OHIO EMERGENCY MANAGEMENT AGENCY
MITIGATION AND RECOVERY BRANCH

ADMINISTRATIVE PLAN

for the

HAZARD MITIGATION GRANT PROGRAM (HMGP)

Updated for DR-4098-OH DECLARED: January 3, 2013
## Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I.</td>
<td>Statement of Purpose</td>
</tr>
<tr>
<td>II.</td>
<td>References and Authorities</td>
</tr>
<tr>
<td>III.</td>
<td>Definitions</td>
</tr>
<tr>
<td>IV.</td>
<td>Concept of Organization and Assignment of Responsibilities</td>
</tr>
<tr>
<td>V.</td>
<td>Funding</td>
</tr>
<tr>
<td>VI.</td>
<td>Eligibility</td>
</tr>
<tr>
<td>VII.</td>
<td>Pre-Declaration and Joint Field Office Activities</td>
</tr>
<tr>
<td>VIII.</td>
<td>Application Process / Project Development</td>
</tr>
<tr>
<td>IX.</td>
<td>Project Review, Ranking, and Selection</td>
</tr>
<tr>
<td>X.</td>
<td>Project Initiation</td>
</tr>
<tr>
<td>XI.</td>
<td>Appeals</td>
</tr>
<tr>
<td>XII.</td>
<td>Technical Assistance</td>
</tr>
<tr>
<td>XIII.</td>
<td>Reports</td>
</tr>
<tr>
<td>XIV.</td>
<td>Program Monitoring</td>
</tr>
<tr>
<td>XV.</td>
<td>Project Completion and Close out</td>
</tr>
<tr>
<td>XVI.</td>
<td>Plan Review and Updating</td>
</tr>
<tr>
<td>XVII.</td>
<td>Attachments</td>
</tr>
</tbody>
</table>
I. STATEMENT OF PURPOSE

Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, and the Disaster Mitigation Act of 2000, Public Law 106-390, establishes a cost-sharing Hazard Mitigation Grant Program (HMGP) used to fund state and local hazard mitigation projects. This section is closely tied to the post-disaster hazard mitigation plans defined and required in Section 322 of the Act, and is implemented following a Presidential declaration of a major disaster. Sections 322 and 404, in combination with several other state and federal programs and activities, help to form an overall pre- and post-disaster hazard mitigation strategy for the State of Ohio and affected local governments in the State.

The purpose of this document is to delineate the general organization, staffing, policies, and procedures which the State of Ohio will use when administering Section 404 HMGP and Section 322 Hazard Mitigation planning requirements.
II. REFERENCES AND AUTHORITIES


B. Hazard Mitigation Relocation and Assistance Act of 1993, Public Law 103-181

C. Disaster Mitigation Act of 2000, Public Law 106-390

D. 44 Code of Federal Regulations
   1. Part 206, Federal Disaster Assistance
   2. Part 7, Nondiscrimination in Federally assisted Programs
   3. Part 9, Floodplain Management and Protection of Wetlands
   4. Part 10, Environmental Considerations
   5. Part 13, Uniform Administrative Requirements for Grants and Cooperative
      Agreements to State and Local Governments
   6. Part 80, Property Acquisition and Relocation for Open Space
   7. Part 207, Management Costs


F. 42 U.S.C. 4001 et seq.

G. Executive Orders 11988 (Floodplain Management), 11990 (Protection of
   Wetlands), 12612 (Federalism), and 12898 (Social Justice)

H. Ohio Revised Code, Section 5502, and implementing rules

I. Ohio Emergency Operations Plan

J. Enhanced State of Ohio Mitigation Plan, 2012

K. Hazard Mitigation Assistance Unified Guidance, June 1, 2010

L. FEMA Memo titled, Disaster Relief Appropriations Act Two-Year Expenditure
   Requirement, dated August 1, 2013
III. DEFINITIONS

APPLICANT - A state agency, local government, or eligible non-profit organization.

GOVERNOR'S AUTHORIZED REPRESENTATIVE (GAR) - The person empowered by the Governor to execute, on behalf of the state, all necessary documents for disaster assistance. In Ohio, the functions of the GAR and the State Coordinating Officer (SCO) may be assigned to the same individual.

GRANT - An award of financial assistance. The total Hazard Mitigation Grant Program (HMGP) award shall not exceed twenty percent (20%) of the estimated eligible disaster assistance programs under the Stafford Act. (For example: Public Assistance, Individual and Family Grant, and Disaster Housing Programs).

GRANTEE - The government entity to which a grant is awarded and accountable for the use of the funds provided. The grantee is the entire legal entity even if only a particular component of the entity is designated in the grant award document. (Except as noted in 44 CFR, Part 206.436 (g) Subpart N, the State is the Grantee.)

MEASURE - Any mitigation measure, project, or action proposed to reduce risk of future damage, hardship, loss or suffering from disasters. The term “measure” is used interchangeably with the terms “project” and “action” in FEMA regulations.

MITIGATION AND RECOVERY BRANCH PROJECT MANAGER – The staff person from the Ohio EMA Mitigation and Recovery Branch that has been assigned by the SHMO to be the Branch point of contact for that particular project.

PROJECT - Any mitigation measure, project, or action proposed to reduce risk of future damage, hardship, loss or suffering from disasters. The term “project” is used interchangeably with the terms “measure” and “action” in FEMA regulations.

44 CFR Part 201 Mitigation Planning and Part 206 Hazard Mitigation Grant Program – These rules contain the requirements to have a FEMA approved state and local natural hazard mitigation plans in order to be eligible for HMGP funds.

STATE ADMINISTRATIVE PLAN FOR THE HMGP - The plan developed by the State to describe the procedures for the administration of the Hazard Mitigation Grant Program (HMGP).

STATE COORDINATING OFFICER (SCO) - The person appointed by the Governor to act in cooperation with the Federal Coordinating Officer to administer disaster recovery efforts. In Ohio, the functions of the SCO and GAR may be assigned to the same person.
STATE HAZARD MITIGATION OFFICER (SHMO) - The person designated by the GAR as the responsible individual on all matters related to the HMGP.

STATE HAZARD MITIGATION PLANNER (SHMP) - The individual with the designated responsibility for developing and maintaining the State of Ohio Hazard Mitigation Plan in accordance with Section 322.

STATE HAZARD MITIGATION TEAM - The team chaired by the SHMO that has a role in developing, updating, and implementing the state hazard mitigation plan; and assisting in recommendations and selection of projects for the HMGP and other Hazard Mitigation Assistance programs.

SUBGRANT - An award of financial assistance under the grant by a grantee to an eligible Subgrantee.

SUBGRANTEE - The government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided. Subgrantees can be a state agency, local government, or private non-profit organization.

SUPPLEMENT - A request that the state submits to FEMA to add to, or modify the project(s) for which it initially requested Section 404 funding.
IV. CONCEPT OF ORGANIZATION AND ASSIGNMENT OF RESPONSIBILITIES

A. ORGANIZATION

1. Staffing Plan

Refer to Attachment 1.

2. Mitigation Staffing Assignments

a. The Ohio Emergency Management Agency (Ohio EMA) and various State agencies will provide personnel who will perform the following functions:

   1. Governor’s Authorized Representative (GAR) – Executive Director, Ohio EMA.
   2. Alternate GAR – Assistant Director, Ohio EMA.
   3. State Coordinating Officer (SCO) – Executive Director, Ohio EMA.
   4. State Hazard Mitigation Officer (SHMO) – Mitigation and Recovery Branch Administrator, Ohio EMA.
   5. State Hazard Mitigation Planner – The individual with the designated responsibility for developing and maintaining the State of Ohio Hazard Mitigation Plan in accordance with Section 322.
   6. Business Manager - Fiscal Branch Chief, Ohio EMA.
   7. Disaster Services Consultant (DSC) employees – will generally serve as Mitigation Branch Project Managers overseeing multiple subgrants. One DSC is also assigned to be the Branch fiscal point-of-contact.
   8. Disaster Relief Grant Employees (DRG) staff will be hired as dictated by the staffing plan for the disaster – will generally serve as mitigation project managers overseeing multiple subgrants.
   9. Administrative Assistants – Ohio EMA Mitigation, Recovery, Grants and Fiscal Division Administrative Assistants provide support to staff that manage and projects.
   10. Members of the State Hazard Mitigation Team.

b. Cost of State personnel assigned to administer the HMGP in the Joint Field Office (JFO) are eligible HMGP management costs.

c. After the close of the JFO, costs of State personnel (regular time salaries only) for continuing management of the HMGP are eligible HMGP management costs.
3. Securing Other Specialized Technical Assistance

   a. Contractual Assistance – Traditional areas where assistance is needed and it is either not possible or cost effective to have such skill sets on staff include data development for benefit-cost analysis, expert appraisal review, and specialized research assistance to complete NEPA requirements (i.e., records review by the Ohio Department of Natural Resources).

B. ASSIGNMENT OF RESPONSIBILITIES

1. Governor’s Authorized Representative (GAR)

   a. Ohio Revised Code Section 5502.22 provides authority for the Emergency Management Agency to administer the HMGP. The GAR is the state official ultimately responsible for ensuring that the state properly implements its responsibilities under Sections 322 and 404 in a Presidential disaster declaration. The GAR shall supervise/monitor the activities of the SHMO. The GAR is responsible for the submission of a Section 404 grant application to Federal Emergency Management Agency (FEMA), on behalf of the State of Ohio, including state agencies, local governments, and private non-profit organizations.

2. State Hazard Mitigation Officer (SHMO)

   a. The SHMO is responsible for the State’s Mitigation Program and the Section 404 program, as well as other mitigation programs, including development and maintenance of this Administrative Plan and procedures.

   b. Major responsibilities include:

      1. Prepare Section 404 program materials for distribution to communities announcing the availability of plan update funds.
      2. Train mitigation staff to assume their responsibilities.
      3. Provide direction for mitigation staff, as necessary.
      4. Disseminate Section 404 program information, initial application forms, and other program material.
      5. Participate on mitigation team, brief local officials on mitigation, work with local Points-of-Contact, as related to HMGP.
      6. Ensure all required reports and correspondence are prepared and distributed.
      7. Chair meetings of the State Hazard Mitigation Team, and follow-up on team recommendations, in support of HMGP.
      8. Ensure project development and technical assistance is provided to interested communities.
9. Participate in, and set-up meetings, with State Hazard Mitigation Team to discuss mitigation issues and problems.
10. Ensure project selection is in compliance with administrative plan guidelines and State Hazard Mitigation Plan.
11. Submit projects selected to FEMA for review and approval.
12. Ensure proper grant management of HMGP projects approved by FEMA.
13. Monitor the status of projects.
14. Ensure projects are completed in a timely manner and within federal rules and regulations governing the HMGP.
15. Ensure review of audits for compliance.
16. Ensure projects are closed properly and in a timely manner.

3. Business Manager

   a. Managing SMARTLINK, including:

      1. Performing disbursements and financial revisions;
      2. Preparing appropriate forms for closeout of projects/disasters; and,
      3. Providing monthly status reports on expenditures to program managers.

   b. Processing, or supervising the processing, of HMGP checks or the transfer of funds to Subgrantees, recording disbursements, determining correct mailing addresses for checks, and entering disbursements into the state financial management system.

   c. Maintaining records of administrative expenses and state management costs eligible for reimbursement for each open disaster.

   d. Other duties as identified in Attachment 1.

4. State Hazard Mitigation Planner (SHMP)

   a. Develop and deliver training to local officials on updating local natural hazard mitigation plans to ensure compliance with 44 CFR 201.6.

   b. Perform project manager duties associated with planning grant projects.

   c. Review draft local hazard mitigation plans for compliance with 44 CFR 201.6 before forwarding to FEMA Region V for final approval.

   d. Update state mitigation plan with relevant data follow disaster declaration.

5. Other Mitigation Staff
a. Work on project development and implementation. Duties are outlined in the staffing plan *(Attachment 1).*
V. FUNDING

A. FEMA will make HMGP monies available to the State of Ohio as follows:

1. The total funds available for the HMGP shall be up to 20% of the total Stafford Act assistance provided.

   a. FEMA will provide an initial estimate of the total available HMGP funds to the State Hazard Mitigation Officer not earlier than 30 days and not later than 35 days from the date of the disaster declaration.

   b. Within 120 days of the disaster declaration, documentation must be submitted to FEMA to support costs and activities for which projected management costs will be used in accordance with 44 CFR 207.7. Alternatively, a letter requesting an extension up to one (1) year from the declaration date must be submitted to FEMA.

   c. The state may request an estimate of the amount of HMGP funds available at any time. Prior to 12 months after the declaration, total HMGP obligations are limited to not more than 75% of the current estimate without the concurrence of the Regional Administrator, or Federal Coordinating Officer, and the Office of Chief Financial Officer (OCFO).

   d. The final lock-in of funds will be provided by the OCFO one (1) year from the date of declaration. This amount, known as the “lock-in”, is the maximum that FEMA can obligate for HMGP activities.

   e. FEMA may, at the Grantee’s written request, conduct a subsequent review of the lock-in amount 18 months after the declaration. The resulting review may result in an increase or reduction of the lock-in.

   f. Large sub-awards may be subject to the FEMA Strategic Funds Management (SFM) process. FEMA may elect to provide funding for certain projects in incremental amounts. SFM allows FEMA to schedule obligations to be available when the State is ready to execute an HMGP subgrant or components of the subgrant. SFM also allows for incremental obligations as needed within the 3-year POP requirements to support project activities as described in the project work schedule.

2. The federal funds provided each community will be based on the cost-sharing provisions outlined in the FEMA-State Agreement or state legislation or as determined for each disaster. The federal share of projects may not exceed 75% of the cost of approved projects.
3. The non-federal share of projects may exceed the federal share, and it may be provided from a combination of state, local, or private funding sources. However, Section 404 funds cannot be used as a substitute or replacement to fund projects or programs that are available under other federal authorities, or used as a match for other federal funds.

4. Applicants must invest in the project cost through cash or in-kind contributions accounting for 25% of the total project cost, unless state funds are provided and the GAR approves a lesser share. For DR-4098, the state will be providing a 12.5% (one-half of the 25%) match to mitigation project applications (including planning grants).

B. The availability of state funding for Section 404 projects will be determined at the time of a Presidential disaster declaration. If such funds are made available, the amount of state funds for hazard mitigation projects available to communities will be equal to or less than the amount of HMGP funds awarded.

1. If State funding is provided, the funding shall be allocated in accordance with any requirements set by the Governor and/or the Ohio General Assembly. If there are no requirements set by the Governor and/or the General Assembly or the requirements apply to only a portion of state funds, combined HMGP and State funds will provide no more than 87.5% of the project cost. However, if additional funds are needed, the GAR may increase the percentage of funds to a level above 87.5% but not greater than 90%. It is the approach of Ohio EMA that applicants must invest in at least a portion of the cost of a HMGP project.

2. State agencies may receive a state share toward a project under the same percentages as local governments.

C. All potential funding sources from other agencies and programs will be explored, and utilized, wherever possible.

D. The State can set-aside 5% of the total HMGP available to use at its discretion. Any 5% project submitted to FEMA for approval must still meet basic eligibility, environmental, and benefit-cost analysis (BCA) requirements (although it is only a narrative BCA). Examples of projects eligible for 5% funding are experimental actions and measures not identified in the State’s priorities (as noted in Section VI of this document). The 5% can be increased to 10% at the discretion of the Grantee for a disaster declaration involving tornadoes or high winds.

E. The State can utilize up to 7% of the total HMGP funds available to award plan development/update grants to subgrantees. The final plan deliverable of any subgrantee awarded HMGP funds to develop/update a local mitigation plan will meet 44 CFR Part 201. These funds may also be used to update the State of Ohio Hazard Mitigation Plan.
F. Management costs will be requested from FEMA in accordance with 44 CFR 207.7. The State may use funds made available by FEMA under its management cost allowance for any indirect costs, any administrative expenses, and any other expenses not directly chargeable to a specific project that are reasonably incurred in administering and managing HMGP. Regular time salaries, materials/equipment costs, travel and other cost items are allowable.

For DR-4098, $1,000 will be passed through to communities that are awarded project grants (planning projects will not receive management cost pass through funds). The Subgrantee may use in-direct management costs funds for any indirect costs, administrative expenses, and other expenses not directly chargeable to a specific project that are reasonably incurred in administering and managing the HMGP subaward.

Any subgrantee funds that are not used will be reallocated for State use. Reallocations that are less than 10% of the management cost budget do not require prior approval from FEMA. Reallocations that are greater than 10% must be submitted to FEMA in writing and include:

1. An explanation of why the change in budget is necessary,
2. An updated budget, and
3. An updated budget support narrative.

The grantee is responsible for oversight of in-direct management cost funds given to subgrantees. Subgrantee in-direct management cost funds will be reviewed by Mitigation and Recovery Branch staff on a quarterly basis and during monitoring visits in accordance with this plan. Subgrantee in-direct management cost closeout procedures will comply with Section XV.

G. Fiscal Procedures

1. Sub-grantee fiscal procedures

   a. Sub-grantees with approved projects will make requests for an advance of funds using the Mitigation Grant Program Request for Payment form (Attachment 15) at least 4 – 6 weeks prior to the actual need for the funds. This will allow enough time for the State to issue the state warrant or transfer funds. A community may elect to use electronic transfer of funds (EFT).
b. The Sub-grantee Project Coordinator should request funds to pay salary on a quarterly basis. These funds should be identified appropriately on the request for payment form.

c. The advance of funds request should specify how the funds would be utilized. For example, the request should indicate the need for in-direct management costs and/or project costs, and what supplies or equipment and the number of structures to be acquired or demolished.

d. The final payment of HMGP and/or state share for planning grants will be held until the final, FEMA approved locally adopted plan has been provided to the Ohio EMA. The amount held will not exceed 10% of the total project cost.

e. The Sub-grantee will follow established fiscal procedures and comply with the 44 Code of Federal Regulations Part 13. Expenditures will be tracked by funding source and show the balance of federal, state, and local funding. **Attachment 9** is an example of the appropriate spreadsheet for tracking funds that will be used in all HMGP projects.

2. State fiscal procedures

   a. State fiscal procedures include built in redundancy – the Mitigation and Recovery Branch fiscal point-of-contact works closely with the Ohio EMA Business Manager and ODPS fiscal office. Procedures to ensure proper fiscal management include the program fiscal point-of-contact reviewing, on a monthly basis, grant expenditures to ensure proper coding.

   b. A monitoring program as described in this document will be used to monitor both programmatic and fiscal issues.

   c. Procedures have been developed to manage fund drawdowns including ensuring that quarterly reports from the subgrantee are up-to-date before processing the drawdown.

   d. Quarterly reports are required to be submitted by subgrantees to the grantee. These reports are reviewed for programmatic and fiscal issues.
VI. ELIGIBILITY

A. Applicants

1. Applicant eligibility criteria will be in accordance with federal regulations. Eligible applicants are: state agencies, local governments, and certain eligible private non-profit organizations. Ohio does not have any Federally recognized Indian tribes. Any questions regarding the eligibility of an applicant will be resolved by the SHMO or, if necessary, by the GAR.

2. The entire State is declared for Hazard Mitigation with a presidential declaration. The process for selecting applicants is explained in Section VIII.

B. Projects

1. Eligible Project Types. Projects may be of any nature that will result in protection to public or private property. Specific types of eligible projects include but are not limited to:

   a. Acquisition/relocation of real property in a hazard area;

   b. Elevation of structures above the base flood elevation (BFE);

   c. Retrofit of structures by wet or dry flood proofing (according to local code/building standards, compliant with NFIP standards); high wind strengthening; seismic strengthening of structures or their nonstructural components; application of wildfire resistant materials;

   d. Minor structural flood control and storm water management measures, to include but not limited to: debris basins, storm water detention basins or infiltration wells, culvert upgrades; diversions, flap gates or floodgates, and localized flood control systems to protect critical facilities;

   e. Vegetation management, such as natural windbreaks; living snow-fences; shoreline stabilization; natural dune restoration using native vegetation and sand-fencing; urban-forest practices; landslide stabilization.

   f. Safe room design and construction

   g. Phase I or II design, engineering, or feasibility study for complex mitigation projects that are reasonably expected to be funded and implemented;

   h. The state may utilize up to 5% of total HMGP funds for non-technically proven projects that would not normally be funded under the program. Potential projects include, but are not limited to: research and development; generators for non-critical facilities; development of codes
and standards; education/public awareness programs with mitigation as central feature. Hazard warning systems, sirens, NOAA weather radios may be eligible if the declaration includes a tornado event. Projects funded through this initiative are determined on a case by case basis and do not require review by the State Hazard Mitigation Team.

i The state may utilize up to 7% of total HMGP funds for mitigation planning purposes. Potential projects include, but are not limited to: updating/revision of state and/or local mitigation plans (or portions thereof), or the creation of new local mitigation plans.

2. Minimum Project Eligibility Criteria

a. **Federal Criteria.** To be eligible for the HMGP, a project must meet the minimum project criteria established by FEMA:


2. For all disasters declared on or after November 1, 2004 local government applicants for subgrants must have an approved local mitigation plan in accordance with 44 CFR 201.6 prior to receipt of HMGP subgrant funding.

3. Have a beneficial impact upon the designated disaster area, whether or not located in the designated area.


5. Be cost-effective and substantially reduce the risk of future damage, hardship, loss, or suffering resulting from a major disaster. The grantee must demonstrate this by documenting that the project:

   a. Addresses a problem that has been repetitive, or a problem that poses a significant risk if left unsolved.

   b. Will not cost more than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future disasters were to occur. Both costs and benefits will be computed on a net value basis.
6. Has been determined to be the most practical, effective, and environmentally sound alternative after consideration of a range of options.

7. Contributes, to the extent practicable, to a long-term solution to the problem it is intended to address.

8. Considers long-term changes to the areas and entities it protects and has manageable future maintenance and modification requirements.

9. Solves a problem independently or constitutes a functional portion of the solution where there is assurance that the project as a whole will be completed. Projects that merely identify or analyze hazards or problems are not eligible.

b. **State Criteria.** In addition to the above criteria, the State of Ohio has considered other basic criteria for evaluating potential Section 404 projects:

1. The community is participating and in good standing with the National Flood Insurance Program (NFIP). As a general rule, only mitigation activities involving pre-FIRM or post-FIRM compliant structures are eligible.
VII. PRE-DECLARATION AND JOINT FIELD OFFICE ACTIVITIES

A. Concept of Operations. As an event unfolds that may result in a Presidential disaster declaration, State Mitigation and Recovery Branch staff initiate activities that, in the eventuality of a declaration, will lay the groundwork for appropriate and successful project applications, will maximize the technical assistance given limited resources, and will result in effective mitigation. These activities are divided into the following phases: Incident assessment, declaration, and Joint Field Office (JFO) activities.

B. Incident Assessment. Incident assessment may include but is not limited to the following activities:

1. Reviewing local and state mitigation plans including: hazard identification / risk assessments; potential mitigation activities; identifying any problems or vulnerable critical infrastructure.
2. Generate HAZUS models to project possible impacts in case of flood or earthquake.
3. Participating in Crisis Action System (CAS) briefings,
4. Coordinating with ODNR during flood incidents to identify NFIP sanctioned communities in impacted areas, and
5. Participate on joint federal/state hazard mitigation teams formed during the preliminary damage assessment (PDA). Information acquired during this assessment process may be used to identify potential projects, and develop the mitigation strategy for that disaster.

C. Disaster Declaration

1. Develop staffing plan and logistics information for JFO, and
2. Begin to work on the Hazard Mitigation Strategy in consultation with FEMA, and ODNR (for flood events).

D. JFO Activities

1. Develop the Hazard Mitigation Strategy. The Hazard Mitigation Strategy will identify the different activities that are to be conducted as a result of the disaster declaration. It will be prepared in consultation with FEMA and ODNR.
2. Provide technical and other assistance to impacted communities.
3. Attend meetings / briefings, including Federal Coordinating Officer meetings.


5. Implement the Hazard Mitigation Strategy.

6. Conduct Mitigation Briefings. Normally, Mitigation and Recovery Branch staff will offer to conduct countywide mitigation briefings in all counties included in the declaration to discuss mitigation with local officials. Since Ohio has frequent disaster declarations, counties sometimes opt to not have a mitigation briefing (they may have had one recently), packets will be offered to them for distribution to local officials. Briefings are part of the State’s education and public awareness process necessary to the effective implementation of mitigation. Local officials will, during this process, be given the opportunity to identify mitigation issues and concerns. Although primarily focused on HMGP eligibility issues, application process/development, and types of mitigation actions; the National Flood Insurance Program, disaster recovery programs, FEMA’s other mitigation programs and mitigation planning are also discussed briefly. The briefing is given as a Powerpoint presentation (Attachment 10).

Briefings can be a joint NFIP/mitigation briefings if the flood event was in an area with high flood insurance policy coverage and Increased Cost of Compliance will be triggered due to the large number of substantially damaged structures.

For this declaration, mitigation briefings involving state personnel travel to the community were offered to both declared counties. A series of three additional briefings were conducted utilizing webinar and teleconference technology.

Since HMGP is made available statewide, the briefing schedule was emailed to all county EMA directors and local floodplain administrators in the state inviting them to attend any of the scheduled briefings. A webpage was created on the Ohio EMA Mitigation and Recovery Branch website to notify potential subapplicants of the availability of HMGP funds.
VIII. APPLICATION PROCESS / PROJECT DEVELOPMENT

A. Concept of Operations

The application process is a two part process. Pre-applications are submitted first (Attachment 2). Pre-applications are reviewed and ranked by the SHMT and enough pre-applications to expend 150 - 200% of the estimated project funds will be selected for full project application development (this is to allow for projects that could be withdrawn and for the submission of zero funded projects to ensure that all Federal and state funds can be appropriated). Full project applications (Attachment 3) will be evaluated by the SHMT after the deadline for submission has passed. Projects will then undergo a cost-effectiveness, environmental, and completeness review conducted by Mitigation and Recovery Branch staff. Eligible and complete full project applications will then be submitted to FEMA for approval. The goal is to submit projects on or near the one year anniversary date of the disaster declaration.

The timeline for this process is as follows:

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<thead>
<tr>
<th>ESTIMATED HMGP APPLICATION TIMELINE</th>
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<tbody>
<tr>
<td>Time Period</td>
</tr>
<tr>
<td>Week 0</td>
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<td>Week 3-4</td>
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<td>Week 8</td>
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<td>Week 13</td>
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<td>Week 36</td>
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<td>Week 52</td>
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IX. PROJECT REVIEW, RANKING, AND SELECTION

A. Priority

The following priorities are established by the State of Ohio under HMGP for DR-4098 based on the unique characteristics of the event, the DR-4098 Hazard Mitigation Strategy and the State of Ohio Hazard Mitigation Plan:

- Priority will be given to projects in the declared counties over projects in other counties (except for planning grant applications).
- 7% planning funds will be utilized to fund local natural hazard mitigation plans that are approaching the five year deadline for plan expiration. Priority will be given to planning grant applications with the earliest plan expiration date.
- Among flood loss reduction projects, priority will be given for the acquisition of repetitively flood prone properties as it is the only permanent mitigation solution.
- Priority will also be given to the construction/installation of safe rooms that mitigate the loss of life from severe wind and storm events.

B. Review Process

1. The SHMO and/or Mitigation and Recovery Branch staff will perform the initial review of project pre-applications to ensure all information and documentation is provided. The Mitigation and Recovery Branch staff member assigned to each pre-application will present the project to the SHMT.

2. The SHMO will chair the SHMT. Representatives from the following agencies/organizations are permanent members of this team:
   a. Ohio EMA
   b. Department of Development, Office of Community Partnerships
   c. Department of Natural Resources, Division of Soil and Water Resources, Floodplain Management
   d. State and Local Government Commission
   e. Emergency Management Association of Ohio (EMAO)
   f. US Army Corp. of Engineers (USACE)
   g. US Fish and Wildlife Service
   h. US Environmental Protection Agency
   i. Ohio Public Works Commission
   j. Federal Emergency Management Agency (FEMA)

3. Additional State Agency representatives will be determined by the nature of the projects for which HMGP funds have been requested. Appropriate Federal agencies may also be asked to help review the merits of certain types of projects.
4. In keeping with the MOU between FEMA and the USACE, the appropriate Corps district will be advised of all proposed mitigation projects in Ohio prior to the recommendation to forward to FEMA for approval.

C. Evaluation and Ranking of Projects

1. The SHMT will review all applications (with the exception of applications for projects under 5% and 7% funding set-asides) according to established criteria. Evaluation of projects is based on two types of criteria: NFIP compliance and the composite team score.

   a. **NFIP Evaluation** - Ohio Department of Natural Resources (DNR) will evaluate each community according to NFIP/Floodplain Management criteria utilizing findings from Community Assistance Visits (CAVs), Community Assistance Contacts (CACs) or NFIP Self Assessments. The NFIP evaluation will be based on the findings and subsequent community efforts to correct any identified deficiencies.

   b. **Composite Team Score and Additional Evaluation Criteria** - The membership of the State Hazard Mitigation Team will evaluate each project according to the HMGP Application Scoring Sheet (see **Attachment 6**). Criteria used to evaluate the projects include but are not limited to the following:

      1. Whether the community was in the declared or impacted area,
      2. Consistency with state and local mitigation plans,
      3. The community’s ability to manage a grant,
      4. Durability (longevity) of the proposed mitigation solution,
      5. Repetitive nature of the hazard the mitigation option is designed to protect against,
      6. Implementation of day-to-day mitigation programs outside of HMGP,
      7. Other criteria as necessary

      Projects are ranked according to their total evaluation score, highest to the lowest.

   c. The SHMT will review all projects submitted as zero funded projects using the above evaluation and ranking criteria.
D. Environmental and Floodplain Management Reviews

1. National Environmental Policy Act (NEPA) coordination and review are FEMA responsibilities. In order to assist FEMA, the Mitigation and Recovery Branch gathers documentation from applicants and various government agencies and prepares a Record of Environmental Consideration (REC) for FEMA concurrence. Documentation includes:

   a. Site photographs

   b. Subapplicant responses to the Environmental Review section of the HMGP application (see Attachment 3),

   c. A series of maps depicting the project location on:
      
      i. A street and/or plat map
      ii. Topographic map
      iii. Flood Insurance Rate Map
      iv. Wetlands map (if applicable)
      v. State Historic Preservation Office Map (if applicable)

   d. Consultation with:
      
      i. The U.S. Army Corps of Engineers
      ii. State Historic Preservation Office
      iii. Ohio Department of Natural Resources
      iv. The Ohio Environmental Protection Agency
      v. The U.S. Fish and Wildlife Service

   e. Public notice of project provided by community

2. Communities that participate in the National Flood Insurance Program and/or that adopt local regulations governing development in identified flood hazard areas are responsible for ensuring that proposed mitigation projects in these areas meet applicable floodplain management criteria. Copies of this documentation should be maintained with the local project files and be available for review during monitoring visits.

E. Selection

1. For project applications, following the evaluation and ranking of projects, the SHMT will make the following recommendations to the GAR:

   a. Projects recommended for approval, and,
b. The order in which projects should be funded (i.e., a listing of the projects by priority).

2. In the event two or more projects are tied in rank, they will be listed according to their benefit-cost ratios (BCR). In the event of another tie, the NFIP score will determine the highest rank.

3. The GAR will make the final decision regarding the selection, level of funding for, and ranking of projects by priority. Those projects not selected for funding will be forwarded to FEMA for approval as zero funded projects. This means that if additional funds become available, or if cost-underruns occur in other projects, the zero funded projects can receive funding for the approved project.

4. The GAR will notify all applicants of the decision made by the state relative to their proposed project.

5. Following notification of the applicant, the projects will have a final environmental, cost-effectiveness, and completeness review. The GAR will then submit the applications to FEMA for approval. Submittal will be done in NEMIS as well as hard copy. Hard copy application documents include the Project Summary, B/C Analysis narrative, and Record of Environmental Consideration (REC) with supporting letters and documentation. A hard copy will be forwarded to the FEMA Regional Administrator for approval. The application materials, which the GAR will forward to FEMA, will include the following:

   b. A SF 424D (Assurances for Construction Programs), if appropriate.
   c. A Project Summary that includes:

      1. Community point of contact, address, phone and fax numbers
      2. Major disaster number
      3. Project number
      4. Applicant name
      5. Location of the project
      6. Description of the project
      7. List of alternatives considered
      8. Congressional district
      9. Record of Environmental Consideration
      10. Benefit Cost Analysis
      11. Project Review and Results statement
      12. Projects involving the acquisition of property for open space (acquisitions and relocations) must include:
- A photograph that represents the property at the time of application,
- Statement of assurances acknowledging the conditions for mitigation of the property,
- A notice of voluntary interest form signed by each property owner, which must include that the sub-applicant has informed them in writing that it will not use its eminent domain authority for the open space purpose,
- Sample of the actual deed restriction that the local government will record with each property deed and,
- Documentation of coordination with the U.S. Army Corps of Engineers and the Ohio Department of Transportation.

13. Projects that mitigate property by elevating, retrofitting, and/or relocation must include a signed form acknowledging the conditions for mitigation of property in a Special Flood Hazard Area with FEMA grant funds.

6. All approved mitigation projects must be submitted to FEMA for environmental concurrence and obligation of funds twelve (12) months from the date of the disaster declaration. If necessary, the state can request up to two additional (2) ninety (90) day extensions to the one year application deadline (for a total of 18 months).

F. Award

1. FEMA will sign the REC and approve projects when all submittal requirements are met. Within seven (7) days of project approval, the state will be notified and a joint press release will be issued.

2. Prior to project approval and if notice has been received by the SHMO, the local official of the community (project point-of-contact), the County EMA Director, the OEMA Field Liaison, the EMA PIO (if not already notified), and Ohio EMA Executive Director will be notified by the SHMO. Preferably this will be done by e-mail or FAX to ensure that local and state staff are aware in the case that there is media follow-up due to an early FEMA and/or Congressional press release.

3. After either a FAXed or mailed copy of the FEMA approval of a project has been received by the Mitigation Branch, the Executive Director will send a congratulatory letter followed by the State/Local Agreement and other administrative forms from the SHMO.
X. PROJECT INITIATION

A. General

1. Ohio EMA will serve as the Grantee for project management and accountability of funds in accordance with 44 CFR Part 13 and appropriate OMB Circulars. (Subgrantees are accountable to the Grantee for funds that have been awarded to them and will utilize the same resources).

2. The SHMO will provide the approved community with the State/Local Grant Agreement, two W-9 forms, and a sample Designation of Applicants Agent (see Attachments 7 and 8). The Chief Elected Official (CEO) must sign the agreement and return to the Ohio EMA within thirty (30) days of receipt. If a problem should arise with the agreement, the SHMO should be notified as soon as possible to avoid any delays in beginning the project.

3. The GAR must sign the agreement and the Mitigation Branch Project Manager will provide the Subgrantee with a copy of the executed document, along with program requirements and information during the Implementation Meeting.

4. The designated local Project Manager will meet with the Mitigation Branch Project Manager within thirty (30) days of submission of the signed State/Local agreement (see Section XIV(A)(3) for more specific information on the Implementation Meeting).

5. Based upon the approved project application and work schedule for a project, both the Ohio EMA and local community will implement a record keeping and financial system relative to the project.

6. Subgrantees will submit quarterly progress reports (Attachment 11) to the SHMO. Program regulations and this Administrative Plan identify specific due dates for these reports (see Section XIII – Reports.). The SHMO will submit quarterly progress reports to FEMA. The final report will be a complete assessment of project accomplishments and will meet 44 CFR Part 206 requirements.

7. The Mitigation Branch Project Managers will monitor and evaluate project accomplishments, and adherence to the work schedule. Problems will be reported to the SHMO, GAR and FEMA HMO as soon as identified (see Section XIV).

8. The Mitigation Branch Project Manager, SHMO, and Fiscal Officer will review advance of funds requests, time extension requests, and cost overruns.
9. The Mitigation Branch Project Manager will coordinate individual project close out and the SHMO will coordinate the overall grant closeout.

B. Request for Funds

1. The state may advance a portion of the federal share of the cost of an approved hazard mitigation project.

2. An initial advance will be made to an applicant based on expenditures necessary to start the project; ensuring that the remaining work to be completed is well within the dollar amount of the approved project. Additional advances will be made as long as expenditures can be documented, good recordkeeping is maintained, and sound fiscal procedures are used.

3. A request for an advance of funds must be submitted in writing to the SHMO. The request must be made using the form in Attachment 15. Request for funds should be made at least 4 – 6 weeks prior to the identified need, and should be expended within thirty (30) days of receipt.

4. Requests for funds are reviewed and signed in the following order prior to forwarding to the Fiscal Specialist for processing:
   a. The Mitigation Branch Project Manager responsible for project oversight
   b. The Mitigation Branch Fiscal Staff person responsible for fiscal tracking and grant reconciliations, and
   c. The SHMO for final review and concurrence.

5. If the request is denied, the applicant will be advised and given the reason for the denial. Requests will be denied if the subgrantee is not up-to-date in submitting quarterly reports.

C. Time Limits and Extensions

1. Time Limits
   a. As a general rule, projects must be initiated within ninety (90) days of the approval date. When FEMA approves a project, the initial approval period is (3) three years. However, due to the requirement to spend funds allocated through the Sandy Recovery Improvement Act within two years of FEMA award, the state-local grant agreement has a timeframe of eighteen (18) months from the date of project approval by FEMA.
2. Time Extensions

a. If a subgrantee determines that the project cannot be completed by the time specified in the state-local grant agreement, the subgrantee must immediately notify the Mitigation Branch Project Manager, and request a time extension. Formal requests for a time extension must be submitted by letter and the subgrantee must:

1. Explain why the project cannot be completed by the deadline;
2. Explain the outstanding project work;
3. Explain when it anticipates the project will be completed; and
4. Provide a signed request for extension by the appropriate local authority.

b. Upon receipt of the time extension request, the Mitigation Branch Project Manager will review the request for appropriateness and determine whether the extension request is necessary for the state-local agreement, for the FEMA approval, or both. The Mitigation Branch Project Manager will send the extension request form (for a state-local agreement extension request) to the subgrantee for signature. If a FEMA extension request is needed, the Mitigation Branch Project Manager will complete the extension request form and prepare the request letter for the GAR signature. Extension requests to the FEMA period of performance must be submitted to the FEMA Regional Office no later than 60 days prior to the expiration of the period of performance.

c. The Mitigation Branch Project Manager will then forward the request, signed form(s) and prepared letters (if necessary) with a recommendation to the SHMO who will then forward the request to the GAR and/or FEMA (if necessary), along with a recommendation for approval or disapproval.

c. The Mitigation Branch Project Manager is responsible for ensuring that projects are operational within approved timeframes.

D. Cost Overruns/Under-runs

1. Subgrantees will be required to notify their assigned Mitigation Branch Program Manager by letter as soon as they determine that they will have a project cost overrun. The letter should include the dollar amount of the overrun, the reason for the overrun, and an appropriate justification and documentation (invoices, copies of contracts, pictures, and so on) to support the additional costs.

2. The SHMO in consultation with the Mitigation Branch Project Manager will evaluate each cost overrun. If the evaluation indicates that the cost overrun is justified, and if funds are available, the SHMO may recommend to the GAR
approval of cost overruns. Cost overruns will be approved only if funds are available in the grant program to support the additional amount requested.

3. The GAR will forward all such cost overruns, along with a recommendation for approval, to the FEMA Region V, Regional Administrator. The Regional Administrator will notify the GAR of the final determination made on the overrun.

4. The community must notify the SHMO as soon as possible if a cost under run will occur.

5. Any request for deviation from an approved project must be consistent with and approved in accordance with current FEMA policy guidance as it relates to a change of project scope. This may trigger the need to review environmental compliance and/or conduct a new benefit-cost analysis. Project amendments must be sent to the FEMA Regional Office for approval. The Mitigation Branch Project Manager will be responsible for any NEMIS changes that may be needed.
XI. APPEALS

A. An eligible applicant or subgrantee may appeal a decision made by the Mitigation Branch staff regarding projects submitted for funding under the HMGP. The appeal must be in writing, and contain sufficient additional information beyond that submitted with the original application, to warrant consideration. There are two types of appeals: those appealing state policies and those appealing Federal (FEMA) policies. The appeal will be made to the SHMO who will then determine whether the appeal is to a state policy or Federal policy. Upon this determination, the processes identified below will be followed accordingly.

Appeals relating to state decisions based on state policies such as determinations made by the State Hazard Mitigation Team, NFIP compliance, state mitigation priorities, state/local agreement issues, reasonable and necessary costs associated with project management, etc. are usually state appeals. For issues regarding program eligibility, time extensions beyond the FEMA approved time for the grant overall, determination of allowable project management and in-direct management costs, allowable project costs, and other project implementation requirements, or the state’s interpretation of any Federal policy related to these issues is usually a Federal appeal. Any appeal disputing the benefit-cost ratio (BCR) for a specific property or project must be accompanied by a benefit-cost analysis conducted by the appellant in accordance with FEMA guidelines.

B. State Appeals. There are two levels of state appeal. The Assistant Executive Director (AED) is the decision-maker for the first appeal. If a second appeal is necessary the Governor’s Authorized Representative (GAR) makes the decision on the second appeal.

1. All applicant appeals must be submitted in writing to the AED within thirty (30) days of the date of the letter notifying the applicant of the State Hazard Mitigation Officers decision. The AED will respond within thirty (30) days of the applicant’s letter.

2. If the applicant does not agree with this decision they can appeal to the GAR. The applicant must provide additional information supporting their position to the GAR within thirty (30) days of the first decision letter. The GAR will respond within thirty (30) days of receipt of the request for appeal. The GAR’s decision is final and no other state appeals will be considered.

3. The GAR may, on behalf of an applicant or the state, request guidance and/or a decision from FEMA related to an applicant’s appeal to the state. If guidance is requested from FEMA, the GAR will notify the applicant and
an additional thirty (30) days will be added to the time frame for response from the GAR.

C. Federal Appeals. The applicant or subgrantee has the option of appealing to FEMA for a decision relating to Federal policy.

1. Federal appeals must be submitted in writing to the SHMO. All Federal appeals on behalf of the applicant or state are made by the Executive Director of the Ohio Emergency Management Agency to the FEMA Regional Administrator.

2. The Mitigation Branch may prepare materials and information including a summary and staff recommendation related to the issue being appealed to be forwarded to FEMA.

3. The appeal will then be forwarded to the FEMA Regional Administrator within sixty (60) days of the date the applicant requests the appeal.

4. Per the 44 CFR Part 206.440 FEMA will respond within ninety (90) days.

5. An appeal of the FEMA decision may be made within the following ninety (90) days to the FEMA Associate Director in Washington. FEMA will respond within ninety (90) days and the decision is final. No other appeals exist.

FEMA’s decision will be in writing to the state. The state will copy the applicant with FEMA’s decision.
XII. TECHNICAL ASSISTANCE

As a general rule, applicants for HMGP funds will be responsible for obtaining any technical assistance they may need in order to develop a hazard mitigation project proposal, or to carry out a hazard mitigation project. Technical assistance will be available from the Ohio Emergency Management Agency Mitigation staff, and FEMA Region V, Mitigation Division. Applicants may also request assistance from Regional Planning Councils, and State agencies. Applicants who want such assistance will be advised to notify the SHMO.

The exception to this rule is for the development of data necessary to perform the benefit-cost analysis. In this case, Ohio EMA can utilize state management costs to obtain data required to conduct a benefit cost analysis. Examples of the types of data include finished floor elevations and the suite of flood discharge and elevation data required to determine cost effectiveness using the full data option of the benefit-cost analysis tool. However, for storm water mitigation projects, the applicant shall be responsible for providing enough data and information to adequately assess flood frequencies and damages.
XIII. REPORTS

A. Subgrantees will submit a Quarterly Progress Report (QPR) *(Attachment 11)* to the SHMO within fifteen (15) days of the end of the quarter, on the following schedule:

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Months</th>
<th>Report Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>1\textsuperscript{st}</td>
<td>Oct. - Dec.</td>
<td>Jan. 15</td>
</tr>
<tr>
<td>2\textsuperscript{nd}</td>
<td>Jan. - Mar.</td>
<td>Apr. 15</td>
</tr>
<tr>
<td>3\textsuperscript{rd}</td>
<td>Apr. – June</td>
<td>July 15</td>
</tr>
<tr>
<td>4\textsuperscript{th}</td>
<td>July - Sept.</td>
<td>Oct. 15</td>
</tr>
</tbody>
</table>

B. QPR’s will be used to monitor and follow-up on projects. Failure to submit reports may result in suspension of HMGP funds. Copies of QPR’s will be maintained by the State. The SHMO will submit a quarterly report to FEMA on the status of all mitigation projects by the end of the month following the end of the quarter.
XIV PROGRAM MONITORING

A. Purpose of Project Monitoring

1. As the Grantee for federal mitigation funds, the Ohio Emergency Management Agency (EMA) is responsible for managing the day-to-day operations of Grantee and Subgrantee supported activities. Ohio EMA must monitor Grantee and Subgrantee supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Monitoring must cover each program, function or activity.

2. Role of Mitigation Staff

a. The Mitigation Branch staff person assigned the project (herein referred to as the Mitigation Branch Project Manager) will be responsible for reviewing and documenting the community’s ability to implement the project according to their project application, grant agreement, and program requirements, and to administer the grant funds including their local share according to federal regulations. This is accomplished through the review of quarterly progress reports, on-site review of the project and fiscal records and the project area to ensure the scope of work as outlined in the project application is being fulfilled and funds are expended and accounted for properly.

b. The SHMO will be notified as soon as possible of any significant issues related to the above. Reporting requirements are discussed under section XIII Reports.

3. Implementation Meeting & Monitoring Visits

a. **Implementation Meeting.** An on-site meeting will be conducted no later than three (3) months after the grant agreement has been signed by the community. The purpose of this meeting is to ensure the local Project Manager understands the program requirements. Often, the local Project Manager will not be the person who was involved in the development of the project and may not be as familiar with requirements of the program. The local Project Manager, local officials, and fiscal officer for community are encouraged to attend. Meeting topics include:

   - Presentation and review of the Implementation Binder. The Implementation Binder includes guidance materials, forms, timelines, and reporting requirements.
   - Review of file management procedures and fiscal management procedures.
   - Review of procedures that are specific to the mitigation action taking place.
The implementation meeting should also consist of a tour of the project site, especially if it has not been visited by Mitigation Branch Project Manager to date.

b. Following the implementation meeting, monitoring visits will be conducted. The frequency of monitoring visits will be based on the project type:

- For 5% Projects, such as single warning siren, that does not constitute significant construction, an annual monitoring visit shall be conducted at a minimum.
- Planning projects shall not necessitate any additional monitoring visits beyond the first on-site visit. Provided drawdown requests are tied to plan progress milestones that have been verified by the Mitigation Branch Project Manager and the final drawdown is contingent on the final plan being submitted.
- For all other mitigation projects, monitoring visits shall be conducted no less than one time each year. The monitoring visits will include a review of programmatic files and fiscal records. The visit should also include an on-site visit to the project area. These visits will occur throughout project completion.

c. Additional monitoring visits may be scheduled by assigned Mitigation Branch Project Manager(s) in communities displaying an inability to manage the mitigation grant properly. Determination of an inability to manage the grant would include, but not be limited to the following inconsistencies in project implementation:

1. The project is not on schedule for completion within the 18-month grant agreement.
2. Project/program activities are not being documented properly.
3. Quarterly progress reports are not being provided each quarter or are not complete.
4. The community does not appear to be meeting their local share responsibility.
5. More than one instance of a failure to follow guidance on issues related to the project.

d. The SHMO or immediate supervisor will determine if additional monitoring visits are needed after discussion with the assigned Mitigation Branch Project Manager. The local Project Manager will be notified in writing, within ten (10) days of the most recent monitoring visit, of any corrective actions and the date of the next monitoring visit.

e. A subgrantee’s failure to comply with requested corrective actions may result in enforcement actions as outlined in 44 CFR Part 13.43.
4. Scheduling the Implementation Meeting and Monitoring Visit(s)

   a. The scheduling of the implementation meeting should be done through the local Project Manager. Minimally, local officials, the local Project Manager, and whoever is responsible for fiscal management in the community should attend.

   b. The first monitoring visit will be scheduled during the implementation meeting. Other monitoring visits should be scheduled during each subsequent visit.

   c. A letter to the local Project Manager will be used to confirm the implementation meeting and monitoring visits. The County EMA Director, Ohio EMA field liaison and any other appropriate local officials should be copied. The letter should outline the purpose of the visit, what the Mitigation Branch Project Manager wants to review, who should be at the meeting, and if other officials are needed in addition to the local Project Manager.

5. Conducting the Monitoring Visit

   a. The Mitigation Branch Project Manager shall review the project application prior to the monitoring visit and take the project files/binder to the monitoring visit. At a minimum the Mitigation Branch Project Manager should be as familiar with the project as the local Project Manager.

   b. The project must be implemented according to program guidance and the scope of work outlined in the project. Discrepancies should be discussed with the local Project Manager. If needed, clarification will be requested from the community officials or committee members. This is especially true early in project implementation.

   c. Quarterly Progress Reports (QPRs) are required to document the progress of the project. The QPR should reflect the amount of funds expended, and the steps taken with each structure in the project.

   d. The QPR should be used in the review of project files. For example, if the QPR indicates a property has been acquired, the file should include the appropriate documentation.
e. The Mitigation Branch Project Manager shall review the fiscal information and spreadsheets to assess the funding levels and the amount advanced. All funds advanced prior to the last thirty (30) days should be expended. The only exception to this would be management costs.

   1. The fiscal documentation should be compared to the last QPR and/or the spreadsheet.

   2. Use the Final Closeout Report form (Attachment 12) to determine the amount of the local share of the project. Calculating the local share is especially important after the project is a year old and/or actions are documented for over half of the properties in the project. All communities are aware of their local share commitment and should be prepared to document availability.

   3. Verify the exact percentage of local share budgeted in the project. The federal funds contributed will never be greater than 75%. In some instances, State funds may be contributed toward the project cost or the local match requirement.

f. Each property file must be reviewed to ensure compliance with the Duplication of Benefit (DOB) requirement. Documentation related to how disaster assistance was expended should be provided in each file.

g. The Record of Environmental Consideration (REC) should also be reviewed during the monitoring visit, especially if further coordination has been requested or required by an agency. For example, the Indiana bat is commonplace in Ohio and will impact the cutting of trees. The local Project Manager should document whether trees have been removed during implementation of the project. Or, if an elevation project requires obtaining a local floodplain development permit, this should be in the file. The REC should be reviewed during the first monitoring visit and in subsequent visits if conditions have been identified requiring compliance by the community.

h. The Project Monitoring Forms will be used to document the review of individual property files (Attachment 13). The appropriate form will be completed for each property file. Identify whether the file was complete or incomplete in the box in the upper right corner.

i. The Mitigation Branch Project Manager shall discuss corrective actions with the local Project Manager at the time of the monitoring visit. The local Project Manager can begin working on the corrections before the follow up letter is sent.
6. Reporting Requirements

   a. After the implementation meeting, the Mitigation Branch Project Manager will follow-up on specific issues with the local Project Manager but a follow-up letter is not required.

   b. Following monitoring visits (not implementation meetings) a follow up letter will be sent by the Mitigation Branch Project Manager to the local Project Manager within 10 days of the monitoring visit. The letter will outline the results of the visit and any corrective actions required. The local Project Manager will be given 30 days to complete the corrective actions.

7. Follow-up

   a. The completed Project Monitoring forms should be given to the designated staff person upon return from the visit.

   b. This individual will prepare property listings with property owner, address, and parcel numbers for the completed files, and property owner, address, and the information missing from the file.

   c. The monitoring forms and property listings will be filed when completed. A copy of the property listings will be provided to the appropriate staff person.

   d. The property listings will be used during future monitoring visits to identify the files already reviewed and prevent duplication of effort.
XV. PROJECT COMPLETION AND CLOSE OUT

A. The period of performance begins on the date of declaration or authorization for HMGP and ends no later than 3 years from the award of the final subgrant under the grant. The Mitigation Branch Project Manager is responsible for ensuring that all approved activities are completed by the end of the period of performance. The deadline can be extended if necessary, but only in unusual circumstances (see Section X(C)(2)). The total period of performance should not exceed five (5) years.

B. Project Completion by Subgrantee

1. The local Project Manager must notify the Ohio EMA Mitigation Branch Project Manager within ten (10) days of the completion of all work on the project. This contact may be by phone with a follow up written notification by fax, or by letter.

2. The notification should be accompanied by a Final Progress Report (which is a quarterly report modified to indicate that it is a final report) and fiscal documentation including a completed Record of Grant Activity (Attachment 9).

3. Upon receiving this notification the Mitigation Branch Project Manager will schedule a final monitoring visit to review all program and fiscal records related to the project. All project funds are suspended at the time of completion of the project unless approval to spend is given in writing by the SHMO.

C. Final Monitoring Meeting -- Programmatic Closeout

1. At the time of closeout all files not previously reviewed or complete will be reviewed to ensure all appropriate documents are included. The Project Monitoring Form (Attachment 13) will be utilized for the review. At closeout, the Mitigation Branch Project Manager should be able to fully complete a monitoring form for each property in the project.

2. If a file does not contain all required documentation, the local Project Manager will be required to provide the information within thirty (30) days of closeout, if not readily available at the monitoring meeting. If this time frame is not appropriate, a greater amount of time may be granted by the Mitigation Branch Project Manager. However, failure to provide the documentation may result in the requirement to repay some or all of the grant amount for a particular property or activity.

3. A photograph of the project area or each individual acquired property must be taken by the Mitigation Branch Project Manager at the closeout meeting. The photograph(s) are required to close out the project with FEMA.
4. An Environmental Closeout Declaration must be presented to the local project manager and signed by them at the closeout meeting. This form is to verify compliance with the provisions of the REC.

5. For projects involving the acquisition of property for open space, the Mitigation Branch Project Manager must obtain a copy of the recorded deed for each property mitigated with deed restrictions consistent with FEMA model language. The Mitigation Branch Project Manager must also obtain a signed copy of the Statement of Voluntary Interest form.

6. The Mitigation Branch Project Manager will obtain a completed NFIP Repetitive Loss Update Worksheet (AW-501 form) for each property mitigated that is on the repetitive loss or severe repetitive loss list.

7. For projects where a structure will remain in the Special Flood Hazard Area, the Mitigation Branch Project Manager will obtain a copy of the notice recorded with the deed specifying flood insurance, disaster assistance and floodplain regulation compliance requirements for the property.

D. Final Monitoring Meeting - Fiscal Closeout

1. If possible, the local Project Manager should provide copies of spreadsheets to the Mitigation Branch Project Manager before conducting the closeout meeting.

2. The total project cost will be determined and appropriate cost shares calculated. Any discrepancies will be noted and brought to the attention of the local Project Manager. The Mitigation Branch Project Manager will work with the local Project Manager to reconcile any discrepancies. If the closeout identifies unspent funds being held by the community they must return the funds upon notification by the Mitigation Branch Project Manager. If funds are due the community, the Mitigation Branch Project Manager will request those funds as soon as possible and will forward the state warrant within sixty (60) days of identifying the short fall.

3. In the event final closeout cannot be completed, funds due the community will be held until all required information has been provided to the Mitigation Branch Project Manager.

E. Completing Project Closeout with Subgrantee

After the fiscal issues have been reconciled, monitoring forms are completed, and the necessary documentation has been obtained from the local Project Manager, the Mitigation Branch Project Manager shall provide a final closeout package to the community. The package will include:
A letter of congratulations (under the signature of the SHMO) indicating that the documents and fiscal records were reviewed and accepted by the Mitigation Branch, and

- A completed Final Closeout Report with the reconciled / adjusted project costs (Attachment 12).

F. Completing Project Closeout with FEMA

1. De-Obligation of Funds. If funds are to be de-obligated because of cost under-runs, it is necessary to request that FEMA de-oblige funds. The Mitigation Branch must have confirmation of FEMA’s de-obligation of the funds (a letter) before a Closeout Package can be sent to them. The de-obligation request letter will be under the signature of the Alternate GAR or GAR to the FEMA V Regional Administrator.

2. Transmittal of Closeout Package to FEMA. Upon completion of the project closeout with the subgrantee and de-obligation of remaining funds (when necessary), a closeout package shall be submitted to FEMA. The closeout package will include:

- A letter of transmittal to the FEMA V Regional Administrator, cc: HMO, (under the signature of Alternate GAR or GAR) requesting that FEMA closeout the project,
- A completed Final Closeout Report with the reconciled / adjusted project costs (Attachment 12),
- Property Information Sheet for each property mitigated,
- Pictures of properties in their final, mitigated state,
- Completed and signed Environmental Closeout Declaration
- Completed NEMIS Project Closeout Verification Form, and
- For projects involving the acquisition of property for open space, the following shall be provided for each mitigated property
  - A copy of the recorded deed,
  - A photo of each property site after project completion,
  - A signed Voluntary Participation Form for each property acquired,
  - The latitude and longitude coordinates, and
  - Identification of property repetitive loss status.
- For mitigation projects in the Special Flood Hazard Area where structures remain after project implementation (elevation or retrofit of a structure), a copy of the notice recorded with the deed specifying flood insurance, disaster assistance and floodplain regulation compliance requirements for the property.
  - Verification of flood insurance for each structure
- For elevation projects:
  - A final Elevation Certificate for each structure to verify compliance with NFIP requirements
- Verification of flood insurance for each structure

G. The Ohio EMA and subgrantee will comply with the Single Audit Act, as amended, and maintain all project documentation for a period of three years following project or disaster closeout.

H. Specific audit requirement information will be included with the State/Local Agreement.

I. The Mitigation Branch Project Manager is responsible for ensuring that the appropriate mitigation project information is entered into the State Hazard Analysis, Resource and Planning Portal. Some of this data may be entered by the local Project Manager.
XVI. PLAN REVIEW AND UPDATING

A. This document will be reviewed annually by the SHMO, or when a Major disaster declaration occurs, to ensure compliance with the law, implementing regulations, and state policies. It will be updated as needed to reflect regulatory or policy changes, or to improve program administration and will be submitted to FEMA for approval during the second quarter of the federal fiscal year.

B. Following a Presidential disaster declaration, the SHMO will prepare any updates, amendments, or revisions to the plan that are required in order to meet current policy guidance or changes in the administration of the HMGP, and submit the plan to FEMA for approval.

C. FEMA will reply in writing that the plan is approved and/or if any further revisions required. FEMA will provide a timeframe for submission of any corrections in their letter.
XVII. ATTACHMENTS

Attachment 1 – State Management Cost & Staffing Plan / Budget Worksheet
Attachment 2 – HMGP Project Pre-application
Attachment 3 – HMGP Project Full Application
Attachment 4 – HMGP Planning Grant Application
Attachment 5 – HMGP Application Workbook
Attachment 6 – HMGP Application Scoring Sheet and Instructions
Attachment 7 – State/Local Agreement for Projects and Planning Grants (includes audit standards)
Attachment 8 – Sample Designation of Applicants Agent
Attachment 9 – Record of Grant Activity form
Attachment 10 – Mitigation Briefing PowerPoint Slides
Attachment 11 – Quarterly Progress Report (QPR)
Attachment 12 – Final Closeout Report
Attachment 13 – Individual File Review form
Attachment 14 – Property Information Sheet
Attachment 15 – Mitigation Grant Program Request for Payment form