

Guidance for Acquisition Subapplications

Read the Notice of Funding Opportunity issued by FEMA for the funding year under the subapplicants are applying for, reread as necessary, and keep handy to refer to. The following guidelines are for Texas subapplicants applying to FEMA's Flood Mitigation Assistance Program. Please review the NOFO page 21-23 for instructions for FEMA GO and Sam.GOV.

FEMA Go:

Subapplication Title:

Please ensure subapplication title clearly indicates subapplication type, mitigation activity type and suborganization name: Climate Resilient Demolition Project for *Community Name or Project Site*.

Subapplication Type:

All subapplicants must submit an FMA grant application via FEMA GO by the January 8th application deadline to be considered for funding. The required format for applications and subapplications is built into FEMA GO. Individual Flood Mitigation Project must be submitted in a “**project**” subapplication type. Failure to submit the subapplication as the correct subapplication type will require you to restart and resubmit the subapplication as this cannot be changed.

Application Attachment Naming Conventions:

Please ensure that all attachments throughout subapplication are named clearly and identify the document attached. Clearly label the name of the document and the date it was created or edited.

Examples:

- “Budget Spreadsheet for Property Acquisition 10.2.2023”
- “City of Floodville Hazard Mitigation Plan Approved 8.5.2022”

Subapplication Development Resources:

- [2023 FMA Prioritization Criteria Scoring Sheet](#)
- [2023 Individual Property Mitigation NOFO Factsheet- FEMA](#)
- [2023 NOFO Fact Sheet- FEMA](#)
- [2023 Notice of Funding Opportunity \(NOFO\)- FEMA](#)
- [Acquisition Projects Technical Review Job Aid- FEMA](#)
- [BCA Toolkit Version 6.0- FEMA](#)
- [Benefit Cost Analysis Guidance- FEMA](#)
- [Demonstrating Cost-Effectiveness for Projects Less than \\$1 Million Dollars- FEMA](#)
- [EHP Guidance by Project Type HMA TEXAS 2021- FEMA](#)
- [EHP Job Aid: Acquisition Relocation Projects-FEMA](#)
- [Environmental Historic Preservation \(EHP\) Checklist-FEMA](#)
- [Example Demolition Budget and Property Spreadsheet](#): This spreadsheet can be used both for the budget and the property information requested in the SOW.
- [FMA RL/SRL Calculator V.1](#)
- [FMA RL/SRL Calculator V.2](#)
- Website for [Centers for Disease Control and Prevention \(CDC\) Social Vulnerability Index \(SVI\) Score](#)

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Contact Information

Section Requirements:

- Subrecipient Authorized Representative (SAR) must have the authority to sign on behalf of the Community, please provide documentation in the Community Section of subapplication that grants the SAR delegation to sign.

Community

Section Requirements:

- Please note, if your Community participates in the Community Rating System, the subapplication can receive prioritization points in the *Evaluation* section of application.
- Please attach documentation confirming that the listed Subrecipient Authorized Representative (SAR) has the authority to apply for and accept grants on behalf of the Community. This can be in the form of meeting minutes or a resolution.

Section Recommendations:

- Please attach proof of active registration in SAM.gov and note the expiration date in the comments.

Mitigation Plan

Section Requirements:

- Attach a copy of the FEMA approved Hazard Mitigation Plan (or the section of the plan that includes the proposed mitigation activity).
- In “Proposed Activity Description” discuss how the plan addresses the hazard (flooding) and reference the page number with the section relating to flooding and the plan approval date.
- Attach the final approval letter from TDEM or FEMA. In the attachment comments, identify the plan expiration date.

Scope of Work

Section Requirements:

- Primary Activity type: Acquisition
 - Add additional activity types as applicable.
- Primary Hazard Source: Flooding
 - Select additional hazard sources, as appropriate.
- Answer all questions in the scope of work, add as much detail and supporting documentation needed to support the need for the proposed project. Use the scope of work section to tell the story of your Community and proposed mitigation activity.
- Additional information to include in the scope of work:
 - Number of properties to be mitigated and the breakdown of property classifications (FMA RL Status and NFIP RL Status). Ensure this information is consistent throughout the application.
 - Detailed descriptions of both the hazard to be mitigated and the proposed project. Flood risk should be supported by data such as an FIS or H&H study.

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- Specify if property market values are pre-flood event or post flood (current) fair market value
 - Provide support of fair market value (such as a current appraisal) if no appraisals provided then Subapplicant should budget for appraisals during the project.
- Identify at least two alternatives to the proposed mitigation activity and a justification as to why this mitigation type is the best fit. One alternative can be no action.
- Refer to FEMAs [EHP Job Aid: Acquisition Relocation Projects](#) and [EHP Guidance by Project Type HMA Texas 2021](#) for the EHP requirements for the SOW
- If applying for management costs, the management activities must be discussed in the scope of work.
- All properties in subapplication must be NFIP Insured. NFIP information is obtained by submitting the required "[Request for NFIP Policy Holder PII](#)" form. Include a GIS map and related geospatial files such as Shapefile, KML/KMZ, Geodatabase, or other GIS enabled document) with all properties located and the project area delineated. The geospatial files should be provided as compressed/zipped files containing all kmz/shapefiles used to develop the map.
- Include a Project Implementation Plan with the proposed project's tasks documented, including responsible parties for task assignments, and associated milestones. The implementation needs to include a section for appeals or reconsideration process for property owners who dispute the purchase offer property valuation.
- [Statement of Assurances for Property Acquisition Projects \(FF-206-FY-22-156\)](#).

Section Recommendations:

- For a project to receive state funding identify whether the project is included in the Regional Flood Plan.
- Provide an excel spreadsheet with the following information for each property in subapplication: Latitude and Longitude to the 6th decimal place, whether the property is deemed substantially damaged, the foundation type, date of construction NFIP policy number, NFIP expiration date, FMA property classification, NFIP property classification, NFIP RL number (if applicable), CDC SVI score (using average of Socioeconomic Status, Household Characteristics and Housing Type and Transportation), flooding source, Replacement Cash Value or Actual Cash Value, and the federal cost of acquisition. If you need assistance gathering any of the information, please contact floodgrants@twdb.texas.gov.

Schedule

Section Requirements:

- The standard Period of Performance is 36 months. Project activities should be able to be completed within the POP.
- Subapplication should have a detailed schedule of activities required to complete the proposed project, including all construction activities and administrative tasks up to close out. Each month within the period of performance should be accounted for within the schedule with no lapsing months. Schedule should coincide with implementation plan.

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Location

Section Requirements:

- The following information should be included for each property in the property inventory drop down: structure type, foundation type, square footage, property classification, date of construction, substantial damage in the past two years, etc. Ensure all information is consistent throughout application.

Section Required Attachments: Each property mitigated must have a packet with the following documents:

- Voluntary interest/participation statement signed by the property owner(s) (If the structure will have a local match requirement that is being passed down to the homeowner, it should indicate that the homeowner will provide those funds.),
- FEMA Form 009-0-3, *Declaration and Release*
[https://www.disasterassistance.gov/sites/default/files/daip/Declaration_and_Release_FEMA_Form_009-0-3_\(Aug2022\).pdf](https://www.disasterassistance.gov/sites/default/files/daip/Declaration_and_Release_FEMA_Form_009-0-3_(Aug2022).pdf) for example form,
- Signed Acknowledgement of Special Conditions in a Special Flood Hazard Area (SFHA) *only required if they are in the SFHA,
- Current Proof of Insurance (Declaration page) NFIP policy,
- Flood Loss History or a detailed spreadsheet listed by property with Latitude/Longitude, the date of the claim(s), claim(s) amount by structure, and the claim(s) payments for the structure and contents,
- Location map and FIRM with the structure's location labeled,
- Photographs of the structure (All sides and one from the street),
- Central Appraisal District's worksheet for property

Budget

Section Requirements:

- All costs must be eligible for reimbursement through the FMA Grant.
 - Eligible Acquisition Activities: [HMA Guidance](#) Part 12 B.1.3.6
 - Eligible Management Costs: [NOFO](#) Section D.13.c (pages 32-34)
 - A maximum of 5% of the **total** subapplication budget can be submitted for subapplicant management costs
- New FY 2023 NOFO update: If actual costs exceed projected costs, FEMA will not cover additional costs.
- Attach an excel budget breakdown spreadsheet: Budget Spreadsheet by structure for each budget category, with the cost share based on the FMA property classification (FMA RL, SRLi, SRLii, insured and CDC SVI score). Include every cost associated with each structure (pre-award, administrative, appraisal, asbestos abatement, demolition, acquisition, etc.),
 - Check the federal share of the acquisition costs- if the average is greater than \$750,000 FEMA will rank subapplication lower.
 - Subapplication cost share is determined by the overall average of the property cost shares:
 - FMA Insured Properties:

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- Standard 75% cost share
- Properties with a CDC SVI score of 0.5001 or greater (at the census tract level using the average of the using average of the Socioeconomic Status, Household Characteristics and Housing Type and Transportation CDC scores) will receive a 90% cost share
 - FMA RL Properties: 90% cost share
 - FMA SRL i or ii: 100% cost share
- Cost shares should be inputted into FEMA GO. For both the Construction costs and the Management costs should be the same.
- Spreadsheet should also indicate administrative/management cost breakdown separate from the property budget. Verify the management costs do not exceed 5% of the total subapplication budget. Management costs should not be calculated “by property” like the other costs, they should be a separate cost category (see shell Demolition Budget for an example). Please review NOFO Section D.13.c (pages 32-34) for eligible management costs.
- Please utilize the [Example Demolition Budget and Property Spreadsheet](#) for reference. This spreadsheet can be used both for the budget and the property information requested in the SOW.
- Attach a budget technical memo: discuss how each budget item and projected cost was developed. Items included in the budget narrative must be reflected in the budget spreadsheet(s), and vice versa
 - Budget Narrative should include a breakdown of the position, hourly rate of pay, estimated hours and tasks and activities associated with each position for the management cost budget line item or a description of what the management cost line item will be covering.
 - If Fringe costs are provided, a copy of the negotiated indirect cost rate agreement must be provided and the Budget Narrative should also indicate how the Fringe amount was derived. If Fringe costs are not requested, the narrative should include a statement indicating that they are not requesting Fringe.
 - FEMA encourages the use of environmentally friendly building materials. Please see page 15 of the NOFO for more information.
- Input each budget line item and total cost into the Budget Cost Types and Items section. The descriptions (each line item) must match the tasks broken out in the budget breakdown and the cost categories must match the SF-424A: Budget Information (Non-Construction) or SF-424C (Construction). Separate out Construction costs from Management costs in Cost Type drop down. Management costs have pre-set descriptions for each cost type line item. Management costs must be discussed in the budget technical memo and budget classification should match the SF-424A: Budget Information (Non-Construction) or SF-424C (Construction).
 - If Pre-Award costs budgeted (they must be identified in as an individual line item in the budget): Pre-award procurement documentation; including the instrument used to request services (RFP or RFQ), selected proposal, scoring matrix, contracting documentation. (Please note, that if selected for funding, all invoices and proof of payment for these services are required before FEMA can award the subgrant.).

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- Provide a Funds Commitment Letter (even if there is no local match requirement). Must be signed by the SAR. If the structure has a local match requirement that is being passed down to the homeowner, the funds commitment letter should include a statement as such.
- Provide a signed Maintenance Letter indicating how the mitigated structures (open space) will be maintained and assurance that the community has funds to carry out maintenance.
- Attach the required assurances: **The Standard Forms (SF) are also available at <https://www.grants.gov/web/grants/forms/sf-424-family.html>:**
 - SF-424, Application for Federal Assistance
 - Certification Regarding Lobbying from Grants.Gov.
 - SF-424A: Budget Information (Non-Construction) or SF-424C (Construction): Cost Classifications in the SF form should match the cost categories selected for each line item entered in the FEMA Go Budget.
 - SF-424B: Standard Assurances (Non-Construction) or SF-424D (Construction): Standard Assurances (Construction)
 - FF 20-16C – Assurances and Certifications section (The FEMA Form FF 20-16C, Certifications Regarding Lobbying, Debarment, Suspension and Other Responsibility Matters; and Drug-Free Workplace Requirements); and
 - SF-LLL, Disclosure of Lobbying Activities, if the community participates in or contributes funds toward lobbying activities

Section Recommendations:

- Please utilize the [Example Demolition Budget and Property Spreadsheet](#).

Cost-Effectiveness

Section Requirements:

- All eligible subapplications must be cost-effective. The subapplication Benefit-Cost Ratio (BCR) must be above a 1.0 using a 3% BCA method (by utilizing FEMA's Benefit Cost Analysis Toolkit Version 6.0 or newer) or using the streamlined pre-calculated benefits or meet the requirements for a streamlined BCA when the project costs are below \$1,000,000.
- Different cost-effectiveness methods can be used for each property so there may be mix of methods in one single subapplication, however these will be evaluated separately and not the aggregate of the different methods. Meaning that each method needs to meet the BCR threshold individually.
- Refer to FEMA's [Benefit Cost Analysis Guidance](#)

Required Attachments for each BCA Methodology:

Streamlined Cost-Effectiveness Determination Method:

Pre-Calculated Benefits:

- Pre-calculated Benefits for Acquisitions: the structure must either be an RL or SRL structure or an insured structure in the SFHA, and
 - Pre-Set Benefits: \$360,000
- Substantially Damaged Properties: the structure must be designated as substantially damaged in a riverine SFHA, and provide
 - FIRM verifying it in a riverine SFHA
 - Certification by the Floodplain Administrator that property is substantially damaged

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Projects with a total cost of less than \$1,000,000.00: Please review “FEMAs Demonstrating Cost-Effectiveness for Projects Less than \$1Million Guidance” Document

- Review [Demonstrating Cost-Effectiveness for Projects Less than \\$1 Million-FEMA](#)
- Provide a narrative that includes qualitative and quantitative data demonstrating the benefits and cost-effectiveness of the project

Traditional BCA Requirements:

FEMA’s [Benefit Cost Analysis Toolkit Version 6.0](#) or newer are the only versions FEMA will accept as documentation for demonstrating cost effectiveness (or a method approved by FEMA in writing). Please provide the following documentation:

- BCA files (zipped),
- BCA Report (PDF),
- BCA Module (excel),
- Benefit-Cost Analysis (BCA) technical memo, and
- Any correspondence with the BCA help desk that supports BCA determination. (BCA helpline: 1-855-540-6744).

Environmental/Historic Preservation Review

Section Requirements:

- Please, refer to FEMAs [Environmental Historic Preservation \(EHP\) Checklist](#), [EHP Job Aid: Acquisition Relocation Projects](#) and [EHP Guidance by Project Type HMA Texas 2021](#) for EHP requirements.

Evaluation/ Subapplication Ranking

Tier 1: Priority Order

**Mitigate at least 75%
of Structures**



Individual Flood Mitigation Projects that will mitigate flood damage to **at least 75 percent** of structures included in the subapplication that meet **ANY** of the following FMA and/or NFIP SRL and RL definitions in order by program priority:

- FMA definition of an SRL property
- FMA definition of an RL property
- NFIP definition of an SRL property, and/or
- NFIP definition of an RL property

Tier 2: Final Priority Scoring Criteria



Substantial Damage
*(*10 points per Substantial
Damage structure, no cap)*



**Justice40 Community
or Community Disaster
Resilience Zones**



**Flood Mitigation Assistance
(FMA) and National Flood
Insurance Program (NFIP)
Defined Severe Repetitive
Loss (SRL) and Repetitive
Loss (RL) Properties**



**FEMA Flood Mitigation
Assistance (FMA)
Capability
and Capacity Building
(C&CB) Activities**

Source: FEMA 2023 NOFO Webinar Deep Dive

Section Requirements:

- Please submit a completed [2023 FMA Prioritization Criteria Scoring Sheet](#) to rank the subapplication. Provide all supporting documentation for that ranking in this section. For Individual Property Mitigation subapplications, there are two levels of prioritization. The first is based on the number of properties classified as FMA or NFIP RL or SRL. The second is based on the Prioritization Criteria Scoring Sheet. In the comments section please identify the number of FMA RL or SRL i and SRL ii and number of NFIP RL or SRL.

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Additional Subapplication Ranking Concerns

FEMA may rank subapplications lower where the average elevation federal cost share is greater than \$250,000 for all single dwelling units or the average acquisition federal cost share is greater than \$750,000 for all single dwelling units.

FEMA will further prioritize properties from subapplications if the building value of a single-family dwelling is less than \$750,000, according to best available data, to ensure maximization of the number of NFIP-insured properties selected for mitigation projects.