

# Hazard Mitigation Assistance Program and Policy Guide Summary of Changes

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The following is a summary of changes for the 2023 Hazard Mitigation Assistance Program and Policy Guide update. This content replaces the 2015 Hazard Mitigation Assistance Guide and Addendum. This updated guide includes four current FEMA hazard mitigation programs. For the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire, the HMA Guide applies to major disaster declarations and Fire Management Assistance Grant declarations issued on or after March 23, 2023. For Building Resilient Infrastructure and Communities and Flood Mitigation Assistance, the HMA Guide applies to application periods open on or after March 23, 2023. The Safeguarding Tomorrow Revolving Loan program is in development and guidance will be published at a later date.

## Overview

### Purpose and Scope of the Hazard Mitigation Assistance Program and Policy Guide Update

FEMA's Hazard Mitigation Assistance (HMA) programs are mandated to provide assistance to state, local, tribal and territorial governments so they can plan for and implement activities that mitigate future disaster losses in local communities. The last comprehensive HMA guidance was issued in February 2015 through the publication of the 2015 HMA Guidance and the 2015 HMA Guidance Addendum.

The purpose of the HMA Program and Policy Guide (HMA Guide) is to outline the policy and procedural requirements of FEMA's mitigation grant programs over the lifecycle of a project or activity. The HMA Guide includes information for the following grant programs: Building Resilient Infrastructure and Communities (BRIC), Flood Mitigation Assistance (FMA), the Hazard Mitigation Grant Program (HMGP), and the Hazard Mitigation Grant Program Post Fire (HMGP Post Fire).

The 2023 HMA Guide:

- Integrates stakeholder feedback
- Improves navigation and ease of use
- Incorporates existing hazard mitigation policies and guidance materials issued since 2015
- Simplifies and clarifies guidance
- Contains strategic mitigation priorities



# FEMA

## Inputs into the HMA Guide

The below information informed the development of the 2023 HMA Guide:

Input Type	Input Overview
Internal and External Stakeholder Feedback	<ul style="list-style-type: none"> <li>• 5,000+ comments from the BRIC stakeholder engagement process (2019)</li> <li>• 400 HMA Guide internal data call comments (April 2020)</li> <li>• 147 <a href="#">Federal Register</a> comments for BRIC policy (comment period closed on May 11, 2020)</li> <li>• Federal interagency review</li> <li>• 50+ submissions to the <a href="#">Federal Register</a> during the HMA Guide public comment period, resulting in over 700 individual comments (September 2022)</li> </ul>
Statutory, Regulatory, Policy, Guidance Changes Since 2015	<ul style="list-style-type: none"> <li>• <a href="#">Disaster Recovery Reform Act of 2018</a> :             <ul style="list-style-type: none"> <li>– Building Resilient Infrastructure and Communities (BRIC) program</li> <li>– Hazard Mitigation Grant Program (HMGP) Post Fire program</li> <li>– Management costs</li> <li>– Earthquake early warning system eligibility</li> <li>– All other Disaster Recovery Reform Act changes impacting Hazard Mitigation Assistance</li> </ul> </li> <li>• Partial Implementation of the Federal Flood Risk Management Standard for Hazard Mitigation Assistance Programs <a href="#">FP-206-21-003-0001</a></li> <li>• <a href="#">Build America, Buy America Act</a></li> <li>• Additional policies and policy clarifications</li> <li>• Updates to federal grants administrative regulations in <a href="#">Title 2 Code of Federal Regulations Part 200</a></li> <li>• Updates to Hazard Mitigation Assistance regulations in <a href="#">Title 44 Code of Federal Regulations</a> Parts 77, 80, 201, and 206</li> </ul>

Input Type	Input Overview
Administration Priorities and Strategic Initiatives	<ul style="list-style-type: none"> <li>• <a href="#">Executive Order (EO) 13985</a>, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (January 20, 2021)</li> <li>• <a href="#">EO 13990</a>, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (January 20, 2021)</li> <li>• <a href="#">EO 14008</a>, Tackling the Climate Crisis at Home and Abroad (January 27, 2021)</li> <li>• <a href="#">EO 14030</a>, Climate-Related Financial Risk (May 20, 2021)</li> <li>• Innovative mitigation approaches such as climate resilient mitigation activities and nature-based solutions</li> <li>• <a href="#">National Mitigation Investment Strategy</a></li> <li>• <a href="#">FEMA Community Lifelines</a></li> <li>• <a href="#">Climate Change</a></li> <li>• <a href="#">Equity</a></li> <li>• <a href="#">FEMA Building Codes and Standards Strategy</a></li> </ul>
Resources Issued Since 2015	<ul style="list-style-type: none"> <li>• <a href="#">Resources for Applying and Managing Grants</a>: Content from 65+ existing tools, fact sheets, job aids and information bulletins</li> </ul>

## Collaboration Throughout the Hazard Mitigation Assistance Program and Policy Guide Update Drafting Process

The HMA Guide update process relied on feedback from and collaboration among internal stakeholders and subject matter experts from both the FEMA regional offices and FEMA headquarters. In April 2020, HMA requested feedback on the HMA Guide from a variety of programs and received over 400 comments. Additionally, throughout the update drafting process, staff from across FEMA headquarters and its regional offices participated in working groups and a steering committee. These groups actively reviewed and edited a redlined version of the updated program and policy guide, supported content development, and assisted with resolving complex issues.

In August 2022, FEMA released the draft HMA Guide via the [Federal Register for public comment](#). This was the first time a comprehensive guidance document for FEMA's hazard mitigation programs was released for public comment. FEMA received 53 responses, which contained over 700 individual comments that were analyzed and processed for incorporation into the document. While not all requested changes could be implemented in this version of the HMA Guide, a number of changes were made in response to public comments:

- Updated secondary power source activity section
- Expanded aquifer recharge, storage and recovery activity section

- Added building codes as overall strategic consideration
- Clarified budget and scope change procedures
- Clarified subaward closeout and liquidation timeframes
- Clarified beach and dune nourishment eligibility

## Comprehensive Changes

### Reorganization of the HMA Program and Policy Guide

- Combined the HMA Guide into one document (formerly 2015 HMA Guidance and the 2015 HMA Guidance Addendum).
- Better organized content around the stages of the grant cycle.
- Updated “Part 1. Introduction” to provide an overview of the different grant programs and highlight HMA priorities.
- Moved and incorporated the 2015 HMA Guidance text from “Part 2. Frontloading HMA Program Eligibility Requirements” to the updated “Part 3. Subapplication Consideration and Scoping” and to the extent possible, eliminated the term “frontloading” to reduce confusion about its meaning.
- Added new parts to the HMA Guide, including the following:
  - New “Part 5. Cost Effectiveness (BCA),” which consolidates information about cost-effectiveness and principles governing Benefit-Cost Analysis (BCA) from the 2015 guidance; additionally, the content has been updated with BCA and cost-effectiveness guidance principles published after 2015.
  - New parts to detail activity types:
    - “Part 11. Capability and Capacity Building,” which includes sections on hazard mitigation planning and planning-related activities, project scoping/advance assistance, technical assistance, codes and standards, and partnerships.
    - “Part 12. Mitigation Projects.”
    - “Part 13. Management Costs.”
  - New “Part 14. Program Administration by State (PAS),” which fully incorporates the content from the Addendum to the Hazard Mitigation Assistance Guidance Program Administration by States Pilot, Hazard Mitigation Grant Program (October 2017). The program continues to be a pilot.

## Content Updates: High-Level Summary

The HMA Guide includes the following content updates:

- Incorporates policies, policy clarifications, job aids, and Office of Chief Counsel legal interpretations and determinations released since 2015.
- Highlights FEMA priorities such as resilience and climate adaptation, community lifelines, whole community, equity, capability and capacity building, comprehensive planning, and building codes.
- Incorporates the following Disaster Recovery Reform Act updates:
  - [Building Resilient Infrastructure and Communities Policy #104-008-05](#)
  - [Hazard Mitigation Grant Program Post Fire Policy #207-088-2](#)
  - [Hazard Mitigation Grant Program Management Cost Interim Policy #104-11-1](#)
  - Earthquake early warning systems
  - Wildfire mitigation activities
- Clarifies issues specific to Hazard Mitigation Grant Program:
  - 12-month lock-in and de-obligation
  - Information required to request an application period or period of performance extension
  - Total award amount for the purpose of management costs
- Expands information on project types based on existing job aids and factsheets; added new and expanded guidance for additional project types:
  - Aquifer Recharge, Storage, and Recovery
  - Stabilization
  - Floodproofing
  - Tsunami Vertical Evacuation Refuge.
  - Retrofitting
  - Secondary Power Source
  - Warning Systems

- Includes regulatory changes made to [Title 2 Code of Federal Regulations \(CFR\) Part 200](#) in 2020 and expands information on grants management requirements and procedures.
- Incorporates changes made to Hazard Mitigation Assistance regulations effective Oct. 1, 2021.
- Provides more information on codes and standards as eligible Hazard Mitigation Assistance activities.
- Expands guidance content and resources on mitigation planning, recognizing its importance to effective hazard mitigation and the grants cycle process.
- Includes new guiding principles, such as nature-based solutions, the National Mitigation Investment Strategy and the FEMA Building Codes Strategy.
- Replaces, to the extent possible, “will” with “must” to clarify when FEMA is referring to a requirement.

## Update Highlights

This section highlights changes in each section or part of the HMA Guide.

### Universal Changes

- Updated and added statutory and regulatory references.
- Moved all activity-specific eligibility requirements to Parts 11-13.
- Added additional references to Building Resilient Infrastructure and Communities and the Flood Mitigation Assistance Notice of Funding Opportunities (funding opportunities) to clarify that these typically contain additional program-specific information and requirements.
- Replaced all references to “cost estimate” with “budget” to align with the definition in [Title 2 Code of Federal Regulations Part 200](#).
- Transitioned from “project” specific terminology to “activity” specific terminology to be more inclusive of the new activity types and reduce confusion.
- Transitioned from the “State Hazard Mitigation Officer (SHMO)” acronym to a more inclusive “Hazard Mitigation Officer (HMO).”
- Updated references to Robert T. Stafford Disaster Relief and Emergency Assistance Act Section 406 funding to read “Public Assistance Mitigation or PA Mitigation” to align with the *Public Assistance Program and Policy Guide* (2020).

### Part 1. Introduction

- Updated the introduction and summary of changes.
- Updated content regarding the agency’s priorities, including priorities outlined in [EO 13985](#), Advancing Racial Equity and Support for Underserved Communities Through the Federal Government; [EO 13990](#), Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis; [EO 14008](#), Tackling the Climate Crisis at Home and Abroad, and [EO 14030](#), Climate-Related Financial Risk.
- Added details about the intersection of the National Mitigation Investment Strategy and the HMA Guide; as well as the importance of community lifelines, climate change, equity, and building codes and standards.
- Specific guidance for the legacy Pre-Disaster Mitigation program was removed and language was added to clarify that FEMA may use the program when administering grant funding as directed by Congress. For more information and guidance regarding Congressionally directed spending, refer to the relevant fiscal year’s funding opportunities and the 2015 HMA Guidance and Addendum, and other programmatic guidance.
- Included date of applicability or effective date of additional FEMA references and other government or professional publications for hazard mitigation programs when the HMA Guide references requirements detailed in these documents.

- Included a list of changes and a list of guidance documents from which content was incorporated or which will be superseded upon publication of the HMA Guide.

## Part 2. Overview of Hazard Mitigation Assistance Programs

- Added new sections to introduce Hazard Mitigation Grant Program Post Fire and Building Resilient Infrastructure and Communities.
- Added a program comparison table to highlight similarities and differences among the Hazard Assistance Mitigation programs. Included information about the Building Resilient Infrastructure and Communities program, Flood Mitigation Assistance, Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire. This HMA Guide does not include information about the new Safeguarding Tomorrow Revolving Loan Fund program as it is currently being developed.
- Added a new section, “Roles and Responsibilities of State, Local, Tribal, and Territorial Governments,” describing the role of federally recognized tribes and clarifying information about how tribes can apply for assistance as either a recipient or subrecipient.
- Clarified that the amount of Hazard Mitigation Grant Program assistance available under the disaster declaration will be apportioned among the applicants if there is more than one applicant under that disaster declaration. That is, if a state and a federally recognized tribe are applicants under the same disaster declaration, then the available Hazard Mitigation Grant Program assistance will be apportioned among the state and the federally recognized tribe. The apportionment is based on the disaster assistance provided within tribal lands.
- Included new content explaining the relationship between Title 2 CFR Part 200 regulations and program-specific regulations.

## Part 3. Subapplication Considerations and Scoping

- Renamed Part 3 from “Frontloading HMA Program Eligibility Requirements” to “Subapplication Considerations and Scoping.”
- Added a new section providing an overview of the Hazard Mitigation Assistance grant development process, including selecting a mitigation activity and scoping.
- Identified funding strategies that may be used to assist with project scoping and subapplication development.
- Clarified that advance assistance under the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire and project scoping under Building Resilient Infrastructure and Communities and Flood Mitigation Assistance encompass the same eligible activities (eligibility criteria are covered in greater detail in Part 11).
- Updated information on management costs, phased projects (previously found in Part 8 of the 2015 HMA Guidance), pre-award costs, and universal accessibility (previously located in Part 2 of the 2015 HMA Guidance).



- Provided additional clarifying information in the section entitled, “HMGP and Public Assistance Mitigation.”
- Added a “Cost Review” section stating subapplication costs would be reviewed according to Title 2 CFR Part 200 principles, including reasonable costs.
- Added a list of general documentation requirements for each Hazard Mitigation Assistance subapplication, including activity-specific documentation requirements that are detailed in Parts 11-13.

## Part 4. Eligibility and Requirements

- Moved cost-effectiveness content to a new Part 5, “Cost-Effectiveness.”
- Clarified information about remedies of noncompliance when a subapplicant does not complete a mitigation plan within 12 months after receiving an extraordinary circumstances exception. Included Hazard Mitigation Grant Program Post Fire, Building Resilient Infrastructure and Communities, and Flood Mitigation Assistance program information into the section on extraordinary circumstances for the local mitigation plan requirement.
- Clarified the requirement for projects to be consistent with mitigation plans. This was done by including examples of how a statewide agency may provide benefits from mitigation activities to properties in a local jurisdiction without a local mitigation plan and without violating the local mitigation plan requirement.
- Updated the summary of eligible activities to account for policy changes since 2015.
- Included project types that have previously been found eligible but were not specifically discussed in the 2015 HMA Guidance.
- Provided a high-level overview of activities, including new subsections for activities under capability and capacity building, mitigation planning and management costs (these activities are covered in greater detail in Parts 11 and 13).
- Provided clarification on certain ineligible activities, including projects in the Coastal Barrier Resources System, water quality infrastructure projects, activities involving other federal entities, wildfire activities, and response/preparedness activities.
- Added information about the eligibility of pre-award costs for property owners using private funds to demolish an event-damaged structure.
- Incorporated the requirements from [FEMA Policy #206-21-003-0001](#), Partial Implementation of the Federal Flood Risk Management Standard for Hazard Mitigation Assistance Programs (Dec. 7, 2022).
- Clarified that for structures in the Special Flood Hazard Area at the time of project completion and for all structures receiving assistance through Flood Mitigation Assistance, flood insurance must be maintained for the life of the structure and after the completion of the mitigation project. Insurance must also be maintained regardless of whether the structure is subsequently removed from the Special Flood Hazard Area. In addition, FEMA updated language in the notice of flood insurance requirements to correct the statutory reference and

clarify that failure to obtain and maintain flood insurance for these structures will result in the property being ineligible for future Hazard Mitigation Assistance awards.

- To align with Public Assistance procedures, FEMA added information about cost eligibility and cost reasonableness principles under Title 2 CFR Part 200. Generally, the 2015 HMA Guidance referred to the reasonable cost principles under Title 2 CFR Part 200.
  - In 2018, Public Assistance issued guidance on reasonable cost evaluation. See [FEMA Public Assistance: Reasonable Cost Evaluation \(Oct. 13, 2018\)](#).
  - Hazard Mitigation Assistance adopted Public Assistance guidance on the reasonable cost evaluation as part of the implementation of Section 1215, Management Costs in the Disaster Recovery Reform Act. See [FEMA Policy #104-11-1](#), Hazard Mitigation Grant Program Management Costs Interim Policy (Nov. 14, 2018) and [Public Assistance Reasonable Cost Evaluation Job Aid – Hazard Mitigation Grant Program Crosswalk \(2020\)](#).
  - As part of the HMA Guide update, the Hazard Mitigation Assistance programs are now applying the Public Assistance principles on reasonable cost determinations in most instances.
- Added cost share requirements for Building Resilient Infrastructure and Communities projects and updated previously published management cost share requirements for Building Resilient Infrastructure and Communities and Hazard Mitigation Grant Program.
- Updated the list of insular areas that may receive a waiver for the non-federal cost share requirement to remove Puerto Rico, which was mistakenly listed in the 2015 HMA Guidance. The insular areas are American Samoa, Guam, the Northern Mariana Islands and the U.S. Virgin Islands.
- Added a section about how recipients may use Hazard Mitigation Grant Program Global Match to help meet the nonfederal cost share requirement.
- Added [U.S. Department of Housing and Urban Development Community Development Block Grants Disaster Recovery](#) and [U.S. Department of Defense Readiness and Environmental Protection Integration](#) programs as examples of other federal funding sources that can be used to meet the nonfederal cost share requirement.
- Added information about Increased Cost of Compliance qualification requirements.
- Clarified conflict of interest requirements to align with Title 2 CFR Section 200.212.
- Added information about procurement and contracting requirements and related documentation requirements, including:
  - New requirements for states to follow socioeconomic contracting steps and encourage the use of domestic preferences (Title 2 CFR Section 200.321 and Title 2 CFR Section 200.322).
  - Prohibition on procuring certain types of covered telecommunications equipment from Huawei and ZTE Technologies, as published in [FEMA Policy #405-143-1](#), Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services (May 10, 2022) (Title 2 CFR Section 200.216).

- Allowability of noncompetitive procurement methods for purchases below the micro-purchase threshold (Title 2 CFR Section 200.320).
- The Build America, Buy America Act requirements as detailed in [FEMA Interim Policy #207-22-0001](#), Buy America Preference in FEMA Financial Assistance Programs for Infrastructure (Nov. 16, 2022),
- Clarified the eligibility of FEMA reimbursement for costs incurred by homeowners contracting to perform eligible mitigation activities.
- Clarified that projects involving acquisition, rehabilitation or demolition may be subject to the requirements of the [Uniform Relocation Assistance and Real Property Acquisition Policies Act](#). Additionally, FEMA clarified that costs incurred to meet Uniform Relocation Assistance requirements are eligible and should be included in the subapplication budget.
- Added information about how the Hazard Mitigation Grant Program may fund certain water resources projects without violating the prohibition on duplication of programs because of a new provision under Disaster Recovery Reform Act Section 1210(b).

## Part 5. Cost-Effectiveness (Benefit-Cost Analysis)

- Consolidated cost-effectiveness information from other parts of the guidance and created a new Part 5.
- Included high-level information about the elements of a benefit-cost analysis.
- Added list of activities that are exempt from the requirement to demonstrate cost-effectiveness.
- Clarified that water resource projects are not exempt from the statutory requirements to demonstrate cost-effectiveness.
- Included content on the different methods to demonstrate cost-effectiveness, including streamlined methodologies (substantial damage waiver and pre-calculated benefits) and the [BCA toolkit](#).
- Removed information about using Greatest Savings to the Fund to demonstrate cost-effectiveness for Flood Mitigation Assistance because of changes enacted under the [Biggert Waters Act of 2012](#).
- Updated the definition of ecosystem service benefits and removed the requirement to achieve 0.75 Benefit-Cost Ratio before applying these benefits according to [FEMA Policy # 108-024-02](#) Ecosystem Service Benefits in Benefit-Cost Analysis for FEMA's Mitigation Program (Sept. 2020).
- In addition, removed the requirement to achieve a 0.75 Benefit-Cost Ratio before social benefits can be incorporated in a benefit-cost analysis.
- Included expanded information about the aggregation of benefits.
- Clarified that management costs may be excluded from project costs for the purpose of the benefit cost analysis.

- Included more information on the cost-effectiveness of floodplain and stream restoration projects from the [Supplemental BCA Guidance for Floodplain and Stream Restoration Projects](#).

## Part 6. Application and Submission Information

- Provided an overview of the requirements to submit an application, which is supplemented with activity-specific information found in Parts 11-13.
- Moved mitigation planning application and submission information to “Part 11. Capability and Capacity Building.”
- Moved management costs application and submission information to “Part 13. Management Costs.”
- Updated content related to the Hazard Mitigation Grant Program and Flood Mitigation Assistance and included new content for Hazard Mitigation Grant Program Post Fire and Building Resilient Infrastructure and Communities.
- Included information on the transition to FEMA Grant Outcomes (FEMA GO), which will become the single source of submitting applications for grants in all of FEMA’s programs.
- Clarified the [SF-424](#) Family of Forms requirements.
- Updated budget documentation to better align with the [SF-424](#) form.
- Clarified and added details to the scope of work, schedule, and budget sections

## Part 7. Award Selection and Notification

- Updated and added wording based on Title 2 CFR Part 200 requirements.
- Added mention of the requirement for large project notifications on any obligations of \$1 million federal share or greater.
- Added a new section to align with Building Resilient Infrastructure and Communities and Flood Mitigation Assistance funding opportunities on award selection and notification.
- Added content emphasizing the need for awards to comply with Environmental and Historic Preservation award conditions.

## Part 8. Award Administrative Requirements

- Added information about efficient grants management and responsibilities of the recipient as a pass-through entity to clarify the recipient’s role in managing awards.
- Included new procedures and requirements about conducting a risk assessment of the award.

- Added a new section about strategic funds management and included new content on management costs.
- Updated scope of work change section to clarify procedures and address issues related to non-construction activities.
- Updated the deadline for the recipient to request an extension of the award period of performance from 60 days to 90 days before the period of performance expires.
- Extended the award period of performance from 36 to 48 months for Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire, made in conjunction with updates to closeout deadlines in Title 2 CFR Part 200. FEMA regional administrators' authority was expanded to grant up to two 12-month extensions to the period of performance.
- Clarified that all costs, including management costs, must be spent within the subaward or award period of performance and simplified information regarding when a subrecipient or recipient can claim management costs.
- Added information about period of performance extension justification requirements.
- Updated remedies of noncompliance procedures and added corrective action procedures.
- Provided procedures for following up on remedies of noncompliance and monitoring visits.
- Updated circumstances under which an award may be terminated, in accordance with updates to Title 2 CFR Section 200.339, which was effective August 13, 2020.

## **Part 9. Award Monitoring and Closeout Requirements**

- To align with regulatory references, FEMA changed language from “shall” to “must” and changed “performance reports” to “progress reports” in the following statement: “The recipient must submit quarterly financial status and progress reports.”
- Added procedures for the monitoring of reports and included procedures to address incomplete or late quarterly progress or financial reports.
- Added information on improper payments.
- Included the definition for a project considered to be 100% complete.
- Incorporated information from Closeout Toolkit: Hazard Mitigation Grant Program Management Costs Closeout FAQs.
- In accordance with the updated grants management regulation at Title 2 CFR Section 200.344, effective Nov. 13, 2020, FEMA has updated the deadline for recipients to liquidate all financial obligations and closeout their awards to 120 days after the period of performance.

- Added procedures related to administrative closeout and the collection of debt.
- Added information on the disposition of real property, purchased equipment and supplies.
- Added information on real property monitoring after subawards are closed.

## Part 10. Program-Specific Guidance

- Updated information in the Hazard Mitigation Grant Program Administrative Plan to provide citations and expand on details and description of requirements, using content from the [Administrative Plan Checklist](#).
- Clarified the recipient application period extension requirements and included aspects of the Policy Memo: Hazard Mitigation Grant Program (HMGP) Application Period Extensions to Support Effective and Expedient Program Delivery.
- Provided additional guidance regarding Hazard Mitigation Grant Program assistance estimates and included aspects of the Policy Memo: Hazard Mitigation Grant Program Ceiling Update. The HMA Guide supersedes the policy memo and any FEMA materials or content relating to it.
- Under the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire, FEMA clarified that funds can only be obligated for new activities when the application period and the period of performance are open.
- Clarified that assistance for activities approved and obligated before the 12-month lock-in for the Hazard Mitigation Grant Program will not be de-obligated when the lock-in is less than the previous estimate.
- Updated information on Hazard Mitigation Grant Program assistance restrictions to include Project Scoping/Advance Assistance; 5% Initiative; 7% Planning; and 5% Codes and Standards.
- FEMA removed the “Additional 5% Initiative” and established “5% Codes and Standards.” The name and requirements have been updated to provide dedicated funding to strengthen the use of building codes and standards. This funding source must be used for codes and standards activities and may be paired with the 5% Initiative for a total of up to 10% of the Hazard Mitigation Grant Program ceiling amount.
- Clarified that the amount of Hazard Mitigation Grant Program assistance available under the disaster declaration would be apportioned amongst the applicants if there is more than one applicant under the disaster declaration.
- For the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire, clarified that recipients cannot receive an additional 5% for management costs if also applying as a subrecipient.
- Clarified that, for management cost calculation, the “total amount of the Hazard Mitigation Grant Program (HMGP) award” means the total amount of contributions based on applications submitted when the application period closes or when the total ceiling is determined, whichever is later.

- Clarified that, in cases where the recipient submits subapplications which exceeds the Hazard Mitigation Grant Program ceiling, FEMA will only calculate management costs on subapplication amounts up to the final ceiling amount.
- Added program-specific sections for Building Resilient Infrastructure and Communities and Hazard Mitigation Grant Program Post Fire and incorporated information from the respective program's policies.
- Added information on how federally recognized tribes may apply for Hazard Mitigation Grant Program Post Fire under a Fire Management Assistance Grant (FMAG) declaration.
- Added new program-specific sections on appeals (for Hazard Mitigation Grant Program, Hazard Mitigation Grant Program Post Fire, and Building Resilient Infrastructure and Communities) and reconsideration (for Flood Mitigation Assistance) processes for denied subapplications; clarified that appeals on denied subapplications are reviewed at FEMA headquarters.

## Part 11. Capability and Capacity Building

- Created guidance for capability and capacity building activities as eligible activity types; included dedicated sections for planning and planning-related activities, project scoping/advance assistance, technical assistance, codes and standards, and partnerships.
- Added content explaining how to update a mitigation plan.
- Added new information on building capability through delivery of technical assistance and training.
- Updated eligible planning-related activities to include specifics about how to integrate information from mitigation plans with climate adaptation planning efforts.
- Added a new section about codes and standards based on eligibility of activities under Building Resilient Infrastructure and Communities and expanded eligibility on same activities to Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire.
- Clarified that technical assistance includes both financial and nonfinancial technical assistance types.
- Added specific closeout requirements for mitigation planning and other mitigation activities. Clarified that for purposes of mitigation planning, a planning grant is generally considered complete (100% work completion) once the jurisdiction has adopted and FEMA has approved the plan.

## Part 12. Mitigation Projects

- Incorporated information from the previous 2015 HMA Guidance Addendum into the main Hazard Mitigation Assistance Program and Policy Guide document.
- Included an overview emphasizing nature-based solutions as one of the guiding principles behind all mitigation project types. The principles described in this section are in alignment with [FEMA's Building Community Resilience with Nature-Based Solutions: A Guide for Local Communities](#).

- Added new project type sections, including:
  - Aquifer Recharge, Storage, and Recovery.
  - Stabilization.
  - Floodproofing.
  - Tsunami Vertical Evacuation Refuge.
  - Retrofitting.
  - Secondary Power Source.
  - Warning Systems.
- Incorporated the requirements from [FEMA Policy #206-21-003-0001](#), Partial Implementation of the Federal Flood Risk Management Standard for Hazard Mitigation Assistance Programs (Dec. 7, 2022) under the applicable project types.
- For acquisition projects, modified clear title language to clarify that the subrecipient must conduct a title search for each property it plans to acquire.
- Clarified that for property acquired with FEMA grants in structure demolition or relocation projects, recipients and subrecipients are responsible for gaining approval from FEMA on any future land use change or property disposition issue.
- Incorporated [FEMA Policy #302-094-0333](#), Hazard Mitigation Assistance Acquisition Projects: Hydraulic Fracturing and Horizontal Directional Drilling (July 6, 2017).
- Incorporated FEMA policy clarification: Acquisition and Relocation or Demolition of Structures on or near Sinkholes (April 24, 2015), which clarified the eligibility of acquisition and relocation of demolition projects when the structure is subject to sinkhole hazards.
- Clarified that FEMA will no longer provide square-foot cost estimates for mitigation reconstruction projects.
- Updated content to reflect that non-localized flood risk reduction projects may be eligible for Flood Mitigation Assistance if the FEMA administrator specifically determines, while approving a hazard mitigation plan, that such activities are the most cost-effective mitigation activities for the [National Flood Mitigation Fund](#), reflecting revisions to the Flood Mitigation Assistance regulations effective as of Oct. 12, 2021.
- Consolidated project requirements and included elements from guidance documents and fact sheets that detail safe room eligibility criteria and requirements. Updated requirements to align with [FEMA P-361](#), Safe Rooms for Tornadoes and Hurricanes: Guidance for Community and Residential Safe Rooms, Fourth Edition (April 2021), and the 2020 edition of International Code Council (ICC) 500, ICC/National Storm Shelter Association Standard for the Design and Construction of Storm Shelters.



- Added additional information about properties that are contaminated with hazardous materials and the need for environmental assessments.
- Modified language in the Mitigation Reconstruction section in Part 12 to reflect requirements for inspections and certificates of occupancy.
- Added the Commonwealth of the Northern Mariana Islands to the list of areas eligible for pre-calculated benefits for residential hurricane wind retrofit projects.
- Expanded eligibility for wind retrofits to non-residential structures under Hazard Mitigation Grant Program, Hazard Mitigation Grant Program Post Fire, and Building Resilient Infrastructure and Communities.
- Included additional information about the cost-effectiveness of non-residential hurricane wind retrofits from the [Cost Effectiveness Determination for Non-Residential Hurricane Wind Retrofit Measures Funded by FEMA Memorandum](#).
- Included beach and dune nourishment as an eligible activity under shoreline stabilization. This change is based upon the [FEMA Policy #204-078-112-1, Eligibility of Flood Risk Reduction Measures under the Hazard Mitigation Assistance \(HMA\) Programs \(June 27, 2014\)](#).
- Included information about the eligibility of activities that mitigate extreme temperature, which comes from the [Mitigating the Risk of Extreme Temperatures with Hazard Mitigation Assistance Funds FEMA fact sheet](#).
- Included more information about the cost-effectiveness of floodwater diversion and storage projects, which comes from the FEMA Supplemental BCA Guidance for Floodwater Diversion and Storage Projects.
- Incorporated pre-calculated benefits as described in the [Benefit-Cost Analysis Efficiencies for Repetitive Loss and Severe Repetitive Loss Acquisition Projects Located Outside the Designated Special Flood Hazard Area FEMA memorandum \(Feb.15, 2022\)](#).
- Updated the pre-calculated benefits for property acquisitions, elevations and mitigation reconstruction projects in the Special Flood Hazard Area based on the memorandum published on Sept. 30, 2021.
- Incorporated content from the FEMA memorandum: [Pre-Calculated Benefits for Certain Hospital Generators to Demonstrate Cost-Effectiveness](#) (Sept. 29, 2021).
- Added a section on “Other Innovative Solutions” to capture the potential for other eligible projects that may not be explicitly mentioned in the HMA Guide.

## Part 13. Management Costs

- Consolidated management cost information from across the HMA Guide; [FEMA Policy #104-11-1, Hazard Mitigation Grant Program Management Costs \(Interim\) \(Nov. 14, 2018\)](#); and the [Hazard Mitigation Grant Program Management Costs Policy \(Interim\)](#) (March 23, 2020) frequently asked questions document.

- Added and updated language related to ineligible and eligible activities and application and submission information. This is based on Title 2 Code of Federal Regulations Part 200.
- Clarified that management costs are now available for all project types (no longer limited to project and planning subawards).
- Clarified how to calculate management costs based on the total amount of the award, subapplication requirements, and procedures for incremental obligation and closeout.
- Removed the provision from the interim policy requiring FEMA to develop an agreement with the recipient to outline the release of funding for management cost awards over \$6 million. FEMA instead incorporated information from the [Hazard Mitigation Grant Program Management Costs Policy \(Interim\)](#) frequently asked questions document that set thresholds for incremental funding requirements.
- Simplified information regarding when a subrecipient or recipient can claim management costs. FEMA clarified that management costs must be incurred within the subaward or award period of performance. The deadline to claim management costs is no longer tied to the completion of work or the latest period of performance for other projects. Additionally, there is no longer an eight-year period of availability.

## Part 14. Program Administration by States

- Created a new part from the Program Administration by State Pilot Addendum (2017) but retained the program as a pilot.
- Updated language to include new programs (Building Resilient Infrastructure and Communities and Hazard Mitigation Grant Program Post Fire).
- Updated grants management performance measures to align with [State Plan Review Guide](#).
- Added “States will also update the Mitigation Planning Portal” to the list of activities that states requesting delegation of local mitigation plan approvals are expected to complete.
- Updated the disaster delegation of local hazard mitigation plan approval to include the following substantive change: “FEMA will conduct at least one plan review audit each year based on random selection.”

## Part 15. FEMA Contacts

- Updated contact information and resources.

## Part 16. Appendices

- Moved the “Environmental and Historic Preservation Checklist” to Part 6.
- Made minor updates to the Hazard Mitigation Grant Program Minimum Criteria Checklists for Project Subapplications and Planning Subapplications.

## Questions

Please send all questions to [fema-hma-guide@fema.dhs.gov](mailto:fema-hma-guide@fema.dhs.gov).