

Guidance for Flood Risk Analysis and Mapping

Key Decision Point (KDP) Process Guidance Document

December 2020



FEMA

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/library>.

Table of Revisions

The following summary of changes details revisions to this document subsequent to its most recent version in Feb. 2018.

Affected Section or Subsection	Date	Description
Minor updates to section 4.2.1	February 2018	Adds a pre-KDP5 FEDD file review to the timing and workflow of the KDP5 process.
Significant updates to document	December 2020	Revise the Key Decision Point process flow to remove the final Headquarters review for KDPs 2-4. This final review/approval has been delegated to the FEMA Regions.

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1.0 Introduction

The Key Decision Point (KDP) process is a formal method to document the decision to advance forward in a Flood Risk Project's life cycle at six distinct points and to document the rationale behind these decisions. This guidance document outlines the expectations and actions required at each of the six KDPs and describes the process FEMA Regions and Headquarters will follow to document, review, and approve each KDP.

The KDPs and their documentation add a level of formality to the existing Risk MAP planning and decision-making processes already in use and provide a system of record for these decisions.

The KDPs document answers to the following questions:

- KDP 0: Is FEMA ready to initiate this Flood Risk Project?
- KDP 1: Is FEMA ready to continue this Flood Risk Project?
- KDP 2: Is FEMA ready to develop a Preliminary Flood Insurance Rate Map (FIRM) and Flood Insurance Study (FIS) for this Flood Risk Project?
- KDP 3: Is FEMA ready to issue the Preliminary FIRM and FIS to the community for this Flood Risk Project?
- KDP 4: Is FEMA ready to initiate an Appeal Period for this Flood Risk Project?
- KDP 5: Is FEMA ready to issue the Letter of Final Determination (LFD) for this Flood Risk Project?

Figure 1 illustrates the timing of each KDP relative to a generalized Flood Risk Project process.

A more detailed version of the figure below, outlining the various stages of a Flood Risk Project and the intersections with each KDP is provided in Appendix A: KDP Process Flowchart.

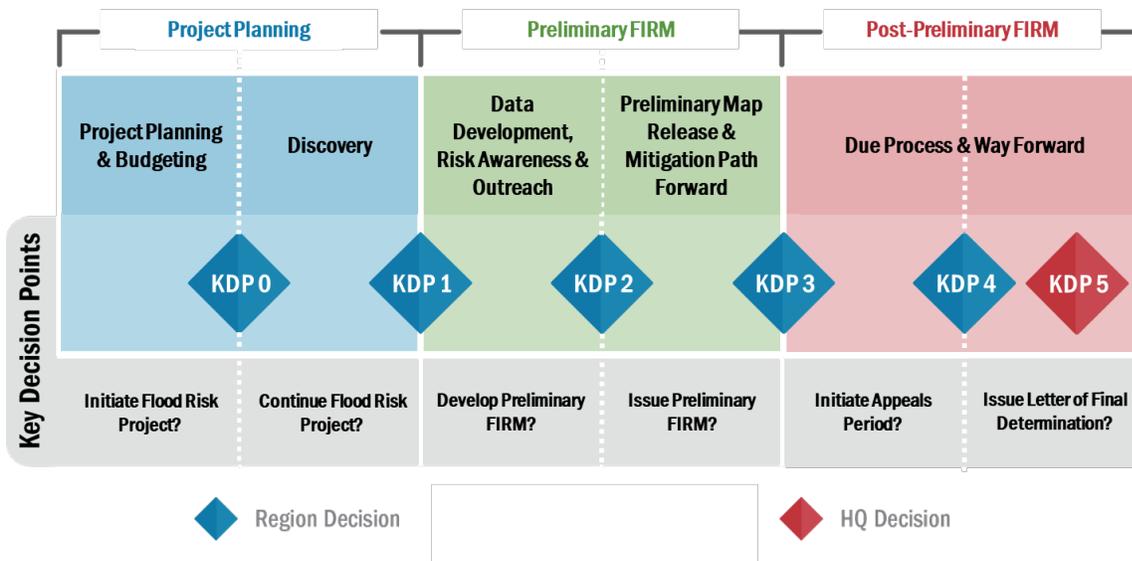


Figure 1: High-level KDP Process

Also, highlighted in Figure 1 is where the authority for each KDP decision rests. Project Planning and Preliminary FIRM KDPs are regional decisions as regional personnel are closest to the project subject matter and can provide approval to advance the Flood Risk Project. Once these KDPs have been documented, the FEMA Region can immediately move on to the next phase of the process. Project Planning and Preliminary FIRM KDPs are regional decisions as regional personnel are closest to the project subject matter and can provide approval to advance the Flood Risk Project. Once these KDPs have been documented, the region can immediately move on to the next phase of the process.

As with KDPs 0-3, the regions will complete the KDP documentation and provide final approval to advance the Flood Risk Project for KDP 4. For KDP 5, regions will complete the KDP documentation but cannot move forward until Headquarters reviews the submitted documentation and provides a “Go” determination. More information on the decision-making process (e.g., FEMA Headquarters review cycles, timing, etc.) is discussed in subsequent sections of this document.

There are a number of Risk MAP Standards that relate to the KDP Process. Information about the FEMA Risk MAP Standards can be found at [FEMA.gov](https://www.fema.gov).

Projects Requiring KDPs

Adherence to the KDP process is required for all Flood Risk Projects. A Flood Risk Project is defined as any FEMA-funded Risk MAP project that will go through the Discovery process, Local Levee Partnership Team (LLPT) process, or similar process with the intention of producing regulatory and/or Flood Risk Datasets.

Additionally, all Physical Map Revisions (PMRs) requiring investment from FEMA must go through the KDP process. This includes both FEMA-initiated PMRs and community-initiated PMRs. Community-initiated PMRs will enter the KDP process with KDP Number 2 and continue through

KDP Number 5. See section 3.1.1 for additional information about the KDP entry point for community-initiated PMRs.

Letters of Map Revision (LOMR) projects are not subject to the KDP process.

1.1. KDP Process Implementation Timeline

All Flood Risk Projects must comply with the full KDP process unless they were initiated before January 2015. All projects initiated prior to that date will only be expected to complete subsequent KDPs. These projects will not have to retroactively document previously made decisions. Therefore, for previously initiated Flood Risk Projects, FEMA Regions will only be required to apply the KDP process towards future work, not work which has occurred in the past.

1.2. KDP Documentation and Review Process

All KDPs will be documented and stored in the KDP Documentation Tool on the Risk MAP Program's SharePoint site:

<https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>

The KDP Documentation Tool will be managed and supported by the FEMA Headquarters and Regional Program Management (PM) team. For KDPs 0-4, Regional Program Management Leads (RPMLs) will support regions in facilitating the KDP documentation and approval process that best suit the needs of the region. For KDP 5, the Headquarters PM team will export and summarize KDP data from the tool for FEMA Headquarters staff to review on a set cycle.

The Headquarters PM team will also monitor key Mapping Information Platform (MIP) data points to alert regions when a Flood Risk Project has reached a KDP or advanced past a KDP without proper documentation. The processes for entering data into the KDP Documentation Tool, the review cycles, and associated MIP data points are described in detail for each KDP in subsequent sections. A full calendar of KDP Headquarters review cycles for KDP 5 is provided in Appendix B: High-Level Headquarters KDP Review Cycle Calendar.

2.0 Project Planning for each KDP

Each FEMA Region approaches multi-year planning and sequencing differently, and, as a result, the information captured in this phase will vary. Because of this, the decision process for advancing Flood Risk Projects past this stage will vary as well. KDP 0 and KDP 1 will document the regional decisions to initiate and to continue a Flood Risk Project, respectively, and will capture the intent with which these decisions were made.

2.1. KDP 0 – Initiate Flood Risk Project

KDP 0 documents the regional decision to initiate a Flood Risk Project or group of Flood Risk Projects and captures the rationale for this decision. KDP 0 documentation should explain the reason that the project was selected over others and include information that led to this project being identified, such as State multi-year plans, community engagement outcomes, or Coordinated Needs Management Strategy (CNMS) data. Should any data development type

tasks become necessary at this point in the project lifecycle, before moving into data development, it should be clearly expressed in the KDP 0 documentation. See MIP User Care for a list of tasks associated with data development.

KDP 0 is unique in that documented decisions to advance forward can be for an individual Flood Risk Project or a group of similar Flood Risk Projects. If each Flood Risk Project was completed separately and had the identical documentation then they could be grouped into a single KDP 0 submittal.

2.1.1. KDP 0 Timing

KDP 0 must be documented before creating a project in the MIP or generating a FEMA Case Number. KDP 0 will generally occur once Headquarters has distributed the Planning and Funding Memorandum and coordination has occurred on regional targets. This timing also aligns with further defining project purchases that are currently contained in the Project Planning and Purchasing Portal (P4) tool. The documentation of KDP 0 may occur once the decision to advance to the Discovery process, initiate an LLPT, or initiate other data-related tasks (e.g., Base Level Engineering (BLE), etc.) has been made. The KDP 0 documentation must be completed before advancing to these tasks. Figure 2 provides a general workflow for formulating the KDP 0 decision and when it should be documented.

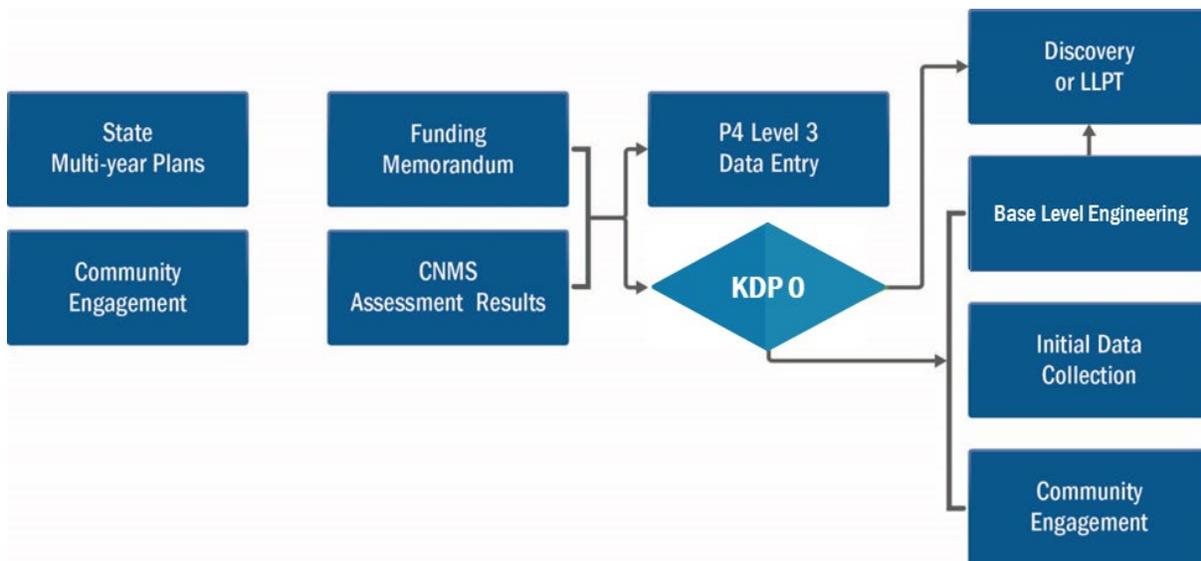


Figure 2: KDP 0 Workflow

If the FEMA Region decides against initiating a Flood Risk Project, no KDP 0 documentation is required. However, it is suggested that FEMA Regions retain any information collected to support the decision to inform future decisions.

2.1.2. KDP 0 Documentation and Review Procedures

Once the decision is made to move a project into the Discovery and/or data development purchases and tasks, the Regional Branch Chief, or their designee, must document the KDP 0 decision in the KDP Documentation Tool located on the FEMA Risk MAP SharePoint site at the

following location: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. While ultimate decision making authority for KDP 0 lies with the Regional Branch Chief, a designee may be selected to document the information in the KDP Documentation Tool on the Regional Branch Chief's behalf. KDP 0 also provides space to document the endorsement of other project stakeholders (e.g., State National Flood Insurance Program (NFIP) Coordinator, State Hazard Mitigation Officer).

As each FEMA Region operates differently, regions are responsible for developing the internal processes for coordinating endorsement from stakeholders and documenting KDP 0. A region can advance to the next stage of the Flood Risk Project as soon as KDP 0 documentation is submitted, as Headquarters approval is not required.

Headquarters will review all documented KDP 0 decisions for awareness purposes on a monthly basis, realizing the majority of KDP 0 documentation will occur during the same few months of the fiscal year. On the first business day of the month, the Headquarters PM team will export all of the KDP 0 documentation that was entered into the KDP Documentation Tool during the previous month.

Additionally, the Headquarters PM team will export from the MIP all Discovery purchase and task information that began in the previous month. The Discovery purchase and task information will be used by the Headquarters PM team to identify any projects that have moved past KDP 0 without the decision being documented. On the second business day of the month, regions who have not documented KDP 0 will be notified of their non-compliance via an email from the Headquarters Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee.

The Headquarters PM team will summarize all KDP 0 documentation exported from the KDP Documentation Tool by the 18th business day of the month and send the summary to the Headquarters Engineering Services Branch Chief, or their designee, for review. The Headquarters Engineering Services Branch Chief, or their designee, will review the summary provided by the 19th business day of the month and, by the 20th business day of the month, notify the Regional Branch Chief, or their designee, if there are any comments or questions about the documentation. The KDP 0 Headquarters review process is outlined in the flow chart in Figure 3.

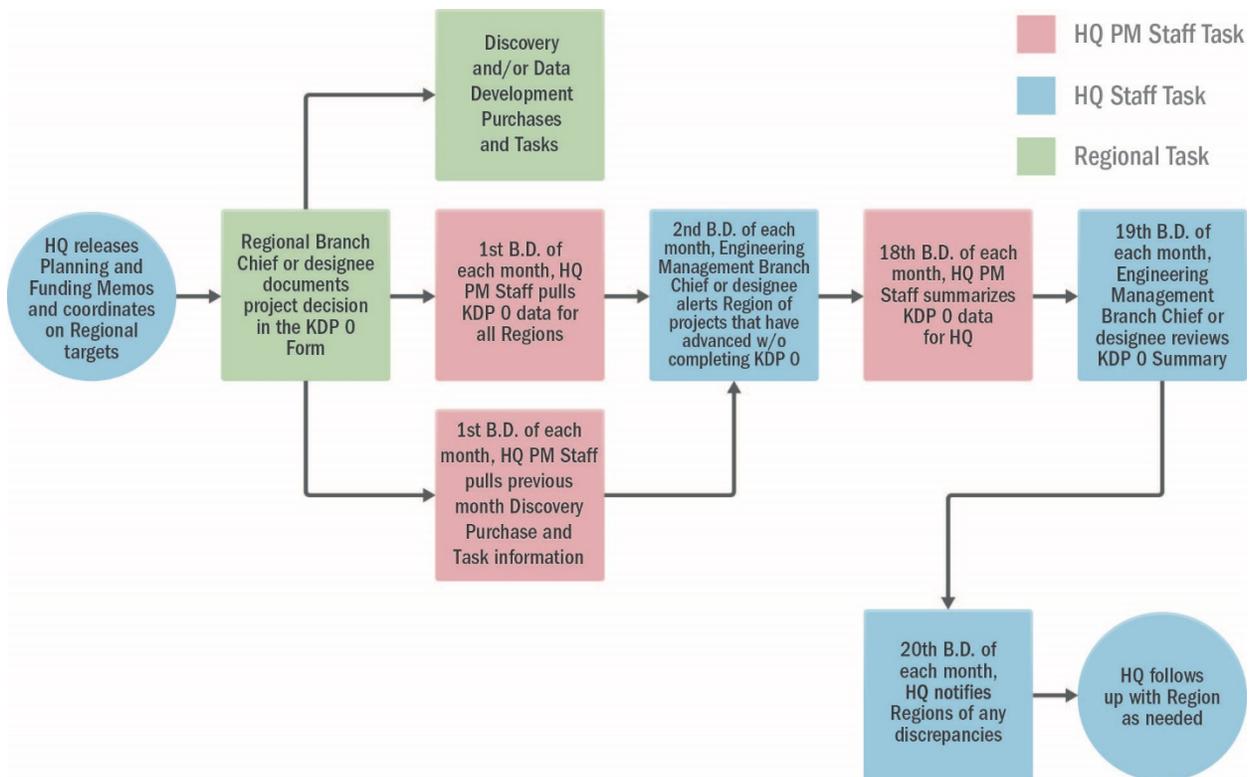


Figure 3: KDP 0 Headquarters Review Process Flowchart

2.2. KDP 1 – Continue Flood Risk Project

KDP 1 documents the regional decision to move forward with a Flood Risk Project through data development, risk awareness, and/or outreach tasks and captures the rationale for this decision. KDP 1 documentation should document the information gained through the Discovery process, LLPT, BLE, and/or community engagement. The information provided should explain the needs identified, provide an understanding of the data available, and include any additional information to support the continuation of the Flood Risk Project. Expected changes to program metrics (e.g., Deployment, New, Validated, or Updated Engineering [NVUE] Initiated) are also captured at KDP 1.

2.2.1. KDP 1 Timing

KDP 1 must occur before new data development purchases and tasks are created in the MIP. KDP 1 will generally occur following the closeout of the Discovery process, LLPT process, or other related data tasks. While KDP 1 must occur before new data development purchases and tasks are created, it may be documented at any time once the decision to move forward to new data development purchases and tasks occurs. Figure 4 provides a general workflow for formulating the KDP 1 decision and when it should be documented.

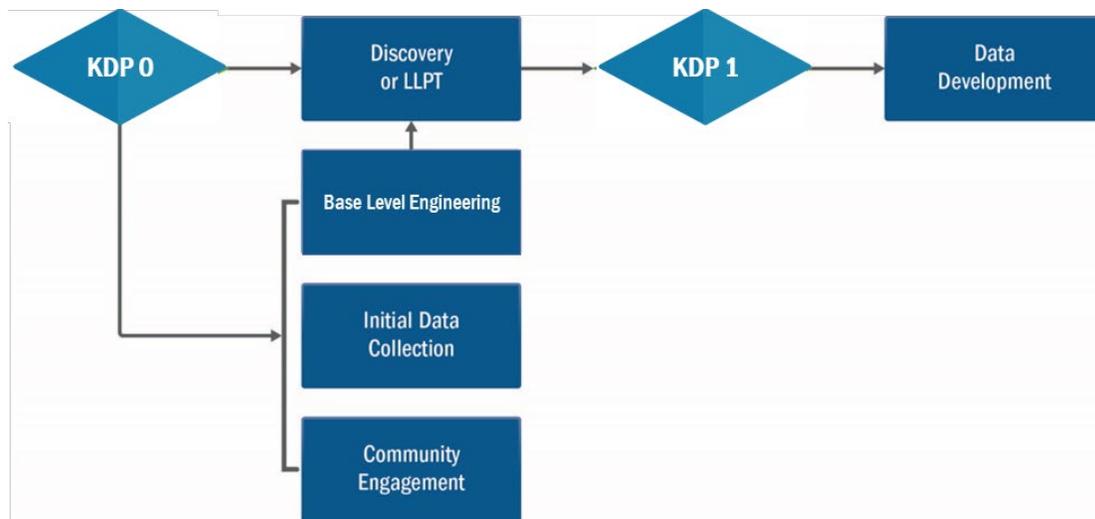


Figure 4: KDP 1 Workflow

Data development purchases and tasks following KDP 1 may vary depending on the identified goals of the project and the findings that resulted from the KDP 0 investments.

2.2.2. KDP 1 Documentation and Review Procedures

The Regional Branch Chief, or their designee, must document the KDP 1 decision in the KDP Documentation Tool located on the FEMA Risk MAP SharePoint site at the following location: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. While decision making authority for KDP 1 lies with the Regional Branch Chief, a designee may be selected to document the information in the KDP Documentation Tool on the Regional Branch Chief’s behalf. KDP 1 also provides space to document the endorsement of other project stakeholders (e.g., State NFIP Coordinator, State Hazard Mitigation Officer). As each FEMA Region operates differently, regions are responsible for developing the internal processes for coordinating endorsement from stakeholders and documenting KDP 1. A region can advance to the next stage of the Flood Risk Project as soon as KDP 1 documentation is submitted, as Headquarters approval is not required.

Headquarters will review all documented KDP 1 decisions for awareness purposes on a monthly basis. On the first business day of the month, the Headquarters PM team will export all of the KDP 1 documentation entered into the KDP Documentation Tool during the previous month. Additionally, the Headquarters PM team will export from the MIP all Discovery and data development purchase and task information occurring in the previous and current month.

The Discovery and data development purchase and task information will be used by the Headquarters PM team to identify any projects which have finished the Discovery process and have entered into the KDP 1 window.

The data development purchase or task information will be used by the Headquarters PM team to identify any projects, which have, or will be moving on to new data development purchases and tasks without documenting KDP 1. On the second business day of the month, regions that have not documented KDP 1 will be notified of their non-compliance via an email from the Headquarters

Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee. The Regional Branch Chief, or their designee, will be expected to submit the KDP 1 documentation before the next scheduled KDP data pull or coordinate with the Headquarters Engineering Services Branch Chief on an alternate approach.

The Headquarters PM team will summarize all KDP 1 documentation exported from the KDP Documentation Tool by the 18th business day of the month and send the summary to the Headquarters Engineering Services Branch Chief, or their designee, for review. The Headquarters Engineering Services Branch Chief, or their designee, will review the summary provided by the 19th business day of the month and, by the 20th business day of the month, notify the Regional Branch Chief, or their designee, if there are any comments or questions about the documentation. The KDP 1 Headquarters review process is outlined in the flow chart in Figure 5.

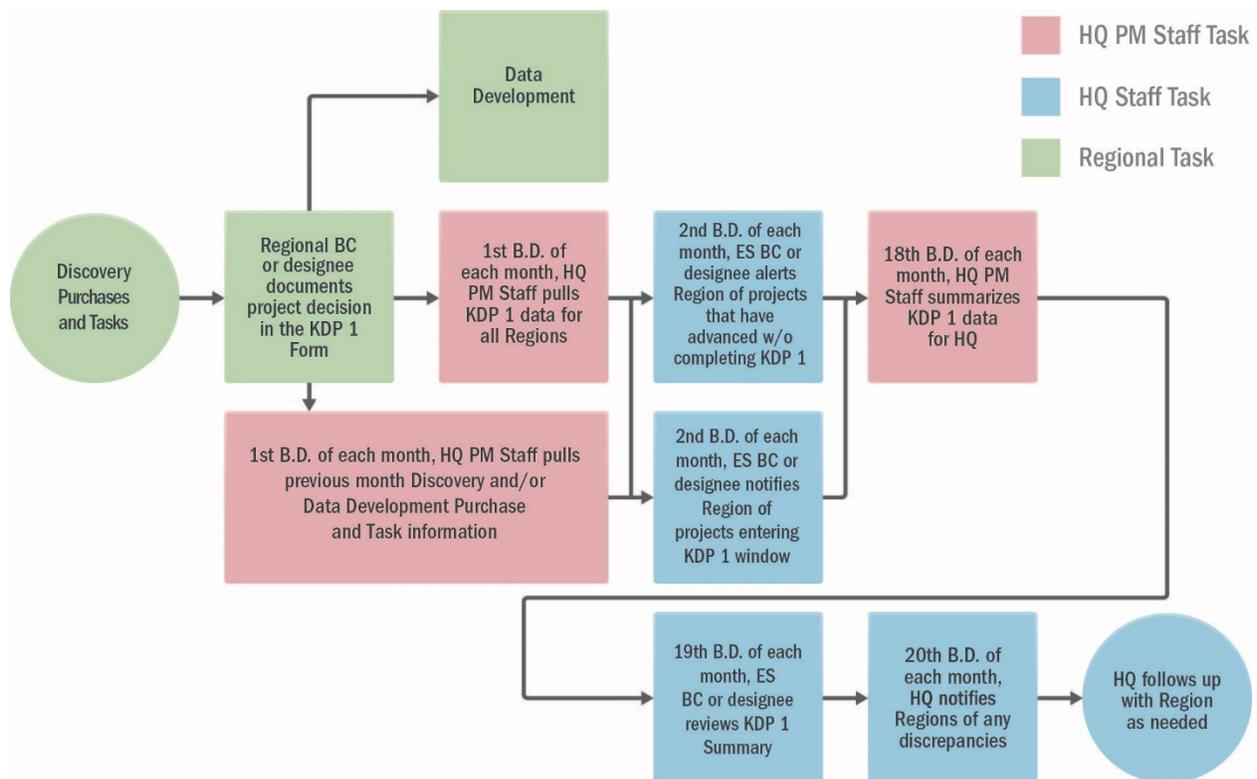


Figure 5: KDP 1 Headquarters Review Process Flowchart

3.0 Preliminary FIRM

KDP 2 and KDP 3 will document the decision to develop and distribute Regulatory Products, respectively, and will capture the intent with which these decisions were made. Within FEMA's internal business processes, the decision to develop a Preliminary FIRM affirms that the Regulatory Process of updating a community's FIRM should continue. Some components of Flood Risk Projects will be consistent across all regions, such as data development standards, quality reviews, and Congressional and property owner notification timelines. Other components, however, such as the timing of community meetings and the development of Flood Risk Datasets may vary from region to region. This variation is expected and should not affect the documentation of Preliminary FIRM KDPs.

It should be noted that the graphics presented in this section are depictions of typical Flood Risk Projects and may not accurately represent how every FEMA Region operates.

3.1. KDP 2 – Develop Preliminary FIRM

KDP 2 documents the FEMA Regional decision to develop a Preliminary FIRM and captures the rationale for this decision. Information captured during KDP 2 is used to understand the impacts of the new flood hazard data compared to the current effective data. Additional information captured at KDP 2 describes the impact of levees on the project area, ensures community engagement has been ongoing following Discovery, and ensures all data has been collected to

lessen the likelihood of Appeals based on new data. KDP 2 is also intended to capture the development and delivery strategy, if applicable, for any Flood Risk Datasets.

3.1.1. KDP 2 Timing

KDP 2 must be completed before Preliminary FIRM development begins (e.g., before Quality Review [QR] 1 is submitted). KDP 2 will generally occur once community coordination has occurred, including the community meetings where flood hazard changes are discussed, and draft data is shared. KDP 2 will also follow completion of data development tasks in the MIP.

Additionally, KDP 2 is the first KDP for community-initiated PMR projects. For these projects, KDP 2 can be documented as soon as the PMR project has been created in the MIP and the decision to develop a Preliminary FIRM has been made. Once receiving KDP 2 approval, regions are responsible for notifying and coordinating a path forward with all Cooperating Technical Partners (CTPs) and mapping partners. Figure 6 provides a workflow for formulating the KDP 2 decision and when it should be documented.

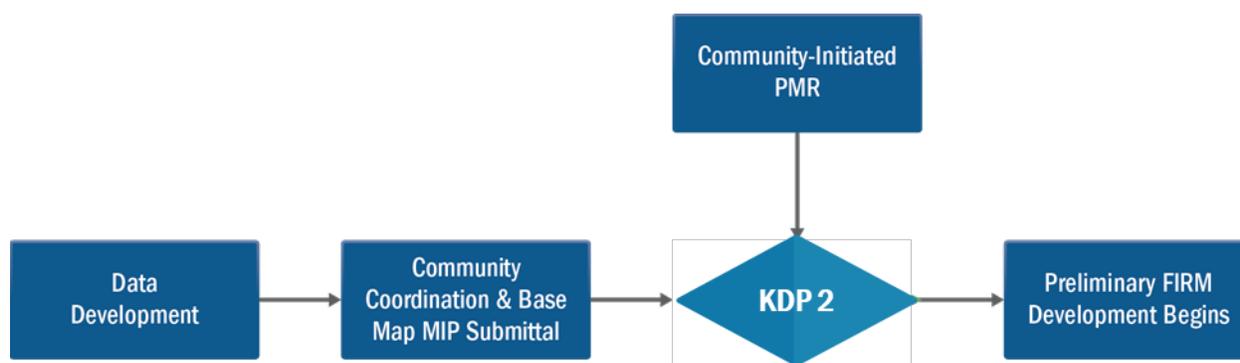


Figure 6: KDP 2 Workflow

There may be instances where single projects coming out of KDP 1 will develop more than one Preliminary FIRM (e.g., separate counties within the project require individual Preliminary FIRMs). The impact of each individual Preliminary FIRM and the changes resulting since the previous Effective FIRM will be quantified for each Preliminary FIRM that is developed and should be documented accordingly. In these instances, KDP 2 documentation, and all subsequent KDPs, will be required for each Preliminary FIRM developed when it reaches the described point in the workflow. Alternately, if changes are consistent across multiple counties and timeframes align, KDP 2 information for these counties can be documented and submitted together.

3.1.2. KDP 2 Documentation and Review Procedures

Once the determination has been made to develop Preliminary FIRMs for a Flood Risk Project or a community-initiated PMR, the Regional Branch Chief, or their designee, must document the KDP 2 decision in the KDP Documentation Tool located on the FEMA Risk MAP SharePoint site: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. Because KDP 2 is a FEMA Regional decision, the region may advance to the next phase of Flood Risk Project development once the Regional Branch Chief, or their FEMA designee, issues final approval on the KDP. As each FEMA Region operates differently, regions are responsible for developing internal processes for documenting KDP 2.

Regions may facilitate the KDP process to issue final approval on KDP 2 documentation in a cadence, and process flow, that best fit the needs of the region. Prior to advancing to the next phase of Flood Risk Project development, the KDP 2 must receive final approval from the Regional Branch Chief, or their FEMA designee.

In the event the “Go” field on the SharePoint KDP form is selected by the Regional Branch Chief, or their FEMA designee, an automated email will be sent to notify the Regional Branch Chief, RPML, Headquarters PM Team, Headquarters Engineering Services Branch Chief, or their designee, and any identified regional support. In the event of additional information being necessary for a decision to be made, the Regional Branch Chief, or their designee, will coordinate with the region to obtain the additional data and ensure all questions are answered.

A recommended Regional KDP 2-4 review process is outlined in the flow chart in Appendix C.

On the first business day of the month, the Headquarters PM team will export all of the KDP 2 documentation entered into the KDP Documentation Tool. Additionally, the Headquarters PM team will export from the MIP all data development purchase and task information updated since the previous conformance report was issued.

The data development purchase and task information will be used by the Headquarters PM team to identify any projects which have moved into the KDP 2 window since the previous review cycle. On the second business day of the month, the Headquarters Engineering Services Branch Chief, or their designee, will email Regional Branch Chiefs, or their designee, of projects that have entered the KDP 2 window, but not yet completed KDP 2 documentation to ensure awareness and avoid project delays.

The data development purchase and task information will also be used by the Headquarters PM team to identify any projects which have, or will be submitting, the FIRM to the FIRM database without documenting KDP 2. On the second business day of the month, FEMA Regions that have not documented KDP 2 will be notified of their non-compliance, via an email from the Headquarters Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee. The Regional Branch Chief, or their designee, will be expected to submit the KDP 2 documentation before the next scheduled KDP data pull or coordinate with the Headquarters Engineering Services Branch Chief on an alternate approach

3.2. KDP 3 – Distribute Preliminary Products

KDP 3 documents the regional decision to distribute the Preliminary FIRM and FIS to communities and captures the rationale for this decision. Information documented at KDP 3 is used to verify all quality assurances have been met to distribute a technically credible product and the systems of record, such as the MIP, CNMS and any other systems, have been updated or are scheduled to be updated within the allotted time frame.

KDP 3 is also intended to capture the delivery strategy, if applicable, for any Flood Risk Datasets.

3.2.1. KDP 3 Timing

KDP 3 must be completed prior to any Regulatory Products being released to communities. KDP 3 will generally occur following the resolution of all issues found during QR3. KDP 3 acts as an intentional pause in the project before the Preliminary FIRM and FIS is distributed so the region can review the products being provided to communities. Once receiving KDP 3 approval, regions are responsible for notifying and coordinating a path forward with all CTPs and mapping partners. Figure 8 provides a general workflow for formulating the KDP 3 decision and when it should be documented.

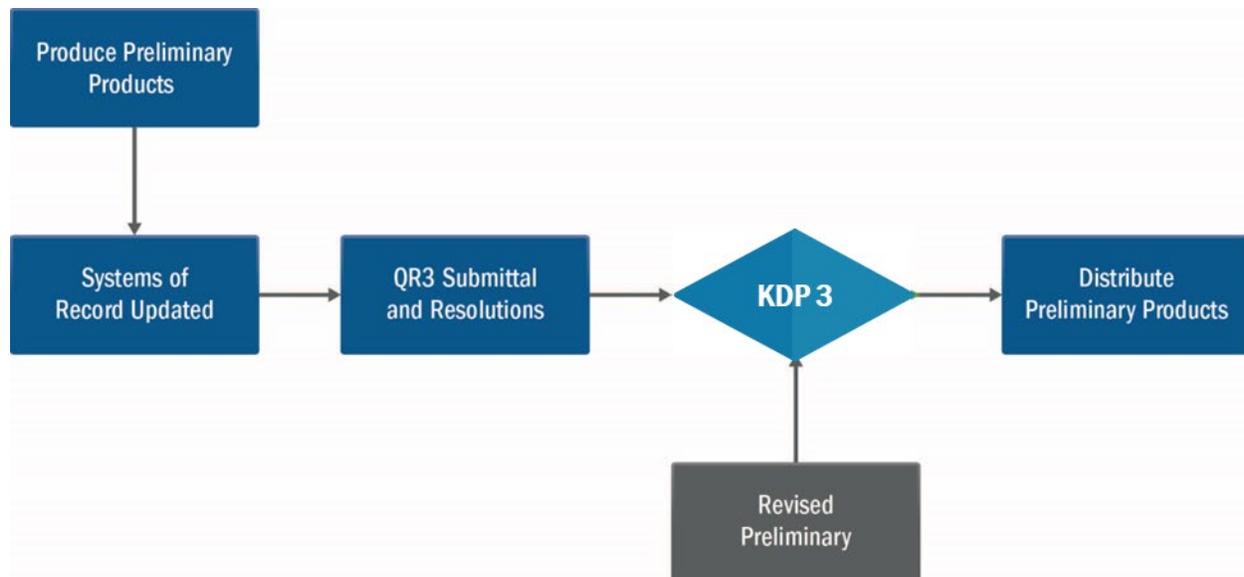


Figure 7: KDP 3 Workflow

There may be instances where single projects coming out of KDP 2 will issue more than one Preliminary FIRM (e.g., different counties within the project release Preliminary FIRMs on different dates). While Preliminary FIRMs may be developed simultaneously, the decision to distribute each Preliminary FIRM is being made according to different timeframes, and should, therefore, be documented accordingly. In these instances, KDP 3 documentation, and all subsequent KDPs, will be required for each Preliminary FIRM released when it reaches the described point in the workflow. Alternately, if changes are consistent across multiple counties and time frames align, KDP 3 information for these counties can be documented and submitted together.

In instances when a Revised Preliminary must be issued, and a second statutory Appeal Period is required, the Regional Branch Chief, or their designee, must update the KDP 3 documentation to reflect the cause of the change and resolution approach. If there is no KDP 3 documentation in the KDP Documentation Tool to edit (e.g., the Revised Preliminary is for a project begun prior to the KDP Process being implemented), a new KDP 3 form must be completed. The updated KDP 3 documentation, in this case, would require Regional Branch Chief, or their FEMA designee, approval before issuing the Revised Preliminary FIRM (i.e., the KDP 3 documentation must be reviewed and approved by the region in the KDP Documentation Tool). Additionally, this case would necessitate KDP 4 be updated and approved by the region.

In instances when a Revised Preliminary must be issued but a second statutory Appeal Period is not required, the Regional Branch Chief, or their designee, must update the KDP 3 documentation to reflect the cause of the change and resolution approach. If there is no KDP 3 documentation in the KDP Documentation Tool to edit (e.g., the Revised Preliminary is for a project begun prior to the KDP Process being implemented), a new KDP 3 form must be completed. In this instance, the updated KDP 3 documentation would require no further regional approval before issuing the Revised Preliminary FIRM (i.e., the KDP 3 documentation must be saved in the KDP Documentation Tool, but does not require additional regional review). In these instances, no change would be necessary to previously documented KDP 4 information; however, if no KDP 4 documentation exists in the KDP Documentation Tool, a new KDP 4 form must be created and saved to explain that a second Appeal Period is unnecessary, and the project will be moving forward.

3.2.2. KDP 3 Documentation and Review Procedures

Once the determination has been made to distribute the Preliminary FIRM and FIS to communities, the Regional Branch Chief, or their designee, must document the KDP 3 decision in the KDP Documentation Tool on the Risk MAP SharePoint site at the following location: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. Because KDP 3 is a FEMA Regional decision, the region may advance to the next phase of Flood Risk Project development once the Regional Branch Chief, or their FEMA designee, issues final approval on the KDP. As each FEMA Region operates differently, regions are responsible for developing the internal processes for documenting KDP 3.

On the first business day of the month, the Headquarters PM team will export all of the KDP 3 documentation entered into the KDP Documentation Tool. Additionally, the Headquarters PM team will export from the MIP all data development and Preliminary purchase and task information updated since the previous conformance report was issued.

The data development and Preliminary purchase and task information will be used by the Headquarters PM team to identify any projects which entered the KDP 3 window during the previous review cycle. On the second business day of the month, the Headquarters Engineering Services Branch Chief, or their designee, will email Regional Branch Chiefs, or their designee, of projects that have entered the KDP 3 window, but not yet completed KDP 3 documentation to ensure awareness and avoid project delays.

The Preliminary purchase and task information will be used by the Headquarters PM team to identify any projects which have or will be submitting Preliminary FIRMs in the current review cycle without documenting KDP 3. On the second business day of the month, FEMA Regions who have not documented KDP 3 will be notified of their non-compliance, via an email from the Headquarters Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee. The Regional Branch Chief, or their designee, will be expected to submit the KDP 3 documentation before the next scheduled KDP data pull or coordinate with the Headquarters Engineering Services Branch Chief on an alternate approach.

Regions may facilitate the KDP process to issue final approval on KDP 3 documentation in a cadence, and process flow, that best fit the needs of the region. Prior to advancing to the next

phase of Flood Risk Project development, the KDP 3 must receive final approval from the Regional Branch Chief, or their FEMA designee. In the event the “Go” field on the SharePoint KDP form is selected by the Regional Branch Chief, or their FEMA designee, an automated email will be sent to notify the Regional Branch Chief, RPML, Headquarters PM Team, Headquarters Engineering Services Branch Chief, or their designee, and any identified regional support. In the event of additional information being necessary for a decision to be made, the Regional Branch Chief, or their designee, will coordinate with the region to obtain the additional data and ensure all questions are answered.

A recommended Regional KDP 2-4 review process is outlined in the flow chart in Appendix C.

4.0 Post-Preliminary FIRM KDPs

KDP 4 and KDP 5 will fit into the existing Post-Preliminary Process (PPP). The PPP includes the 30-day review and comment period occurring after Preliminary FIRMs are distributed, the 90-day statutory Appeal Period, and map adoption by affected communities. KDP 4 and KDP 5 will document the decision to initiate an Appeal Period and issue a Letter of Final Determination (LFD), respectively, and will capture the intent with which these decisions were made.

4.1. KDP 4 – Initiate Appeal Period

KDP 4 documents the regional decision to initiate the Appeal Period and captures the rationale for this decision. Information captured during KDP 4 is used to understand if communities impacted by the regulatory FIRM have been properly engaged through community meetings and other information-sharing approaches and all process requirements have been addressed. Additionally, KDP 4 documents that the Technical Support Data Notebook (TSDN) is prepared if requested by a potential appellant.

4.1.1. KDP 4 Timing

KDP 4 must occur before the region authorizes the mapping partner to initiate population of the Flood Hazard Determination within the MIP. Concurrently, with Quality Review 4 Part 1 review of the Populate FHD submission, the mapping partner must also submit all required Flood Elevation Determination Docket (FEDD) File components for the Interim FEDD Review 1. KDP 4 will typically occur after the region has communicated with affected communities to ensure they understand the impacts of moving forward with the regulatory process and their statutory rights. This typically occurs via community meetings, which may include the Consultation Coordination Officer (CCO) meeting, the Community Open House meeting, or other meetings used for engaging local officials. This can also occur via webinars or other platforms coordinated by the FEMA Region. Once receiving KDP 4 approval, regions are responsible for notifying and coordinating a path forward with all CTPs and mapping partners. KDP 4, Interim FEDD File Review 1, and QR4 Part 1 must all be approved prior to the proposed notice being routed for Federal Register publication. Figure 10 provides a general workflow for formulating the KDP 4 decision and when it should be documented.

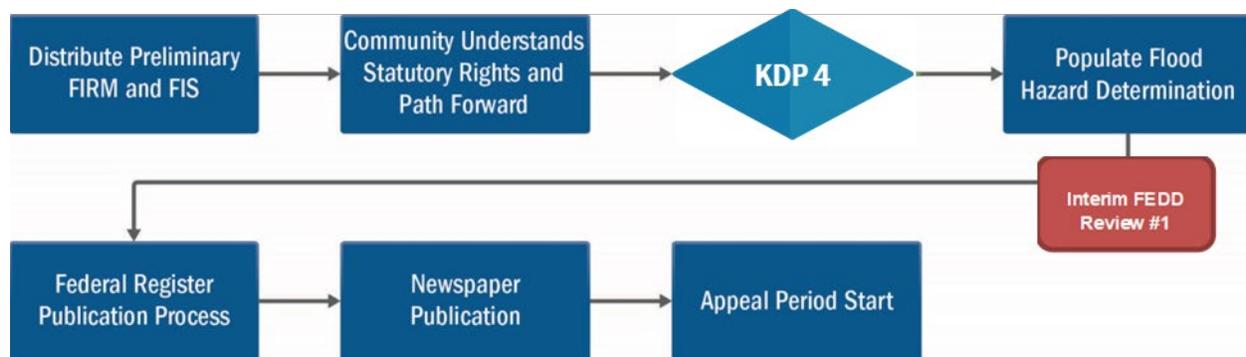


Figure 8: KDP 4 Workflow

Revised Preliminary projects requiring an additional Appeal Period will also require an updated KDP 4. For these projects, the KDP 4 section of the KDP Documentation Tool requesting Appeal information should be updated and resubmitted for approval. If there is no KDP 4 documentation in the KDP Documentation tool to edit (e.g., the Revised Preliminary is for a project begun prior to the KDP Process being implemented), a new KDP 4 form must be completed. Once submitted, the Revised Preliminary Appeal Period process will follow the same approval method as all KDP 4 projects.

4.1.2. KDP 4 Documentation and Review Procedures

Once the determination has been made to move a project to the Appeal Period, the Regional Branch Chief, or their designee, must document the KDP 4 decision in the KDP Documentation Tool located on the FEMA Risk MAP SharePoint site at the following location: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. Because KDP 4 is a regional decision, the region may advance to the next phase of Flood Risk Project development once the Regional Branch Chief, or their FEMA designee, issues final approval on the KDP. As each FEMA Region operates differently, regions are responsible for developing the internal processes for documenting KDP 4.

On the first business day of the month, the Headquarters PM team will export all of the KDP 4 documentation that was entered into the KDP Documentation Tool. Additionally, the Headquarters PM team will export from the MIP all Preliminary and Due Process purchase and task information updated since the previous conformance report was issued.

The Preliminary purchase and task information will be used by the Headquarters PM team to identify any projects which have delivered Preliminary FIRMs to communities and moved into the KDP 4 window but have yet to document KDP 4. On the second business day of the month, the Headquarters Engineering Services Branch Chief, or their designee, will email Regional Branch Chiefs, or their designee, of instances of projects that have moved into the KDP 4 window, but KDP 4 documentation has not been input into the KDP Documentation Tool to ensure awareness and avoid project delays. While a project may have entered into the KDP 4 window, community outreach and the decision to begin an Appeal Period must occur before KDP 4 can be documented.

The Due Process purchase and task information will be used by the Headquarters PM team to identify any projects, which have or will be beginning the Appeal Period without documenting KDP 4. On the second business day of the month, regions who have not documented KDP 4 will be notified of their non-compliance, via an email from the Headquarters Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee. The Regional Branch Chief, or their designee, will be expected to immediately coordinate with the Headquarters Engineering Services Branch Chief on a path forward.

Regions may facilitate the KDP process to issue final approval on KDP 4 documentation in a cadence, and process flow, that best fit the needs of the region. Prior to advancing to the next phase of Flood Risk Project development, the KDP 4 must receive final approval from the Regional Branch Chief, or their FEMA designee. In the event the “Go” field on the SharePoint KDP form is selected by the Regional Branch Chief, or their FEMA designee, an automated email will be sent to notify the Regional Branch Chief, RPML, Headquarters PM Team, Headquarters Engineering Services Branch Chief, or their designee, and any identified regional support. In the event of additional information being necessary for a decision to be made, the Regional Branch Chief, or their designee, will coordinate with the region to obtain the additional data and ensure all questions are answered.

A recommended Regional KDP 2-4 review process is outlined in the flow chart in Appendix C.

4.2. KDP 5 – Issue Letter of Final Determination

KDP 5 documents the Headquarters decision to issue the LFD and captures the rationale for this decision. Information captured during KDP 5 is used to understand the level of community engagement that has occurred, and appropriate Congressional coordination has taken place. If Appeals were submitted, information about how they were addressed and resolved is also documented in KDP 5. An assurance that the due process requirements have been addressed should be documented as well.

4.2.1. KDP 5 Timing

KDP 5 must occur before the region authorizes the mapping partner to prepare the final map products, the QR5, QR6, and QR7 packages, and the FEDD File. KDP 5 will generally occur after all Appeals have been resolved. Prior to submitting the KDP 5 form an interim FEDD file review (interim review #2) must be submitted and pass review.

The LFD Questionnaire must be submitted as an attachment to the KDP 5 form on the KDP Documentation Tool. The LFD Questionnaire can be found on the Post Preliminary Administration page on the Risk MAP SharePoint site. Once receiving KDP 5 approval, regions are responsible for notifying and coordinating a path forward with all CTPs and mapping partners. Figure 12 provides a workflow for formulating the KDP 5 decision and when it should be documented.

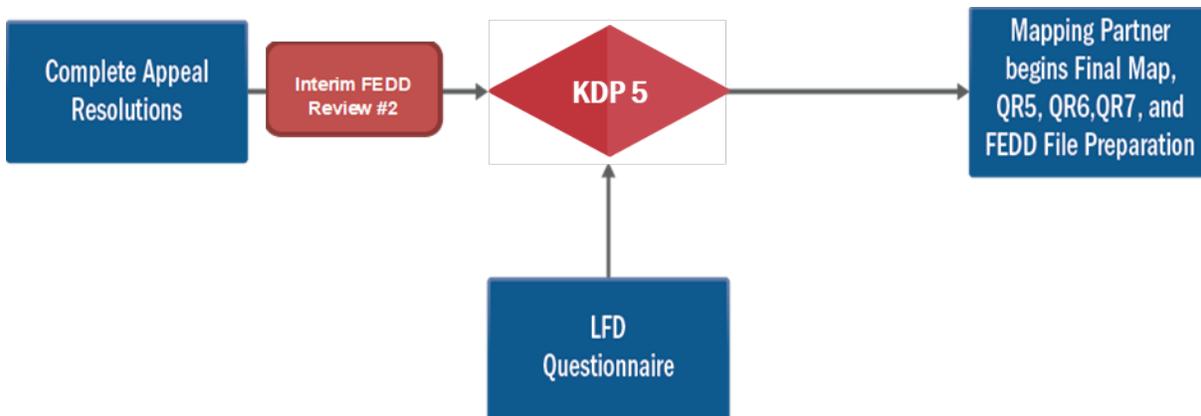


Figure 9: KDP 5 Workflow

4.2.2. KDP 5 Documentation and Review Procedures

Once the determination has been made to move a project into the final Flood Risk Project phase, the Regional Branch Chief, or their designee, must document the KDP 5 decision in the KDP Documentation Tool on the Risk MAP SharePoint site at the following location: <https://rmd.msc.fema.gov/site/kdp/SitePages/KDP%20Home%20Page.aspx>. Because KDP 5 is a Headquarters decision, once KDP 5 has been documented, the region may not advance until receiving a “Go” decision from Headquarters. Headquarters will review all documented KDP 5 decisions on a bi-weekly basis and provide “Go” or “Recommend Further Review” decisions to the regions. While it is the responsibility of the Regional Branch Chief to provide the KDP 5 regional documentation, a designee may be selected to document the information in the KDP Documentation Tool on the Regional Branch Chief’s behalf. As each FEMA Region operates differently, regions are responsible for developing the internal processes for documenting KDP 5.

On the first business day of the month, the Headquarters PM team will export all of the KDP 5 documentation entered into the KDP Documentation Tool during the previous bi-weekly review cycle. Additionally, the Headquarters PM team will export from the MIP all Due Process purchase and task information occurring in the previous and current bi-weekly review cycles.

The Due Process purchase and task information will be used by the Headquarters PM team to identify any projects which have advanced into the KDP 5 window. On the second business day of the month, the Headquarters Engineering Services Branch Chief, or their designee, will email Regional Branch Chiefs, or their designee, of projects that have entered the KDP 5 window, but not yet completed KDP 5 documentation to ensure awareness and avoid project delays.

The Due Process purchase and task information will also be used by the Headquarters PM team to identify any projects which have or will be issuing the LFD without documenting KDP 5. On the second business day of the month, regions who have not documented KDP 5 will be notified of their non-compliance, via an email from the Headquarters Engineering Services Branch Chief, or their designee, to the Regional Branch Chief, or their designee. The Regional Branch Chief, or their designee, will be expected to immediately coordinate with the Headquarters Engineering Services Branch Chief on a path forward.

The Headquarters PM team will summarize all KDP 5 documentation exported from the KDP Documentation Tool by the sixth business day of the month and send the summary to the Headquarters Engineering Services Branch Chief, or their designee, for review. The Headquarters Engineering Services Branch Chief, or their designee, will review the summary provided by the seventh business day of the month, and, by the eighth business day of the month, notify the Regional Branch Chief, or their designee of the “Go” or “Recommend Further Review” decision. All final decisions will be entered into the KDP Documentation Tool by Headquarters PM Staff.

In the event of a “Go” decision, the Headquarters Engineering Services Branch Chief, or their designee, will notify the Regional Branch Chief, or their designee, via email. In the event of additional information being necessary for a decision to be made, the Headquarters Engineering Services Branch Chief, or their designee, will coordinate with the Regional Branch Chief, or their designee, to obtain the additional data and ensure all questions are answered.

In the event of a “Recommend Further Review” decision, the Headquarters Engineering Services Branch Chief, or their designee, will coordinate with the Regional Branch Chief, or their designee, to determine the revised project plan and immediate next steps. A “Recommend Further Review” decision may require updating KDP 5 documentation and again progressing through the Headquarters review process. In some circumstances, KDP 3 and/or KDP 4 may need to be revisited as well. The exact path forward will be handled on a project by project basis. It is important to note a “Recommend Further Review” decision does not mean the project must end; instead, it may be a pause in the project to allow for additional community engagement or development of additional products.

As KDP 5 follows a bi-weekly review cycle, the review process will begin again on the 11th business day, when the Headquarters PM team exports the relevant KDP 5 data from the KDP Documentation Tool. MIP Headquarters sends any potential notifications to the regions based on this data pull on the 12th business day, and the Headquarters PM team develops summaries of KDP 5 documentation for Headquarters review by the 16th business day. Headquarters staff will review the summaries by the 17th business day and deliver final decisions to the regions by the 18th business day. The KDP 5 Headquarters review process is outlined in the flow chart in Figure 13. A comprehensive KDP Headquarters Review schedule is provided in Appendix B: High-Level Headquarters KDP Review Cycle Calendar.

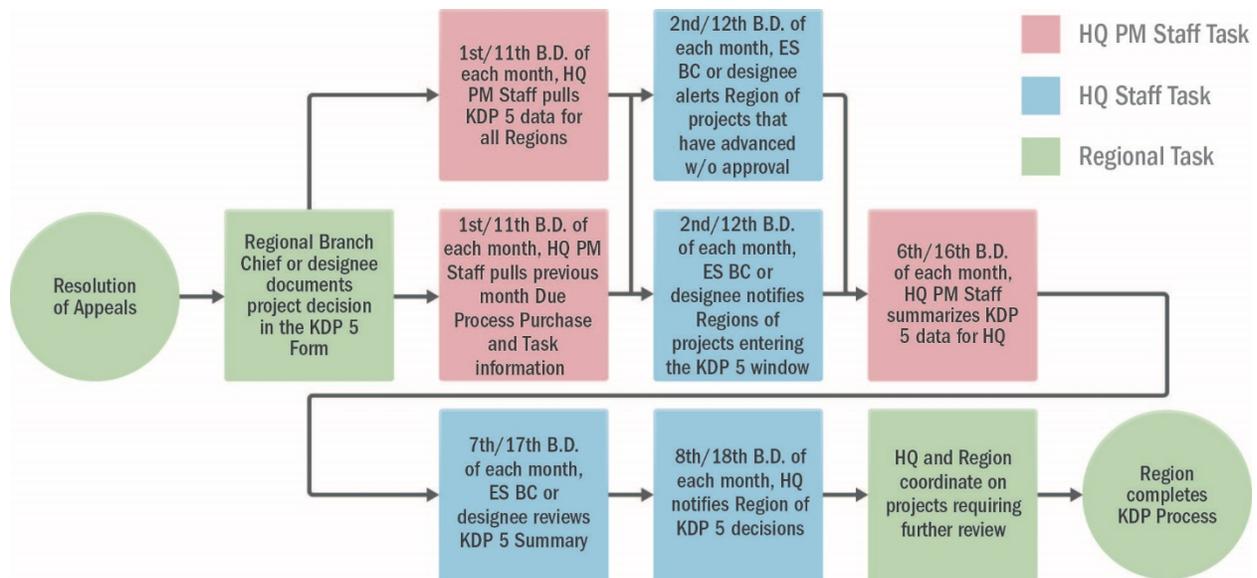


Figure 10: KDP 5 Headquarters Review Process Flowchart

Should an emergency arise and a review of KDP 5 documentation and immediate KDP 5 decision from Headquarters be necessary, the Regional Branch Chief should contact the Headquarters Engineering Services Branch Chief to initiate an ad hoc expedited review of KDP 5 data. Under this process, the Regional Branch Chief, or their designee, will enter the KDP 5 documentation into the KDP Documentation Tool. The Headquarters PM team will then immediately pull the requested data from the KDP Documentation Tool and develop a summary of the documentation outside of the standard KDP 5 review cycle. This individual KDP documentation will be reviewed by the Headquarters Engineering Services Branch Chief, or their designee, and a final decision be provided to the region.

Appendix A: KDP Process Flowchart

The graphic below depicts how a typical Flood Risk Project and community-initiated PMR will flow through the KDP Process based on the decision made at each KDP. For a more detailed explanation of an individual KDP, please reference the appropriate section of the guidance document.

While Flood Risk Projects are subject to multiple standards, there are numerous variations associated with how the regions operate. The graphic below does not attempt to capture all these variations. Various tasks (e.g., Development of Flood Risk Datasets, Community Engagement, etc.) are shown where they typically occur in the project life cycle; however, there may be situations where these actions occur at different points or do not take place at all. These variations will not affect the timing and documentation of the six KDPs.

Project Planning KDPs

All Flood Risk Projects will begin with the Project Planning KDPs (i.e., KDP 0 and KDP 1). Should the regional decision be “Go” at these KDPs, the region will move on to the next project task. Typical tasks coming out of KDP 0 and KDP 1 are shown in the graphic. Should the regional decision be “No Go” at either of these KDPs, typically, this will stop (or pause) all tasks associated with the project.

Preliminary and Post-Preliminary FIRM KDPs

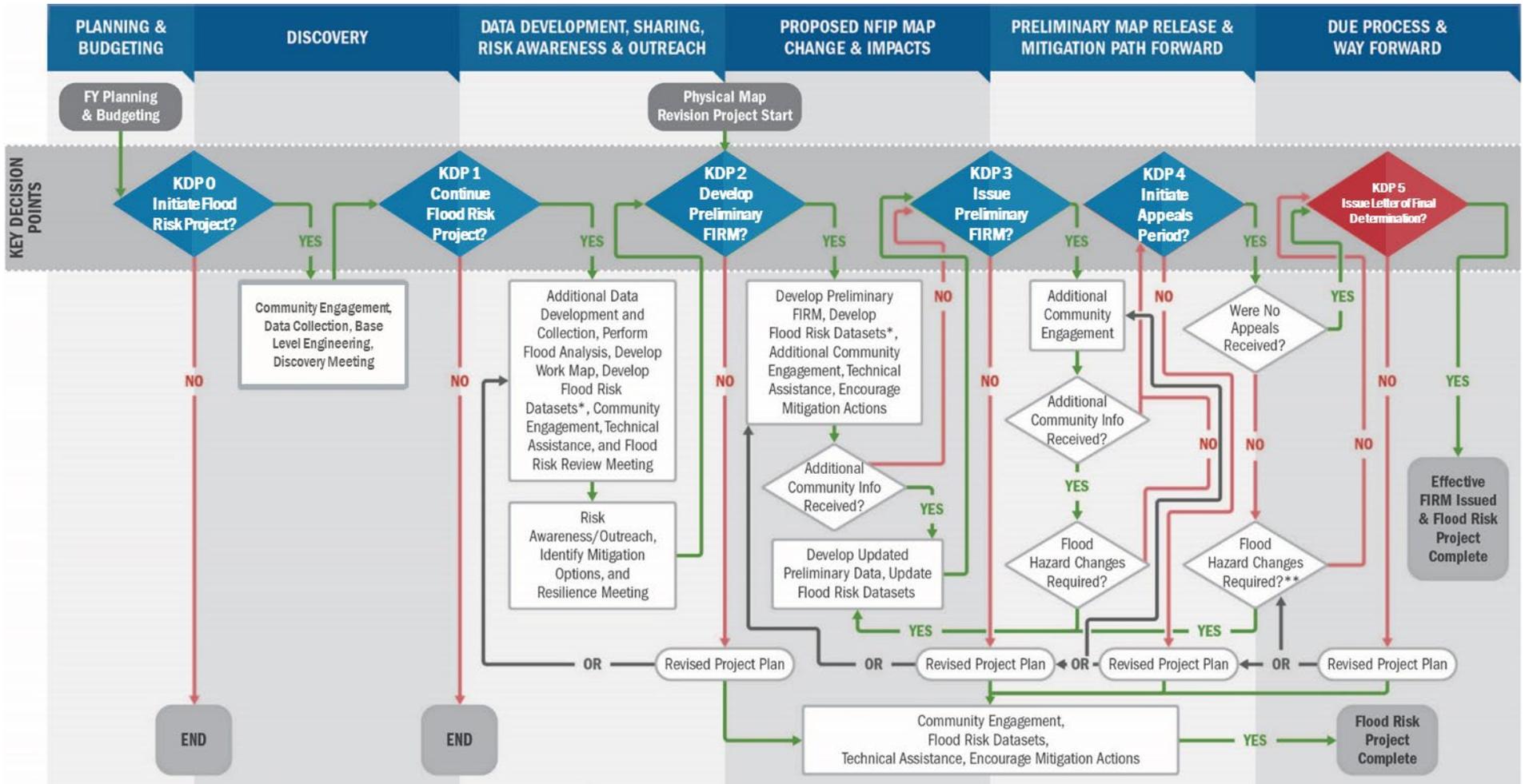
Assuming the Flood Risk Project received a “Go” decision at each of the Project Planning KDPs, the project will move into the Preliminary FIRM KDPs (i.e., KDP 2, KDP 3) and Post-Preliminary FIRM KDPs (i.e., KDP 4, KDP 5). KDP 2 is also the point where community-initiated PMRs enter the KDP process. Should the project receive a “Go” decision at these KDPs, the region will move on to the next project task. Should the project not receive a “Go” decision at any of these KDPs, the region will be required to revise the project plan.

At this point the region will have two options. The first option is that the region can end the Regulatory Process but continue with development of Flood Risk Datasets and/or other community engagement activities. This option would require no further KDP documentation.

The second option is the region can assess the cause of the decision to not issue a “Go” decision, revise the project plan, and revisit the current KDP in order to receive a “Go” decision and move forward with the Regulatory Process. Instances requiring KDPs to be revisited are depicted with grey lines in the graphic below.

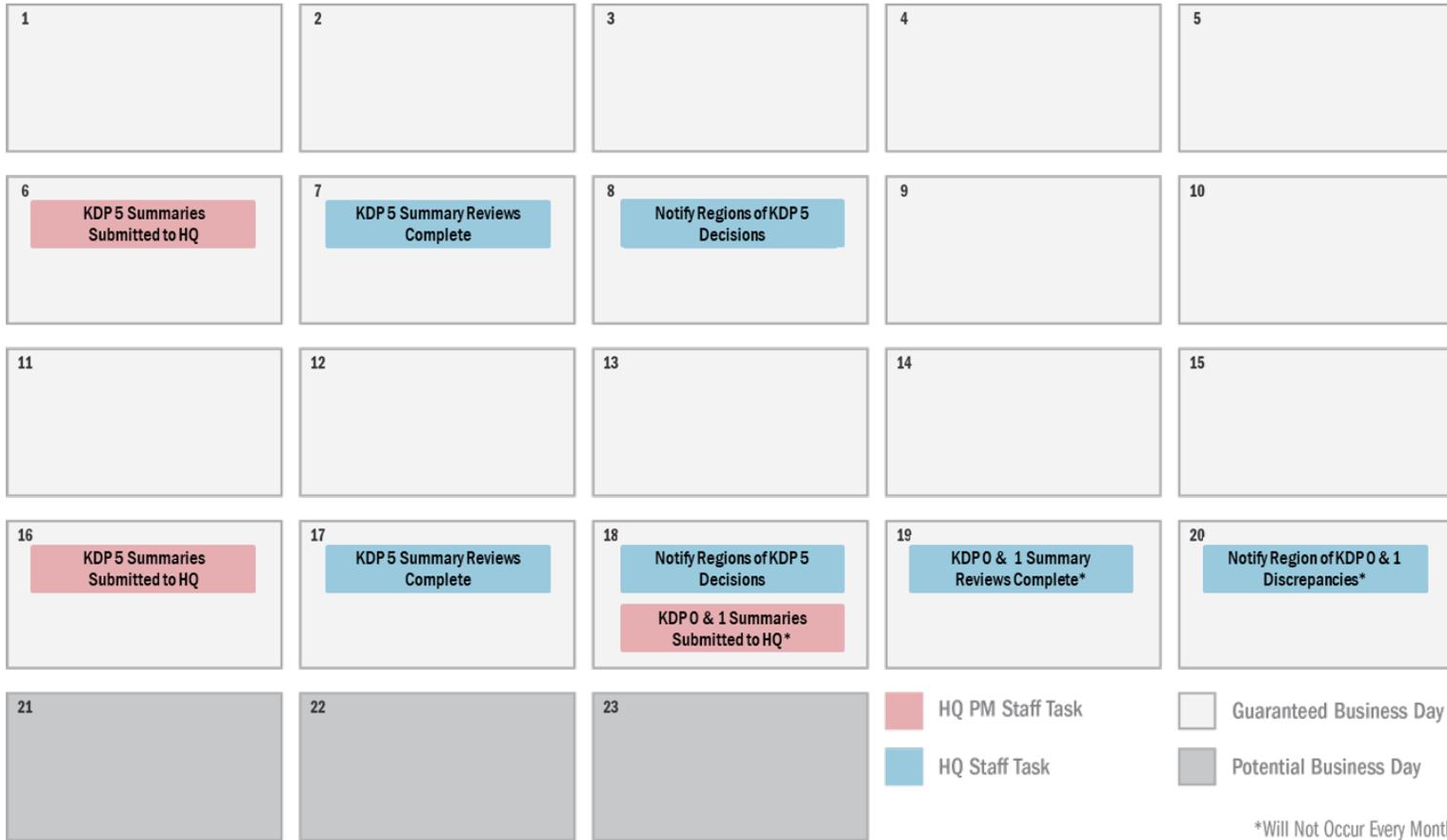
Without a “Go” decision at KDP 4 or KDP 5 and depending on the scale of change required in the project plan, a project may be required to revisit and update the documentation for a previous KDP (i.e., KDP 3 and/or KDP 4).

Additionally, following KDP 3 and/or KDP 4, there may be instances where Revised Preliminaries are required. This will require the region to update the associated documentation in KDP 3 and/or KDP 4. The need for the region to reevaluate the “Go” decision will depend on the circumstances surrounding the Revised Preliminary. Additional information on the Revised Preliminary process associated with KDP 3 and KDP 4 can be found in Section 3.2.1 and 4.1.1 of this document, respectively.



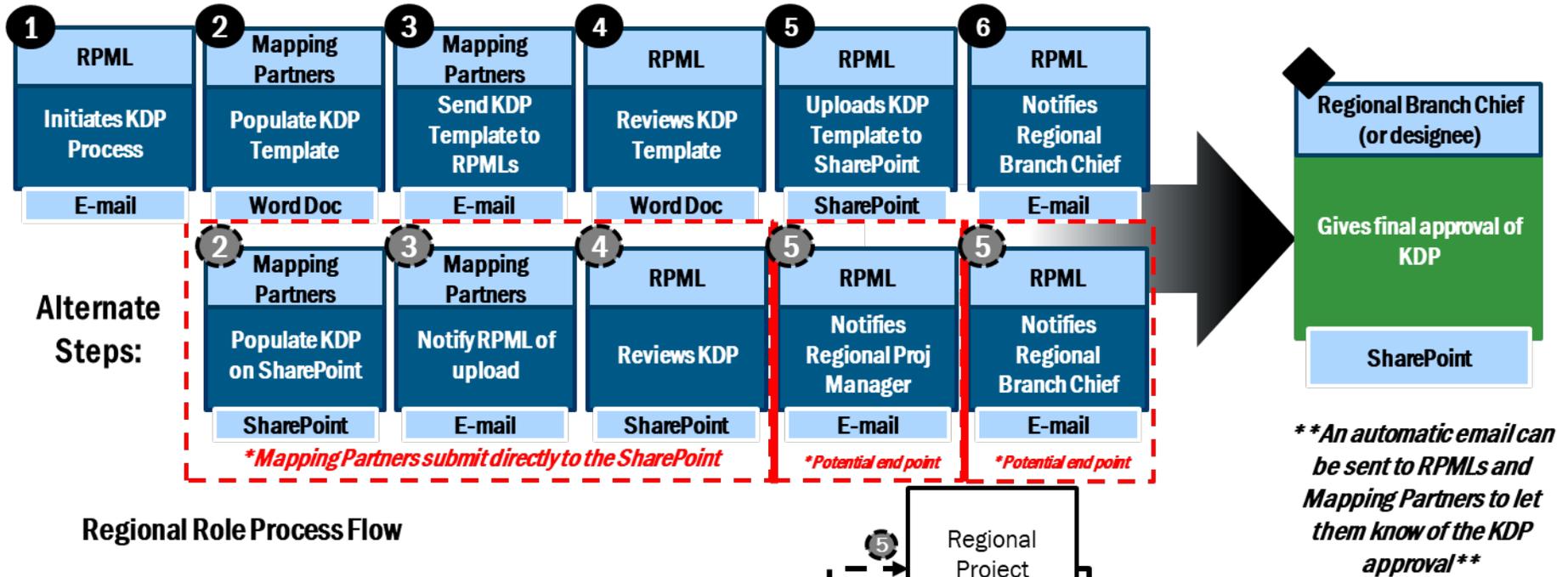
* Timing of Flood Risk Dataset Development may vary. ** Revised Preliminaries will require revised KDP 3 and/or KDP 4. Please refer to the KDP Guidance Document for more information.

Appendix B: High-Level Headquarters KDP Review Cycle Calendar

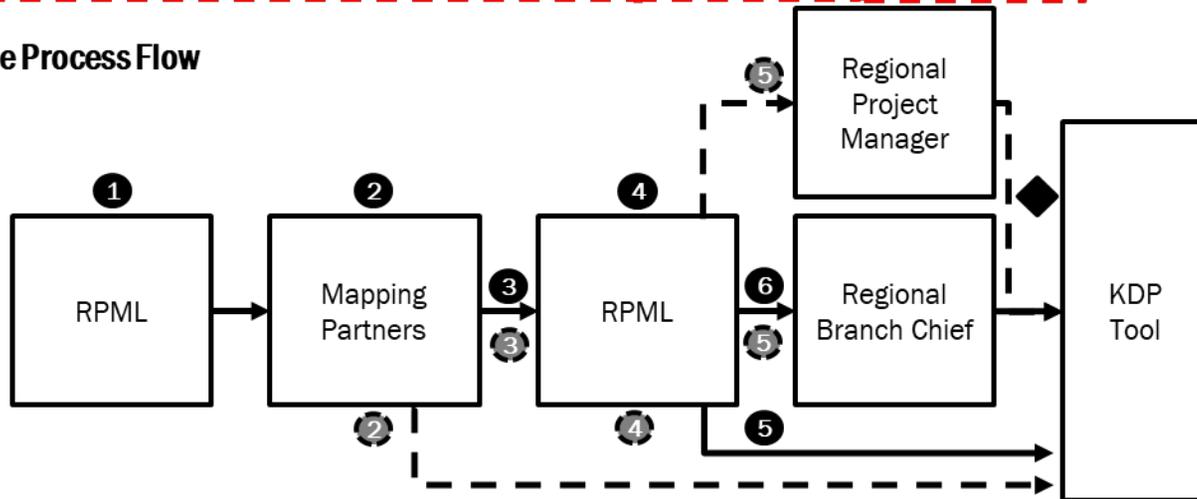


If there are specific questions regarding an individual region's review/approval schedules related to KDP 0 through KDP 4, please reach out directly to the FEMA Region.

Appendix C: Recommended Regional KDP 2-4 Review Process



Regional Role Process Flow



Appendix D: KDP Workgroup Acknowledgment

The Risk MAP Program would like to thank the following people for their participation in the KDP Workgroup and their assistance in developing the KDP Process.

KDP Workgroup Members		
Brent McCarthy	Jennifer Knecht	Rick Sacbibit
Robert (Bob) Schaefer	Elizabeth Savage	Luis Rodriguez
Juan Arevalo	Rick Nusz	Doug Bellomo
Emily Dawson	Cindy Rolli	Craig Kennedy
Lee Brancheau	Sean McNabb	Andy Read
Glenn Locke	Kristina Fritsch	David Bascom
Laura Algeo	Jeanne Ruefer	Austin Horbaly
Nathan Shields	Tamra Biasco	Zachary Baccala
Eric Kuklewski	James Fountain	Brian Given
Vanessa Ng	Tucker Mahoney	Jennifer Simpson

Appendix E: Acronym List

BLE	Base Level Engineering
CCO	Consultation Coordination Officer
CNMS	Coordinated Needs Management Strategy
CTP	Cooperating Technical Partners
FEDD	Flood Elevation Determination Docket
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Study
KDP	Key Decision Point
LFD	Letter of Final Determination
LLPT	Local Levee Partnership Team
LOMR	Letter of Map Revision
MIP	Mapping Information Platform
NFIP	National Flood Insurance Program
NVUE	New, Validated, or Updated Engineering
P4	Project Planning and Purchasing Portal
PM	Program Management
PMR	Physical Map Revision
PPP	Post Preliminary Process
QR	Quality Review
RPML	Regional Program Management Lead
TSDN	Technical Support Data Notebook