OHIO EMERGENCY MANAGEMENT AGENCY
MITIGATION AND RECOVERY BRANCH

ADMINISTRATIVE PLAN

for the

HAZARD MITIGATION GRANT PROGRAM (HMGP)

Updated for DR-4360-OH
DECLARED:
April 17, 2018
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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 Stafford Act, and is implemented following a Presidential declaration of a major disaster. Sections 322 and 404 of the Stafford Act, 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 of the Stafford Act.
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 7, Nondiscrimination in Federally assisted Programs
   2. Part 9, Floodplain Management and Protection of Wetlands
   3. Part 80, Property Acquisition and Relocation for Open Space
   4. Part 201, Mitigation Planning
   4. Part 206, Federal Disaster Assistance
   5. Part 207, Management Costs

E. 2 CFR Part 200

F. National Flood Insurance Act, as amended

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

H. Executive Orders 11988 (Floodplain Management), 11990 (Protection of Wetlands), 12612 (Federalism), and 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Families)

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

J. Ohio Emergency Operations Plan

K. State of Ohio Hazard Mitigation Plan, 2014

L. Hazard Mitigation Assistance Guidance and Addendum, February 27, 2015

M. National Historic Preservation Act and the National Environmental Policy Act (NEPA)
III. DEFINITIONS

APPLICANT - A state agency, local government, or eligible non-profit organization submitting an application to the grantee for assistance under HMGP.

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 total eligible Federal assistance under the Stafford Act up to $35.333 billion of such assistance, excluding administrative costs authorized for the disaster.

GRANTEE - The government entity to which a grant is awarded and, which is 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.

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

NON-FEDERAL ENTITY – A state or local government, institution of higher education (IHE), or non-profit organization that carries out a Federal award as a recipient or sub-recipient.

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.

RECIPIENT – means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program.

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 (42 USC 5165).

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.

SUB-AWARD - An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass through entity.

SUB-RECIPIENT – a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.
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 – Mitigation Branch Planner.
   6. Business Manager - Fiscal Branch Chief, Ohio EMA.
   7. Disaster Services Consultant (DSC) employees – will generally serve as Mitigation Branch Project Managers overseeing multiple sub-awards. 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 sub-awards.
   9. Administrative Assistants – Ohio EMA Mitigation, Recovery, Grants and Fiscal Division Administrative Assistants provide support to staff that manage and projects.
   10. Fiscal Specialist – Specialist assigned by Ohio EMA Fiscal Branch.
   11. 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. These can include but are not limited to: 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 (42 USC 5165) and 404 (42 USC 5170c) 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 (42 USC 5170c) 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 (42 USC 5170c) 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 (42 USC 5170c) 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 (42 USC 5170c) program information, initial application forms, and other program material.
5. 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. Ensure project selection is in compliance with administrative plan guidelines and State Hazard Mitigation Plan.
10. Submit projects selected to FEMA for review and approval.
11. Ensure proper grant management of HMGP projects approved by FEMA.
12. Monitor the status of projects.
13. Ensure projects are completed in a timely manner and within federal rules and regulations governing the HMGP.
14. 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 Sub-recipients, 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 following a disaster declaration.

5. Other Mitigation Staff
   a. Work on project development and implementation. Duties are outlined in the state management cost and 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 twelve months (12) months 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 Recipient’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 period of performance requirement to support project activities as described in the project work schedule.

2. The federal funds provided to sub-recipients 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 (42 USC 5170c) 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-4360, 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 (42 USC 5170c) 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 Recipient 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 sub-recipient. The final plan deliverable of any sub-recipient 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-4360, $1,000 will be passed through to sub-recipients that are awarded project grants (planning projects will not receive in-direct management cost pass through funds). The sub-recipient 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 sub-award.

Any sub-recipient 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 recipient is responsible for oversight of in-direct management cost funds given to sub-recipients. Sub-recipient in-direct management cost funds will be reviewed by Mitigation Branch staff on a quarterly basis and during monitoring visits in accordance with this plan. Sub-recipient in-direct management cost closeout procedures will comply with Section XV.

G. Fiscal Procedures

1. Sub-recipient fiscal procedures
   a. Sub-recipients 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-recipient 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, equipment and/or 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-recipient will follow established fiscal procedures and comply with the 2 CFR Part 200. 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 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 sub-recipient are up-to-date before processing the drawdown.

d. Quarterly reports are required to be submitted by sub-recipients to the recipient. 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 be 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; and landslide stabilization.

   f. Tornado safe room design and construction

   g. Phase I or II design, engineering, or feasibility studies 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; and education/public awareness programs with mitigation as central feature. Hazard warning systems, sirens, and 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. Local planning grant applications may be bundled and submitted as one state application, or submitted separately.

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. Local government applicants for project subgrants must have an approved local plan in accordance with 44 CFR part 201 before receipt of HMGP subgrant funding for projects.

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 to public health and safety 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.
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 a 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 (42 USC 5170c) 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 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 Emergency Operation Center (EOC) Emergency Support Function 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 a 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 (for flood events).
2. Provide mitigation planning and project technical 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 Branch staff will offer to conduct countywide mitigation briefings in all counties included in the declaration to discuss mitigation with local officials. These briefings are coordinated with the PA briefings conducted by the Ohio EMA Recovery Branch. Counties may opt to not have a mitigation briefing (they may have had one recently), in which case 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 and FEMA’s other mitigation programs 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 will be conducted in conjunction with PA briefings conducted by the Recovery Branch, whenever possible. If Mitigation Branch staff are not available to conduct HMGP briefings in coordination with PA briefings, a series of four webinar briefings will be offered. A webpage was also created on the Ohio EMA Mitigation Branch website to notify potential sub-recipients of the availability of HMGP funds.
VIII. APPLICATION PROCESS / PROJECT DEVELOPMENT

A. Concept of Operations

There will be two application cycles for HMGP funds available as the result of DR-4360. The first application cycle will be expedited and include: 1) unfunded Pre-Disaster Mitigation (PDM) and Flood Mitigation Assistance (FMA) applications, 2) “shelf applications” that are ready to be submitted, 3) applications developed to mitigate damage caused by the disaster event and 4) applications for “substantially damaged structures.” Applications in category 1 will not be required to submit an HMGP application. The e-Grants application will be used to enter the required project application data into NEMIS. All other applicants in the first round must complete an HMGP full application by the established deadline in order to be considered for funding. The SHMT will review these applications and make award recommendations to the GAR.

The second HMGP application cycle will be 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 remaining 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 and eligibility review conducted by Mitigation Branch staff. Eligible and complete full project applications will then be submitted to FEMA for approval. The goal is to submit projects for the second cycle on or near the one-year anniversary date of the disaster declaration.
The timeline for this process is as follows:

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<th>Event</th>
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<td>Disaster Declared</td>
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<td>Week 1-2</td>
<td>Pre-application period opens</td>
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<tr>
<td>Week 4-8</td>
<td>Applications for cycle one submitted to FEMA Region and Pre-applications submitted to state for cycle 2</td>
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<tr>
<td>Week 13</td>
<td>SHMT meets to review pre-applications and select those for full application development</td>
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<tr>
<td>Week 24</td>
<td>Full normal applications due at Ohio EMA</td>
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<td>Week 36</td>
<td>OEMA completes completeness and eligibility review; begin to submit projects to FEMA for approval</td>
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<tr>
<td>Week 52</td>
<td>Completion of submission of projects to FEMA; FEMA begins to approve projects</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-4360 based on the unique characteristics of the event, the DR-4360 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. Planning grant applications are not reviewed by the SHMT.
- 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 Branch staff will perform the initial review of project pre-applications to ensure all information and documentation is provided. The Mitigation 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. Development Services Agency, Community Services Division
   c. Department of Natural Resources, Division of Water Resources, Floodplain Management Program
   d. Watershed Conservancy District Representative
   e. Emergency Management Association of Ohio (EMAO)
   f. U.S. Army Corp. of Engineers (USACE)
   g. U.S. Geological Survey
   h. Ohio Voluntary Organizations Active in Disaster
   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. 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. Repetitive nature of the hazard the mitigation option is designed to protect against,

   5. Implementation of day-to-day mitigation programs outside of HMGP,

   6. 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 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).

3. In the event two or more projects are tied in rank, they will be listed according to their benefit-cost ratios (BCR).

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 if approved by FEMA.

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

5. Following notification by 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, and a statement that the elevation will be designed in accordance with ASCE 24-14, or latest edition as minimum design criteria.

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. At the discretion of the SHMO, a press release describing the program may be developed and 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 Ohio EMA Regional Field Office, the EMA PIO (if not already notified), and Ohio EMA Executive Director will be notified by the SHMO. This will be done by e-mail 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 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 Recipients for project management and accountability of funds in accordance with 2 CFR Part 200. (Sub-recipients are accountable to the Recipient for funds that have been awarded to them and will utilize the same resources).

2. The SHMO will provide the sub-recipient 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 Sub-recipient 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 sub-recipient will implement a record keeping and financial system relative to the project.

6. Sub-recipients 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 closeout 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 record keeping 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 sub-recipient will be advised and given the reason for the denial. Requests will be denied if the sub-recipient 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 no later than (3) three years from the close of the application period.

2. Time Extensions
   a. If a sub-recipient determines that the project cannot be completed by the time specified in the state-local grant agreement, the sub-recipient 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 sub-recipient 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 sub-recipient 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. Sub-recipients 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 sub-recipient 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 prior to commencement of work related to the change in scope of the project. The Mitigation Branch Project Manager will be responsible for ensuring project amendments comply with all rules and any NEMIS changes that may be needed as a result.
XI. APPEALS

A. An eligible applicant or sub-recipient 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 (SHMT), 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 indirect 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 Officer (AO) with responsibility for oversight of the Mitigation Branch 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 AO within thirty (30) days of the date of the letter notifying the applicant of the State Hazard Mitigation Officers decision. The AO 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 sub-recipient 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 are advised to notify the SHMO.
XIII. REPORTS

A. Sub-recipients 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>1st</td>
<td>Oct. - Dec.</td>
<td>Jan. 15</td>
</tr>
<tr>
<td>2nd</td>
<td>Jan. - Mar.</td>
<td>Apr. 15</td>
</tr>
<tr>
<td>3rd</td>
<td>Apr. – June</td>
<td>July 15</td>
</tr>
<tr>
<td>4th</td>
<td>July - Sept.</td>
<td>Oct. 15</td>
</tr>
</tbody>
</table>

B. QPRs will be used to monitor and follow-up on projects. Failure to submit reports may result in suspension of HMGP funds. Copies of QPRs 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 Recipient for federal mitigation funds, the Ohio EMA is responsible for managing the day-to-day operations of Recipient and Sub-recipient activities. Ohio EMA must monitor Recipient and Sub-recipient 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, program requirements, and 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 all 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 two (2) 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 the community are encouraged to attend the implementation meeting. 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 implementation meeting. 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 24-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 cost 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 sub-recipients failure to comply with requested corrective actions may result in enforcement actions as outlined in 2 CFR Part 200.338.
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 or email to the local Project Manager will be used to confirm the implementation meeting and monitoring visits. The County EMA Director, Ohio EMA Regional Field Operations staff, 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 responsible for project success.

   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 (e.g. property closing, demolition, etc).

   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. The Mitigation Branch Project Manager will 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.

B. Post-Project Closeout Open Space Monitoring for Properties Acquired with HMGP Funds

1. Ohio EMA will comply with the requirements in 44 CFR Part 80 to monitor properties acquired with Hazard Mitigation Assistance funds and report the status to FEMA every three years

2. Ohio EMA will comply with 44 CFR Part 80 to review re-use requests and coordinate with FEMA Region V as required.
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 close of the application period. 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 (6) years.

B. Project Completion by Sub-recipient

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 email 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(s) 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 NFIP 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 Sub-recipient
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-obligate 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 sub-recipient 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 sub-recipient 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 noting any changes in policy or guidance so that the plan can be easily updated when a Major disaster declaration occurs. It will be updated as needed to reflect regulatory or policy changes, or to improve program administration.

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
Hazard Mitigation Strategy
Declared: April 17, 2018

Counties Declared for Public Assistance:
Adams, Athens, Belmont, Brown, Columbiana, Gallia, Hamilton, Jackson, Lawrence, Meigs, Monroe,
Muskingum, Noble, Perry, Pike, Scioto, Vinton, and Washington Counties
Amended to add: Coshocton, Harrison, Jefferson and Morgan

Figure 1: Ohio EMA Photo Credit (Website)
I. HAZARD MITIGATION STRATEGY

Following a disaster, the Federal Emergency Management Agency's (FEMA's) mitigation programs play a critical role developing and integrating disaster operations policies, procedures, and training under the National Response Plan. The Insurance and Mitigation Readiness Division within the Federal Insurance and Mitigation Administration (FIMA) acts as the coordination point for mitigation disaster operations and activities.

PURPOSE OF THE HAZARD MITIGATION STRATEGY

This document outlines a strategy to identify and implement hazard mitigation opportunities following the disaster declaration for FEMA-4360-DR-OH, severe storms, flooding, and landslides. It also provides the framework for implementing long-term, cost-effective solutions to minimize future disaster damages statewide. The strategy has been designed to be consistent with the State Mitigation Plan and will serve to:

- Describe actions for Hazard Mitigation (HM);
- Identify opportunities to achieve hazard mitigation efforts within the state; and
- Document these efforts so they may be shared and enhanced in future disasters.

This document is a multi-agency effort. For this disaster, the Ohio Emergency Management Agency (Ohio EMA), the Ohio Department of Natural Resources (ODNR), and FEMA coordinated to develop strategies and priorities for HM within this disaster.

DESCRIPTION OF THE EVENT

Beginning on February 14, 2018, and continuing through February 25, 2018, a persistent band of moderate to severe storms moved across Region V impacting Illinois, Indiana, Michigan, Ohio, and Wisconsin. While precipitation levels and storm-related damages varied, Ohio experienced a significant amount of flooding and subsequent damage along the southern portion of the state. The snowmelt and continued rain throughout the incident period, combined with the frozen soils, led to flooding along area streams, rivers, and low-lying areas. Numerous flood gauges in this area rose to moderate flood stage, and rainfall totals in the impacted areas during the incident period ranged from a total of five to nine inches. Following these storms, there were several road closures as well as reports of inaccessible areas throughout southern Ohio due to standing water.

Immediately following the onset of this event, the Ohio State Emergency Operations Center (SEOC) began actively assessing and monitoring the situation across the state. The Governor of Ohio declared a State of Emergency on February 24, 2018 for Adams, Athens, Belmont, Brown, Clermont, Columbiana, Gallia, Hamilton, Hocking, Jackson, Jefferson, Lawrence, Meigs, Monroe, Muskingum, Scioto, and Washington Counties.

Widespread flooding culminated February 26, 2018, when the Ohio River at Cincinnati rain gauge showed a crest of 60.53 feet, 8 feet above flood stage and the highest crest since 1997. Communities near the river and its tributaries incurred damages to roads, bridges, and public buildings, as well as basement flooding and sewage backup. According to the Governor, preventative steps on the part of state and local agencies, such as Ohio EMA, shielded the area from the worst possible damage. The SEOC was partially activated with Emergency Support Functions (ESFs). A FEMA Region V Liaison Officer was deployed to the SEOC from February 25, 2018, through February 27, 2018, and the SEOC returned to normal operations on February 27, 2018.
There were several local evacuations due to flooding and the American Red Cross opened three shelters in the impacted areas. There was one confirmed fatality (Shelby County) as a result of this event, and at its peak, there were 10,449 customers without power statewide. On March 6, the Governor requested a joint preliminary damage assessment (PDA) conducted by local, state, and federal emergency management officials. The joint PDA resulted in documentation of approximately $44 million worth of damages to county, village and township roads, bridges, and public buildings. On March 26, the Governor requested a Presidential Disaster Declaration.

On April 17, 2018, a disaster was declared for the State of Ohio, due to severe storms, flooding, and landslides that occurred during the incident period of February 14, 2018, through February 25, 2018. As a result of that declaration, Public Assistance has been made available for Adams, Athens, Belmont, Brown, Columbiana, Gallia, Hamilton, Jackson, Lawrence, Meigs, Monroe, Muskingum, Noble, Perry, Pike, Scioto, Vinton, and Washington Counties. Hazard Mitigation is available statewide.

II. MISSION, VISION, AND PRIORITIES

The FEMA Mission and Strategic Plan, FIMA Moonshots, and State and Regional priorities were taken into account in the development of this HM Strategy. The following is a summary:
FEMA MISSION
Helping people before, during, and after disasters.

FEMA STRATEGIC PLAN
This FEMA 2018-2022 Strategic Plan was developed with input from our external partners—state, local, tribal, and territorial governments, non-governmental organizations, and the private sector—as well as FEMA employees from offices and directorates across the agency. The vision for the next five (5) years includes objectives that Mitigation directly supports.

The Strategic Plan sets out three overarching Strategic Goals:

- **Build a Culture of Preparedness**
  Every segment of our society, from individual to government, industry to philanthropy, must be encouraged and empowered with the information it needs to prepare for the inevitable impacts of future disasters.

- **Ready the Nation for Catastrophic Disasters**
  FEMA will work with its partners across all levels of government to strengthen partnerships and access new sources of scalable capabilities to quickly meet the needs of overwhelming incidents.

- **Reduce the Complexity of FEMA**
  FEMA must continue to be responsible stewards of the resources we are entrusted to administer. We must also do everything that we can to leverage data to drive decision-making, and reduce the administrative and bureaucratic burdens that impede impacted individuals and communities from quickly receiving the assistance they need.
FIMA - RISK MANAGEMENT DIRECTORATE: Moonshots

The Federal Insurance and Mitigation Administration's (FIMA's) mitigation efforts are significant, are conducted across FIMA's directorates and include visible and less tangible activities, including mitigation planning and grants, investments in better data and maps for decision-making, and capacity building of FIMA stakeholders at the local, state, tribal, and national levels.

The purpose of "moonshots" is to engage, challenge, and motivate FIMA members around certain core objectives. FIMA Leadership believes that moonshot targets should engage staff across various directorates and offices around a common goal. Ideally moonshots address both the Performance and Organizational Health aspects of FIMA's 2017 Leadership Intent. Two aspirational ideas that cut across FIMA:

1. **Double policies-in-force by 2023**
2. **Increase mitigation Investments by 4x by 2023**

While both Moonshots are applicable to all FIMA employees, the Mitigation Investment moonshot is jointly sponsored by the Mitigation and Risk Management Directorates. Selective Executive Service Leads are Mike Grimm and Nick Shufro. Team Leads are Jennie Orenstein and Kathleen Smith. The Double Policies Moonshot is led by the Insurance Directorate under David Maurstad and Paul Huang.

STATE PRIORITIES

The State's HMGP priorities for FEMA-4360-DR-OH, as defined in the State of Ohio Administration Plan, are as follows:

- 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.

FEMA REGION V PRIORITIES

In support of the FIMA Moonshot, to "double coverage by 2023," one of FEMA Recreational Vehicle's (RV) priority is to deliver outreach on flood insurance through a coordinated Flood Insurance Outreach Strategy. This priority is also in line with the FEMA Strategic Plan goal to "Build a Culture of Preparedness" and objective of "Closing the Insurance Gap."

Floods are the most common and most costly natural disaster in the U.S. and it is important for individuals and communities to know their flood risk and take steps to minimize that risk and protect their financial investments. The Flood Insurance Outreach Strategy will be designed to provide outreach materials to increase an individual's knowledge of flood risk and understanding of flood insurance. Region V would like to focus on the Cincinnati Metropolitan Area as the target for this outreach. Outreach activities should include outreach at special events and state/county fairs, coordination with the State Insurance Commissioner's Office, and distribution of flood insurance publications to a wide range of stakeholders. Additionally, research on the availability of private flood insurance coverage in Ohio would be valuable to help inform risk management knowledge.
III. HAZARD MITIGATION GOALS, OBJECTIVES, AND ACTIONS

The mission of hazard mitigation is to protect lives and prevent or reduce the loss of property from hazard events. Post-disaster, this is accomplished through comprehensive efforts authorized by the Stafford Act, as amended by the Disaster Mitigation Act of 2000, the National Flood Insurance Act, the Flood Insurance Reform Act, and Executive Orders.

In this event, the specific HM strategy goals, listed below, lay the foundation for building the capacity to mitigate future disaster damage throughout the state.

HM GRANTS AND PLANNING

Grants and Planning supports state, local, tribal, and territorial governments in the development and update of multi-hazard mitigation plans; provides technical assistance to support the use of Hazard Mitigation Assistance (HMA) grants, specifically Hazard Mitigation Grant Program (HMGP) funding for projects that are consistent with hazard mitigation plan strategies; and collaborates with HM Hazards and Performance Analysis (HPA), Public Assistance (PA), and Environmental Planning and Historic Preservation (EHP) partners to synchronize hazard mitigation opportunities authorized under Sections 404 and 406 of the Stafford Act.

Grants

For this declaration, mitigation briefings will be conducted in conjunction with PA briefings, whenever possible. If Mitigation Branch staff are not available to conduct HMGP briefings in coordination with PA briefings, a series of four webinar briefings will be offered. A webpage was also created on the Ohio EMA Website to notify potential subrecipients of the availability of HMGP funds.

As identified in the Administrative Plan for the HMGP, there will be two application cycles for HMGP funds. The first application cycle will be expedited and will include: 1) unfunded Pre-Disaster Mitigation (PDM) and Flood Mitigation Assistance (FMA) applications, 2) "shelf applications" that are ready to be submitted, 3) applications developed to mitigate damage caused by the disaster event and 4) applications for "substantially damaged structures." Applications in category 1 will not be required to submit an HMGP application. The existing eGrants application for these projects will be used to enter the required project application data into NEMIS. All other applicants in the cycle complete a full HMGP application by the established deadline in order to be considered for funding. The State Hazard Mitigation Team (SHMT) will review these applications and make award recommendations to the Governor's Appointed Representative (GAR).

Also as noted in the Administrative Plan for the HMGP, the second HMGP application cycle will be a two-part process. Pre-applications are submitted first. Pre-applications are reviewed and ranked by the SHMT and enough pre-applications to expend 150 – 200% of the estimated remaining 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 will be evaluated by the SHMT after the deadline for submission has passed. Projects will then undergo a cost effectiveness, environmental, and completeness and eligibility review conducted by the Mitigation Branch staff. Eligible and complete full project applications will then be submitted to FEMA for approval.

Program Administration by States (PAS) is a program created to provide a more streamlined grant approval process allowing communities to get the hazard mitigation funds they need faster. FEMA can delegate activities and subtasks to States, including mitigation planning review. States must submit a request letter to FEMA to indicate interest. States must have a current FEMA-approved mitigation plan, experience in the
activities/subtasks requested, and a demonstrated commitment to hazard mitigation. Under this declaration Ohio EMA would like to explore this option and potentially participate in the program.

Planning
Hazard mitigation is most effective when implemented under a comprehensive, long-term mitigation plan. State, tribal, and local governments engage in hazard mitigation planning to identify risks and vulnerabilities associated with natural disasters and develop long-term strategies for protecting people and property from future hazard events. Mitigation plans are key to breaking the cycle of disaster damage, reconstruction, and repeated damage.

According to the Disaster Mitigation Act of 2000 (DMA2K), states must have an all hazards mitigation plan approved by the Federal Emergency Management Agency (FEMA) in order to remain eligible for federal mitigation and public assistance funds associated with a presidential disaster declaration.

The State of Ohio Standard Hazard Mitigation Plan was first approved by FEMA in 2005. The 2014 Enhanced Hazard Mitigation Plan revision details Ohio’s highest priority hazards: river/stream flooding; tornadoes; winter storms; landslides; dam/levee failure; wildfire; coastal flooding; earthquakes; coastal erosion, drought; severe summer storms; invasive species; and land subsidence hazards. The 2014 Ohio mitigation plan also integrates the State Hazard Analysis, Resource and Planning Portal (SHARPP)—a web-based system that captures and disseminates state and local hazard mitigation planning and project information.

Applicants with a FEMA-approved State or Tribal Enhanced Mitigation Plan are eligible for HMGP funding not to exceed 20 percent of the estimated total Federal assistance under the Stafford Act, up to $35.333 billion of such assistance, excluding administrative costs authorized for the disaster. Therefore, because Ohio has an Enhanced Mitigation Plan, the State is eligible for HMGP funding in accordance with this provision.

The Ohio Comprehensive Hazard Mitigation Plan Report, as of March 27, 2018, provides the status of local mitigation plans statewide (See Appendix 2). All subapplicants for HMGP must have a FEMA-approved local Mitigation Plan at the time of obligation of grant funds for mitigation projects.

Goal 1: Partner with the State of Ohio to identify mitigation opportunities and assist communities in the development of cost-effective and technically feasible mitigation projects.

Objective 1.1 Build and support the capacity of the State to implement Hazard Mitigation Assistance

1.1.1 Support the State in the development of a Program Administration by State (PAS) agreement related to approval of Hazard Mitigation Plans

- Coordinate with Ohio EMA to explore and potentially execute a PAS agreement between the State and FEMA for review of Hazard Mitigation Plans

1.1.2 Support submission and implementation of State Management Costs
• Ohio EMA will submit the initial request for State Management Costs (SMC) in mid-May 2018 after receipt of the initial 30-day lock-in of the estimate of the amount of funding eligible to be used for HMGP, and FEMA will approve and obligate up to 25% of SMC funds.
• Ohio EMA will submit to FEMA by mid-August 2018 (no later than 120 days after the date of declaration) the SMC narrative on how the State will utilize the SMC funds
• Ohio EMA will submit a request for the remaining SMC funds after 12 months from the declaration or in April 2019, and FEMA will approve and obligate the remaining funds for SMC.

1.1.3 Administer HMA grants to reduce future damages from hazards as identified in the State Hazard Mitigation Plan.

• Ohio EMA will contact those counties whose plans have expired or are at risk of expiring to encourage them to apply for a planning grant in May 2018.
• Ohio EMA will solicit pre-applications from affected communities including contacting local officials, mailing application packages, and attending local meetings by December 2018.
• Ohio EMA will submit to FEMA the Application for Federal Assistance (SF424) and Assurances for the Disaster.

1.1.4 Develop two application cycles with the first cycle of submittals including applications for projects which were not selected for the 2017 non-disaster HMA programs. (HMA and Ohio EMA)

Cycle 1, Steps:
• The SHMT will review subapplications and make award recommendations to the Governor's Authorized Representatives (GAR).
• The Ohio EMA will submit HMGP subapplications to FEMA in May 2018.
• FEMA will review and approve sub-applications and obligate HMGP funds.

Cycle 2, Steps:
• The SHMT will review and rank pre-applications to expend 150–200% of the estimated remaining project funds selected for full project application development by May 2018.
• Subapplicants will submit full subapplications to Ohio EMA by December 2018.
• Ohio EMA will submit full subapplications to FEMA beginning in December 2018.
• FEMA will review and approve subapplications and obligate HMGP funds in a timely manner.

Goal 2: Ensure compliance with the Disaster Mitigation Act of 2000, Part 322 (Mitigation Planning Requirements)

Objective 2.1 Encourage communities in the declared area with HM plans that have not been adopted to complete the adoption and resolution process.

2.1.1 FEMA will coordinate with the Ohio EMA to develop a letter to send to communities that have not adopted their local mitigation plan.
First, FEMA will provide a list of communities that have not adopted local mitigation plans.
Ohio EMA will send emails to the County Emergency Management Agencies advising that there are communities within their county that have not adopted to local plan.
Then, FEMA will send letters to the community to encourage communities to submit mitigation plan adoptions to the state.

HM FLOODPLAIN MANAGEMENT AND INSURANCE

Floodplain Management and Insurance promotes community participation in the National Flood Insurance Program (NFIP); monitors compliance with NFIP regulations during rebuilding/relocating; and provides floodplain management expertise to state, local, tribal, and territorial governments, and Joint Field Office (JFO) partners.

Insurance
For this declaration, FEMA will initiate the development of targeted Flood Insurance Outreach Strategy to encourage individuals to consider purchasing flood insurance. The strategy will be developed in coordination with FEMA Region V Floodplain Management and Insurance Branch and External Affairs.

Floodplain Management
Communities that participate in the NFIP are required to adopt and enforce floodplain management regulations that meet or exceed the minimum requirements of the Program. The requirements are intended to prevent loss of life and property and reduce taxpayer costs for disaster relief, as well as minimize economic and social hardships that result from flooding. In exchange for community adoption and enforcement, FEMA makes flood insurance available to all property owners throughout the community. There are 98 communities statewide that do not participate in the NFIP.

Communities that are identified as flood-prone, but do not participate in the NFIP are subject to sanctions. Federal grants and loans for development in SFHAs and Federal disaster assistance for flood damages are not available in these communities.

Of the 98 non-participating communities, 14 have been identified as flood-prone and are subject to sanctions. (See Appendix 1)

For participating communities in the affected areas, one of the most demanding requirements of the NFIP in a post-disaster environment is to evaluate damaged structures to determine if they have been substantially damaged. Additionally, any substantially damaged structures are required to repair or reconstruct in compliance with the local ordinance. This often means elevating, flood proofing, or relocating structures to reduce their future risk to flooding.

For this disaster, FEMA and the State will coordinate to provide any technical assistance or training on substantial damage and other requirements of the NFIP as requested by communities in the affected areas. Rebuilding after an event also provides an opportunity to build back safer and stronger. Therefore, FEMA and the State will work with communities interested in adoption of higher standards.

Goal 3: Assist the State of Ohio in increasing awareness and knowledge of the NFIP and supporting floodplain management compliance and flood insurance.

Objective 3.1 Encourage individuals and communities to evaluate their risk and protect their investments through a targeted Flood Insurance Outreach Strategy.
3.1.1 FEMA will develop a strategy to deliver insurance outreach to communities and individuals in the affected areas

- Coordinate with RV to develop and implement an Insurance Outreach Strategy in the target area, Cincinnati, to include:
  - Agent training—Coordinate with H2O Partners for targeted agent training in Ohio (COMPLETE)
  - Outreach at special events—State and county fairs, first time homebuyers events
  - Coordination with State Insurance Commissioner's office and the Big I (Ohio Insurance Association)
  - Providing Publications to communities, libraries, and home repair stores
  - Analysis of private flood insurance coverage throughout the state
  - Coordination with External Affairs to provide proactive and accurate flood insurance messaging to penetrate the digital media market

**Objective 3.2** Encourage participation in the NFIP through outreach to non-participating communities throughout the state.

3.2.1 Reach out to all non-participating communities throughout the State and invite them to join the NFIP

- Gather current contact information for non-participating/sanctioned communities
- Prepare letter, with attachments, to be signed by FEMA RV Mitigation Director and sent to communities
- Provide any technical assistance necessary to guide interested communities through the process, COMPLETE—technical assistance will be provided, as needed

**Objective 3.3** Provide appropriate technical assistance to communities on the requirements of the NFIP and opportunities to promote resilience and sustainability.

3.3.1 Reach out to all participating communities in the affected area to remind them of their NFIP responsibilities and offer technical assistance

- ODNR emailed impacted communities (COMPLETE)
- Additional follow-up with Pomeroy may be required

3.3.2 Provide publications and technical assistance on compliance with NFIP minimum standards and encourage higher standards

- Cincinnati request (review of ordinance and suggestion for higher standards)
- New Richmond request (support of higher standards in campgrounds)
- Hamilton County (concerns over new National Flood Hazard Layer—no hyperlink to Letter of Map Amendment—coordinate with Risk Analysis)
- Columbus (support of higher standards for storage of materials)
- Publications requested for Hamilton County, Cincinnati, and New Richmond

**COMMUNITY EDUCATION AND OUTREACH**
During the preliminary damage assessment phase of the disaster, potential best practices and success stories were identified. A Best Practice Writer will support the development of potential best practices and successes. Additionally, FEMA and the State of Ohio will coordinate to provide training opportunities to communities.

Goal 4: Advance education, outreach and community resilience in support of the Hazard Mitigation Strategy

Objective 4.1 Identify hazard mitigation measures that effectively reduce damages and develop them into Best Practices and Success Stories, media releases, stories for social media, and local newsletters.

4.1.1 Capture and develop Best Practice story opportunities including those based on past Hazard Mitigation projects implemented in designated areas.

- The following leads have been identified for potential best practices or success stories:
  - Delhi—Successful HMGP projects
  - Cincinnati—East End avoided losses due to acquisition projects
  - Cincinnati—Highlight success of building codes/floodplain management standards as illustrated by an elevated school that avoided losses
  - New Richmond—Successful HMGP projects

Objective 4.2 Identify hazard mitigation training needs and outreach opportunities and provide training and resources to support the needs

4.2.1 Provide training to support project application development and submittal.
- Ohio EMA and FEMA have identified the following trainings for state and local officials responsible for preparing HMA applications:
  - HM Grant Application Development Workshop: 4-hour hazard mitigation workshop based on received pre-applications (this course will not result in a FEMA certificate)
  - BCA Training: A one-day training focusing on storm water and safe room projects (After May 2017 in Columbus)
  - Environmental and Historic Preservation (EHP) Training: A one-day training on EHP for HMA
  - Quality Application Development Webinar: A one-day training (Early to mid-June)

4.2.2 Provide training to support community compliance with NFIP requirements
- Ohio DNR and FEMA have identified the following trainings for NFIP stakeholders
  - Substantial Damage training for Cincinnati area communities
  - Elevation Certificate and Letter of Map Change Training for Ohio River Valley Professional Licensed Surveyor Organization (May 18)

4.2.3 Leverage and build on existing partnerships between the FEMA Region, and local and state organizations to maintain public awareness of hazard mitigation.
- Provide communities with publications for display and dissemination

April 29, 2018
HAZARDS AND PERFORMANCE ANALYSIS

Hazards and Performance Analysis (HPA) informs Response and Recovery operations with risk analysis and provides technical assistance to state, local, tribal, territorial, and federal partners.

With significant investment being made in mitigation, demonstrating cost-effectiveness is crucial for continued support, Loss Avoidance Studies (LAS) quantify the losses avoided (also known as damage prevented or benefits) due to the implementation of the projects. FEMA and Ohio EMA explored the possibility of conducting a LAS for this event, however, the detailed data on acquisition projects in the declared area required to complete a LAS were not available. In lieu of this data, FEMA and Ohio EMA decided to prepare Best Practice and Success Stories to document the projects for the state. Additionally, FEMA RV and Ohio EMA will work with the US Army Corps of Engineers to determine what is required to finalize draft LAS’s completed for the communities of Findlay and Ottawa.

HM HPA analyzes past performance and projects for structural and infrastructure mitigation funded under Sections 404 or 406 of the Stafford Act and supports the development and adoption of more rigorous, risk informed building codes and standards. In this disaster, in support of Public Assistance (PA) projects, Mitigation will deploy 406 Specialists to work directly with the PA organization. The 406 specialists will be embedded on the PA teams. PA has requested 8 406 Mitigation Specialists, however, there are not 8 available. Therefore, PA will be assessing the PA Specialists that are deployed to the disaster to determine if they have knowledge and experience doing 406 Mitigation. Those that do have 406 capability will be redirected to provide that support and any remaining needed staff will be coordinated through the Mitigation Cadre.

HPA will prepare the Best Available Flood Hazard Information Memo in support of the disaster. The memo provides guidance on the following: for FEMA in complying with 44CFR Section 9.7(c) and Executive Order (E.O.) 11988 Sec. 2(a) (1) on the use of best available flood hazard information; and, on the use of work maps, Preliminary Flood Insurance Rate Maps (FIRMs) and Flood Insurance Studies (FIS) or when Advisory BFEs are available to communities for new and substantially improved/substantially damaged structures. The memo also acknowledges the coordination responsibilities for federal agencies to communicate and allow for an informed and collaborative approach to unifying environmental and historic preservation compliance reviews for disaster recovery work under the Unified Federal Review Process.

Goal 5: Provide risk analysis products to support sound decision making in the recovery and rebuilding process in order to reduce vulnerability and increase resiliency to future flood events.

**Objective 5.1** Coordinate with Public Assistance to assist in the identification of potential mitigation opportunities.

5.1.1 Deploy 406 Mitigation staff to support the needs of PA and embed the staff within the PA organization

**Objective 5.2** Provide guidance to FEMA, the State, and communities on the best available flood hazard data for use in rebuilding and recovery.

5.2.1 Prepare Memo on available flood hazard information in compliance with FEMA Policy #104-008-2

**Objective 5.3** Evaluate the possibility of conducting a losses avoided study and finalize previously prepared losses avoided studies that are still in draft format.

5.3.1 Coordinate with Ohio EMA and ODNR to determine if data exists to conduct a losses avoided study for this disaster (Complete)
5.3.2 Coordinate with USACE and Ohio Silver Jackets to determine what is required to finalize draft losses avoided studies

**HM STRATEGY WORK GROUP**

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<tr>
<th>State</th>
<th>Ohio EMA</th>
<th>Ohio DNR</th>
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<tr>
<td>Steve Ferryman</td>
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<td>State Hazard Mitigation Officer</td>
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<td>Alicia Silverio</td>
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<td>State NFIP Coordinator</td>
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<tr>
<td>Dena Barnhouse</td>
<td>Ohio DNR</td>
<td>Dam Safety and Floodplain Program Manager</td>
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**FEMA Region V**

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<th>Group Supervisor</th>
<th>HMA Grants Specialist</th>
<th>Floodplain Management Specialist</th>
<th>Engineer</th>
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<td>Julia McCarthy</td>
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<td>Pamela Broviak</td>
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<td>Laurie Smith-Kuypers</td>
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<th>Planner</th>
<th>Outreach Specialist</th>
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<td>Patricia Beck</td>
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## Community Declared Disaster - Non Participating
### OHIO

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Total: 14

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04/20/2019
Ohio Comprehensive Hazard Mitigation Plan Report (as of 3/27/18)

Plan Status (as of 3/27/18)
- Approved
- Approved Pending Adoption (APA)
- Expired
- Expired with Planning Grant
- Expires within 24 months
- Expiring

April 29, 2018