

Flood Mitigation Assistance (FMA)

FY2024 NOFO Subapplicant Briefing



Agenda

- FMA Program Overview
- Eligible Activities & Cost Share
- Timeline & How to Apply
- Evaluation Criteria & Application Requirements
- Benefit-Cost Analysis
- Management Costs, Procurement & Conflict of Interest
- Best Practices
- Swift Current Overview
- Questions



FMA Program Overview

What it is, how it's funded, and who it serves

FEMA Hazard Mitigation Programs

Pre-disaster Programs



Building Resilient Infrastructure & Communities (BRIC)

Reduce future loss of life and property due to disasters from all hazards before an event.



Flood Mitigation Assistance (FMA)

Reduce the risk of repetitive flood damage to structures insured under the National Flood Insurance Program.



Safeguarding Tomorrow Through Ongoing Mitigation (STORM)

A state revolving loan program designed to reduce future loss of life and property due to disasters.



Hazard Mitigation Grant Program (HMGP)

Reduce future loss of life and property due to disasters following a Major Disaster Declaration.

The Flood Mitigation Assistance (FMA) Program

Program Purpose

- The **Flood Mitigation Assistance** program funds flood mitigation measures to NFIP insured structures with the goal to reduce the number of flood claims by NFIP policy holders.
- The program focuses on reducing repetitive flood losses.

Funding

- An annual grant program with regular appropriations from Congress
- Core funding source is the National Flood Insurance Program (NFIP)
- \$3.5B in BIL supplemental funding for FY2022–FY2026



The FMA FY24 Notice of Funding Opportunity

- **\$600 million** available in a national competition, split into three categories of eligible activities
- Subapplicants must apply through OEM
- Cost-reimbursement program
- All projects must be cost-effective, demonstrated through a FEMA BCA methodology
- Phased projects and planning are allowed

Important Program Priorities

- **National Flood Insurance Program (NFIP) participating community:** A local jurisdiction that adopts and enforces FEMA-compliant floodplain regulations, enabling residents to access federal NFIP flood insurance.
 - Subapplicants must be located within a participating community (in good standing) to be eligible for FMA
- **Repetitive loss (RL) property:** An NFIP-insured structure that has experienced flood-related damage on two occasions, in which the cost of repair equaled or exceeded 25% of the market value of the structure at the time of each flood event.
- **Severe Repetitive (SRL) property:** Applies to NFIP-insured properties with a documented history of multiple, large-value flood claims in either quantity of flooding events or total value. This includes structures that have experienced:
 - Four or more separate claims payments greater than \$5,000 each (including building and contents payments), OR:
 - 2 or more separate claim payments (building payments only) where the total of the payments exceeds the current value of the property.



Eligible Activities and Cost Share

\$600 million across three funding categories,
with higher federal cost share for repetitive loss
properties

FMA Program Eligibility Requirements

Eligible Subapplicants

- ✓ Cities
- ✓ Counties
- ✓ Special Districts
- ✓ Utilities

*Residents cannot apply directly and must be supported by an eligible subapplicant

Pre-Requisites to Apply

- ✓ Subapplicants must participate in the NFIP
- ✓ Must have a FEMA-approved hazard mitigation plan
- ✓ Beneficiaries must have flood insurance provided through the NFIP

*Check your NFIP participation status [here](#)

Eligible FMA Activities

Capacity and Capacity Building (C&CB) projects

\$60 million

- Hazard Mitigation Plans
- Project Scoping
- Partnerships, SRL/RL strategy development, floodplain management program enhancements

Localized Flood Risk Reduction projects

\$420 million

- Upgrading stormwater systems
- Installing retention and detention basins
- Small floodwalls and pump stations
- Stream restoration

Individual Flood Mitigation projects

\$120 million

- Property Acquisition & Demolition/Relocation
- Structure Elevation
- Mitigation Reconstruction
- Dry Floodproofing of historic or non-residential structures

FMA Cost Share

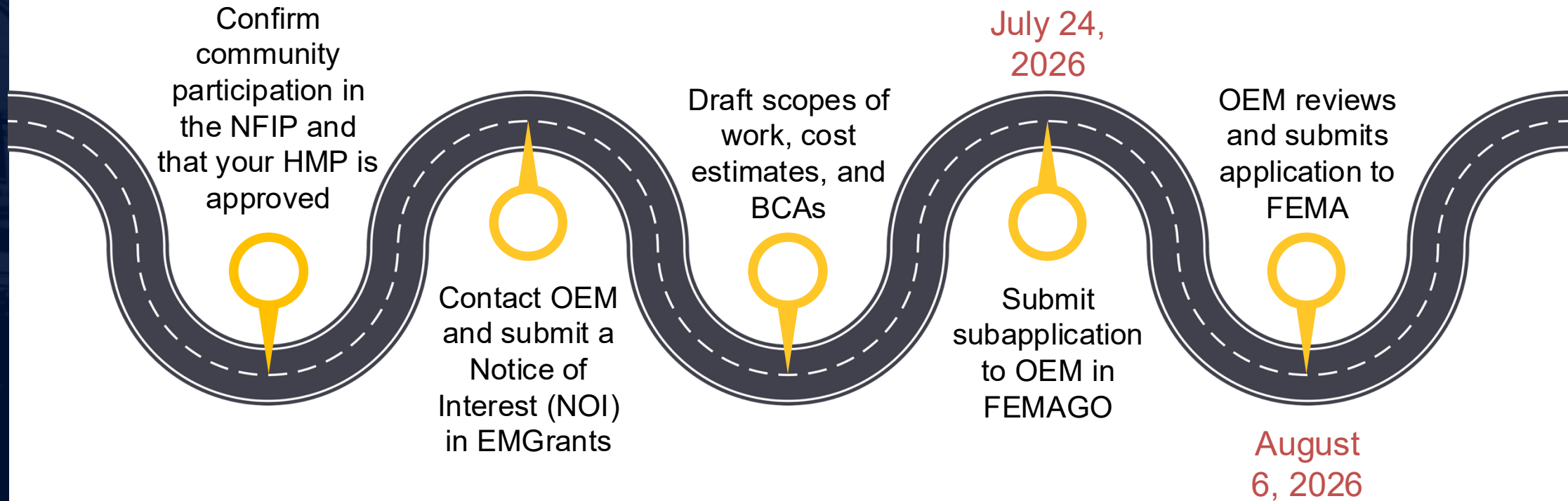
- Standard cost share for FMA projects is 75% federal share, 25% local match
- Individual flood mitigation projects take a different approach:
 - Repetitive Loss Properties
 - Eligible for 90% federal share
 - Severe Repetitive Loss Properties
 - Eligible for 100% federal share
 - NFIP-Insured Properties
 - Eligible for 75% federal share
- Local match can be covered by the community or passed on to homeowners.
 - For example – a home elevation program where a RL house is elevated, with federal funding covering 90% of the cost and the owner covering 10%.



Timeline and How to Apply

Key dates and steps for submitting a complete subapplication

FMA Application Process and Timeline





Evaluation Criteria and Application Requirements

How FEMA scores applications across all three funding categories

FMA Application Components

- **For all projects:**
 - Detailed Scope of Work and cost estimate with aligned structures
 - Project schedule with milestones and a 36-month period of performance
 - Benefit-Cost Analysis (BCA) demonstrating cost-effectiveness
 - Environmental and historic preservation documentation
 - Documented NFIP benefits through policy holders and flood insurance claims. Check out <https://www.fema.gov/about/openfema/data-sets>.
- **For individual flood mitigation projects:**
 - A list of participating properties
 - Voluntary participation forms for each resident
 - Property appraiser data to document home ownership
 - NFIP flood insurance policy declaration pages

Capability and Capacity Building Activities

- Funding caps exist for applicants (states) and subapplicants (SLTTs)
- FEMA will review each application for evaluation criteria and prioritize in the following order:

Activity	Federal Share Funding Caps
Hazard Mitigation Plans	<ul style="list-style-type: none"> • \$100,000 per state • \$25,000 for a local HMP
Project Scoping	<ul style="list-style-type: none"> • \$900,000 per subapplication
Additional C&CB activities such as partnerships, enhancing local floodplain management programs, SRL/RL strategy development, and substantial damage procedures	<ul style="list-style-type: none"> • \$300,000 per subapplication

C&CB Evaluation Criteria



5 pts

Complete RL strategy that includes Substantial Damage Procedures



3 pts

If subapplicant is a Community Rating System (CRS) participant



3 pts

If subapplicant is a Cooperating Technical Partners (CTP) Program participant

Localized Flood Risk Reduction Projects

- \$50 million federal cost share cap
- **Phased projects are allowed!**
- All applications must contain:
 - Documentation of the proposed project benefits of NFIP-insured properties
 - A map and geospatial files delineating:
 - The project location
 - Area with reduced flood risk in alignment with H&H models where available
 - Active NFIP policies if available

Project Evaluation Criteria (scored by a FEMA review panel)



2 pts per NIFP policy, up to 200 points

For every NIFP policy active



50 pts

If project was generated from a previous FMA award



5 pts per RL, 10 per SRL

For repetitive loss properties in the benefitting project area



25 pts

If the community is a CRS participant



100 pts

If applicant has \$1 million+ in NFIP flood insurance claims in the 12 months prior



25 pts

If CTP participant

5-year history of NFIP claims payments will be used as tiebreakers.

Individual Flood Risk Reduction Projects

- \$120 million available nationwide
- Properties must be identified in the subapplications
- Documentation of homeowner voluntary interest must be submitted
- FEMA encourages that packages of residential mitigation projects are submitted. Priority will be given to (in order):



Packages where 75% of structures are SRL or RL properties



Packages with highest counts of SRL and RL properties



Packages with highest NFIP claims history for benefitting properties



If funds are still available, FEMA will follow evaluation criteria

Evaluation Criteria



10 pts per substantial damage structure

Points are awarded per structure that is determined Substantially Damaged



30 point maximum

Points for all FEMA- and NFIP-defined RL and SRL in benefitting project area



20 pts

If project was generated from a previous FMA award

Individual Project Requirements

Acquisition/Demolition

Properties must be maintained as open space in perpetuity and restricted from further development.

Elevation

Structures must be elevated to at least the Base Flood Elevation (BFE) or higher, if required by local ordinance.

Mitigation Reconstruction

New construction cannot exceed 10% of the original square footage.

Must meet current building codes and floodplain management standards.

\$220,000 federal share cap for construction costs.

Cost Share for Individual Projects

- Properties with different federal cost share requirements can be submitted in a single project subapplication.
- The overall federal share should reflect the average federal cost shares of the structures, demonstrated in this example.
- It is both the recipient and subrecipient's responsibility to ensure that the correct federal cost share is applied to properties.

	Severe Repetitive Loss	Repetitive Loss
Total Cost	\$300,000	\$300,000
Federal Share Applied	100%	90%
Federal Share Amount	\$300,000	\$270,000

Total Cost	\$600,000
Total Federal Share	\$570,000
Federal Share Percentage	95%



Benefit-Cost Analysis

Multiple approaches and streamlined methods
available

Benefit-Cost Analysis (BCA)

$$\text{Benefit Cost Ratio (BCR)*} = \frac{\text{Total benefits}}{\text{Total costs}}$$

Narrative for Projects <\$1 million



FEMA released new application support material for the narratives. Narratives must cover at minimum:

- Historical or expected hazard risk
- Benefit locations
- Benefitting population
- Annual maintenance costs

Pre-Calculated Benefits



- Elevations in the SFHA: \$231,640
- Acquisitions in the SFHA: \$365,747
- Acquisition of RL and SRL properties: \$365,747

Modeled Damages



Use property details and data from the Flood Insurance Rate Study to estimate project benefits.

*BCR must be ≥ 1.0 to be considered cost effective



Management Costs, Procurement, and Conflict of Interest

Rules of the road when applying for federal funds

Management and Pre-Award Costs

Management Costs Structure

- Subrecipient: Up to 5% of total subapplication budget (federal + non-federal shares)
- Subrecipient management costs for states are funded at 100% federal share
- Subrecipient management costs must be a separate line item in the SOW and Cost Estimate, with its own budget narrative

Period of Performance

- 36 months from date of award
- Extensions are allowed but not automatic. Requests due 90 days before expiration.
- No additional federal funds awarded with extensions

Pre-Award Costs

- Costs for developing the application (BCA, NEPA data, design specs) may be eligible with FEMA approval
- Must be identified as a line item in the cost estimate
- May count toward non-federal cost share
- Implementation costs incurred before award are not allowed

Procurement: Understanding Compliance

All purchases under a FMA award must comply with 2 CFR 200.317-327. Local governments and nonprofits must use their own documented procedures that conform to federal standards.

States and tribes follow their own procurement policies but must also comply with domestic preference and required contract provisions.

OEM's Expectations:

- Full and open competition with documented rationale for procurement method, contract type, contractor selection, and price basis
- Written procurement policy on file before you issue a solicitation
- All required federal contract clauses (Appendix II to 2 CFR 200)
- Build America, Buy America Act compliance for all infrastructure projects

Restrictive Practices:

- Noncompetitive contracts to consultants on retainer
- Specifying brand name only without allowing equals
- Unnecessary experience requirements or excessive bonding
- Cost-plus-percentage-of-cost contracts (prohibited in all cases)
- Splitting purchases to avoid competition thresholds

OEM will not process reimbursement until you submit your procurement policy, documented process, selection rationale and executed contract documents. Plan for this now!

Conflict of Interest (COI)

NOFO Section 10.B.2: A contractor that helps develop your grant application, project plans or budget cannot compete for the contract to implement or construct that project.

This includes pre-award costs like grant writer fees and post-award grant management fees.

Organizational COI (2 CFR 200.319(b))

- Your application consultant cannot bid on the construction contract
- Former employees who worked on the application are also barred
- Exception: one competitively procured contract covering both application development and execution

Personal COI (2 CFR 200.318(c))

- Written COI standards required before awarding any contract
- No one with a real or apparent COI may participate in contract selection, award or administration
- Includes financial interest by the individual, immediate family, partner or employing organization
- Standards must include disciplinary actions

Decide your procurement strategy before you engage a consultant. If COI is found, costs are disallowed and you repay federal funds!



Best Practices

Tips for winning applications across all three
FMA funding categories

Application Differentiators

C&CB Activities

- Be clear how planning, scoping, and C&CB activities will provide benefits to the NFIP.
 - Submit a map and geospatial files of benefitting areas to quantify these benefits.
 - Example geospatial files: census tracts delineating a benefitting area; zip codes with policy data
- Use scoping projects to build your pipeline of mitigation applications for upcoming FMA cycles.

Localized FRR Projects

- High number of NFIP-insured, RL, and SRL properties in the benefitting area.
- Gather NFIP policy data if you can!
- Communities with history of recent flood claims will be prioritized.
- Consider submitting a phased infrastructure project.

Application Differentiators: Individual Flood Mitigation Projects

Prioritize outreach to your SRL and RL properties for packaging

- This also allows you to balance BCA benefits.

Keep an eye on average cost shares

- High-cost elevations (average fed cost share of \$250,000) and acquisitions (average fed cost share of \$750,000) will not be prioritized.

Communication & coordination with eligible homeowners is critical!

- Participation is voluntary and the award timelines could be long. Set those expectations up front.

Identify priority and alternate properties

- Prepare in case of dropouts. You cannot add properties after FEMA's review process.

Use alternate BCA methodologies if needed

- FEMA's pre-calculated benefits for elevations and acquisitions are not equivalent to funding caps!

Separate Funding Opportunity: FMA Swift Current

- **Noncompetitive State-managed FMA set-aside to accelerate** funding for residential flood mitigation projects
- Available only to states that meet recent NFIP claim thresholds
- Provides a **faster path to funding** compared to the national FMA competition
- Focuses on high-priority repetitive loss properties, especially **elevations and acquisitions** – rolling review process
- **\$10 million in funding available in Oklahoma.** More details to come!

How it works



- States receive an allocation based on recent flood insurance claim activity
- Local communities apply through OEM, not the national competition pool

Steps to take



- Coordinate early with OEM to position eligible projects
- Prepare a pipeline of ready-to-go residential mitigation projects

Wrap Up

Questions and Discussion

Submit questions in the chat or email hm@oem.ok.gov

Contact OEM for Follow-Up

Email: hm@oem.ok.gov | Website: oklahoma.gov/oem

OEM's Mitigation Team is here to help — reach out early and often!