

# State Mitigation Planning Policy Side-by-Side Comparison

This document compares, side by side, the required elements in the updated 2022 [State Mitigation Planning Policy Guide](#) (FP 302-094-2) with two policies:

- The 2015 [State Mitigation Plan Review Guide](#) (FP 302-094-2)
- The 2020 [HHPD Grant Guidance](#) (FP 104-008-7)

Staff who review and approve state mitigation plans can quickly see where the policies changed. This document includes only the requirements. FEMA also updated the narratives in the 2022 version. New and updated wording is highlighted. Minor differences in grammar and capitalization are not highlighted. Material deleted from the 2015 version is not called out in the 2022 column.

## Standard Elements

2015 <a href="#">State Mitigation Plan Review Guide</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in yellow)
<b>S1. Does the plan include a description of the process used to develop the plan?</b>	
<p>The plan must describe the current process used to update the plan, including how the plan was prepared, the schedule or timeframe, specific milestones and activities, the agencies and stakeholders who were involved in the process, and if the mitigation planning process was integrated to the extent possible with other state planning efforts.</p> <p><b><i>Agencies and stakeholders</i></b> means state, local, and tribal agencies, colleges and universities, private entities, or private non-profit organizations, such as multi-jurisdictional utilities, that perform a critical function.</p>	<p>a. The plan must describe the current process used to update the plan, including how the plan was prepared, the schedule or time frame, specific milestones and activities, the <a href="#">agencies and stakeholders</a> who were involved in the process, and if the mitigation planning process was integrated to the maximum extent possible with other state planning efforts. supporting documentation, such as meeting sign-in sheets and notes, does not need to be included in the plan itself. States are <b>strongly</b> encouraged to retain supporting documentation as a record of how decisions were made and who was involved.</p> <p><b><i>Agencies and stakeholders</i></b> mean state, local and tribal agencies; colleges and universities; private entities, <b>including</b> private nonprofit organizations; <b>or quasi-governmental authorities and</b></p>

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<p><b>Special Consideration.</b> The plan must describe the planning process, but supporting documentation, such as meeting sign-in sheets and notes, does not need to be included in the plan itself. States are encouraged to retain supporting documentation as a permanent record of how decisions were made and who was involved.</p>	<p>special districts like port authorities or utility districts that perform critical functions.</p>
<p><b>S2. Does the plan describe how the state coordinated with other agencies and stakeholders?</b></p>	
<p>The plan must describe how other state and Federal agencies and other stakeholders were involved in the process. At a minimum, the plan must describe how the state coordinated with other agencies and stakeholders responsible for the following sectors:</p> <ul style="list-style-type: none"> <li>a. Emergency management;</li> <li>b. Economic development;</li> <li>c. Land use and development;</li> <li>d. Housing;</li> <li>e. Health and social services;</li> <li>f. Infrastructure; and</li> <li>g. Natural and cultural resources.</li> </ul> <p>Where coordination with agencies and stakeholders representing these sectors is not practicable, the plan must describe the limitations.</p> <p><b><i>Involvement in the process</i></b> means engaged as participants and given the chance to provide input to affect the plan’s content.</p>	<p>a. The plan must describe how the state coordinated with other state agencies and appropriate federal agencies that were involved in the process and how they were involved in the process. At a minimum, the plan must describe how the state coordinated with other agencies and interested groups, including stakeholders responsible for the following sectors:</p> <ul style="list-style-type: none"> <li>▪ Emergency management (including Safety and Security, Hazardous Materials, and Food, Water, Shelter community lifelines);</li> <li>▪ Economic development;</li> <li>▪ Land use and development, including the agency or department that regulates building codes;</li> <li>▪ Housing (including Food, Water, Shelter community lifelines);</li> <li>▪ Health and social services (including Health and Medical community lifelines);</li> <li>▪ Infrastructure (including Energy, Communications, Transportation, and Food, Water, Shelter community lifelines); and</li> <li>▪ Natural and cultural resources.</li> </ul>

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<p><b><i>Special Consideration:</i></b> While coordination with other agencies and stakeholders is foundational to the success of the plan update as well as implementation, FEMA acknowledges the inherent differences in state governance and capabilities. In evaluating coordination, FEMA will credit the state’s efforts to engage other agencies and stakeholders.</p>	<p>In addition to the sectors above, the plan should describe how the state coordinated with agencies and organizations with climate change and climate adaptation expertise, state agencies with programs, policies, and assistance that support underserved communities, and other representatives serving these communities in the mitigation planning process.</p> <p>Where coordination with the agencies and stakeholders representing these sectors is not practicable, the plan must describe the limitations as well as how the state will overcome barriers. These items may be included in the mitigation strategy.</p> <p><b><i>Involved in the process</i></b> means engaged as participants and given the opportunity to provide meaningful input to affect the plan’s content.</p> <p><b><i>b.</i></b> If the state is interested in HHPD funding eligibility, the planning process must describe how the state agency(ies) responsible for dam safety and other stakeholders participated in the planning process and contributed expertise, data, studies, information, etc. related to high hazard potential dams (see HHPD1 in Section 3.8.).</p>
<p><b>S3. Does the risk assessment include an overview of the type and location of all of the natural hazards that can affect the state?</b></p>	
<p>a. The plan must include a current summary of the natural hazards that can affect the state. The summary must include information on location, extent, and previous occurrences for each natural hazard, using maps where appropriate.</p> <p>b. If any commonly recognized natural hazards are omitted, the plan must provide an explanation.</p> <p><b><i>Manmade or human-caused hazards</i></b> may be included in the risk assessment but are not required. FEMA will neither review these</p>	<p>a. The plan must include a current overview of all natural hazards that can affect the state. In addition to listing the types of hazards, the summary must include the following:</p> <ol style="list-style-type: none"> <li>1. Location: Information on where the hazards have occurred or could occur, using maps where appropriate and available.</li> <li>2. Previous occurrences: Information about when hazards have occurred in the past, including information about the range of observed intensities of these hazards, using maps where appropriate and available.</li> </ol>

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<p>hazards nor require the removal of this extra information prior to plan approval.</p> <p><b>Natural hazards</b> are a source of harm or difficulty created by a meteorological, environmental, or geological phenomenon or combination of phenomena.</p> <p><b>Risk</b> for the purpose of hazard mitigation planning is the potential for damage or loss created by the interaction of natural hazards with assets, such as buildings, infrastructure, or natural and cultural resources.</p> <p><b>Extent</b> means the strength or magnitude of the hazard. Extent is not the same as impacts.</p> <p><b>Impacts</b> are the consequences or effect of the hazard on the state, including assets and jurisdictions. The type and severity of the impact depend on the vulnerability of the asset, as well as the capabilities in place to mitigate, prepare for, respond to, and recover from events.<sup>1</sup></p> <p>The exposure of people and assets to natural hazards can result in disasters, depending on the impacts.</p>	<p>Information about the range of observed and anticipated intensities of the identified hazards are commonly expressed using various scientific scales. For example, the intensity of hurricane wind speeds is measured on the Saffir-Simpson scale, wind speed and damage from tornadoes is measured on the Enhanced Fujita Scale, and the peak ground acceleration indicates intensity of an earthquake.</p> <p>b. <i>If the state is interested in FMAG program eligibility, the state mitigation plan must identify the state’s wildfire hazards (See FMAG1 in Section 3.9). However, note that if wildfire is a commonly recognized hazard in the state, it must be included in the plan regardless of the state’s interest in pursuing FMAG grants. See note below.</i></p> <p><b>Natural hazards</b> are sources of harm or difficulty created by meteorological, environmental, or geological events. Natural hazards, such as flooding and earthquakes, affect the built environment, including dams and levees.</p> <p><b>Risk</b>, for the purpose of hazard mitigation planning, is the potential for damage or loss created by the interaction of natural hazards with assets, such as buildings, infrastructure or natural and cultural resources.</p> <p><i>If any commonly recognized hazard(s) that could affect the state is omitted, the state must explain the rationale for not including the hazard(s). This rationale must be based on risk.</i></p>
<p><b>S4. Does the risk assessment provide an overview of the probabilities of future hazard events?</b></p>	
<p>a. The risk assessment must provide a summary of the probability of future hazard events that includes projected</p>	<p>a. The risk assessment must provide an overview of the probability of future hazard events that includes projected</p>

<sup>1</sup> The definition of impacts moved from element S3 (2015) to element S5 (2022). The updated definition is shown below in the 2022 Guide column, with changes indicated.

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<p>changes in occurrences for each natural hazard in terms of location, extent, intensity, frequency, and/or duration.</p> <p>b. Probability must include considerations of changing future conditions, including the effects of long-term changes in weather patterns and climate on the identified hazards.</p> <p><b><i>Probability</i></b> means the likelihood of the hazard occurring and may be defined in terms of general descriptors (for example, unlikely, likely, highly likely), historical frequencies, statistical probabilities (for example: 1% chance of occurrence in any given year), and/or hazard probability maps. If using general descriptors, then the plan must provide a definition. For example, “highly likely” could be defined as equals near 100% chance of occurrence next year or happens every year.</p>	<p>changes in the location, <b>range of anticipated intensities</b>, frequency, and/or duration of each natural hazard.</p> <p>b. Probability must include considerations of changing future conditions, <b>including climate change (e.g., long-term weather patterns, average temperature, and sea levels) on the type, location, and range of anticipated intensities of identified hazards.</b></p> <p><b><i>Probability of future hazard events</i></b> means the likelihood of the hazard occurring <b>or reoccurring</b>. It may be defined in historical frequencies, statistical probabilities, hazard probability maps <b>and/or general descriptors (e.g., unlikely, likely, highly likely)</b>. If general descriptors are used, they must <b>be quantified or defined in the plan</b>. For example, “highly likely” could be defined as “100% chance of occurrence next year” or <b>“one event every year.”</b></p>
<p><b>S5. Does the risk assessment address the vulnerability of state assets located in hazard areas and estimate the potential dollar losses to these assets?</b></p>	
<p>a. The risk assessment must include an analysis of the potential impacts of hazard events to state assets and a summary of the assets most vulnerable to the identified hazards. These assets may be located in the identified hazard areas or affected by the probability of future hazard events.</p> <p>b. The risk assessment must estimate potential dollar losses to state assets located in identified hazard areas.</p> <p>Vulnerability and potential losses are not a list or inventory of state facilities but the summary of the potential impacts to those assets from the identified hazards. Factors affecting vulnerability may include asset use and function as well as construction type, age, or intended use.</p> <p><b><i>State assets</i></b> may include state-owned or operated buildings, infrastructure, and critical facilities.</p>	<p>a. The risk assessment must include an overview and analysis of the vulnerability to state assets from the identified hazards as well as a summary of the most vulnerable assets. These assets may be located in the identified hazard areas <b>and could be affected by future hazard events. State assets include state-owned or operated critical facilities, buildings, infrastructure, and community lifelines.</b></p> <p>b. The risk assessment must estimate potential dollar losses to state assets located in identified hazard areas.</p> <p>Vulnerability and potential losses are not simply lists or inventories of state facilities, but a summary of the potential impacts to state assets from each of the identified hazards. Factors affecting vulnerability may include asset use and function as well as construction type, age or intended use.</p>

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<p><b><i>Critical facilities</i></b> means structures that the state determines must continue to operate before, during, and after an emergency and/or hazard event and/or are vital to health and safety. Examples of critical facilities may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Emergency operations centers, police and fire stations, and storage facilities (including data storage).</li> <li>• Structures that house occupants with restricted mobility or access and/or functional needs, such as hospitals, institutions, and shelters.</li> <li>• Utility generating, transmission, and storage facilities and related infrastructure, such as power and/or water treatment plants.</li> <li>• Transportation facilities, such as ports, airports, roads, railroads, bridges, and/or tunnels.</li> </ul>	<p><b><i>Critical facilities</i></b> are structures that the state determines must continue to operate before, during and after an emergency and/or hazard event and/or are vital to health and safety.</p> <p><b><i>Impacts</i></b> are the consequences or effects of each hazard on the state's assets and jurisdictions identified in the vulnerability assessment.</p>
<p><b>S6. Does the risk assessment include an overview and analysis of the vulnerability of jurisdictions to the identified hazards and the potential losses to vulnerable structures?</b></p>	
<p>a. The risk assessment must provide a current summary of the most vulnerable jurisdictions based on the state, local, and tribal, as applicable, risk assessments. Vulnerability must be analyzed in terms of:</p> <ol style="list-style-type: none"> <li>1. Jurisdictions most threatened by the identified hazards (based on hazard location, extent, and probability).</li> <li>2. Jurisdictions most susceptible to damage and loss from hazard events related to populations and assets (such as, structures, infrastructure, critical facilities, and systems). These populations and assets may be located in the identified hazard areas or affected by the probability of future hazard events.</li> </ol> <p>b. The risk assessment must include a summary of the potential losses to the identified vulnerable structures based on</p>	<p>a. The risk assessment must provide an overview and analysis of vulnerable jurisdictions based on the state and local government risk assessments. Vulnerability must be analyzed in terms of:</p> <ol style="list-style-type: none"> <li>1. Jurisdictions most threatened by the identified hazards based on type, location, range of anticipated intensities, and probability. Probability must include the potential impacts of climate change.</li> <li>2. Jurisdictions most vulnerable to damage and loss from hazard events with respect to potential impacts to:             <ol style="list-style-type: none"> <li>i. Populations, including socially vulnerable and underserved communities.</li> <li>ii. Structures, including critical facilities.</li> </ol> </li> </ol>

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<p>estimates in the local risk assessments as well as the state risk assessment.</p> <p>c. <i>If the state is interested in an increased Federal cost share under the FMA program, the risk assessment must address repetitive loss (RL) and SRL properties. (See RL1 in Section 3.8 Repetitive Loss Strategy.)</i></p> <p><b>Special Consideration:</b> An overview or summary provides the results of the analysis and does not need to include the details from each local plan. An example is a list of key issues or problem statements that clearly describes the greatest vulnerabilities and compares losses across the state, allowing the state to determine mitigation priorities.</p>	<p>iii. Infrastructure and community lifelines servicing jurisdictions that could affect state resilience, including Safety and Security; Food, Water, Shelter; Health and Medical; Energy; Communications; Transportation; and Hazardous Material lifelines.</p> <p>b. The risk assessment must include an overview and analysis of the potential losses to the identified vulnerable structures based on estimates in the local risk assessments as well as the state risk assessment.</p> <p>c. <i>If the state is interested in HHPD funding eligibility, the risk assessment must address risks from high hazard potential dams in the risk assessment (see HHPD2 in Section 3.8.).</i></p> <p><b>Community lifelines</b> are the most fundamental services in the community that, when stabilized, enable all other aspects of society to function.</p> <p>An <b>overview</b> provides the results of the analysis and does not need to include the details from each local plan. Detailed analyses do not need to be placed in the body of the plan. They can be included as appendices. An example of an overview is a list of key issues or problem statements that clearly describes the greatest vulnerabilities and compares losses across the state, allowing the state to determine mitigation priorities.</p>
<p><b>S7. Was the risk assessment revised to reflect changes in development?</b></p>	
<p>The plan must provide a summary of the changes in development that have occurred or are projected to occur in hazard prone areas based on the state, local, and tribal, as applicable, risk assessments, specifically:</p> <p>a. Changes in land use and the built environment;</p> <p>b. Changes in population demographics that may affect vulnerability to hazard events; and</p>	<p>a. The plan must provide a summary of recent development and potential or projected development in hazard-prone areas based on state and local government risk assessments including, but not limited to the following:</p> <p>1. Changes in land use and the built environment and projected future growth or re-development areas.</p>

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<p>c. Changes to the vulnerability of state-owned or operated buildings, infrastructure, and critical facilities.</p> <p><i>Changes in development</i> means recent development, potential and projected land use and development, or conditions that may affect risk and vulnerability to the state and jurisdictions within the state, such as changes in population demographics.</p>	<ol style="list-style-type: none"> <li>2. Changes in population demographics that may affect vulnerability to hazard events, including socially vulnerable and underserved communities.</li> <li>3. Changes to the vulnerability of state assets.</li> <li>4. Changes in development that could impact jurisdictions most threatened by the identified hazards based on local risk assessments, including the potential impacts of climate change.</li> </ol> <p><i>Changes in development</i> include conditions that may affect jurisdictions' risks from and vulnerabilities to hazards, such as changes in land use and development, including infrastructure development, declining populations, projected increases in population, or shifts in the needs of underserved communities or gaps in social equity.</p>
<p><b>S8 [formerly S12]. Does the plan discuss the evaluation of the state's hazard management policies, programs, capabilities, and funding sources to mitigate the hazards identified in the risk assessment?</b></p>	
<p>The plan must describe existing state pre- and post-disaster hazard management policies, programs, and capabilities to mitigate the hazards in the state, including:</p> <ol style="list-style-type: none"> <li>a. An evaluation of state laws, regulations, policies, and programs related to hazard mitigation, as well as to development in hazard-prone areas, to include the state's administration of the:             <ol style="list-style-type: none"> <li>1. National Flood Insurance Program (NFIP) and Community Rating System (CRS); and</li> <li>2. Risk Mapping, Assessment, and Planning (Risk MAP) program.</li> </ol> </li> <li>b. A discussion of state funding capabilities for hazard mitigation projects, including:</li> </ol>	<p>The plan must describe and evaluate the state's existing pre- and post-disaster hazard management policies, programs and capabilities to mitigate the hazards identified in the risk assessment, including but not limited to:</p> <ol style="list-style-type: none"> <li>a. An evaluation of state laws, regulations, policies and programs related to hazard mitigation that improve or impede resilience to future natural hazard events and other future conditions, including the potential effects of climate change, that contains:             <ol style="list-style-type: none"> <li>1. A summary description of state land use laws, enabling legislation, and plans, including authorities that may be delegated to local governments by state law.</li> <li>2. A summary description of state laws governing adoption and enforcement of building codes in the state, including</li> </ol> </li> </ol>



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<ol style="list-style-type: none"> <li>1. A general description of how the state has used its own funds for hazard mitigation projects; and</li> <li>2. A general discussion of how the state has used FEMA mitigation programs and funding sources, including but not limited to:               <ol style="list-style-type: none"> <li>a. HMGP, PDM, and FMA; and</li> <li>b. PA C-G.</li> </ol> </li> <li>c. A general summary of:               <ol style="list-style-type: none"> <li>1. Obstacles and challenges; and</li> <li>2. Changes since the previous plan approval.</li> </ol> </li> </ol>	<p>authorities that may be delegated to local governments by state law.</p> <ol style="list-style-type: none"> <li>i. For states that have adopted a statewide building code, a description of the code including the year of adoption, model code year (as applicable), and whether the code includes hazard-resistant provisions.</li> </ol> <ol style="list-style-type: none"> <li>3. A summary description of how state agencies work together to administer the NFIP pre- and post-disaster, including:               <ol style="list-style-type: none"> <li>i. Changes in participation, insurance coverage and trends.</li> <li>ii. Substantial damage administration.</li> <li>iii. Support for communities participating in or interested in the Community Rating System (CRS).</li> <li>iv. A summary of structures at high risk of flooding, including repetitive and severe repetitive loss structures and any action taken to reduce the number of these structures.</li> <li>v. Any other NFIP challenges that may be identified during regular coordination between the state and FEMA.</li> </ol> </li> <li>4. A summary discussion of the state's participation in and capabilities related to FEMA's flood hazard mapping program (i.e., Risk MAP) including how the state shares flood risk data for use in mitigation and community planning and mitigation action development, identifies areas that need to be studied or restudied, and builds partnerships.</li> </ol> <ol style="list-style-type: none"> <li>b. A general discussion of state funding capabilities for hazard mitigation actions and projects, including how the state has used:               <ol style="list-style-type: none"> <li>1. Its own funds and other state resources.</li> </ol> </li> </ol>

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	<ul style="list-style-type: none"> <li>2. FEMA mitigation programs and funding sources, including, but not limited to: HMGP, HMGP Post Fire, BRIC, FMA, HHPD, and PA Mitigation.</li> <li>3. Other federal programs and funding sources for mitigation, if applicable.</li> </ul> <p>c. A summary of:</p> <ul style="list-style-type: none"> <li>1. Obstacles, challenges and proposed solutions related to any state capabilities, including a brief discussion of potential strategies for overcoming any challenges related to implementing and enforcing hazard-resistant building codes statewide, as applicable. These items may be included in the mitigation strategy.</li> <li>2. Changes since the previous plan approval.</li> </ul>
<p><b>S9 [formerly S8]. Does the mitigation strategy include goals to reduce long-term vulnerabilities from the identified hazards?</b></p>	
<ul style="list-style-type: none"> <li>a. The plan must identify hazard mitigation goals representing what the state seeks to accomplish through mitigation plan implementation.</li> <li>b. The goals must be consistent with the hazards and vulnerabilities identified in the risk assessment.</li> <li>c. The goals must address reducing the vulnerability of jurisdictions within the state as well as the vulnerability of state-owned or operated buildings, infrastructure, and critical facilities.</li> <li>d. <i>If the state is interested in an increased Federal cost share under the FMA program, the plan must include goals to address RL and SRL properties. (See RL2 in Section 3.8 Repetitive Loss Strategy.)</i></li> </ul>	<ul style="list-style-type: none"> <li>a. The plan must identify hazard mitigation goals representing what the state seeks to accomplish through mitigation plan implementation using a wide range of funding, including non-FEMA funding.</li> <li>b. The goals must be consistent with the hazards and vulnerabilities identified in the risk assessment.</li> <li>c. <i>If the state is interested in HHPD funding eligibility, the plan must include mitigation goals to reduce long-term vulnerabilities from high hazard potential dams. The plan does not need to include a goal specific to high hazard potential dams alone (see HHPD3 in Section 3.8.).</i></li> </ul> <p><b>Goals</b> are broad, long-term policy and vision statements that explain what will be achieved by implementing the mitigation strategy.</p>

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<p><b>Goals</b> are broad, long-term policy and vision statements that explain what will be achieved by implementing the mitigation strategy.</p>	
<p><b>S10 [formerly S9]. Does the plan prioritize mitigation actions to reduce vulnerabilities identified in the risk assessment?</b></p>	
<ul style="list-style-type: none"> <li>a. The plan must identify actions based on the current risk assessment to reduce the vulnerability of jurisdictions within the state as well as the vulnerability of state-owned or operated buildings, infrastructure, and critical facilities.</li> <li>b. The plan must describe the process used by the state to evaluate and prioritize actions that are cost effective, environmentally sound, and technically feasible.</li> <li>c. The plan must describe how each action contributes to the hazard mitigation goals.</li> <li>d. The plan must describe how the local and tribal, as applicable, mitigation strategies are linked with the state mitigation strategy.</li> <li>e. <i>If the state is interested in an increased Federal cost share under the FMA program, the plan must address RL and SRL properties in the risk assessment. (See RL3 in Section 3.8 Repetitive Loss Strategy.)</i></li> </ul>	<ul style="list-style-type: none"> <li>a. The plan must identify actions based on the current risk assessment to reduce the vulnerability of jurisdictions within the state as well as the vulnerability of state-owned <b>assets as described in Elements S5 and S6.</b></li> <li>b. The plan must describe the process used by the state to evaluate and prioritize actions that are cost-effective, environmentally sound, and technically feasible.</li> <li>c. The plan must describe how each action contributes to the hazard mitigation goals.</li> <li>d. The plan must describe how local <b>government</b> mitigation strategies <b>link to</b> the state mitigation strategy.</li> <li>e. <i>If the state is <b>interested in FMAG program eligibility, the state mitigation plan's mitigation strategy must contain wildfire-related mitigation initiatives. (See FMAG2 in Section 3.9.)</b></i></li> <li>f. <i>If the state is <b>interested in HHPD funding eligibility, the plan must prioritize mitigation actions to reduce vulnerabilities from high hazard potential dams (see HHPD4 in Section 3.8.)</b></i></li> </ul>
<p><b>S11 [formerly S10]. Does the plan identify current and potential sources of funding to implement mitigation actions and activities?</b></p>	
<ul style="list-style-type: none"> <li>a. Each mitigation action or project must include the identification of current and/or potential sources of Federal, state, local, tribal, as applicable, or private funding for implementation.</li> </ul>	<ul style="list-style-type: none"> <li>a. <b>Mitigation activities</b> must include the identification of current and/or potential sources of federal, state, local or private funding for implementation.</li> </ul>

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<p>b. At a minimum, the plan must identify FEMA mitigation funding sources, including, if applicable, but not limited to HMGP, PDM, FMA, and PA C-G.</p> <p>c. <i>If the state is interested in an increased Federal cost share under the FMA program, the plan must address identify current and potential sources of funding with respect to RL and SRL properties. (See RL4 in Section 3.8 Repetitive Loss Strategy.)</i></p>	<p>b. At a minimum, the plan must identify FEMA mitigation funding sources (if applicable) including, but not limited to: HMGP, HMGP Post Fire, BRIC, FMA, HHPD and PA Mitigation.</p> <p>c. <i>If the state is interested in HHPD funding eligibility, the plan must identify current and potential sources of funding to implement mitigation actions and activities for high hazard potential dams (see HHPD5 in Section 3.8.).</i></p>
<p><b>S12 [formerly S11]. Was the plan updated to reflect progress in statewide mitigation efforts and changes in priorities?</b></p>	
<p>a. The plan must describe the status of hazard mitigation actions in the previous plan by identifying those that have been completed or not completed. For those actions not completed, the plan must provide a narrative describing the status (for example, is the action relevant or will it be included in the plan update).</p> <p>b. The prioritization of mitigation actions and activities must be updated based on the updated analysis of risks, capabilities, and progress.</p>	<p>a. The plan must provide a narrative of the status of each mitigation action in the previous plan. This narrative must identify which actions have been completed or not completed. For uncompleted actions, the plan must describe whether the action is either no longer relevant or included in the updated plan.</p> <p>b. The prioritization of mitigation actions and activities must be updated based on the updated analysis of risks, capabilities and progress.</p>
<p><b>S13. Does the plan generally describe and analyze the effectiveness of local and tribal, as applicable, mitigation policies, programs, and capabilities?</b></p>	
<p>a. The plan must provide a general summary of current local and tribal, as applicable, policies, programs, and capabilities of jurisdictions to accomplish hazard mitigation.</p> <p>b. The plan must describe the effectiveness of local and tribal, as applicable, mitigation policies, programs, and capabilities, including:</p> <ol style="list-style-type: none"> <li>Challenges to implementing local and tribal, as applicable, mitigation policies, programs, and capabilities.</li> </ol>	<p>a. The plan must provide a summary of current local government policies, programs and capabilities of jurisdictions to accomplish hazard mitigation.</p> <p>b. The plan must describe the effectiveness of local government mitigation policies, programs and capabilities, including:</p> <ol style="list-style-type: none"> <li>Challenges to implementing these mitigation policies, programs and capabilities. These should include gaps and disparities in serving underserved communities and challenges resulting from the impacts of climate change.</li> </ol>

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<p>2. Opportunities for implementing mitigation actions through local and tribal, as applicable, capabilities.</p> <p>c. <i>If the state is interested in an increased Federal share under the FMA program, the plan must include RL and SRL properties in the analysis of effectiveness. (See RL5 in Section 3.8 Repetitive Loss Strategy.)</i></p>	<p>2. Opportunities for implementing mitigation actions through local <b>government</b> capabilities.</p> <p>c. <i>If the state is interested in <b>HHPD funding eligibility</b>, the plan <b>must generally describe and analyze the effectiveness of local mitigation policies, programs, and capabilities that address high hazard potential dams (see HHPD6 in Section 3.8).</b></i></p>
<p><b>S14. Does the plan describe the process to support the development of approvable local and tribal, as applicable, mitigation plans?</b></p>	
<p>a. The plan must describe how the state supports developing or updating FEMA-approvable local and tribal, as applicable, mitigation plans, including the process used to provide:</p> <ol style="list-style-type: none"> <li>1. Training;</li> <li>2. Technical assistance; and</li> <li>3. Funding [NOTE: criteria for prioritizing funding for planning and project awards are addressed in S15].</li> </ol> <p>b. The plan must provide a summary of the:</p> <ol style="list-style-type: none"> <li>1. FEMA-approved local and tribal, as applicable, mitigation plan coverage;</li> <li>2. Barriers to developing or updating, adopting, and implementing FEMA-approved local and tribal, as applicable, mitigation plans; and</li> <li>3. Approach to remove barriers in order to advance local and tribal, as applicable, mitigation planning.</li> </ol>	<p>a. The plan must describe how the state supports developing or updating FEMA-approvable mitigation plans, including the process used to provide:</p> <ol style="list-style-type: none"> <li>1. Training.</li> <li>2. Technical assistance.</li> <li>3. Funding [NOTE: criteria for prioritizing funding for planning and project awards are addressed in S15].</li> </ol> <p>b. The plan must provide a <b>brief</b> summary of the <b>following</b>:</p> <ol style="list-style-type: none"> <li>1. Barriers to developing or updating, adopting and implementing FEMA-approved local <b>government</b> mitigation plans <b>based on an analysis of plan and jurisdiction coverage data and trends across the state.</b></li> <li>2. <b>Steps</b> to remove barriers to <b>help local governments</b> advance mitigation planning, <b>including how plan and jurisdiction coverage data and trends inform those steps. Maps or tables may be used if appropriate.</b></li> </ol>

# State Mitigation Planning Policy Side-by-Side Comparison

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## S15. Does the plan describe the criteria for prioritizing funding?

- a. The plan must describe criteria for prioritizing jurisdictions to receive planning and project grants under available Federal and non-Federal programs. A principal criterion for prioritizing grants shall be the extent to which benefits are maximized.
- b. *If the state is interested in an increased Federal share under the FMA program, the plan must address RL and SRL properties when prioritizing funding. (See RL6 in Section 3.8 Repetitive Loss Strategy.)*

- a. The plan must describe criteria for prioritizing jurisdictions to receive planning and project grants under available federal and non-federal programs. A principal criterion for prioritizing grants will be the degree to which benefits are maximized. Areas of consideration should include, but not be limited to:
  1. Communities at the highest risk with the highest vulnerability, including underserved communities and socially vulnerable populations. The plan should consider non-monetary benefits.
  2. High-risk properties, including repetitive loss and severe repetitive loss structures.
  3. Areas under intense development pressures and areas that may experience increasingly severe impacts from climate change.
- b. *If the state is interested in HHPD funding eligibility, the plan must describe the criteria for prioritizing funding for high hazard potential dams (see HHPD in Section 3.8.).*

## S16. Does the plan describe the process and timeframe to review, coordinate, and link local and tribal, as applicable, mitigation plans with the state mitigation plan?

- a. The plan must describe the process and timeframe used by the state to review and submit approvable local and tribal, as applicable, mitigation plans to FEMA.
- b. The plan must describe the process and timeframe used by the state to coordinate and link risk assessments and mitigation strategy information from local and tribal, as applicable, mitigation plans into the state mitigation plan.

- a. The plan must describe the state's process and time frame to review and submit approvable local and tribal (if applicable) mitigation plans to FEMA. If the state is unable to consistently submit approvable plans to FEMA or submit adoption resolutions from participating jurisdictions, including special districts, the plan must describe actions planned to improve state and local mitigation planning capabilities.
- b. The plan must describe the state's process and time frame to share risk assessment data and mitigation priorities with local

# State Mitigation Planning Policy Side-by-Side Comparison

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	governments for their plan updates, as well as integrate local risk assessment and mitigation actions into the state mitigation plan updates.
<p><b>S17. Is there a description of the method and schedule for keeping the plan current?</b></p>	
<p>The plan must describe the process to monitor, evaluate, and update the plan, specifically the:</p> <ol style="list-style-type: none"> <li>Agency/office responsible for monitoring, evaluating, and updating; and</li> <li>Schedule for monitoring, evaluating, and updating.</li> </ol> <p><b>Monitoring</b> means tracking the relevance and implementation of the plan over time and includes all elements of the plan.</p> <p><b>Evaluating</b> means assessing the effectiveness of the plan at achieving the goals and objectives.</p> <p><b>Special Consideration:</b> Various methods are possible for keeping the plan current. For example, one method may be to amend the plan, as appropriate, using annexes to document changes during the plan approval period that can be more fully integrated during the next plan update cycle.</p>	<p>The plan must describe the process to monitor, evaluate and update the plan. <b>The description must include:</b></p> <ol style="list-style-type: none"> <li>The agency/office responsible for monitoring, evaluating and updating.</li> <li>The schedule for monitoring, evaluating and updating.</li> </ol> <p><b>Monitoring</b> means tracking <b>the plan's</b> implementation <b>over time</b>.</p> <p><b>Evaluating</b> means assessing the effectiveness of the plan at achieving its stated purpose and goals.</p> <p><b>Updating</b> means reviewing and revising the plan at least once every <b>five years</b>.</p>
<p><b>S18. Does the plan describe the systems for monitoring implementation and reviewing progress?</b></p>	
<ol style="list-style-type: none"> <li>The plan must describe the system for tracking the implementation of the mitigation activities and projects identified in the mitigation strategy. This includes all mitigation activities, not just those funded by FEMA.</li> <li>The system must include the following:             <ol style="list-style-type: none"> <li>A schedule;</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>The plan must describe the system for tracking the implementation of the mitigation activities and projects identified in the mitigation strategy. This includes all mitigation activities, not just those funded by FEMA.</li> <li>The system must include the following:             <ol style="list-style-type: none"> <li>A schedule.</li> </ol> </li> </ol>

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<ul style="list-style-type: none"> <li>2. Agency/office responsible for coordination; and</li> <li>3. Role of the agencies/offices identified in the mitigation strategy as responsible for implementation of actions.</li> </ul> <p>c. The plan must describe a system for reviewing progress on achieving the goals of the mitigation strategy that includes the criteria and process for evaluating progress.</p>	<ul style="list-style-type: none"> <li>2. The agency/office responsible for coordination.</li> <li>3. The role of the agencies/offices identified in the mitigation strategy as responsible for implementation of actions.</li> </ul> <p>c. The plan must describe a system for reviewing progress on achieving the mitigation strategy's goals that includes the criteria and process for evaluating progress.</p>
<p><b>S19. Did the state provide documentation that the plan has been formally adopted?</b></p>	
<p>The state must provide documentation of formal adoption by the highest elected official or designee prior to the final review and approval by FEMA. Documentation of formal adoption may be a resolution or other mechanism.</p> <p><b><i>Highest elected official or designee</i></b> means a senior state official with authority to commit the various state agencies responsible for implementing the mitigation actions identified in the plan.</p> <div style="background-color: #f0f0f0; padding: 10px; margin-top: 10px;"> <p><b><i>Special Consideration:</i></b> After all other plan requirements have been met and FEMA has received the formal adoption documentation, FEMA will provide a letter indicating the plan is approved. See Appendix A: Submission and Review Procedures.</p> </div>	<p>a. The state must provide documentation of formal adoption by the highest elected official or designee prior to FEMA approval. Documentation of formal adoption may be a resolution or other mechanism.</p> <p>After FEMA has determined that all plan requirements have been met, including receipt of the formal adoption documentation, FEMA will provide a letter indicating the plan is approved. See Appendix A, Standard Submission and Review Procedures.</p> <p><b><i>Highest elected official or designee</i></b> means a senior state official with authority to commit the various state agencies responsible for implementing the mitigation actions identified in the plan.</p>
<p><b>S20. Did the state provide assurances?</b></p>	
<p>a. The plan must include assurances that the state will manage and administer FEMA funding in accordance with applicable</p>	<p>a. The plan must include assurances that the state will manage and administer FEMA funding in accordance with applicable</p>



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<p>Federal statutes and regulations. For information on FEMA mitigation grants programs award administration requirements, refer to the HMA Guidance (Part VI. Award Administration Information). For example, reporting requirements include, but are not limited to, submitting quarterly financial and performance reports on time.</p> <p>b. The plan must include assurances that the state will amend its plan whenever necessary to reflect changes in state or Federal laws and statutes.</p> <p><i>Special Consideration.</i> For information regarding consequences of failure to comply with applicable Federal statutes and regulations, see Appendix A: Submission and Review Procedures.</p>	<p>federal statutes and regulations. For example, reporting requirements include, but are not limited to, submitting quarterly financial and performance reports on time.</p> <p>b. The plan must include assurances that the state will <b>update</b> its plan whenever necessary to reflect changes in state or federal laws and statutes.</p> <p>For information about consequences of failure to comply with applicable federal statutes and regulations, see Appendix A, <b>Standard</b> Submission and Review Procedures.</p>

## Removed Standard Elements

FEMA removed the optional Repetitive Loss Strategy requirements from the 2022 [State Mitigation Planning Policy Guide](#). This was based on statutory changes.

## Added Standard Elements

The 2022 [State Mitigation Planning Policy Guide](#) incorporates the existing mitigation planning requirements for two programs:

- Rehabilitation of High Hazard Dams Grant Program (HHPD).
- Fire Management Assistance Grants (FMAG).

The table below compares the HHPD requirements from the 2020 [HHPD Grant Guidance](#) and the 2022 State Mitigation Planning Policy Guide. The policy expanded the types of dams that must be planned for from “eligible high hazard potential dams” to “all high hazard potential dams.” This change came from consultation with the National Dam Safety Review Board.

# State Mitigation Planning Policy Side-by-Side Comparison

## 2020 [HHPD Grant Guidance](#)

## 2022 [State Mitigation Planning Policy Guide](#) (changes in yellow)

**HHPD1. Did Element S2 (planning process) describe how the state dam safety agency, other agencies, and stakeholders participated in the planning process and contributed expertise, data, studies, information, etc. relative to high hazard potential dams?**

To meet this requirement with a specific focus on eligible high hazard potential dams, the plan must:

- a. Describe how the state dam safety agency, other agencies, and stakeholders were involved in the planning process.
- b. Describe the types of data contributed. Examples of data include:
  1. Location and size of the population at risk (PAR), as well as potential impacts to institutions and critical infrastructure/facilities/community lifelines.
  2. Include inundation maps, emergency action plans (EAPs), floodplain management plans, and/or data or summaries provided by dam breach modeling software such as Hydrologic Engineering Center’s River Analysis System (HEC-RAS), Decision Support System for Water Infrastructure Security (DSS-WISE) Human Consequences Module, DSS-WISE Lite, FLO-2D, or more detailed studies.

Where coordination is not practicable, the plan must describe the limitations.

To meet this requirement with a specific focus on **eligible** high hazard potential dams, the plan must:

- a. Describe how the state dam safety agency, other agencies, and stakeholders were involved in the planning process.
- b. Describe the types of data contributed. Examples of data include:
  1. Location and size of the population at risk (PAR), as well as potential impacts to institutions and critical infrastructure/facilities/community lifelines.
  2. Include inundation maps, emergency action plans (EAPs), floodplain management plans, and/or data or summaries provided by dam breach modeling software such as the Hydrologic Engineering Center’s River Analysis System (HEC-RAS), Decision Support System for Water Infrastructure Security (DSS-WISE) Human Consequences Module, DSS-WISE Lite, FLO-2D, or more detailed studies.

Where coordination is not practicable, the plan must describe the limitations **as well as how the state will overcome barriers. These items may be included in the mitigation strategy.**

**HHPD2. Did Element S6 (risk assessment) address all dam risks from high hazard potential dams in the risk assessment?**

To meet this requirement with a specific focus on eligible high hazard potential dams, the plan must:

- a. Provide a list of eligible high hazard potential dams that have been identified by the state with their names, National Inventory of Dams (NID) identification number, locations by jurisdiction, and other relevant information, as well as maps.

To meet this requirement with a specific focus on **eligible** high hazard potential dams, the plan must:

- a. Provide a list of **eligible** high hazard potential dams that have been identified by the state with their names, National

# State Mitigation Planning Policy Side-by-Side Comparison

2020 <a href="#">HHPD Grant Guidance</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in yellow)
<p>NOTE: Ensure sensitive and/or personally identifiable information is protected.</p> <p>b. Summarize state-wide vulnerabilities to/from eligible high hazard potential dams from hazards and the potential consequences associated with dam incidents, including:</p> <ol style="list-style-type: none"> <li>1. Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential in terms of breach, non-breach, and residual risks.</li> <li>2. Potential significant economic, environmental, or social impacts as well as multi-jurisdictional impacts from a dam incident.</li> <li>3. Location and size of PARs from eligible high hazard potential dams as well as potential impacts to institutions and critical infrastructure/facilities/lifelines.</li> <li>4. Methodology and/or assumptions for risk data and inundation modeling should be noted.</li> </ol> <p>c. Document limitations and describe the approach to address deficiencies.</p>	<p>Inventory of Dams identification numbers, locations by jurisdiction, and other relevant information, as well as maps.</p> <p>NOTE: Ensure sensitive and/or personally identifiable information is protected.</p> <p>b. Summarize statewide vulnerabilities to/from <b>eligible</b> high hazard potential dams from hazards and the potential consequences associated with dam incidents, including:</p> <ol style="list-style-type: none"> <li>1. Potential cascading impacts of storms, seismic events, landslides, wildfires, etc. on dams that might affect upstream and downstream flooding potential. <b>in terms of breach, non-breach, and residual risks.</b></li> <li>2. Potential significant economic, environmental, or social impacts, as well as multi-jurisdictional impacts from a dam incident.</li> <li>3. Location and size of PARs from <b>eligible</b> high hazard potential dams, as well as potential impacts to institutions and critical infrastructure/facilities/community lifelines.</li> <li>4. Methodology and/or assumptions for risk data and inundation modeling should be noted.</li> </ol> <p>c. Document limitations and describe the approach to address deficiencies.</p>
<p><b>HHPD3. <b>Did Element S9 (mitigation goals) include mitigation goals to reduce long-term vulnerabilities from high hazard potential dams?</b></b></p>	
<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the plan must:</p> <p>a. Address a reduction in vulnerabilities to/from eligible high hazard potential dams from hazards and the potential consequences associated with dam incidents as part of their</p>	<p>To meet this requirement with a specific focus on <b>eligible</b> high hazard potential dams, the plan must:</p> <p>a. Address a reduction in vulnerabilities to/from <b>eligible</b> high hazard potential dams from hazards and the potential consequences associated with dam incidents as part of their own goals or with other long-term strategies. <b>The plan does not need to include a goal specific to high hazard potential dams</b></p>

# State Mitigation Planning Policy Side-by-Side Comparison

2020 <a href="#">HHPD Grant Guidance</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in yellow)
<p>own goals or with other long-term strategies. Examples include:</p> <ol style="list-style-type: none"> <li>1. Reducing number of eligible high hazard potential dams.</li> <li>2. Identifying opportunities for non-federal risk reduction investments.</li> <li>3. Developing floodplain management strategies to mitigate risk associated with eligible high hazard potential dams.</li> <li>4. Building community resilience to dam-related flooding from eligible high hazard potential dams.</li> </ol> <p>b. Link proposed actions to reducing long-term vulnerabilities consistent with the goals. For example, consider how projects submitted for HHPD funding will be consistent with the goals and objectives identified in the current, FEMA-approved hazard mitigation plan.</p>	<p>alone. The plan's goal(s) may be broader than HHPDs, but the goal(s) must encompass high hazard potential dams and mitigating the vulnerabilities of dam failure(s). Examples include:</p> <ol style="list-style-type: none"> <li>1. Reducing the number of eligible high hazard potential dams.</li> <li>2. Identifying opportunities for non-federal risk reduction investments.</li> <li>3. Developing floodplain management strategies to mitigate risk associated with eligible high hazard potential dams.</li> <li>4. Building community resilience to dam-related flooding from eligible high hazard potential dams.</li> </ol> <p>b. Link the proposed actions to reducing long-term vulnerabilities consistent with the goals. For example, consider how projects submitted for HHPD funding will be consistent with the goals identified in the current, FEMA-approved hazard mitigation plan.</p>
<p><b>HHPD4. Did Element S10 (mitigation actions) prioritize mitigation actions and activities to reduce vulnerabilities from high hazard potential dams?</b></p>	
<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the plan must:</p> <ol style="list-style-type: none"> <li>a. Include actions to reduce vulnerabilities to/from eligible high hazard potential dams, such as:             <ol style="list-style-type: none"> <li>1. Proposing, enacting and/or delegating authority for local land use regulations, ordinances, and/or construction standards to protect life and property from eligible high hazard potential dams.</li> <li>2. Working with of eligible dam owners to create/update and share EAPs or dam incident annex to emergency operations plans (EOPs).</li> </ol> </li> </ol>	<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must:</p> <ol style="list-style-type: none"> <li>a. Include actions to reduce vulnerabilities to/from eligible high hazard potential dams, such as:             <ol style="list-style-type: none"> <li>1. Proposing, enacting, and/or delegating authority for local land use regulations, ordinances, and/or other standards to protect life and property from eligible high hazard potential dams.</li> <li>2. Working with dam owners to create/update and share EAPs or dam incident annexes to emergency operations plans.</li> </ol> </li> </ol>

# State Mitigation Planning Policy Side-by-Side Comparison

2020 <a href="#">HHPD Grant Guidance</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in <b>yellow</b> )
<ul style="list-style-type: none"> <li>3. Delegating authority to local governments to adopt and enforce land use ordinances in inundation zones.</li> <li>4. Acquiring and/or elevating structures both upstream and downstream of eligible high hazard potential dams.</li> <li>5. Rehabilitating and/or removing eligible high hazard potential dams.</li> </ul> <ul style="list-style-type: none"> <li>b. Describe the process to evaluate and prioritize actions related to eligible high hazard potential dams that are cost effective, environmentally sound, and technically feasible.</li> <li>c. Describe how each action to reduce risks from related to eligible high hazard potential dams contributes to the goals as well as how strategies are linked to the state mitigation strategy.</li> </ul>	<ul style="list-style-type: none"> <li>3. Delegating authority to local governments to adopt and enforce land use ordinances in inundation zones.</li> <li>4. Acquiring structures both upstream and downstream of <b>eligible</b> high hazard potential dams.</li> <li>5. Rehabilitating and/or removing <b>eligible</b> high hazard potential dams.</li> </ul> <ul style="list-style-type: none"> <li>b. Describe the process to evaluate and prioritize actions related to <b>eligible</b> high hazard potential dams that are cost-effective, environmentally sound, and technically feasible.</li> <li>c. Describe how each action to reduce risks related to <b>eligible</b> high hazard potential dams contributes to the goals and describe how strategies are linked to the state mitigation strategy.</li> </ul>
<p><b>HHPD5. <b>Did Element S11 (funding sources)</b> identify current and potential sources of funding to implement mitigation actions and activities for high hazard potential dams?</b></p>	
<p>To meet the requirement, the mitigation plan must include various funding sources to mitigate vulnerabilities to / from eligible high hazard potential dams from hazards and the potential consequences associated with dam incidents as well as sources of funding to rehabilitate / remove eligible high hazard potential dams. Funding may include sources other than FEMA for activities other than rehabilitation of the eligible high hazard potential dams.</p>	<ul style="list-style-type: none"> <li>a. To meet the requirement, the mitigation plan must include various funding sources to mitigate vulnerabilities to <b>and</b> from <b>eligible</b> high hazard potential dams from hazards and the potential consequences associated with dam incidents, as well as funding sources to rehabilitate <b>or</b> remove <b>eligible</b> high hazard potential dams. Funding may include sources other than FEMA for activities other than rehabilitation of <b>eligible</b> high hazard potential dams.</li> </ul>
<p><b>HHPD6. <b>Did Element S13 (local coordination)</b> generally describe and analyze the effectiveness of local mitigation policies, programs, and capabilities that address high hazard potential dams?</b></p>	
<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must:</p> <ul style="list-style-type: none"> <li>a. Provide a summary of the local policies, programs, and capabilities to implement mitigation actions and reduce</li> </ul>	<p>To meet this requirement with a specific focus on <b>eligible</b> high hazard potential dams, the mitigation plan must:</p> <ul style="list-style-type: none"> <li>a. Provide a summary of the local policies, programs, and capabilities to implement mitigation actions and reduce</li> </ul>

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2020 <a href="#">HHPD Grant Guidance</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in yellow)
<p>vulnerabilities from eligible high hazard potential dams from hazards and the potential consequences associated with dam incidents.</p> <p>b. Describe challenges to implementing local mitigation policies, programs, and capabilities to reduce vulnerabilities to and from eligible high hazard potential dams and the approach to overcome these challenges.</p> <p>c. Describe opportunities for implementing mitigation actions to reduce risks to and from eligible high hazard potential dams through local capabilities. Examples include tools for regulating land use around dams.</p>	<p>vulnerabilities from eligible high hazard potential dams from hazards and the potential consequences associated with dam incidents.</p> <p>b. Describe challenges to implementing local mitigation policies, programs and capabilities to reduce vulnerabilities to and from eligible high hazard potential dams and the approach to overcome these challenges.</p> <p>c. Describe opportunities for implementing mitigation actions to reduce risks to and from eligible high hazard potential dams through local capabilities. Examples include tools for regulating land use around dams.</p>
<p><b>HHPD7. Did Element S15 (prioritizing funding) describe the criteria for prioritizing funding for high hazard potential dams?</b></p>	
<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must:</p> <p>a. Describe the method for funding actions to reduce vulnerabilities to and from eligible high hazard potential dams, if these actions were prioritized differently than mitigation actions for other hazards. For example, include a summary of the methodology used by the state dam safety program to assess projects based on failure modes, potential consequences resulting from a dam incident, and the expected risk-reduction and other benefits of the project. The state may also assess the loss of the resource and/or benefits of the dam.</p> <p>b. Document limitations and describe the approach to addressing deficiencies.</p> <p>Note: Recipients of HHPD grant funds are required to use a risk-based prioritization method to rank eligible high hazard potential dams and decide which activities to fund, which may meet this</p>	<p>To meet this requirement with a specific focus on eligible high hazard potential dams, the mitigation plan must:</p> <p>a. Describe the method for funding actions to reduce vulnerabilities to and from eligible high hazard potential dams if these actions were prioritized differently than mitigation actions for other hazards. For example, include a summary of the methodology used by the state dam safety program to assess projects based on failure modes, potential consequences resulting from a dam incident, and the expected risk reduction and other benefits of the project. The state may also assess the loss of the resource and/or benefits of the dam.</p> <p>b. Document limitations and describe the approach to addressing deficiencies.</p> <p>Note: Recipients of HHPD grant funds are required to use a risk-based prioritization method to rank eligible high hazard potential dams and decide which activities to fund, which may meet this</p>

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## 2020 [HHPD Grant Guidance](#)

requirement. However, use of that method is not necessary to fulfill this requirement for the hazard mitigation plan.

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requirement. However, use of that method is not necessary to fulfill this requirement for the hazard mitigation plan.

For FMAG, the following elements were added to Section 3.9:

- **FMAG1.** Does the plan address wildfire risks? [44 CFR 201.4(c)(2); 44 CFR § 204.51(d)(2)]
- **FMAG2.** Does the plan’s mitigation strategy contain wildfire-related mitigation initiatives? [44 CFR 201.4(c)(3); 44 CFR § 204.51(d)(2)]

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## Enhanced Elements

2015 <a href="#">State Mitigation Plan Review Guide</a>	2022 <a href="#">State Mitigation Planning Policy Guide</a> (changes in <b>yellow</b> )
<p><b>E1. Does the enhanced plan include all elements of the standard state mitigation plan?</b></p>	
<p>The enhanced plan must meet all the required elements of the standard state mitigation plan.</p>	<p>a. The enhanced plan must meet all the required elements of the standard state mitigation plan.</p>
<p><b>E2 [formerly E6]. With regard to HMA, is the state maintaining the capability to meet application timeframes and submitting complete project applications?</b></p>	
<p>a. All applications and amendments are submitted by the end of each program’s respective application period.</p> <p>b. All applications are entered into FEMA’s electronic data systems (such as, NEMIS and/or eGrants).</p> <p>c. Eligibility and Completeness Checklist is prepared for all applications.</p> <p>d. All applications are determined to be complete by FEMA within 90 days of submittal or selection for further review. Required environmental and historic preservation reviews and consultations will not be included in the 90-day review timeframe calculation.</p>	<p>a. All applications are <b>complete and</b> submitted by the end of each program’s respective application period.</p> <p>b. All applications are entered into FEMA’s electronic data systems <b>(i.e., the National Emergency Management Information System [NEMIS], eGrants, and/or FEMA Grants Outcomes [FEMA GO]).</b></p> <p>c. <b>A complete Minimum Criteria Checklist for Project Subapplicants or equivalent documentation is prepared for all subapplications. States may develop and use their own checklists if approved by FEMA and the state.</b></p> <p>d. All applications are determined to be complete by FEMA within 90 days of submittal or selection for further review, <b>or after the first request for information response.</b> Required environmental and historic preservation (EHP) reviews and consultations will not be included in the 90-day review time frame calculation.</p>
<p><b>E3 [formerly E7]. With regard to HMA, is the state maintaining the capability to prepare and submit accurate environmental reviews and benefit-cost analyses?</b></p>	
<p>All applications and amendments are determined to be complete by FEMA within 90 days of submittal or selection for further review, including all data requested by FEMA to</p>	<p>a. All applications and amendments are determined to be complete by FEMA within 90 days of submittal or selection for further review, <b>or after the first request for information response,</b> including all data</p>



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<p>support Cost Effectiveness determinations and environmental/historic preservation compliance reviews. Required environmental and historic preservation reviews and consultations will not be included in the 90-day review timeframe calculation.</p>	<p>requested by FEMA to support cost-effectiveness determinations and EHP compliance reviews. Required EHP reviews and consultations will not be included in the 90-day review time frame calculation. <b>Technical assistance contracts for EHP considerations and cost-effective determinations will not be charged against the state. However, the state staff must document general understanding of the program. This should be done by completing relevant Emergency Management Institute courses (Benefit-Cost Analysis and EHP) or their equivalent.</b></p>
<p><b>E4 [formerly E8]. With regard to HMA, is the state maintaining the capability to submit complete and accurate quarterly progress and financial reports on time?</b></p>	
<p>a. All progress reports must be complete and submitted on time. Information in reports must accurately describe grant activities, including data related to the completion of individual property acquisitions. Incomplete progress reports that do not provide information on all open grants and subgrants or include all information required by the <a href="#">HMA Guidance</a> are not considered on time.</p> <p>b. All Federal financial reports (FFR), Standard Form (SF) SF-425 are submitted on time. Information in reports must accurately describe grant activities, as described in the HMA Guidance.</p> <p>c. State consistently complies with the Financial Management Standard requirements described in 2 CFR §§200.300 to 200.309.</p>	<p>a. All progress reports must be complete and submitted on time. Information in reports must accurately describe grant activities, including data related to the completion of individual property acquisitions. Incomplete progress reports that do not provide information on all open grants and subgrants or do not include all information required by the HMA Guidance are not considered on time.</p> <p>b. All Federal Financial Reports (FFR) Standard Form (SF) SF-425 are submitted on time. Information in reports must accurately describe grant activities as described in the HMA Guidance.</p> <p>c. State consistently complies with the Financial Management Standard requirements described in 2 CFR §§ 200.300 to 200.309.</p>

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**E5 [formerly E9].** With regard to HMA, is the state maintaining the capability to complete HMA projects within established performance periods, including financial reconciliation? [E9 in 2015 Guide]

- a. All work as part of HMA subawards must be completed by the end of Period of Performance as described in the [HMA Guidance](#).
- b. No major findings on last single audit obtained by the state related to HMA programs. For states without HMA grants, FEMA will review other Federal grants prepared by the responsible agency (such as state Emergency Management Agency).
- c. All grant close-out activities, including financial reconciliation, are completed within 90 days from the end of the performance period including:
  - 1. Final FFR SF-425 and Performance Reports were submitted within 90 days from the end of the performance period unless an extension is granted by FEMA.
  - 2. Statement submitted that approved Scope of Work and all environmental and historic preservation requirements have been satisfied.
  - 3. SF-270 Request for Advance or Reimbursement or request to de-obligate funds is completed, if applicable due to cost underruns.
  - 4. Other documentation as required in the [HMA Guidance](#).
  - 5. No late drawdowns are requested or performed after the liquidation period has ended.
- d. Actual expenditures have been documented and are consistent with SF-424A or SF-424C.

- a. All work as part of HMA subawards must be completed by the end of the period of performance as described in the [HMA Guidance](#). All extension requests must be complete, on time, and with adequate justification as described in the [HMA Guidance \(2015\)](#) and subsequent update.  
Complete subaward closeout packages are submitted to FEMA no later than 180 days from project completion. All subaward closeout packages are determined to be complete by FEMA after the first request for information response.
- b. There should be no major findings on the last single audit obtained by the state related to HMA programs. For states without HMA grants, FEMA will review other federal grants prepared by the responsible agency (such as the state emergency management agency).
- c. All grant closeout activities and documentation, including financial reconciliation, are completed within 120 days from the end of the award performance period as outlined in 2 CFR 200.344, including:
  - 1. Final FFR SF-425 and Performance Reports complete and submitted within 120 days from the end of the performance period, unless an extension is granted by FEMA.
  - 2. Statement that approved scope of work and all EHP requirements have been satisfied.
  - 3. Completed SF-270 Request for Advance or Reimbursement or request to de-obligate funds, if applicable, due to cost underruns.
  - 4. Other documentation is complete, as required in the HMA Guidance.
  - 5. No late drawdowns are requested or performed after the liquidation period has ended.

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	d. Actual expenditures have been documented and are consistent with SF-424A or SF-424C.
<b>E6 [formerly E2]. Does the plan demonstrate integration to the extent practicable with other state and/or regional planning initiatives and FEMA mitigation programs and initiatives?</b>	
<p>a. The Enhanced plan must demonstrate integration with other state and/or regional planning initiatives, including, at a minimum, the following sectors:</p> <ol style="list-style-type: none"> <li>1. Emergency management;</li> <li>2. Economic development;</li> <li>3. Land use development;</li> <li>4. Housing;</li> <li>5. Health and social services;</li> <li>6. Infrastructure; and</li> <li>7. Natural and cultural resources.</li> </ol> <p>Where integration with other state and/or regional planning initiatives representing these sectors is not practicable, the plan must describe the limitations.</p> <p>b. The Enhanced plan must demonstrate integration of FEMA mitigation programs and initiatives, including, if applicable, but not limited to: HMGP, PDM, FMA, NFIP, CRS, Risk MAP, and the National Dam Safety Program, as well as FEMA programs that advance mitigation, such as Threat Hazard Identification and Risk Assessment, Emergency Management Performance Grant Program, and PA C-G. Where integration with FEMA mitigation programs and initiatives is not practicable, the plan must describe the limitations.</p>	<p>a. The enhanced plan must demonstrate integration with other state and/or regional planning initiatives, including, at a minimum, the following sectors:</p> <ol style="list-style-type: none"> <li>1. Emergency management (including Safety and Security; Hazardous Materials; and Food, Water, Shelter community lifelines).</li> <li>2. Economic development.</li> <li>3. Land use development, including the agency or department that regulates building codes and administers land use authorities.</li> <li>4. Housing (including Food, Water, Shelter community lifelines).</li> <li>5. Health and social services (including Health and Medical community lifelines).</li> <li>6. Infrastructure (including Energy; Communications; Transportation; and Food, Water, Shelter community lifelines).</li> <li>7. Natural and cultural resources.</li> </ol> <p>Integration must be coordinated and demonstrated with agencies, departments, programs and organizations within the state and/or geographic region, as well as <i>beyond</i> the state agency leading the development of the mitigation plan. Integration should include state agencies and organizations with expertise in climate change and climate adaptation and agencies with programs, policies and assistance that support underserved communities, as well as other leaders and key stakeholders from non-governmental organizations serving these communities in the mitigation planning process.</p> <p>Integration must be demonstrated in terms of current activities and outcomes. Where integration with other state and/or regional</p>

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<p><b>Special Consideration:</b> In evaluating integration, consideration will be given to the inherent differences in governance and capabilities among states, crediting measurable progress towards integration of efforts.</p>	<p>planning initiatives representing these sectors is not practicable, the plan must describe the limitations as well as how the state will overcome barriers. These items must be included in the mitigation strategy.</p> <p>b. The enhanced plan must demonstrate integration of FEMA mitigation programs and initiatives. This may include, but is not limited to: PA, FMAG, HMGP, HMGP Post Fire, BRIC, FMA, NFIP, CRS, the Cooperating Technical Partners (CTP) program, Risk MAP, NEHRP, HHPD and the National Dam Safety Program, as well as FEMA programs that advance mitigation, such as Threat Hazard Identification and Risk Assessment and Emergency Management Performance Grant Program.</p> <p>Where integration with FEMA mitigation programs and initiatives is not practicable, the plan must describe the limitations as well as how the state will overcome barriers. These items must be included in the mitigation strategy.</p>
<p><b>E7 [formerly E3]. Does the state demonstrate commitment to a comprehensive mitigation program?</b></p>	
<p>The plan must describe an existing comprehensive state mitigation program that might include, but is not limited to, examples listed in the mitigation planning regulation at 44 CFR §201.5(b)(4).</p> <p><b>Comprehensive state mitigation program</b> means a broad range of state-supported initiatives and activities that:</p> <ol style="list-style-type: none"> <li>1. Targets risk reduction for each of the identified hazards in the state;</li> <li>2. Is inclusive of various state agencies and sectors with mitigation capabilities and resources; and</li> <li>3. Is coordinated to increase statewide resilience from the adverse impacts of future hazard events.</li> </ol>	<p>a. The state must demonstrate commitment to statewide programs, initiatives, and plans that advance mitigation and resilience. The state must demonstrate commitment through a combination of activities that may include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Statewide planning laws, legislative initiatives, or frameworks (where permitted by state and local law) that require or promote land use planning or other integrated strategies aimed at advancing mitigation.</li> <li>2. Establishing councils or teams (beyond the state mitigation planning team) or forming innovative mitigation public/private partnerships focused on mitigation investment at the state, regional and local levels.</li> </ol>

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<p>Initiatives and activities that demonstrate commitment include, but are not limited to, a combination of current training, partnerships, leadership initiatives, funding, technical assistance, codes and ordinances, or other activities that reduce risks.</p> <p><b>Special Consideration:</b> Descriptions of the various programs and initiatives to meet this requirement do not need to be repeated in a separate section. However, if the documentation to meet this requirement is not a separate section, the Plan Review Tool (refer to Appendix B: State Mitigation Plan Review Tool) should identify where in the plan the descriptions are found.</p>	<ol style="list-style-type: none"> <li>3. Integrating mitigation and community resilience principles into the state's post-disaster recovery operations.</li> <li>4. Developing a comprehensive, multi-year plan to mitigate the risks posed to existing buildings identified as necessary for post-disaster response and recovery operations.</li> <li>5. Use of a model floodplain ordinance that includes and goes beyond the NFIP minimum requirements and is coordinated with the state building code(s).</li> <li>6. Other executive actions and activities that promote mitigation statewide.</li> </ol> <p>b. The state must demonstrate a commitment to mitigation training and capability building. The state can demonstrate this commitment through a combination of activities that include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Advancing local mitigation planning by providing or supporting workshops, training and capability building beyond the basic requirements under 44 CFR § 201.3(c)(5). For example, the state could develop a program for supporting floodplain management or other certification programs related to hazard reduction or provide workshops on more advanced mitigation topics to develop mitigation capabilities at the local level.</li> <li>2. Partnering with other state and federal agencies, or the private sector, to provide resources and incentives for more inclusive and integrated mitigation planning and plan implementation using a wide range of public and private resources.</li> <li>3. Supporting implementation of local government mitigation actions, including providing state planning grants or a portion of the non-federal match for HMGP, BRIC and/or other mitigation projects and programs.</li> </ol> <p>c. The state must demonstrate a commitment to its mitigation planning responsibilities by helping local governments update and adopt their</p>

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	<p>plans before they expire. To this end, the state must be able to show that at least 75% of all its local jurisdictions that have previously submitted a mitigation plan are currently approved or updating their plans. Special districts are excluded from this calculation. If the state cannot show this at the time of plan submittal, the plan must document when this was met in the previous five years and the process to improve this status with a focus on adoption by all participating jurisdictions.</p> <p>d. The state is strongly encouraged to demonstrate its commitment to mitigation by adopting and enforcing building codes that enhance mitigation and resilience.</p> <ol style="list-style-type: none"><li>1. For states that have a mandatory, statewide building code, the state is strongly encouraged to demonstrate the following:<ol style="list-style-type: none"><li>i. The state has adopted the current or next most recently published editions of hazard-resistant building codes from nationally recognized authorities such as the International Code Council that have not been amended or changed in a way that weakens code provisions related to natural hazards.</li><li>ii. The state does not allow local governments to weaken the hazard-resistant provisions of the state building code.</li><li>iii. The state encourages local governments to adopt higher standards for hazard resistance in their locally adopted building codes.</li><li>iv. The state ensures that state-owned and operated facilities are constructed in compliance with the current or next most recent hazard-resistant building codes as described in E7(d)(1)(i) above and the state avoids constructing facilities in areas vulnerable to current and future hazards (e.g., the facility's lifespan) to the greatest extent possible.</li></ol></li><li>2. If the state <b>has not</b> adopted the current or next most recently published editions of hazard-resistant building codes, as described above in E7 (a)(1)(i), the state is strongly encouraged to include in</li></ol>

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	<p>the plan a strategy with action steps toward state adoption and implementation of the current or next most recent hazard-resistant building codes as part of its commitment to mitigation. The strategy and action steps should be based on national programs and standards, such as the state Building Code Effectiveness Grading Schedule (BCEGS) scores and state averages (where available).</p> <p><b>3. For states that do not have a mandatory statewide building code,</b> based on the evaluation of building code adoption and enforcement in the state required under Element S8, the state is strongly encouraged to:</p> <ul style="list-style-type: none"> <li><b>i.</b> Describe and document a strategy with action steps to support and encourage all local jurisdictions in the state to adopt and enforce the current or next most recent hazard-resistant building code as described in E7 (a)(1)(i) above.</li> <li><b>ii.</b> Describe and document a strategy and action steps that the state could take toward the adoption of a hazard-resistant mandatory statewide building code.</li> <li><b>iii.</b> Ensure that state-owned and operated facilities are constructed in compliance with the current or next most recent hazard-resistant building code as described in E7(a)(1)(i) above and that the state avoids constructing facilities in areas vulnerable to hazards to the greatest extent possible.</li> </ul> <p>For Element E7-d., reviewers should document strengths and opportunities for improvement related to building codes in the Plan Assessment section of the Plan Review Tool (see Appendix C).</p>
<p><b>E8 [formerly E5]. Is the state effectively using existing mitigation programs to achieve mitigation goals?</b></p>	
<p>a. The enhanced plan must document how the state has fully made use of the funding available through the FEMA assistance programs (for example, PA C-G, HMGP, PDM, and FMA). If the state has not made full use of available funding, the enhanced plan must</p>	<p>The state must demonstrate and document the full and effective use of existing mitigation programs to achieve its mitigation goals, as outlined below.</p>

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<p>document the reasons why funding was not used and explain the process to improve this capability.</p> <p>b. The enhanced plan must document how the state effectively uses existing state programs to achieve its mitigation goals.</p> <p><i>Special Consideration:</i> Citing limited staff resources is not considered an acceptable reason for not making full use of funding. Further, citing limited staff resources would document the inability to meet the requirement at §201.5(b)(2)(iii), that requires the state to demonstrate HMA grants management capability.</p>	<p>a. The state must demonstrate and document the full and effective use of existing FEMA programs (if funding is available), including, but not limited to:</p> <ol style="list-style-type: none"> <li>1. FEMA HMA Programs: HMGP, HMGP Post Fire, BRIC, and FMA (including management costs).</li> <li>2. Public Assistance: PA C-G (permanent work) and PA Mitigation.</li> <li>3. Flood Hazard Mapping, including the CTP Program, Floodplain Management, and the Community Assistance Program – State Support Services Element.</li> <li>4. Dam Safety: Rehabilitation of HHPDs; State Assistance for Dam Safety.</li> <li>5. NEHRP – Earthquake State Assistance Grants (high and very high risk states only).</li> </ol> <p>Note: If the state has not made full and effective use of available funding, the enhanced plan must document the reasons why and include a strategy for improving this capability.</p> <p>b. The state must demonstrate and document the full and effective use of non-FEMA programs including, but not limited to:</p> <ol style="list-style-type: none"> <li>1. State-supported hazard mitigation and resilience programs, including those led by agencies and departments outside the state agency that leads the development of the mitigation plan (e.g., the state emergency management agency/department).</li> <li>2. Other federal programs that support mitigation and resilience, where available. Examples include, but are not limited to, programs administered by the following: Economic Development Administration, Environmental Protection Agency, HUD, Department of Transportation, National Oceanic and Atmospheric Administration, U.S. Army Corps of Engineers, and the U.S. Department of Agriculture.</li> </ol>



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	<p>3. <b>Non-governmental organizations</b>, including public-private partnerships. This may include nonprofit organizations, academia, business, and industry.</p>
<p><b>E9 [formerly E4]. Does the enhanced plan document capability to implement mitigation actions?</b></p>	
<p>a. The Enhanced plan must describe the system to rank the mitigation measures according to established eligibility criteria, including a process to prioritize between funding programs, jurisdictions, and proposals that address different or multiple hazards.</p> <p>b. The Enhanced plan must describe how the state will assess the effectiveness of mitigation actions, including the agencies that are involved as well as the timeline, and use the results to inform the mitigation strategy. Effectiveness may be based on cost factors but may also include other beneficial functions.</p>	<p>a. The enhanced plan must describe the system to rank the mitigation measures according to established eligibility criteria, including a process to prioritize between funding programs, jurisdictions, and proposals that address different or multiple hazards.</p> <p>b. The enhanced plan must describe how the state will assess the effectiveness of mitigation actions, including the agencies that are involved as well as the timeline, and use the results to inform the mitigation strategy. Effectiveness may be based on cost factors but may also include other beneficial functions, <b>including non-monetary benefits for underserved communities.</b></p>