle in a timeline format. 	<ul style="list-style-type: none"> • If Resilience Meetings were not held earlier, hold them after the LFD is issued. • At the Resilience Meetings, potentially share the following videos from the Risk Communication Toolkit: <i>Flood Risk Basics and Communities, Introduction to Risk MAP, and We have a Map, Now What?*</i> • Hold followup meetings with Resilience Meeting participants to discuss the status of previously identified and documented mitigation actions. Identify resources to support these activities, and identify and document additional mitigation activities, as needed. • Work with community officials and other key influencers to develop tailored communication resources for use before, during, and after the FIS and FIRM delivery phase. • If needed, continue to work with communities to facilitate the adoption of the FIS Report and FIRM before the 6-month adoption/compliance period ends. 	<ul style="list-style-type: none"> • Help community officials advance the mitigation actions identified during the Resilience Meeting(s). Encourage communities to identify and initiate additional appropriate actions to increase flood risk awareness and mitigate flood risks. • Provide community officials and others with information about how and why flood insurance requirements and premium rates may be affected when the FIS Report(s) and FIRM(s) become effective. Include information on rating options for those with increased risk (i.e., newly mapped or grandfathering rates) and for those no longer in a high-risk area (i.e., conversion to a Preferred Risk Policy). • Inform stakeholders about the processes for revising FIS Report(s) and FIRM(s) after they are effective. • Increase community officials' awareness and knowledge of their community's flood hazards. Show how mitigation actions can help reduce the consequences of this risk. • Encourage property owners and lessees to purchase flood insurance. • Share information and resources that support risk reduction. • Increase community official commitment to undertake adopting the latest consensus-based hazard-resistant building codes and standards.

* The Flood Communication Toolkit videos can be found at: https://www.youtube.com/playlist?list=PL720Kw_OoJlUwW2bDc-On5MjQw13E6e

1.3 Implementing Communication Standards

Given the emphasis placed on community outreach and engagement, both by Risk MAP and by Congress in BW12 and HFIAA, it is appropriate for the Project Team to establish and maintain a consistent level of engagement with community and county officials in the watershed or geographic area that is the focus of the project. This engagement should start before or during the Discovery phase, as documented in Guidance Document No. 102, [Guidance for Stakeholder Development: Project Planning and Discovery Phase](#).

FEMA's communication-related Standards (SIDs 620, 621, and 622) address requirements of BW12, as amended by HFIAA. The following limitations apply to these Standards:

- They apply only to FEMA Flood Risk Projects funded in or after June 2016.
- They are not retroactive (even where projects were funded in phases).
- They do not need to be met a second time (i.e., if a revised preliminary map is prepared).
- They do not apply to Letters of Map Revision, community-initiated Physical Map Revisions (PMRs), or PMRs that are undertaken as a followup to a LOMR.

Templates to support the implementation of the communication-related Standards are available from the Flood Mapping Letter Repository, which is accessible through the password-protected Risk Management Directorate (RMD) SharePoint Portal or through the FEMA Program Officer. Additional information on all Risk MAP standards and guidance can be found by referencing FEMA Policy Standards for Flood Risk Analysis and Mapping (FEMA Policy #204-078-1) on the Guidelines and Standards Policy page at FEMA.gov.

Section 4.1 of this document provides additional details on implementing SID 622 during the Post-Preliminary Due Process.

2.0 Coordinating with Mitigation Planning Activities and Local Hazard Mitigation Plans

2.1 Planning for Mitigation Action Phase

Flood Risk Products developed as part of the Risk MAP process, if scoped, can help communities effectively plan to mitigate flood risk. The vision for Risk MAP is to deliver precise and accurate data that increases public awareness and leads to mitigation action that reduces risk to life and property.

Advancing flood risk mitigation actions provides these main benefits:

- Empowering individuals to act as agents of change in their communities
- Reducing the negative financial impacts of hazard events on individuals, communities, and society as a whole
- Strengthening the community's economic, environmental, and public health sectors

The Community Engagement and Risk Communication (CERC) Mitigation Champion should continue to work with FEMA and its stakeholders throughout the Risk MAP process and collect details and information on new and existing mitigation actions.

The Project Team should review and reference Guidance Document No. 100, [Incorporating Mitigation Planning Technical Assistance into Risk MAP Projects](#), for best practices on planning for mitigation.

2.2 Review of Local Hazard Mitigation Plans

The Risk MAP lifecycle provides an opportunity for FEMA to review the local Hazard Mitigation Plans (LHMPs) for the study area. These documents may reveal data and information that were not presented during virtual and in-person meetings, since members of that planning team may not have participated in meetings due to staff turnover, elections, or other factors. LHMPs more accurately reflect the communities' priorities and interests when the plans were created. They contain important information about proposed mitigation projects, their prioritization, and potential funding mechanisms; this could be important after the new maps are developed. Additionally, data deficiencies identified in the LHMP may help guide the development of Flood Risk Products. Flood Risk Products such as depth grids may also help the community prioritize its proposed mitigation actions, such as property acquisitions.

2.3 Due Process Phase

While the Due Process phase presents many opportunities to advance mitigation, the primary stage is the adoption/compliance period. After all appeals and comments regarding the information shown on the FIRM and in the FIS Report are resolved and LFDs are issued, participating communities have a 6-month period to adopt or amend their floodplain management ordinance before the FIS Report and FIRM panels become effective.

During the adoption/compliance period, the Project Team can provide communities with the support they need—not only to adopt their local floodplain ordinance in a timely manner to avoid suspension from the NFIP, but also to adopt floodplain management ordinances that exceed the minimum NFIP and state standards and adopt disaster-resistant building codes. It is the responsibility of state and local jurisdictions to adopt and enforce the latest consensus-based disaster-resistant building codes and standards. Adoption and effective enforcement of the latest consensus-based disaster-resistant building codes and standards is the best line of defense against flood and other natural hazards. It is critical that property owners, planners, designers, contractors, elected officials, emergency managers, and other decision makers understand the building code and its value. It is equally important that Project Stakeholders support the adoption, use, and enforcement of codes; incorporating codes into local resilience efforts and allowing builders to construct structures to higher standards are important steps to becoming more disaster resilient.

FEMA has funding and other resources to support state and community efforts related to building code and floodplain management ordinance administration and enforcement, including resources made available under DRRA 2018 and Section 20606 of the Bipartisan Budget Act of 2018.

Many states have suggested or provided model floodplain management ordinances that include options for higher standards that can result in safer communities. Adopting higher floodplain

management standards is one of the most effective flood hazard mitigation techniques communities can use. The following higher standards are recommended for local floodplain management ordinances:

- Freeboard (for residential construction and dry flood-proofed non-residential construction)
- Prohibit development in the floodway
- Flood protection setbacks
- Community-identified Special Flood Hazard Areas (SFHAs)
- Requiring non-conversion agreements
- Requiring a certificate of compliance
- Restrictions on storing hazardous materials
- Lower substantial damage ratios

The adoption/compliance period is also a good time to encourage communities to learn more about the Community Rating System (CRS) and the additional incentives provided by participation in the CRS. It is also a good opportunity to discuss the process for, and the benefits and costs associated with, adopting the latest consensus-based hazard-resistant building codes and standards as well as what the BCEGS ratings are, how the BCEGS rating process works, and the tools that are available.

2.4 FIS and FIRM Delivery Phase

Resilience Meetings may have been held earlier in the project lifecycle, as discussed in Guidance Document No. 103, Stakeholder Engagement: Preliminary Production Process. If not, the best way to engage stakeholders during the FIS and FIRM Delivery phase is to hold a Resilience Meeting. Resilience Meetings provide a unique opportunity to track the community officials' progress on prioritized activities and to help them move forward in a timely manner. Key activities related to mitigation planning and action can take place during a Resilience Meeting:

- Review decisions about the community's priorities for local mitigation activities.
- Have community officials report on their progress in completing priority mitigation actions, including any barriers that have negatively influenced that completion. This will help the Project Team identify the support they need to advance their mitigation actions.
- Document any new mitigation-related actions that have been taken or planned for each community.

The Resilience Meeting also can provide a forum for disseminating information on best practices for enforcing the floodplain management ordinance. The FEMA Project Officer, FEMA Planner, or state NFIP Coordinator could facilitate this discussion or identify an appropriate subject matter expert to engage for the discussion.

To spark conversations during the Resilience Meeting, consider showing selections from YouTube video series on flood risk communication. The video series includes eight 2- to 5-minute videos that showcase personal stories from around the country. Each video communicates technical information in a relatable manner, and the links can also be shared with

community officials to use elsewhere. Access the video series directly at https://www.youtube.com/playlist?list=PL720Kw_OojIUWw2bDc-On5MjQw13E6e.

Based on stakeholder engagement and progress to date, the Project Team may decide to hold a followup meeting with community officials. At that meeting, they could discuss mitigation actions identified during the Resilience Meeting and encourage communities to identify and initiate more appropriate actions, both to increase flood risk awareness and to mitigate flood risks.

2.5 Mitigation Planning Activities and Engagement Outcomes

Successful stakeholder engagement throughout the Post-Preliminary phase should result in the following outcomes for communities and the Project Team:

- Implementation of the previously developed stakeholder engagement plan
- Improved understanding of the mitigation planning and mitigation options available, including integration with other community planning processes
- Improved stakeholder understanding of, confidence in, and ownership of the Risk MAP process, Flood Risk Datasets, and Flood Risk Products
- Enhanced relationships with community officials, key influencers, and other stakeholders.
- Improved stakeholder awareness and understanding of flood risk and its potential impacts
- Encouragement for mitigation actions by community officials and property owners
- Continued transparency of the Risk MAP process
- Improved understanding of how to leverage community activities, assets, and concerns in support of mitigation actions to remove barriers and/or create incentives for mitigation action
- Increased desire by community stakeholders and/or residents to plan for and take mitigation actions
- Improved compliance with the requirements of Section 216 of BW12, as amended by HFIAA

3.0 CCO Meetings and Flood Risk Open Houses

Two sets of 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 advance this goal, the Project Team should use the CCO Meeting(s) to provide resources and information to community officials to prepare them to share risk reduction messages and information with the public more effectively.

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 revision processes and procedures.

For some Flood Risk Projects that are limited in scope, or where the number of communities or residents affected by flood hazard changes is small, FEMA and the community officials may decide that CCO Meetings and/or Flood Risk Open Houses are not needed (note specific requirements of SID 384 related to the CCO Meeting).

The Open House format has been selected as the most appropriate for presenting the preliminary FIRM, FIS Report, and associated products to the public. However, based on coordination with the affected communities, another format may be more appropriate. Reference the *Designing Effective Public Meetings Guide* that is part of FEMA's Flood Risk Communication Toolkit online at <https://www.fema.gov/media-library/assets/documents/179697>.

In addition, communities actively involved in the mitigation planning process can use the regulatory and Flood Risk Products, if scoped, to update or validate their risk assessment. These products may also meet the public participation requirements inherent in the plan development, maintenance, and update processes.

To determine the specific needs for this project, the Project Team should work with community stakeholders and the FEMA Project Officer. 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 RMD SharePoint Portal or by contacting the FEMA Project Officer.

3.1 Meeting Objectives

The objectives for this set of meetings are firmly rooted in the results of the Flood Risk Project, as depicted on the Preliminary FIRM panels and accompanying FIS Report. Specifically, the objectives of the CCO Meeting and Flood Risk Open Houses are to:

- Present the preliminary FIRM, FIS Report, FIRM database, and other products to meeting attendees
- Briefly explain 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 the requirements for the 90-day appeal period and the definitions of appeals and comments
- Explain how community officials should submit appeals and comments on the preliminary FIRM and FIS Report
- Help community officials explain how the public can submit appeals or comments
- 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 how the FIRM and FIS Report are maintained after they are effective, through LOMCs and the FEMA Coordinated Needs Management Strategy (CNMS)
- Discuss appropriate outreach alternatives that enable 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 FIRM into the community floodplain management ordinances
- Discuss the impact of the FIRM on flood insurance purchase requirements, and the benefit of coverage, including qualifications for grandfathering and Preferred Risk Policies (PRPs)
- Prepare community officials to share information during the Flood Risk Open Houses about their community’s flood hazards and risks, the proposed maps, actions taken and planned, the status of mitigation planning activities, and individuals’ responsibility to manage their own risks
- Discuss LOMC revalidation, the LOMC submission processes, and the timeline associated with the submitting a LOMA application
- Officially deliver the preliminary FIRM, FIS Report, and related products to the communities

3.2 Planning the Meetings

3.2.1 Timing

The Project Team should work with community officials—primarily Chief Executive Officials (CEOs) and Flood Plain Administrators (FPAs)—to hold these meetings as soon as possible after the preliminary FIRM and FIS Report are released. For most Flood Risk Projects, the CCO Meetings are held immediately before the Flood Risk Open Houses.

3.2.2 Meeting Invitees and Attendees

Table 2 provides a list of attendees to invite to CCO meetings and Flood Risk Open Houses.

Table 2: CCO Meeting and Flood Risk Open House Attendees

CCO Meeting	Flood Risk Open House
<ul style="list-style-type: none"> • CEOs, FPAs, and other community officials from affected communities who are interested in seeing the preliminary FIRM and FIS report • FEMA Insurance Specialists (if not already members of the Project Team) • Individuals from affected communities who were invited to the Discovery, Flood Risk Review, and Resilience Meetings, as appropriate 	<ul style="list-style-type: none"> • All attendees listed in the CCO Meeting column • People who live and work in the affected communities • Members of tribes and tribal nations • U.S. and state senators and representatives and their staff, as appropriate • State and federal agencies with an interest in the Flood Risk Project, as identified in the stakeholder engagement plan • Local media, as appropriate

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------|--|
| <ul style="list-style-type: none">• People identified as key influencers in the project's stakeholder engagement plan | |
|-------------------------------------------------------------------------------------------------------------------------------------|--|

3.3 Flood Risk Open House Best Practices

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 these areas are fully aware of the Flood Risk Open House. In addition, it may maximize attendance, increase local awareness of updates to the flood map, and build the public's capacity for taking actions. 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.

To help local officials notify residents about the Flood Risk Open House, the Project Team can provide customizable templates to advertise the meeting through direct mailing, the Internet, the media, and social media. Project Team members can download the "Flood Risk Open House Meeting Announcement" from the password-protected RMD SharePoint Portal. The Project Team 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 tips, tools, and best practices for holding successful Flood Risk Open Houses are available in the CERC Playbook. The Playbook can be accessed through the password-protected RMD SharePoint Portal or by contacting the FEMA Project Officer.

3.4 Meeting Activities

The following activities generally take place during CCO Meetings and Flood Risk Open Houses:

- Help community officials and property owners locate their residences or businesses on the FIRM, using digital tools.
- Present or discuss an overview of the 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 stations where attendees can obtain information, including a station where appeal, comment, and map revision requirements and processes are discussed in detail and where fact sheets and other information may be distributed.
- Identify new community mitigation actions.
- Explain how updated FIRM panels may affect flood insurance premiums, including the qualifications for grandfathering and the PRP.
- Explain how the FIRM, FIS Report, and Flood Risk Products can be used in the mitigation planning process and with planning activities related to future development, beneficial uses of the floodplain, and protecting sites of cultural, historic, and religious significance.
- Provide the opportunity for citizens to talk in person with their FPA and other local officials about property-specific issues.

- Discuss outreach and risk communication tools available to communities via the fema.gov website or other sources.

3.5 Post-Meeting Activities and Products

A key followup task after CCO Meetings and Flood Risk Open Houses is documenting participants' reactions to the products that were presented. The Project Officer or other Project Team member may also post a summary, along with other documents related to the CCO Meeting and Flood Risk Open House, to a FEMA, CTP, or project-specific website, as appropriate.

It may be appropriate to hold an additional public meeting or webinar after the LFD has been issued, following the appeal period. The Project Team, as always, should coordinate with the communities involved, to gauge the need for this meeting and any additional resources to assist them with their progress toward mitigation activities that would reduce their risk.

3.6 Best Practices if CCO Meetings or Flood Risk Open Houses are not Held

Sometimes the FEMA Project Officer, after coordinating closely with officials from the affected communities, may decide to forego a CCO Meeting or Flood Risk Open House for a small-scale map revision project. 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 and send a copy to the community and interested stakeholders.

Project Team members may access the “No_CCO_Meeting_Letter_Template” from the password-protected RMD SharePoint Portal, after confirming with the FEMA Project Officer that a Region-specific template is not available. The Project Team should discuss this decision with key influencers and other stakeholders that have been involved, especially if previous communication with these individuals and organizations indicated that a CCO Meeting and/or Flood Risk Open House would be held.

4.0 Appeal Period Engagement Activities

When updated flood hazards are proposed for a community's FIRM, a 90-day appeal period is required. FEMA initiates the appeal period with the following actions:

- Publishes a proposed Flood Hazard Determination (FHD) notice in the *Federal Register*;
- Notifies the community CEO by sending an appeal start letter; and
- Publishes a notice of the proposed FHDs twice in a prominent local newspaper during the 10-day period after sending the appeal start letter.

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

Just before and during the appeal period, the Project Team should encourage community officials, key influencers, and other stakeholders to actively publicize and explain the appeal period and the map revision processes as widely as possible. Sharing resources, such as press release

templates and fact sheets, with community officials and stakeholders will simplify this engagement process. The Project Team should advise community officials to use the publicly available Flood Risk Communication Toolkit (<https://www.fema.gov/media-library/assets/documents/179697>) and YouTube videos (https://www.youtube.com/playlist?list=PL720Kw_OoijlUiWw2bDc-On5MjQw13E6e).

Additional guidance on appeal and comment processing is available in Guidance Document No. 26, [Guidance for Flood Risk Analysis and Mapping: Appeal and Comment Processing](#).

4.1 Media Engagement and Communication Standards Implementation

In accordance with Section 216 of BW12, as amended by HFIAA, the Project Team will engage with local media outlets to educate property owners about the Risk MAP process, the newly revised flood maps (i.e., FIRM), and the process available to appeal the proposed changes in flood elevations through their community. The Project Team should work with the appropriate staff in the Regional Office of External Affairs to identify and connect with the appropriate local media outlets.

Section 216 specifically requires including local radio and television stations in this education effort. Although Section 216 does not mention other flood hazard information that is subject to appeal, any engagement with local media would need to include the requirements for appeals of other flood hazard data (i.e., base flood depths, SFHAs, flood insurance zone designations, and regulatory floodways) as defined by SID 622.

FEMA has developed templates to help the Project Team communicate with local media outlets. Project Team members may access the following templates developed by FEMA from the Flood Mapping Letter Repository on the password-protected RMD SharePoint Portal or by contacting the FEMA Project Officer. The Project Team should confirm that there are no Region-specific versions of a template before customizing a template.

- TV Producer Email Pitch Template – The local point of contact can use this template to provide a background story to local TV producers and ask them to run a segment about the map revision and appeal processes.
- Map Change Press Release Template – The local point of contact can send this notification of the upcoming appeal period and a summary of the project with the TV Producer Email Pitch.
- Radio PSA Program Director Email Pitch Template – The local point of contact can use this template to transmit a 30-second Public Service Announcement (PSA) script regarding the map revision and appeal processes to local radio program directors.
- Appeals Process Radio PSA Script Template – This document contains language that local radio stations can use to inform listeners about the appeal and map revision processes.

This activity should take place after the preliminary FIRM and FIS Report are released and before the appeal period starts. While the Project Team may also choose to disseminate information just before or after the CCO Meeting, there is no specific time requirement for that. There is also no requirement to purchase airtime.

To document compliance with SID 622, the Project Team must keep on file—and upload to the FEMA Mapping Information Platform—copies of any press release, PSA script, or other local media engagement materials that are used, as well as documentation of the local television and radio outlets to which the materials were sent.

4.2 Appeal Period Best Practices – Working with Community Officials

As previously noted, FEMA publishes the FHD notice in the *Federal Register* and in the local legal or classified section of the prominent local community newspaper. However, this information is often overlooked and fails to reach those most in need of the information.

Section 216 of BW12, as amended by HFIAA, requires FEMA to assist local officials with outreach efforts related to the appeal period, to maximize property owner awareness. The Project Team should provide community officials with guidance on ways to advertise the appeal process to property owners and other residents through direct mail, the Internet, print, and social media. Guidance and templates for outreach can be found in the Flood Risk Communication Toolkit, available online at <https://www.fema.gov/media-library/assets/documents/179697>. As always, Project Team members should confer with the FEMA Project Officer to determine whether a Region-specific version of a template or preferred approach should be used.

5.0 Adoption/Compliance Period Engagement Activities

A community that participates in the NFIP is responsible for ensuring that its floodplain management regulations meet the minimum requirements of the NFIP. Following the 90-day appeal period, FEMA resolves all appeals and comments and finalizes all changes to the FIRM and FIS Report.

Once all appeals and comments have been addressed, FEMA issues an LFD 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 ordinances to reference the new FIRM and FIS Report. During the 6-month adoption/compliance period, FEMA sends 90- and 30-day suspension letters, as appropriate. These letters notify the community that it must have approved floodplain management ordinances in place before the effective date of the FIRM or face suspension from the NFIP.

Three other resources that the Project Team may use or reference to engage stakeholders include the Flood Risk Communication Toolkit, available online at <https://www.fema.gov/media-library/assets/documents/179697>; FEMA 495, *Adoption of Flood Insurance Rate Maps by Participating Communities*; and FEMA 496, *Joining the National Flood Insurance Program*. FEMA 495 and 496 can be accessed through the online FEMA Resource and Document Library.

5.1 Adoption/Compliance Period Objectives

The Project Team performs stakeholder engagement activities such as the following during the adoption and compliance period:

- See that communities have the support they need to adopt or amend their local floodplain management ordinances in a timely manner. This includes knowledge of the appropriate

level of regulations to adopt (44 CFR 60.3), where to access state model ordinances, and how to obtain assistance.

- See that communities begin the compliance/adoption process in a timely fashion and allow adequate time for the state NFIP Coordinator or FEMA staff to review and approve the submitted ordinances, to avoid NFIP suspension.
- Encourage communities to adopt floodplain management ordinances that exceed NFIP and state minimum standards.
- Encourage communities to consider adopting the latest consensus-based hazard-resistant building codes and standards for flooding and other hazards.
- Increase community awareness of the FEMA assistance and resources available to support adoption, administration, and enforcement of hazard-resistant building codes and standards and floodplain management ordinances, including funding and other resources made available under DRRA 2018 and Section 20606 of the Bipartisan Budget Act of 2018.
- Help communities, property owners, and lessees understand the LOMC revalidation process.
- Educate property owners and lessees about the benefits and costs of maintaining or acquiring flood insurance (i.e., lower cost PRPs for properties outside the SFHA).

5.2 Adoption/Compliance Period Best Practices

While the Project Team may have held a Resilience Meeting either before or after the preliminary FIRM and FIS Report were issued, they can also hold another one—or a first Resilience Meeting—after the LFD is issued.

During this meeting organized by the Project Team, community officials will have the chance to discuss the FIRM, FIS Report, Flood Risk Datasets, and Flood Risk Products and how to leverage them to increase risk awareness and community resilience. The meeting also provides a great avenue to discuss higher floodplain management standards, the benefits of adopting the latest consensus-based hazard-resistant building codes and standards, mitigation strategies, and the benefits of joining the CRS.

During the adoption/compliance period, the Project Team may distribute fact sheets, brochures, PSAs, videos, and other tools and materials. These can be used to educate property owners about the following topics:

- Flood risk in their community and how to reduce it
- The fact that properties no longer subject to mandatory purchase of flood insurance are still at risk for flooding, and should consider maintaining their flood insurance
- The benefits and costs of maintaining or acquiring flood insurance, including the qualifications for grandfathering and, where applicable, lower cost PRPs.
- Mitigation projects that property owners can use to reduce their individual risk.

As part of this effort, the Project Team can use fact sheets and content from [floodsmart.gov](https://www.floodsmart.gov). Additional insurance-related resources to help community officials communicate with residents about pending map changes can be found at <https://www.fema.gov/media-library/resources-documents/collections/706>. A fact sheet on adopting higher NFIP floodplain management standards is available at https://www.fema.gov/media-library-data/1436818440760-e98afeaaf063ee3417e6a76a62fb0a48/FPM_1_Page_Higher_FPM_Standards.pdf. A toolkit developed by the FEMA Building Science Branch provides basic guidance and easy-to-use tools to help property owners understand building codes and the basic processes and standards associated with proper design, permitting, construction, and mitigation; the toolkit is available at <https://www.fema.gov/media-library/assets/documents/30423>.

5.3 Outcomes of Adoption/Compliance Period Engagement

Successful stakeholder engagement during the adoption and compliance period should result in the following outcomes:

- Enhanced relationships between FEMA, community officials, key influencers, and other stakeholders
- Provide community officials and key influencers with a better understanding of, confidence in, and ownership of the preliminary FIRM, FIS Report, FIRM database, and SOMA, who know how and why the new products are different from the effective FIRM, FIS Report, and FIRM database or other existing NFIP products
- Provide community officials with a better understanding and ownership of the Risk MAP process, particularly with the planning of and participation in the Flood Risk Open Houses following the CCO Meetings, the appeal and map revisions processes, and the adoption and compliance process
- Provide community officials and influencers with a better understanding of their flood risks, and how mitigation actions and flood insurance can reduce these risks
- A deeper community commitment to meaningful mitigation and risk-reduction actions
- More communities that consider adopting floodplain management ordinances that exceed the NFIP or state minimum standards
- More communities that consider adopting the latest consensus-based hazard-resistant building codes and standards
- Improved community official awareness of BCEGS ratings, the BCEGS rating process, and the tools and resources available
- Improved community official awareness of the FEMA assistance and resources available to support adoption, administration, and enforcement of hazard-resistant building codes and standards and floodplain management ordinances, including funding and other resources made available under DRRA 2018 and Section 20606 of the Bipartisan Budget Act of 2018
- Property owners and lessees with a greater awareness and understanding of the appeal, map revision, and adoption/compliance processes

- Improved education for property owners and lessees about flood risks and reducing these risks in their community, including the continued flood risk in areas that are no longer subject to the mandatory flood insurance purchase requirement
- Improved education for property owners and lessees about the benefits and costs of maintaining or acquiring flood insurance
- A reduced amount of misleading or incorrect information disseminated by media and other stakeholders
- Increased compliance with the requirements of NFIP statutes and regulations.

6.0 Final FIS Report and FIRM Delivery Phase Activities

6.1 Resilience Meetings

The FEMA Project Officer, working with community leaders and stakeholders, may determine that one or more followup meetings will help promote the mitigation actions identified during the Resilience Meetings or at other times. Detailed Resilience meeting guidance is provided in Guidance Document 103, [Stakeholder Engagement Guidance: Preliminary Production Process](#). The Project Team should consider working with community officials (primarily CEOs, and FPAs) to schedule and hold these “mitigation action followup meetings” after digital versions of the final FIS Report(s) and FIRM(s) have been posted to the MSC website and paper copies have been distributed to the communities.

As with earlier meetings, community officials should help to determine the meeting’s format. That format—whether in-person or a webinar—should be based on the number of people to invite and the relative success of the format used for the Resilience Meeting(s). In addition, communities who are actively involved in the mitigation planning process can use the regulatory and Flood Risk Products to update or validate their risk assessment, and possibly meet public participation requirements inherent to the plan development, maintenance, and update processes.

The Project Team should review all tools and templates (meeting invitations, agendas, etc.) that have been developed to support CCO Meetings, Flood Risk Open Houses, and Resilience Meetings, to determine if they can be amended for the followup meeting. Because each FEMA Regional Office is different, the Project Team will need to ask the FEMA Project Officer about Regional needs and preferences.

Additional information about community meetings and open houses, tools, and examples is available in the CERC Playbook, which will be updated regularly. The Project Team can access the CERC Playbook through the password-protected RMD SharePoint Portal or by contacting the FEMA Project Officer.

6.2 Mitigation Action Followup Meetings – Best Practice

6.2.1 Meeting Objectives

The objectives of a mitigation action followup meeting are listed below.

- Educate community officials so they clearly understand the ongoing maintenance activities and resources available to support these activities (see Section 6.2.3, Meeting Activities).

- Ensure attendees agree about what was discussed and decided during the Resilience Meeting(s).
- Continue building local capacity for and commitment to implementing priority mitigation activities within a watershed or other geographic area.
- Ascertain the community's progress on priority mitigation activities, and help the community move those activities forward.
- Document any new mitigation-related actions that the community has taken.
- Promote, and address community officials' questions regarding, the latest consensus-based hazard-resistant building codes and standards; BCEGS ratings; available FEMA Building Science resources, and funding and other resources available under DRRRA 2018 and the Bipartisan Budget Act of 2018.

6.2.2 Meeting Implementation

6.2.2.1 Meeting Timing

Followup meetings should be scheduled 2 to 3 months before the FIS Report and FIRM become effective.

6.2.2.2 Meeting Invitees and Attendees

In addition to the FEMA Project Officer and other Project Team members who will lead or facilitate portions of the meetings, FEMA Planners, state NFIP Coordinators, State Hazard Mitigation Officers, CTPs, Risk MAP providers, key influencers, regional tribes and tribal nations, and all individuals who were invited to the Resilience Meeting(s) are appropriate attendees for followup meetings.

6.2.3 Meeting Activities

The following activities are likely to take place during followup meetings:

- A brief review of the following items:
 - Maintaining the FIS Report and FIRM after they become effective, through LOMCs and the CNMS;
 - Resources available to explain the procedures and processes for PMRs, LOMRs, LOMR-Fs, and LOMAs to community officials;
 - Resources available to help community officials explain how the public can submit requests for a PMR, LOMR, LOMR-F, or LOMA;
 - Resources available to explain the impact of the FIRM on insurance purchase requirements, and the benefit of insurance coverage, including rating options for those with increased risk (e.g., newly mapped procedure, grandfathering) and those no longer in a high-risk area (e.g., conversion), as well as mitigation projects that people can take at an individual level; and
 - Status of the local HMP and recommendations for incorporating the new flood hazard data and newly identified mitigation actions into the HMP.

- Revisit the timeline for communities to adopt the FIRM into their floodplain management ordinances (could be a breakout session at the end of a meeting).
- Review the key items discussed at the Resilience Meeting(s), including decisions about the priorities for local mitigation activities. Depending on the size of the group, it may be appropriate to provide participants with a summary to review before the meeting, particularly if a substantial amount of time has elapsed since the Resilience Meeting(s).
- Have community officials report in detail about their community's progress on completing priority mitigation actions, including any barriers to completion they may have faced. Depending on community need, an action support plan can be developed to support harder-to-implement mitigation actions.
- Facilitate a discussion and document any new mitigation-related actions that were taken or are planned for each community.
- Facilitate a discussion of the requirements for, the benefits and costs associated with, and resources available under DRRA 2018 and the Bipartisan Budget Act of 2018 for adopting, administering, and enforcing the latest consensus-based hazard-resistant building codes and standards that address all natural hazards.
- Review all decisions made during the meeting(s), and followup actions that are required.

6.2.4 Post-Meeting Activities

After the mitigation action followup meeting, it is important to document what was accomplished during the meeting and any followup actions to take. The Project Officer or another Project Team member can post a summary, along with other meeting documents, to a FEMA, CTP, or project-specific website, as appropriate. Project Team members or other FEMA Regional Office and state staff will contact community officials, as appropriate, to ensure communities are making progress toward completing their prioritized mitigation actions.

6.3 Outcomes of Engagement During the FIS Report and FIRM Delivery Phase

Successful stakeholder engagement during the Delivery phase for the final FIS and FIRM should result in the following outcomes:

- Communities with a better recognition of flood risk and a commitment to implement appropriate mitigation actions
- Stakeholders with more understanding of, confidence in, and ownership of the Flood Risk Datasets and Flood Risk Products provided by FEMA, who know how they can be used
- Enhanced relationships with community officials, stakeholders, and other key influencers
- Continued transparency into the Risk MAP process
- A better understanding of how to leverage community activities, assets, and concerns in support of mitigation actions and to remove barriers and/or create incentives for mitigation action
- Increased community official commitment to undertake adopting the latest consensus-based hazard-resistant building codes and standards that address all natural hazards

- Improved compliance with the requirements of BW12, as amended by HFIAA, for educating property owners and lessees on the following topics:
 - Map revision and map amendment processes and procedures
 - Flood risk and reducing this risk in their community, including the flood risk that remains in areas that are no longer subject to the flood insurance mandatory purchase requirement
 - Benefits and costs of maintaining or acquiring flood insurance for properties both inside and outside SFHAs

7.0 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 project. The required community files for all affected communities should have been set up during the Discovery phase, following protocols established by the FEMA Regional Office. Therefore, the Project Team should place records of engagement activities (e.g., letters, email messages, memorandums, meeting notes) taken during the Post-Preliminary Due Process period in these previously established community files. This includes any documentation related to working with the media to educate property owners and lessees about the appeals and map revision processes and procedures in accordance with Section 216 of BW12, as amended by HFIAA.

To comply with Section 67.3 of the NFIP regulations (44 CFR 67.3), the Project Team should also establish a Flood Elevation Determination Docket (FEDD) file for each affected community. The FEDD file should contain copies of all correspondence with communities concerning preliminary flood hazard information, as well as copies of the preliminary FIRM, FIS Report, and SOMA. The Project Team should also include all communication with community officials and the media undertaken to comply with the requirements of Section 216 of BW12, as amended by HFIAA.

Additional guidance on the information to be included in the FEDD file is provided in Guidance Document No. 69, [Guidance for Flood Risk Mapping and Analysis: Technical Support Data Notebook and Flood Elevation Determination Docket](#). Please visit Mapping Information Platform (MIP) User Care online for information about MIP requirements and documentation pertaining to this phase.