



OREGON DEPARTMENT OF EMERGENCY MANAGEMENT

Hazard Mitigation Assistance Building Resilient Infrastructure & Communities (BRIC) Flood Mitigation Assistance (FMA)

Announcement and Guidance: FEMA’s 2023 BRIC and FMA Grant Round

This announcement shares available information regarding the forthcoming release of the Federal Emergency Management Agency (FEMA) Notice of Funding Opportunity (NOFO) for the FY2023 BRIC and FMA grant round. This announcement also provides information about Oregon’s Department of Emergency Management (ODEM) guidelines to potential BRIC and/or FMA sub-applicants required in the grant sub-application process.

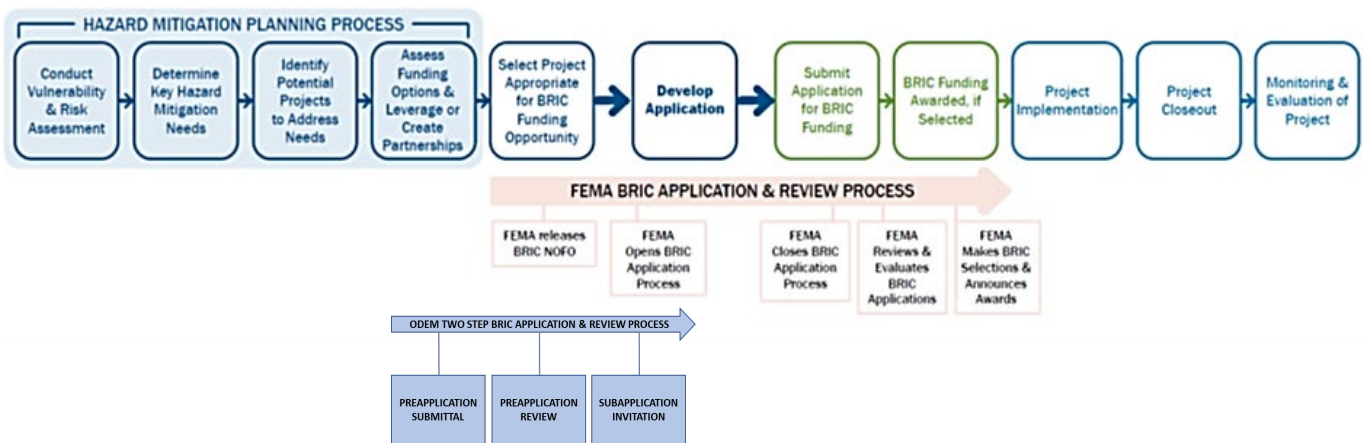
FY2023 BRIC and/or FMA Grant Application Timeline

9/18/2023: Oregon Department of Emergency Management is opening up the FY2023 grant round for BRIC and FMA. The intent is to collect pre-applications to determine eligibility and provide technical assistance to our communities. Once the NOFO is released for BRIC and/or FMA, the Mitigation Team may coordinate through additional request for information to ensure all pre and subapplications are consistent with the priorities of the FEMA NOFO.

8/29/2023: FEMA has put an INF in place which will delay the release of the BRIC and FMA FY2023 NOFO until resolved by Congress.

FEMA is anticipated to announce the opening of their application period for BRIC and FMA FY2023 program later this Fall. ODEM is designated to administer and oversee these programs for the State, including the application process for all eligible entities with the State. Federally recognized Tribes may apply directly to FEMA.

Figure 1 – FEMA BRIC/FMA Program Cycle



In line with FEMA's process (see *Figure 1*), ODEM has established a two-step process for BRIC and FMA sub-applicants that starts with a pre-application followed by a full sub-application. ODEM's process and timeline has been adjusted to accommodate a delay in the NOFO release and ensure we meet FEMA's (anticipated) January 2024 deadline for the State, as the applicant, to submit its complete package of sub-applications. All entities seeking consideration must follow the State's submission process and deadlines, which are described below. Any changes to the timelines, eligibility requirements, or other items identified in the released NOFO will be immediately communicated to those applying for BRIC and/or FMA.

STEP ONE: Pre-application and Eligibility Review

- a. Beginning on **Thursday, September 20th, 2023** ODEM's Mitigation Section will begin to accept pre-application forms, which are available on our website (insert) and submitted to ODEM via email to oem.hazardmitigation@oem.oregon.gov. ODEM will review the pre-applications for eligibility and contact potential sub-applicants to discuss their proposals.
- b. Entities who wish to reenter a sub-application that was submitted to FEMA GO during the BRIC and/or FMA FY2022 round may do so by submitting a Letter of Intent (LOI) on their entity letter head¹ to ODEM.
- c. Any entities intending to submit multiple pre-applications for consideration will rank their pre-applications by priority.
- d. Entities are encouraged to contact their county Emergency Managers and ODEM Regional Coordinators to review their pre-applications prior to submittal.
- e. The submittal for pre-applications or reentry LOI's will close on **Monday, October 16th, 2023**, unless otherwise modified by ODEM.
- f. ODEM will begin holding office hours for BRIC and/or FMA pre-applications on **Thursday, September 28th at 2:00pm**. Please email oem.hazardmitigation@oem.oregon.gov to sign up.

STEP TWO (by invitation only): Development and Submission of a full FEMA GO Sub-Application

- a. ODEM will invite eligible entities to submit full sub-applications in FEMA GO only after their pre-application has been received, reviewed by panel and ODEM has contacted them to discuss the proposal's eligibility. Sub-applicants who do not submit a pre-application form via the process described above will not be eligible for invitation to submit full sub-applications².
- b. For sub-applicants who have completed Step One (pre-application or LOI), invitations for sub-applications are expected to be sent the **1st week of November, 2023**, unless otherwise modified by ODEM.
- c. Sub-applicants who receive an invitation will have until **mid to late December 2023** to submit a complete FEMA GO sub-application for ODEM review. This date will be formally established after the release of the NOFO. Sub-applicants may submit for review at any time prior to this deadline. Any sub-applications submitted after this date will not be reviewed or submitted to FEMA for consideration.
- d. ODEM will review sub-applications for eligibility, completeness, and cost effectiveness. We may request additional information and clarifications during the review and will work with sub-applicants to make applications as complete and competitive as possible. Sub-applications deemed substantially incomplete and/or lacking key required implementation information by the December deadline shall be removed from consideration in the current round.

¹ BRIC FY2022 sub-applications determined "Did Not Meet Requirements" will receive a technical review separately following FEMA release of the discrepancy report.

² For additional information on FEMA's sub-application Considerations and Scoping (including sub-application development) view pages 41-51 of the Hazard Mitigation Assistance Program and Policy Guide: <https://www.fema.gov/grants/mitigation/hazardmitigation-assistance-guidance>

- e. ODEM will complete its sub-application review and submit its final state application package to FEMA for the FY2023 BRIC and/or FMA program no later than FEMA's anticipated state submission deadline, which is currently anticipated in **late January 2024**.
- f. FEMA is forecasted to announce its selections for FY2023 BRIC and/or FMA grants in late **Summer 2024**. Following this notice of selection, FEMA will conduct more in-depth reviews of the proposals before issuing final awards. Depending upon project complexity and FEMA's internal review process for specific mitigation activities, notification of grant award dates will vary.

FY2023 Building Resilient Infrastructure and Communities (BRIC)

The BRIC program makes federal funds available to states, U.S territories, tribes, and local communities for pre-disaster mitigation activities. BRIC is a cost-shared grant, 75% federal funds and 25% local (non-federal) matching funds, which is distributed through the reimbursement of eligible expenses over a 4-year period of performance. Detailed program information is available at <https://www.fema.gov/bric>.

- Eligible Sub-Applicants: Local governments, including cities, townships, counties, special district governments, and tribes (including federally recognized tribes who choose to apply as sub-applicants) are eligible for grant consideration. All sub applicants must have a FEMA-approved hazard mitigation plan by the grant application deadline AND at the time of award, in accordance with Title 44 Code of Federal Regulations (CFR) Part 201.
- Funding: All statements regarding potentially available funds are estimates inferred from FY22 nationally available funding for FEMA's BRIC of \$2.95 billion. FEMA will establish specific state allocations and tribal set-a-sides, as described in their NOFO, this is expected to leave about \$2.13 billion available for the national project competition.

BRIC funds are competitively available for eligible mitigation activities that fall into two main categories:

1. Capability- and Capacity-Building (C&CB): activities which enhance the knowledge, skills, expertise, etc., of the current workforce to expand or improve the administration of mitigation assistance. This includes activities in the following sub-categories: building codes activities, partnerships, project scoping (previously known as advance assistance), mitigation planning and planning-related activities (e.g., writing or updating hazard mitigation plans), and other activities.
2. Mitigation Projects: cost-effective projects designed to increase resilience and public safety, reduce injuries and loss of life, and reduce damage and destruction to property, critical services, facilities, and infrastructure. The ceiling for federal share available for any single project sub-application is historically around \$50,000,000.

The following funding details apply to all sub-applications, regardless of category:

- Up to 10 percent of any single sub-application can be used for information dissemination activities, including public awareness and education (brochures, workshops, videos, etc.) related to a proposed C&CB activity or mitigation project.
- Up to 5 percent of any single sub-application can be used for eligible and reasonable indirect costs, direct administrative costs, and other administrative expenses associated with the specific mitigation measure or project. Unlike all other sub-application budget categories, these Management Costs funds are not subject to the local cost share requirement; they are 100% federal and do not require local matching funds.

For general, programmatic guidance on mitigation grant eligibility categories and requirements, please see the [2023 Hazard Mitigation Assistance Guide](#). This guide was updated in March 2023 and contains significant updates from the prior 2015 version. When it is released, FEMA's BRIC FY2023 NOFO will provide specific priorities for FY2023.

ODEM encourages mitigation proposals for the following project types and methods based on statewide priorities:

- Support state and local governments, tribes and territories through capability- and capacity-building or technical assistance that enables communities to identify mitigation actions and implement projects that reduce risks posed by natural hazards.
- Projects that advance climate adaptation, or address impacts of climate change including drought, extreme heat, precipitation, wildfire, increasing climactic events, and results that integrate innovative nature-based solutions³. As future conditions, like climate change, amplify these hazards, nature-based solutions can help communities adapt and build resilience to natural hazards, which may be exacerbated by climate change.
- Encourage and enable innovation while allowing flexibility, consistency and effectiveness.
- Promote partnerships and enable high-impact investments to reduce risk from natural hazards with a focus on critical services and facilities, public infrastructure, public safety, public health and communities.
- Promote equity, including by helping members of disadvantaged groups and prioritizing 40% of the benefits to disadvantaged communities as referenced in Executive Order (EO) 14008 on Tackling the Climate Crisis at Home and Abroad (Jan. 27, 2021) in line with the Administration's Justice40 Initiative.
- Support the adoption and enforcement of building codes, standards and policies that will protect the health, safety and general welfare of the public, considering future conditions, prominently including the effects of climate change, and have long-lasting impacts on community risk reduction, including for critical services and facilities and for future disaster costs.
- Critical Infrastructure and Facilities: projects that correct or eliminate seismic structural deficiency, severe wildfire vulnerability, or repetitive flooding for community lifeline infrastructure such as water, wastewater, powerlines, communications, transportation and roadways, public safety facilities (fire, police, hospitals, 911, schools, etc.), and hazardous materials.
- Coastal Erosion: projects that address root causes of coastal erosion, incorporate green infrastructure methods to reduce or eliminate vulnerability to erosive events, and inhibit development in high-risk coastal areas (especially V Zones).
- Tsunami Inundation: projects within mapped tsunami inundation zones that develop, design and/or construct tsunami vertical evacuation structures or evacuation routes, as well as projects designed to improve evacuation efficiency and access to vertical evacuation structures post-earthquake (e.g., landslide mitigation along evacuation routes).
- Extreme Temperatures: projects that improve community resilience to extreme temperatures through measures such as proactive planning, green infrastructure and urban design, structural retrofits, warming and cooling shelters.
- Wildfires: projects that invest in measures that reduce wildfire disaster impacts, suffering and create safer conditions and more resilient communities.
- Drought: projects that increase community resilience through conservation in a watershed-scale approach that restores rainwater infiltration to increase aquifer recharge, rain-water harvesting, storage, surface infiltration and off-sets demand of non-potable water through xeriscaping, or drought-tolerant landscaping.
- Flood Mitigation: projects that address root causes of hydrologic flow problems and expand drainage/storage capacity, such as improving stream/river connectivity with floodplains, reducing channelization, reducing impervious surfaces, and removing hydrologic barriers.
- FEMA has published a 2021 portfolio of model HMA activities for sub-applicant reference⁴ which is a useful resource of successful mitigation project examples.

³ FEMA Building Community Resilience with Nature-Based Solutions:

https://www.fema.gov/sites/default/files/documents/fema_riskmap-nature-based-solutions-guide_2021.pdf

⁴ FEMA HMA Mitigation Action Portfolio: https://www.fema.gov/sites/default/files/2020-08/fema_mitigation-action-portfolio-support-document_08-01-2020_0.pdf

The Benefit Cost Analysis (BCA):

For the FY2022 BRIC round, ODEM was able to provide BCA support through contracted services to those sub-applicants with specific needs. This BCA support may be available for the FY2023 subapplication period. The BCA is required for all mitigation project sub-applications to determine cost effectiveness using FEMA’s benefit-cost analysis (BCA) software, Version 6.0, except those proposals covered under the Pre-calculated Benefits waiver and Community & Capacity Building proposals . BCA training, resources, contact information and the MS Excel based software are available for free on [FEMA’s BCA website](#). Please note ODEM staff are unable to provide technical assistance for BCA software download issues, please contact the BCA helpline with any issues.

While a BCA is required for all project sub-applications, two exception project types fall under FEMA’s “Pre-Calculated Benefits” waiver: a) property acquisitions located within the Special Flood Hazard Area (SFHA) that cost \$323,000 or less, or b) home elevations within the SFHA that cost \$205,000 or less⁵. FEMA considers these to be cost effective and requires no further BCA work. FEMA allows sub-applicants to apply locality multipliers to these amounts where appropriate. Additionally, acquisition projects of RL and SRL properties outside the SFHA with a project cost of \$323,000 or less are also considered cost effective; no BCA is required.

Review and Evaluation:

When the official NOFO is released, FEMA’s BRIC and FMA FY2023 NOFO will provide specific evaluation criteria, which includes technical and qualitative evaluation metrics. These scores will be used to determine the competitive outcomes for all sub-applications that pass their initial Eligibility and Completeness reviews.

As part of the pre-application process, ODEM will further assess pre-applications based on the evaluation and scoring criteria described in *Table 1* below.

Table 1. Sample ODEM Project Evaluation Criteria and scoring scale for FY2023 BRIC

Mitigation Project Evaluation Criteria	0	1	2	3
The proposed project has a clear and direct link to action items within a local, FEMA-approved Hazard Mitigation Plan.				
The proposed project anticipates impacts on disadvantaged and/or underserved communities, especially regarding the Justice40 Initiative ⁶ , equitable risk-reduction outcomes and whole-community approaches to disaster resilience.				
The proposed project clearly addresses climate adaptation, or impacts of climate change including drought, extreme temperature, precipitation, wildfire, increasing climactic events, and integrates innovative nature-based solutions.				
The proposed project includes multiple hazard categories and engages multiple community lifelines and critical infrastructure vulnerability.				
The proposed project has multiple benefits beyond hazard risk reduction, including community resilience, sustainable development, and environmental restoration.				
The proposed project is collaborative and promotes shared responsibility & partnerships within and between communities, and is supported by multiple jurisdictions or agencies.				

⁵ FEMA allows sub-applicants to apply locality multipliers to these amounts, information can be found at: <https://www.fema.gov/grants/guidance-tools/benefit-cost-analysis/streamlined-bca>

⁶ The Climate and Economic Justice Screening Tool (CEJST) is a geospatial mapping tool designed to identify disadvantaged communities that are marginalized and overburdened by pollution and underinvestment. The CEJST is updated annually and can be found at <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

Sub-totals				
Total Score				

Sample score valuation:

0	Not at all	The pre-application entry does not address the criterion at all.
1	Minimally	The pre-application entry addresses the criterion, but information in the subapplication may be confusing, unclear, incorrect, and/or not substantive.
2	Partially	The pre-application entry partially addresses the criterion, but lacks clarity and/or strong support, contains some minor inconsistencies, or does not address all components of the criterion. The degree to which the subapplication demonstrates the criterion has been met is mediocre.
3	Mostly	Although the pre-application entry includes a few minor inconsistencies or areas that need more clarity, there is strong support for most components of the criterion and the degree to which the entry responds and demonstrates the criterion has been met is acceptable.

Additional Information:

1. The FY2023 BRIC and FMA grant round is nationally competitive, ODEM cannot guarantee grant awards to any sub-applicant.
2. State contributions to the non-federal cost share requirements are subject to Legislature approval and cannot be guaranteed at the time of this Announcement. See the 2023 Hazard Mitigation Assistance Program and Policy Guide for more information.
3. To be eligible for the grant award, sub-applicants must have a FEMA-approved Hazard Mitigation Plan at the time of the sub-application deadline AND when funds are awarded. If a plan is still under FEMA review in January 2024, then ODEM will coordinate with FEMA regarding the approval timeline.
4. Private non-profit organizations are not eligible to directly apply for assistance from the BRIC program. Another eligible applicant (e.g., local government or state agency) can however, acting as Sub-applicant Agent and apply on the organization's behalf. The Sub-applicant Agent is then responsible for meeting all award terms and conditions.
5. All sub-applications for BRIC and/or FMA must be made to the State through FEMA's online FEMA GO system⁷. FEMA GO access information will be provided to those sub-applicants who are invited to apply.
6. FEMA will notify applicants (states) whose sub-applications are identified for further review. We anticipate that these notifications will be sent out in late Summer 2024. However, this notification and the applicant's compliance with FEMA-requested pre-award activities are not considered notification or guarantee of an award.
7. Sub-applicants may be reimbursed for eligible pre-award costs incurred prior to the date of grant award for non-construction activities directly related to developing the project proposal. Activities may include, but are not limited to, development of the application, benefit-cost analysis, environmental/historic preservation data, project documentation, and design/engineering. These costs can only be reimbursed a) in accordance with the approved cost share terms, b) are included in the proposed budget, c) with proper documentation, and d) after award is made. If an award is not made, costs are the sole responsibility of the sub-applicant.
8. Except for the above-noted pre-award costs, BRIC and/or FMA grant funds are only available for work performed after FEMA issues an award. For this reason, BRIC AND/OR FMA grants are suitable for projects with extended implementation schedules rather than short-term, time-sensitive projects.

⁷ FEMA Go Startup Guide can be found at: <https://www.fema.gov/grants/guidance-tools/fema-go>

ODEM staff will review timelines with potential sub-applicants and discuss these considerations during pre-application reviews.

9. A sub-application cannot be submitted for both BRIC and/or FMA programs. If a proposal is eligible for FMA then it will not be considered for BRIC.
10. Project sub-applications must determine cost effectiveness using FEMA's benefit-cost analysis (BCA) software, Version 6.0, except those proposals covered under the Pre-calculated Benefits waiver and Community & Capacity Building proposals⁸. The BCA software is MS Excel based and available for free on the linked FEMA site⁹. ODEM staff cannot provide technical assistance for BCA software download issues, please contact the BCA helpline with any issues.

FY2023 Flood Mitigation Assistance (FMA)

The FMA grant program makes federal funds available to states, U.S. territories, federally recognized tribal governments,¹ and local governments to reduce or eliminate the risk of repetitive flood damage to buildings and structures insured under the National Flood Insurance Program (NFIP). It does so with a recognition of the growing flood hazards associated with climate change², and of the need for flood hazard risk mitigation activities that promote climate adaptation, equity, and resilience with respect to flooding. These include both acute extreme weather events and chronic stressors which have been observed and are expected to increase in intensity and frequency in the future. From Fiscal Year (FY) 1996 to FY 2019, FMA obligated over \$1.5 billion in federal share mitigating over 8,000 properties insured by the National Flood Insurance Program.

1. FMA aims to implement projects that reduce flood risks posed to repetitively flooded properties insured under the NFIP.
2. The FMA program also aims to promote equity in the delivery of funds in line with the Administration's Justice40 Initiative, established in Executive Order (EO) 14008: Tackling the Climate Crisis at Home and Abroad. In implementing the Justice40 Initiative, the FMA program is prioritizing assistance that benefits disadvantaged communities as referenced in EO 14008 and subsequent guidance. A disadvantaged community may be characterized by variables including, but not limited to: low income, high and/or persistent poverty, high unemployment and underemployment, racial and ethnic segregation particularly where the segregation stems from discrimination by government entities, linguistic isolation, high housing cost burden and substandard housing, distressed neighborhoods, high transportation cost burden and/or low transportation access, disproportionate environmental burden and high cumulative impacts, limited water and sanitation access and affordability, disproportionate climate impacts, and high energy cost burden and low energy access, jobs lost through the energy transition, access to health care, and all geographic areas within Tribal jurisdictions.
3. FY 2022 (FY 22) FMA funds are sourced from congressionally appropriated funding from the National Flood Insurance Fund (NFIF) as well as funding made available for FY 22 Flood Mitigation Assistance via the Infrastructure Investment and Jobs Act. The IIJA funding allows increased federal cost share for a property: located within a census tract with a Centers for Disease Control and Prevention Social Vulnerability Index score of not less than 0.5001. (Refer to Section C.4, Cost Share or Match).
4. Further, in FY 22, the FMA program is using the Centers for Disease Control and Prevention (CDC) Social Vulnerability Index (SVI) score of not less than 0.6 as included in the project's benefiting area map as a priority scoring criterion for Capability and Capacity Building (C&CB), Localized Flood Risk Reduction Project, and Individual Flood Mitigation Project.

⁸ For additional resources (e.g., pre-calculated benefits, BCA Guidance, ecosystem services, and other supporting documents) visit: <https://www.fema.gov/grants/guidance-tools/benefit-cost-analysis/streamlined-bca>

⁹ For training on conducting a BCA visit: <https://www.fema.gov/grants/guidance-tools/benefit-cost-analysis/training>