Flood Mitigation Assistance (FMA)
Swift Current Program
FY2024 Subapplicant Briefing

Oklahoma Department of Emergency Management

Agenda

- Swift Current Program overview
- Eligible project types and costs
- Subapplication requirements
- Application timeline and process
- Cost share, cost-effectiveness, and management costs
- Procurement and conflicts of interest
- Plan exception, next steps, and OEM support

Swift Current Program Overview

Swift Current Turns Recent Flood Losses Into Mitigation

Program purpose

- Speed up FMA funding to quickly elevate, acquire, or rebuild flood-damaged properties after a disaster.
- Support NFIP-participating communities and insured properties.

OEM is the state applicant

- Communities identify properties, build subapplications, and submit through OEM.
- Residential flood mitigation projects + limited scoping is allowed
- No construction before approval

Oklahoma Opportunity

- $10 million is available to Oklahoma communities for the FY24 Swift Current cycle as a non-competitive state set-aside.
- Funds are available from flood-related declarations that occurred between June 1, 2024 and May 31, 2025.
- 36 month period of performance
- OEM deadline: October 16, 2026
- FEMA deadline: October 30, 2026

Why Swift Current Is Unique

A faster, property-focused path that is activated by disaster and managed through OEM.

Disaster-Activated Mitigation Funds
Begins after an eligible flood-related major disaster and claims threshold.

Property-Focused
Targets eligible NFIP insured RL, SRL, or substantially damaged properties.

Time-Bound
Oklahoma's specific subapplication deadline to FEMA is October 30, 2026. Funds will expire by end of December.

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Eligible Properties

FMA-defined Severe Repetitive Loss (SRL) – 100% fed share

- Four or more claims over $5,000 each and cumulative claims over $20,000; OR two or more building claims exceeding market value.

FMA-defined Repetitive Loss (RL) – 90% fed share

- Two flood-damage occasions; average repair cost equaled or exceeded 25% of market value at each event.

Substantially Damaged (SD) – 75% fed share

- Identified as more than substantially damaged by floods after the disaster declaration date

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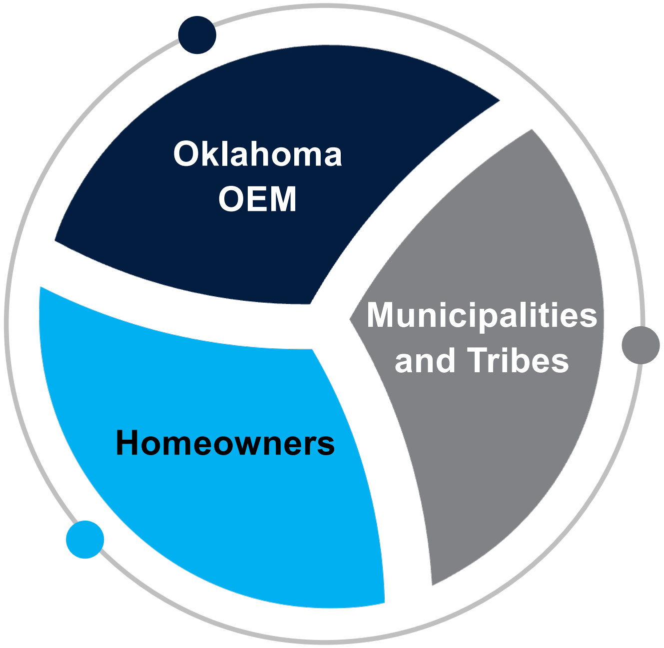
All properties must have an active NFIP flood insurance policy to participate.

Swift Current Roles and Responsibilities



Oklahoma OEM

Serve as the state applicant and administrating agency, provides technical assistance to subapplicants

Municipalities and Tribes

Coordinates with homeowners to participate, develops subapplications, identifies match sources and administers projects

Homeowners

Must voluntarily participate in the application process and the program. If elevating, must maintain NFIP flood insurance over the life of the property.


Eligible Project Types and Costs

FMA Program Eligibility Requirements

Eligible Subapplicants

- ✓ Cities
- ✓ Counties

*Residents cannot apply directly and must be supported by an eligible subapplicant. All participation is voluntary.

Pre-Requisites to Apply

- ✓ Subapplicants must participate in the NFIP
- ✓ Must have a FEMA-approved hazard mitigation plan
- ✓ Properties must meet SRL, RL, or Substantial Damage definitions
- ✓ Beneficiaries must have flood insurance provided through the NFIP in effect prior to the application period (June 1, 2024)
- ✓ Projects must be cost-effective

*Coordinate with OEM and OWRB to check property categories

Eligible Project Types

Acquisition

ACQUISITION AND DEMOLITION OR RELOCATION

Property must be deed-restricted as open space in perpetuity

Elevation

STRUCTURE ELEVATION*

First floors are elevated above the base flood elevation on piers, piles, or a stem wall with flood vents

Reconstruction

MITIGATION RECONSTRUCTION*

If a structure is unable to be elevated, residents can rebuild an elevated structure that adheres to new building codes

Floodproof

DRY FLOODPROOFING*

Eligible only for historic structures

*Flood insurance must be maintained through the NFIP for the life of the structure.

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Project Scoping and Exclusions

Limited Project Scoping

- Up to 1% of Oklahoma's set aside can be used for project scoping ($100,000 this cycle)
- May obtain data, prioritize properties, and develop scopes
- **Must lead to an eligible individual flood mitigation project**

Ineligible Project Types

- Hazard mitigation planning
- General capability building beyond project scoping
- Stand-alone drainage or infrastructure projects
- Properties outside RL, SRL, or qualifying substantially damaged status

Eligible Costs

Acquisition and Demolition or Relocation

- Fair market value of the land and structure
- Structure demolition
- Structure relocation
- Legal and administrative costs for closing and to record open-space deed restrictions
- Appraisals and title work
- Uniform Relocation Act support for tenants
- Limited relocation benefit for displaced owner-occupants

Elevations

- Lifting and raising
- Foundation work
- Utility reconnection
- Access and egress
- Permits and fees, including new Elevation Certificates
- Limited displacement costs for owner-occupants

Eligible Costs for Mitigation Reconstruction

- Structure demolition
- Site and foundation work
- Construction
- Utilities and permits
- Limited relocation benefit for displaced owner-occupants

Additional Mitigation Reconstruction Requirements

- New construction cannot exceed 10% of the original square footage.
- $220,000 federal share cap for construction costs.
- Must meet current building codes and floodplain management standards.

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Cost Share for Individual Flood Mitigation Projects

- Federal cost share: up to 100% (SRL), up to 90% (RL), and general 75% (SD).
- Properties with different federal cost share requirements can be submitted in a single project subapplication.
- All project types in the subapplication should be the same (no mixing elevations and acquisitions).
- 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%**

Subapplication Requirements

Swift Current 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
  - Proposed elevation or floodproofing height (if applicable)
  - Substantial damage documentation (if applicable)

Scope of Work Data

An individual flood mitigation project scope of work should include:

- The location of properties
- Description of existing conditions and historic losses, including elevation of the first floor compared to FEMA Flood Insurance Rate Maps (FIRMs) or best available flood data
- Target elevation height or goal of acquisition
- Engineering methods expected to complete the work
- The subapplicant’s management approach for the project

See the next two slides for sample scopes of work for acquisition and elevation projects.

Acquisition/Demolition Project Scope of Work Sample

The scope of work for this project is to acquire, demolish and remove debris from the Smith residence at 123 First St. and the Jones residence at 345 Elm St. in Anytown, Oklahoma, 32100. The structures suffer repeated damage from floods. The structure is in an AE-Zone and is a designated Severe Repetitive Loss property.

The land will be converted to open space and deed restricted as set forth in FEMA program requirements as described in 44 CFR 206.434 (e). The completed work shall comply with all Federal, State and Local Rules and Regulations.

Elevation Project Scope of Work Sample

XYZ County intends to elevate the private residential structure of John Mark located at 123 Oklahoma Drive above the Base Flood Elevation (BFE). The proposed project existing structure will be elevated two feet above the BFE on piling/columns in accordance with our local building requirements.

This structure has suffered repeated damage from floods and the proposed project will eliminate the current flooding problem. The structure is located in an AE-Zone. At a minimum when completed, it will meet the AE-Zone requirements including having the lowest floor at 1,301 feet, NAVD (BFE + 1). The BFE is 1,300 feet NAVD. The enclosed area below the BFE will have a minimum of two hydrostatic openings to allow for automatic entry/exit of floodwaters, and all construction materials below BF E will be constructed with flood resistant materials. The electrical and mechanical equipment outside the meeting will also be elevated.

XYZ County will provide proof of as-built, final elevation certificate and certificate of occupancy will be required by the State and FEMA for the final inspection.

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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

EHP for Individual Flood Mitigation Projects

All projects must have:

- ✓ Photographs of all 4 sides of the structure
- ✓ High resolution parcel, street, and topographic maps marking the project boundaries
- ✓ Precise GPS coordinates
- ✓ Ground disturbance maps
- ✓ Documentation of ownership (Property Tax ID map)
- ✓ Original construction date
- ✓ Letters or database data demonstrating the project will not jeopardize threatened species or critical habitats
- ✓ An assumption or the potential of lead-based paint, asbestos, or radon

For structures 45-50 years or older or in a historic district:

- ✓ Documented coordination with the State Historic Preservation Officer (SHPO). Subapplicants will need to prepare submissions for OEM to send.

For acquisitions:

- ✓ Documented coordination with OKDOT confirming the property is not identified for future use. Subapplicants will need to prepare submissions for OEM to send.

Additional Paperwork Requirements for Individual Flood Mitigation Projects

Property Owners

- Notice of Voluntary Interest
- Current NFIP flood insurance declaration page
- If available:
  - Declaration and Release forms
  - Flood claim history, insurance estimate, or claim decision letter
  - Substantial damage determination, if applicable

Subapplicant

- Model Statement of Assurances for Property Acquisition Projects
- Model Deed Restriction Language

Application Tips and Tricks: Individual Flood Mitigation Projects

Verify property status

- Confirm that each property is eligible. A property must be an SRL, RL, substantially damaged **and** have an NFIP flood insurance policy

Confirm the match source

- It is common for elevations and mitigation reconstructions to offset local match to the homeowners

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!

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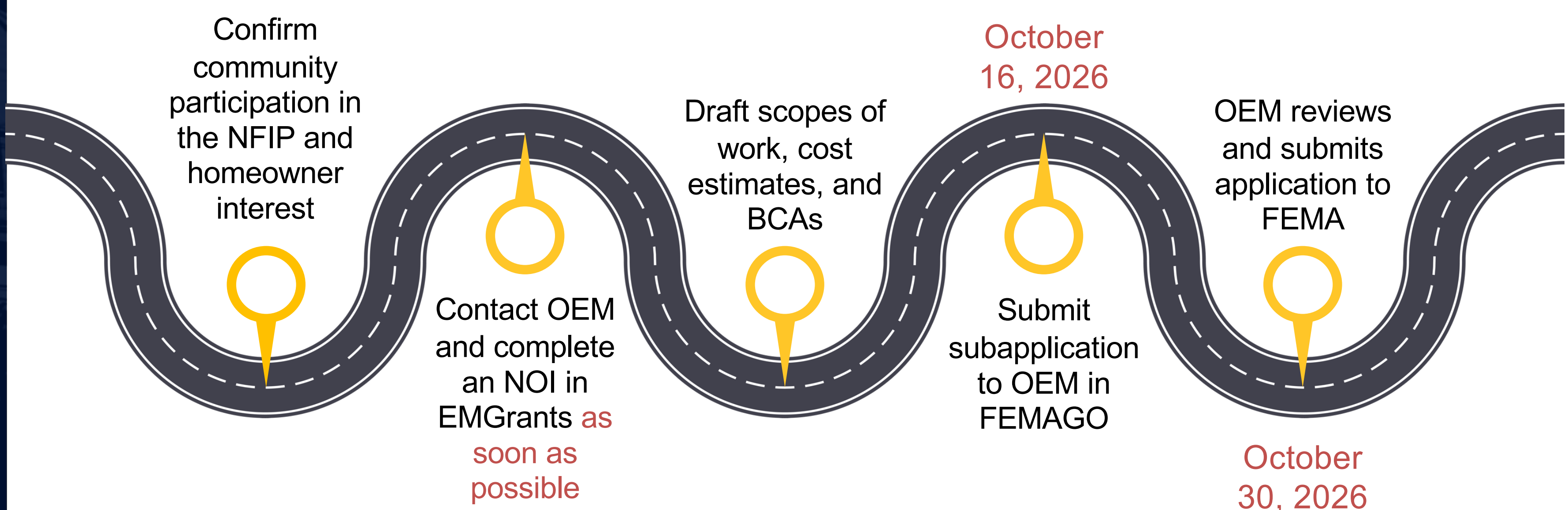
Timeline and How to Apply

Swift Current Application Process and Timeline



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Complete, Consistent Files Move Faster

Do

- ✓ Use consistent attachment and property naming in FEMA GO
- ✓ Verify NFIP policy status and RL/SRL/SD support
- ✓ Align the scope, budget, schedule, BCA, and project type
- ✓ Tie design criteria to documented flood risk
- ✓ Identify match, procurement approach, and EHP needs
- ✓ Continuous outreach to SRL and RL properties

Don’t

- × Submit unsupported or inconsistent property data
- × Omit homeowner, ownership, or flood-history documents
- × Begin implementation before approval
- × Use a vague scope that does not match cost or schedule
- × Propose general infrastructure or ineligible capability-building work

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Management Costs, Procurement, and Conflict of Interest

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

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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!

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OEM Technical Assistance

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HOW OEM CAN HELP

01 Program guidance

02 Subapplication support

03 Benefit-cost analysis and documentation support

04 Environmental and historic preservation guidance

GENERAL QUESTIONS

hm@oem.ok.gov

oklahoma.gov/oem.html

KEY DATES

Community applications to OEM: October 16, 2026

OEM submission to FEMA: October 30, 2026