

# Guidance for Flood Risk Reduction Subapplications

Read the Notice of Funding Opportunity (NOFO) issued by FEMA for the funding year that the subapplicants are applying for. Re-read as necessary and keep handy as a reference. The following guidelines are for Texas subapplicants applying to FEMA's Flood Mitigation Assistance Program. Please review the NOFO pages 23-27 for instructions for FEMA GO and Sam.GOV.

## FEMA GO:

### Subapplication Title:

Please ensure subapplication title clearly indicates sub-application type, mitigation activity type, sub-organization name. (see example below):

- Flood Risk Reduction Project for *Community Name or Project Site*.
- Hazard Mitigation Plan Update for *Community Name*.

### Sub-application Type:

All subapplicants must submit an FMA grant application via FEMA GO by the June 25, 2026, application deadline to be considered for funding. The required format for applications and subapplications is built into FEMA GO. Localized Flood Risk Reduction Project must be submitted in a “**project**” sub-application type. Failure to submit the subapplication as the correct sub-application 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:

- [2024 FMA Prioritization Criteria Scoring Sheet](#)
- [Localized Flood Risk Reduction NOFO Fact Sheet FY24](#)
- [FMA FY24 NOFO](#)
- [FEMA BCA Toolkit 6.0](#)
- [Benefit Cost Analysis Policy Guide 08/2024](#)
- [Benefiting Area Maps Guidance 01-2025](#)
- [Best Practices for Documenting Compliance with BABAA- FEMA](#)
- [Build America Buy America Act Policy- FEMA](#)
- [Demonstrate Cost Effectiveness for Projects Less than \\$1 Million Dollars- 05-2024](#)
- [EHP Guidance by Project Type HMA TEXAS 2021- FEMA](#)
- [EHP Review Job Aid Flood Risk Reduction 03-2022](#)
- [Environmental Historic Preservation EHP Checklist-FEMA.pdf](#)
- [Example Flood Risk Reduction Budget](#)
- [Guidance for Submitting Phased Projects- FEMA.pdf](#)

## Guidance for Flood Risk Reduction Subapplications

### 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 sub application 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 Requirements:

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

### Mitigation Plan

#### Section Requirements:

- The proposed project must be included in, or consistent with, the FEMA-approved hazard mitigation plan. Attach a copy of the HMP (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: Flood Control
  - Select applicable Primary sub-activity type for the project.
  - Add additional activity types as applicable.
- Primary Hazard Source: Flooding
  - Select additional hazard sources, as appropriate.
- Application should identify whether this is a Phased Project. For complex flood risk reduction projects please consider submitting a phased application. Review [Guidance for Submitting Phased Projects](#).

It is best practice to check the box for phased projects in FEMA GO and to include insight on the proposed phasing in the project schedule and cost estimate. While a phased project may not have all the required information, the scope of work must explain how those gaps will be reflected in Phase I. Include any available preliminary design and site data for proposed project.

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- Provide all available technical data such as existing or preliminary H&H data, preliminary geotechnical data, existing models, and other relevant technical data, as appropriate. It is important to identify all data needs during the pre-screening process and update the Phase I scope of work to ensure it is complete.
- 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. Additionally, the scope of work should contain:
  - 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.
    - Include pre-and post-project H&H data with water surface elevations for multiple recurrence intervals and documented lowest flood elevations for all structures (or elevation of vulnerable infrastructure roads)
  - Include narrative descriptions of population benefiting to supplement the data and shapefile provided, particularly in rural areas with limited population data or for projects benefiting geographically dispersed populations.
  - Identify if a CLOMR or LOMR will be required at the end of the project- projects within the SFHA that alter the characterizations of the H&H will require one or the other.
  - Projects must be standalone solutions to a problem described in the SOW and the SOW should address if there are upstream or downstream impacts.
    - Provide justification such as a letter from an engineer or a no-rise study.
  - Clear definition of the level of protection (i.e., if the project is to expand a stream culvert explain the current capacity and the post project capacity)
  - 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.
  - Description of how the project is going to benefit properties that participate in the NFIP and supporting documentation.
  - For non-phased projects include all H&H Data and a justification as to whether project has upstream or downstream impacts.
- Project must benefit NFIP insured structures.
  - NFIP information is obtained by submitting the required [“Request for NFIP Policy Holder PII”](#) form.
- Include a Project Implementation Plan with the proposed project’s tasks documented, including responsible parties for task assignments, and associated milestones.
- Please, see FEMA’s [EHP Guidance by Project Type HMA Texas 2021 from FEMA Region VI](#) and [Flood Risk Reduction EHP Job Aid](#)
- If Sub-applicant is applying for management costs, the management cost activities must be discussed in the scope of work.

### Section Recommendations:

- For a project to receive state funding identify whether the project is included in the Regional Flood Plan.
- Include a spreadsheet or documentation of all impacted properties loss data.

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### Schedule

#### Section Requirements:

- The standard Period of Performance is 36 months. Project activities should be able to be completed within the POP.
- A longer POP for a Localized Flood Risk Reduction Project must be requested, documented, reasonable, and justified. Any subsequent amendments to the federal award will not extend the POP unless explicitly stated. Page: 48-50 of the (FY24 FMA NOFO).
- Provide a detailed schedule of activities required to complete the proposed project. Each month within the period of performance should be accounted for within the schedule with no lapsing months up to project closeout. Schedule should coincide with implementation plan.
- Phased Projects
  - Go/ No Go Milestones: A Go/No-Go milestone is a major milestone in the project that if not completed on time may result in a cancellation of the subaward. Progress towards meeting the Go/No-Go milestones must be reported in the quarterly progress reports submitted to the recipient and FEMA. At these Go/No-Go milestones, FEMA will evaluate project performance, schedule adherence, and contribution to FEMA's program goals and objectives.
  - Standard Go/No- Go Milestone for Phased Projects: Whether the project is determined to be cost-effective.

### Location

#### Section Requirements:

- Subapplications must prove that the project will benefit NFIP insured structures.
  - 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) proving that the proposed project benefits NFIP insured properties by submitting a map and associated geospatial files (e.g., Shapefile, KML/KMZ, Geodatabase, or other GIS enabled document) delineating:
    - The proposed project footprint boundary,
    - Area benefiting from project (in alignment with H&H modeling, as available),
    - Active NFIP policies,
    - The RL and SRL designated properties within the project benefit area,
    - A pdf of maps is beneficial, but geospatial.
    - Review FEMA's "[Benefitting" Area Maps Guidance](#)" to ensure provided benefiting area map meets all FEMA requirements.

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### Budget

#### Section Requirements:

- Ensure that all costs are eligible for reimbursement through the FMA Grant.
  - Eligible Flood Risk Reduction Activities and Costs: HMA Guidance Part 12.E.1
  - Eligible Management Costs: NOFO Section 2.I (page 18)
    - A maximum of 5% of the total subapplication budget can be submitted for subapplicant management costs.
- New FY 2024 NOFO update: If actual costs exceed projected costs, FEMA will not cover additional costs.
- Attach an excel budget breakdown spreadsheet: Budget Spreadsheet with every cost associated with the proposed mitigation project. Avoid using lump sums and include itemized expenses.
  - Subapplication Cost share:
    - Standard Flood Risk Reduction subapplication cost share: 75%
    - Cost share should be input in FEMA Go both at the project costs and the management costs. Cost share should be the same for both sections.
  - 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. Please review NOFO Section 2.I for eligible management costs.
  - Ensure construction supplies follow the Build America, Buy America (BABA) requirements: [FEMA Build America Buy America Act Policy](#) and [Best Practices for Documenting Compliance with BABAA](#)
  - Please utilize the [Example Flood Risk Reduction Budget Spreadsheet](#) for reference.
- 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, tasks, and activities associated with each position for the management cost budget line item or a description 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.
- In FEMA GO 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-

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Construction) or SF-424C (Construction). Separate out all project 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).
- Provide a Funds Commitment Letter (even if there is no local match requirement). Must be signed by the SAR.
- Subapplicants must ensure there is no duplication of benefits. Any federal funding received for the same purpose must be disclosed and cannot fund the same costs.
- Attach the required assurances: **The Standard Forms (SF) are also available at <https://www.grants.gov/forms/forms-repository/sf-424-family>:**
  - 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 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

## 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 7% 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.
- Phased Projects are not required to submit a complete BCA as Phase I will be developing the finalized BCA, however a preliminary BCA is required. Application must demonstrate potential cost-effectiveness based on a preliminary assessment of anticipated project benefits and cost, the subapplicant must be aware that this preliminary assessment is solely for the purpose of the Phase I pre-screening process and is not the final cost-effectiveness determination.
- Refer to FEMAs [Benefit Cost Analysis Guidance](#)

### Required Attachments:

#### **Streamlined Cost-Effectiveness Determination Method:**

#### ***Projects with a total cost of less than \$1,000,000.00***

- Review FEMAs [Demonstrating Cost-Effectiveness for Projects Less than \\$1 Million](#)

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- 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 helpdesk that supports BCA determination. (BCA helpline is: 1855-540-6744).

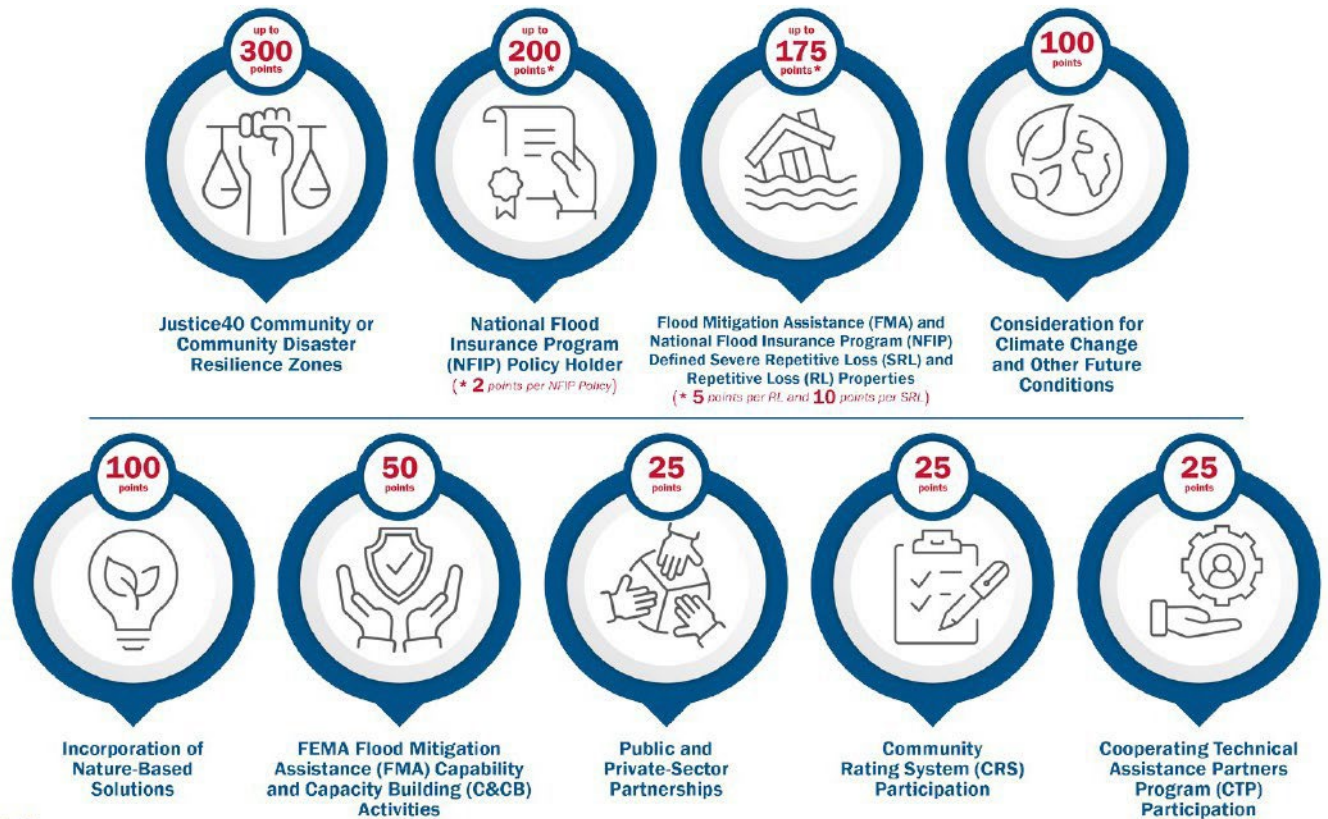
## Environmental/Historic Preservation Review

### Section Requirements:

- No construction, ground disturbance, or project activity may begin prior to FEMA completing Environmental and Historic Preservation (EHP) review and issuing written approval.
- Please, refer to FEMA's [Environmental Historic Preservation \(EHP\) Checklist](#) Region 6 [EHP Guidance by Project Type HMA Texas 2021](#), and [EHP Job Aid: Flood Risk Reduction Projects](#) for EHP Requirements
- Phased Projects Environmental Review:
  - Environmental Planning and Historic Preservation Review: Phase I review is generally categorically excluded from [National Environmental Policy Act \(NEPA\)](#) review with some exceptions. Phase I EHP review should identify any potential EHP compliance issues and information needs for Phase II review. When a Phase I scope of work is limited to developing engineering and architectural design plans, the Phase I review would likely meet a specified [Categorical Exclusion \(CATEX\)](#), which is a type of work categorically excluded from detailed documentation prepared to complete the NEPA review.

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### Evaluation



### Section Requirements:

- Please submit a completed [2024 Prioritization Criteria Scoring Sheet](#) to rank the subapplication. Provide all supporting documentation for that ranking in this section

### Funding Caps

The \$600 million available may be used to fund the traditional Flood Mitigation Assistance grant program prioritizes as well as the community flood mitigation priorities FEMA will select up to \$420,000,000 of Localized Flood Risk Reduction Projects that address community flood risk for the purpose of reducing NFIP flood claim payments.

- \$50,000,000 cap (federal share) per localized flood risk reduction subapplication
- A maximum of 5% of the total subapplication budget can be submitted for subapplicant management costs