Announcement and Guidance: FEMA’s 2021 BRIC and FMA Grant Rounds

The purpose of this announcement is to share key information regarding FEMA’s recently released Notice of Funding Opportunity (NOFO) for the FY2021 BRIC and FMA grant rounds, and to provide guidance to potential BRIC/FMA sub-applicants about Washington Emergency Management Division’s (EMD) required grant application process.

FY2021 BRIC and FMA Grant Application Timeline

The Federal Emergency Management Agency (FEMA) has announced the opening of their application period for the FY2021 Building Resilient Infrastructure and Communities (BRIC) and Flood Mitigation Assistance (FMA) grant programs. EMD is designated to administer and oversee these programs for the State, including the application process for all eligible entities with the State (Federally recognized Tribes may apply directly to FEMA).

EMD has established a two-step process for BRIC/FMA sub-applicants that starts with a pre-application followed by a full application. EMD’s process and timeline is designed to ensure we meet FEMA’s January 28, 2022 deadline for the State, as applicant, to submit its complete package of sub-applications. All entities seeking grant consideration must follow the State’s submission process and deadlines, which are described below.

STEP ONE: Pre-application and Eligibility Review

- **No later than Tuesday, September 07, 2021:** EMD’s Mitigation Section will accept pre-application forms, which are available on its website and submitted to EMD via email to hma@mil.wa.gov. EMD will review the pre-applications for eligibility and contact potential sub-applicants to discuss their proposals.

- EMD will invite eligible sub-applicants to submit full sub-applications in FEMA GO only after their pre-application has been submitted and EMD has contacted them to discuss the proposal’s eligibility. **Sub-applicants who do not submit a pre-application form by September 07, 2021 will not be eligible to submit full applications.**

- Once invited to submit a full sub-application, jurisdictions are encouraged to submit early in order to receive technical assistance from EMD.

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

- For sub-applicants who complete step one (pre-application) and who are invited to submit full applications, the deadline to submit a complete FEMA GO sub-application for BRIC or FMA for EMD review will be **Monday, November 08, 2021.** Sub-applications submitted after this date will not be reviewed or submitted to FEMA for consideration.

- EMD will review sub-applications for eligibility, completeness and cost effectiveness. We will request additional information if required and will work with sub-applicants to make selected applications as competitive and complete as possible. Sub-applications deemed mostly or substantially incomplete and/or lacking key required information may be omitted from further consideration.
• WA State EMD will complete its sub-application review and selection process and will submit its final state application package to FEMA for the FY2021 BRIC and FMA programs no later than January 28, 2022 (FEMA’s established State submission deadline).

According to their NOFOs, FEMA will announce its selections for FY2021 BRIC and FMA grants in Summer 2022. After selections, FEMA will conduct more in-depth reviews of the proposals (especially regarding environmental and historic preservation considerations) before issuing final awards. Grant award dates will vary, depending upon project complexity and FEMA’s internal review process for specific mitigation activities.

On a case-by-case basis EMD may provide limited technical assistance for sub-application development on the Scope of Work, Benefit-Cost Analysis (BCA), Project Budget, and other sections if requested. EMD will also include several application tools in full application packages to assist local jurisdictions in the preparation and development of quality sub-applications. In addition, FEMA is offering webinars on the FY21 NOFOs for prospective applicants. See FEMA’s online Webinar Series information page for schedules and more information.

**FY2021 Building Resilient Infrastructure and Communities (BRIC)**

The BRIC program makes federal funds available to states, U.S territories, tribes, and local communities for pre-disaster mitigation activities. It is a cost-shared grant, 75 percent federal funds and 25 percent local (non-federal) matching funds, which is distributed through the reimbursement of eligible expenses over a 3-year period of performance. Jurisdictions that meet the *Economically Disadvantaged Rural Communities* criteria, as described in FEMA’s BRIC 2021 NOFO (pg. 12) are eligible to receive an increase in federal cost share, up to 90 percent federal and 10 percent non-federal. The criteria are synonymous with the *small impoverished communities* criteria set forth in the Stafford Act.

Detailed BRIC program information is available at [https://www.fema.gov/bric](https://www.fema.gov/bric) and described in [FEMA’s full BRIC 2021 NOFO](https://www.fema.gov/bric).

**Eligible Sub-Applicants:** Local governments, including cities, townships, counties, special district governments, and tribes (including federally recognized tribes who choose to apply as sub-applicants) are eligible for grant consideration. All sub-applicants must have a FEMA-approved hazard mitigation plan by the grant application deadline and at the time of award, in accordance with Title 44 Code of Federal Regulations (CFR) Part 201.

**Funding:** The total, nationally available funding for FEMA’s 2021 BRIC grant round is $1 billion. FEMA has established specific state allocations and tribal set-asides, as described in their NOFO, leaving $919,000,000 (estimated) available for the national competition.

The maximum federal share available to any single project sub-application is $50,000,000. These funds are competitively available for eligible mitigation activities that fall into in two main categories:

1. **Capability- and Capacity-Building (C&CB):** activities which enhance the knowledge, skills, expertise, etc., of the current workforce to expand or improve the administration of mitigation assistance. This includes activities in the following sub-categories: building codes activities, partnerships, project scoping (previously known as advance assistance), mitigation planning and planning-related activities (e.g., writing or updating hazard mitigation plans), and other activities. States may submit up to $1,000,000 (federal share) of eligible C&CB sub-applications.

2. **Mitigation Projects:** cost-effective projects designed to increase resilience and public safety, reduce injuries and loss of life, and reduce damage and destruction to property, critical services, facilities, and infrastructure.

The following funding details apply to all sub-applications, regardless of category:
• up to 10 percent of any single sub-application can be used for information dissemination activities, including public awareness and education (brochures, workshops, videos, etc.) related to a proposed C&CB activity or mitigation project.

• up to 5 percent of any single sub-application can be used for eligible and reasonable indirect costs, direct administrative costs, and other administrative expenses associated with the specific mitigation measure or project. Unlike all other sub-application budget categories, these Management Costs funds are not subject to the local cost share requirement; they are 100% federal and do not require local matching funds.

For general, programmatic guidance on mitigation grant eligibility categories and requirements, see the FY2015 Hazard Mitigation Assistance Unified Guidance & Addendum.

FEMA Priorities and Evaluation Criteria: FEMA’s priorities for the program, as stated in their NOFO, are as follows:

...to incentivize natural hazard risk reduction activities that mitigate risk to public infrastructure and disadvantaged communities as referenced in EO 14008; mitigate risk to one or more community lifelines; incorporate nature-based solutions; enhance climate resilience and adaptation; and to increase funding to applicants that facilitate the adoption and enforcement of the latest published editions of building codes. BRIC encourages mitigation projects that meet multiple program priorities.

FEMA’s NOFO also provides their specific evaluation criteria, which includes a Technical Evaluation Criteria table and a Qualitative Evaluation Criteria Table (see pages 27-28 of the NOFO). The scores resulting from FEMA’s application of these criteria will be used determine the competitive outcomes for all sub-applications that pass their initial Eligibility and Completeness reviews.

Washington State EMD will further assess and prioritize its own sub-applications based on the qualitative criteria described in Table 1 below.

Table 1. WA EMD Project Evaluation Criteria and scoring scale for FY2021 BRIC and FMA

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<td>The proposed project anticipates impacts on disadvantaged communities (e.g., socially vulnerable populations), especially regarding the Justice40 Initiative, equitable risk-reduction outcomes and whole-community approaches to disaster resilience.</td>
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<td>The proposed project addresses community lifelines and critical infrastructure vulnerability.</td>
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<td>The proposed project has multiple benefits beyond hazard risk reduction, including climate change, regional growth and development, and social vulnerabilities.</td>
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<td>The proposed project is collaborative and promotes shared responsibility, partnerships, and is supported by multiple jurisdictions or agencies.</td>
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<td>The proposed project includes innovative solutions to mitigate natural hazards, such as nature-based solutions when feasible.</td>
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<td>The proposed project has a clear and direct link to a local, FEMA-approved Hazard Mitigation Plan.</td>
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In addition, EMD encourages mitigation proposals for the following project types and methods (all project applications must meet FEMA’s BCA criteria and other programmatic criteria):

- **Coastal Erosion and Tsunamis**: projects that address root causes of coastal erosion, incorporate green infrastructure methods to reduce or eliminate vulnerability to erosive events, and inhibit development in high-risk coastal areas (especially V Zones). Projects within mapped tsunami inundation zones that develop, design and/or construct tsunami vertical evacuation structures or evacuation routes, as well as projects designed to improve evacuation efficiency and access to vertical evacuation structures post-earthquake (e.g., landslide mitigation along evacuation routes).

- **Critical Infrastructure and Facilities**: projects that correct or eliminate seismic structural deficiency, severe wildfire vulnerability, or repetitive flooding for community lifeline infrastructure such as water, wastewater, powerlines, roadways, public safety facilities (fire, police, hospitals, 911, etc.), and schools.

- **Extreme Heat**: projects that improve community resilience to extreme heat through measures such as proactive planning, green infrastructure and urban design, structural retrofits, and cooling shelters.

- **Flood Mitigation**: projects that address root causes of hydrologic flow problems and expand drainage/storage capacity, such as improving stream/river connectivity with floodplains, reducing channelization, reducing impervious surfaces, and removing hydrologic barriers.

- **Wildfire, Smoke, and Post-Wildfire Debris Flow**: projects that address the causes of and/or contributing factors to wildfires (e.g., fuel loads and types), the impacts of wildfire smoke on air quality and public health (e.g., structural retrofits for indoor air quality), and the causes of and/or contributing factors to post-wildfire debris flows (e.g., hillslope stabilization).

**FY2021 Flood Mitigation Assistance (FMA)**

The Flood Mitigation Assistance (FMA) program makes federal funds available to states, U.S. territories, tribal governments, and local communities to reduce or eliminate the risk of repetitive flood damage to buildings and structures insured under the National Flood Insurance Program (NFIP). **Only projects that directly mitigate NFIP-insured properties qualify for FMA grant funding.**

FMA grants are dispersed through the reimbursement of eligible expenses and are based upon an established federal-local cost share of the given award. For mitigation activities not targeting severe repetitive loss (SRL) or repetitive loss (RL) structures, the cost share will be 75 percent federal funds and 25 percent local (non-federal) funds. For mitigation activities involving eligible SRL or RL properties, the cost shares are as follows:

- SRL properties: 100 percent federal funds. No match requirement.
- RL properties: 90 percent federal funds and 10 percent local (non-federal) funds.

FEMA will distribute up to $160 million (nationally) through the 2021 FMA grant program in the following manner:

1. **Up to $10 million (nationally) for Project Scoping** (previously Advance Assistance): Project Scoping to develop community flood mitigation projects and/or individual flood mitigation projects that will subsequently reduce flood claims against the NFIP.

2. **Up to $70 million (nationally) for Community Flood Mitigation Projects** to address community flood risk for the purpose of reducing NFIP flood claim payments.

3. The remaining funds, at least $80 million (nationally), will be used for the following:
a. **Technical Assistance** to maintain a viable FMA program over time. To be eligible to apply, the applicant must have received an Fiscal Year 2020 Flood Mitigation Assistance award of at least a $1 million federal share.

b. **Flood hazard mitigation planning** sub-applications for the flood hazard component of states, local communities, tribes and territories hazard mitigation plans and updates to plans.

c. **Individual Flood Mitigation Projects**:
   - Projects that mitigate the risk of flooding to individual NFIP insured structures. FEMA will select sub-applications in this category on a competitive basis in the following prioritized order:
     - **Severe Repetitive Loss (SRL) (B)(ii)**: Projects that will mitigate flood damage to at least 50% of structures included in the sub-application that meet the definition of an SRL property: At least two separate NFIP claim payments have been made with the cumulative amount of such claims exceeding the market value of the insured structure.
     - **Repetitive Loss (RL)**: Projects that will mitigate flood damage to at least 50% of structures included in the sub-application that meet the definition of an RL property: Property has incurred flood-related damage on two occasions in which the cost of the repair, on the average, equaled or exceeded 25% of the market value of the structure at the time of each such flood event.
     - **Sever Repetitive Loss (B)(i)**: Projects that will mitigate flood damage to at least 50% of structures included in the sub-application that meet the statutory definition of an SRL property: Four or more separate NFIP claims payments have been made with the amount of each claim exceeding $5,000, and with the cumulative amount of claims payments exceeding $20,000.

Additional details regarding these categories, FMA funding priorities, and eligible activities are provided in [FEMA’s 2021 FMA NOFO](#).

All properties participating in an FMA grant must have NFIP flood insurance policies in place at the time of application, which must be maintained for the duration of the activity. Please refer to the [FY2015 HMA Unified Guidance and Addendum](#) for more details regarding this and other important eligibility requirements.

A Benefit-Cost Analysis (BCA) is required for all project sub-applications, with the exception of two project types, which fall under FEMA’s “Pre-Calculated Benefits” waiver: property acquisitions that cost $276,000 or less, or home elevations that cost $175,000 or less. FEMA considers these to be cost effective and requires no further BCA work. Please see Part V, Section I.7 of [FEMA’s FY2015 HMA Unified Guidance](#) for further information.

**Additional Sub-Application Information**

- The State does not provide any portion of the non-federal cost share for the BRIC and FMA programs, as it typically does for the Hazard Mitigation Grant Program (HMGP). Also, special conditions apply to FMA grants when Increased Cost of Compliance payments (Coverage D of NFIP insurance policies) are used to cover a local match requirement. See the [FY2015 HMA Unified Guidance and Addendum](#) for more information.

- To be eligible for grant award, sub-applicants must have a FEMA-approved Hazard Mitigation Plan by the sub-application deadline AND when funds are awarded. If a plan is still under FEMA review on January 28, 2022, then EMD will coordinate with FEMA regarding the approval timeline.

- Private non-profit organizations are not eligible to directly apply for assistance from the BRIC and FMA programs. Another eligible applicant (e.g., local government or state agency) can, however, act as Applicant Agent and apply on the organization’s behalf. The Applicant Agent is responsible for meeting the award terms and conditions.
• All sub-applications must be made to the State through FEMA’s online FEMA GO system (both BRIC and FMA). FEMA GO account and login information will be provided to sub-applicants when they are invited to apply, after pre-application evaluation.

• Sub-applicants may be reimbursed for eligible **pre-award costs** incurred prior to the date of grant award for non-construction activities directly related to developing the project proposal. Activities may include, but are not limited to, development of the application, benefit-cost analysis, environmental/historic preservation data, project documentation, and design/engineering. These costs can only be reimbursed after award with proper documentation, and in accordance with the approved cost share terms, if they are included in the proposed budget.

• Except for the above-noted pre-award costs, BRIC and FMA grant funds are only available for work performed after FEMA issues an award. For this reason, BRIC and FMA grants are suitable for projects with extended implementation schedules rather than short-term, time-sensitive projects. WA EMD staff will review timelines with potential sub-applicants and discuss these considerations during pre-application reviews.

• A sub-application cannot be submitted for both FMA and BRIC programs. If a proposal is eligible for FMA then it will not be considered for BRIC.

• All project sub-applications must determine cost effectiveness using [FEMA’s benefit-cost analysis (BCA) software](https://bcasoft.fema.gov/), Version 6.0, except for proposals covered under the Pre-calculated Benefits waiver and Community & Capacity-Building proposals. The BCA software is available for free on the linked FEMA site. WA EMD staff cannot provide technical assistance for BCA software download issues, so please contact the [BCA helpline](https://bcasoft.fema.gov/contact) with any issues.

• The FY2021 BRIC and FMA grant rounds are nationally competitive and WA EMD cannot guarantee grant awards to any sub-applicant.