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1. Local Funding and Technical Assistance

44 CFR 201.4(c)(4)(i): [The section on the Coordination of Local Mitigation Planning must include a] description of the State process to support through funding and technical assistance, the development of local mitigation plans.

Local funding and technical assistance to support Local Hazard Mitigation Planning is divided into two key parts:

- Planning Technical Assistance
- Planning Grant Management Technical Assistance

1.1 Planning Technical Assistance

Iowa HSEMD provides the technical assistance for planning and grant management under the direction of the State Hazard Mitigation Officer (SHMO) and the mitigation staff. The primary conduit for technical assistance to local plan writers is the State Mitigation Planner. The Mitigation Planner provides comments and suggestions, submits, tracks, and participates in review dialog throughout the planning process for local mitigation plans. District Liaisons, or Regional Planners, do conduct reviews of local hazard mitigation plans, and help answer questions when necessary. State review of local mitigation plans is generally completed within two weeks.

In this planning cycle Iowa has transitioned from having help in providing technical assistance provided by FEMA planners located in Des Moines to the State performing all review and technical assistance before submittal to FEMA. This transition was gradual, and over time the level of in depth technical assistance from the state level continues to improve. Iowa has provided some form of technical assistance since 1997 and continues to today to ensure local hazard mitigation planning efforts in Iowa are integrated with the legal requirements in the following to form the framework for state and local planning and planning integration.

- Disaster Mitigation Act of 2000 (44CFR),
- National Flood Insurance Reform Act (NFIRA),
- Flood Mitigation Assistance program (FMA),
- 2003 Iowa Code and Iowa Administrative Code, Section 605—7.3(4)d,
- Executive Order 62 established the organization and responsibilities of the State Hazard Mitigation Team (SHMT)

The Pre-Disaster Mitigation Grant Program (PDM), Hazard Mitigation Grant Program (HMGP), Public Assistance (PA), and the Flood Mitigation Assistance (FMA) Program and Repetitive Flood Claims program (RFC) are administered through the Iowa HSEMD. These programs are used as vehicles to implement the integrated planning process and to implement mitigation measures via funding sources and policy. These HMA Programs are currently used to fund state and local planning efforts and the implementation of the mitigation strategies identified in this plan. Large amounts of HMGP funds have been available for planning grants since 2007 following the multitude of disaster events affecting a large proportion of the state.

The State of Iowa had 1 property acquisition under the Repetitive Flood Claims Program for mitigation projects in 2006. The FMA program provided grants for 2 property acquisitions in 2003, 1 project and 3 plans in 2004 and 1 flood pump in 2006. There were no projects funded under the RFC and FMA programs during the previous or current time period for this update 2010-2013 primarily due to availability of HMGP funding.

The Severe Repetitive Loss Program (SRL) eligible properties included 49 validated by FEMA in November of 2012. Although funding is made available annually for these programs, ongoing funding from the HMGP has reduced demand for

funds from the PDM, FMA, RFC, and SRL programs for present time mitigation funding needs. Primarily because the State contributes 10% cost share for the HMGP, local jurisdictions generally choose not to seek funding for other HMA programs when HMGP funding is available. Communities in Iowa (the State does not acquire property) have acquired many properties, demolished them, and turned them into perpetual greenspace through the HMGP. The following chart shows the number of acquisitions by disaster, how many are greenspace, in how many communities, and of those properties how many are repetitive loss structures.

Disaster	Properties Acquired	Perpetual Greenspace	Number of Communities	Rep. Loss	Number of Communities
DR-1763	933	922	33	85	19
DR-1880	86	85	6	8	3
DR-1930	17	5	4	2	2
DR-1998	4	4	1	0	0

Iowa began promoting a local hazard mitigation planning process in 1997 as a key element to a complete Local Hazard Mitigation Plan. Local planning committees often work with a professional planner from a Regional Planning Agency (RPA) or Council of Governments (COG) in identifying mitigation objectives and communicating these objectives. The state's capability to procure and provide available resources and grant programs to support local mitigation actions is enhanced as a result from evaluating the mitigation objectives and associated needs. This initiative incorporated the requirements and values of the Flood Mitigation Assistance (FMA) planning initiative, the Community Rating System (CRS) planning initiative and the Project Impact planning initiative. The result of correlating the various planning programs into one guidance document created a tool that enabled communities in Iowa to develop one plan covering the array of community interests and concerns,

while also meeting the requirements for funding under various technical and grant assistance programs.

Implementation of the local hazard mitigation planning initiative in Iowa also meant a program of agency and public education and planning workshops to reach community leaders and professional planning organizations. This process has continued with the implementation of DMA 2000 as Iowa has led efforts to educate and train community officials, professional planners and emergency management professionals in FEMA courses addressing hazard analysis and risk assessment, cost benefit analysis, and hazard mitigation planning workshops.

For the 2010 update Iowa counted 307 local jurisdictions with FEMA approved local mitigation plans, and in 2013 that number has more than doubled to 711 jurisdictions covered by FEMA approved local mitigation plans. Of particular note has been the progress achieved in including school districts in the planning process. Iowa HSEMD continues to encourage jurisdictions without FEMA approved plans to start the planning process.

Eighty-seven (87) communities applied for planning grants under the PDM 2005 and PDM 2006 competitive grants but they were not selected for funding. HMGP funds from recent disasters are currently funding planning grants to complete local hazard mitigation plans to expand coverage to include all counties in Iowa.

Iowa promotes multi-jurisdiction planning to achieve all-inclusive plans across the State. Overall, multi-jurisdiction planning is a benefit to local jurisdictions, counties, State and FEMA by creating a more efficient planning process, less grants management, and offering a more streamlined process in developing plans. In 2008, DR-1763 provided planning funds needed for the completion of multi-jurisdictional local hazard mitigation plans. Since that time requested planning

applications are to be multi-jurisdictional and all-inclusive of the county or regional location.

Iowa's guidance and technical assistance objectives are that Local Hazard Mitigation Plans result in sound public policy and allow for integration of hazard mitigation strategies with community objectives. This is accomplished through the encouragement of a process for improved public participation and the ability to enhance stakeholder partnerships. The process should provide neighboring communities, agencies, academia, nonprofits, businesses, jurisdictions, etc. an opportunity to participate in the plan development. Planning integrated at this level include comprehensive, capital improvement, watershed, land use, and zoning regulation.

Prior to DMA 2000, HSEMD mitigation staff developed a Model Local Hazard Mitigation Planning Guidance Handbook. This handbook was developed by a planning subcommittee of the SHMT as a tool for local jurisdictions to develop an acceptable hazard mitigation plan. This tool was intended to lead local elected officials, professional planners, and emergency management officials through a methodical planning exercise.

HSEMD has facilitated several DMA 2000 mitigation planning workshops in order to train planners and emergency management professionals on the process of developing and implementing local hazard mitigation plans. FEMA Region VII was instrumental in the success of the planning workshops by providing funds for and coordinating with the training contractors. Planning requirements from 44 CFR Part 201 were explained; along with recommendations on how to successfully meet the requirements throughout the plan. In addition, the planning workshops were designed to encourage communities to use the STAPLEE (Social acceptability, Technical feasibility, Administrative capability, Political desirability, Legal authority, Economic benefits, and Environmental benefits) criteria in order to assess their mitigation measures (actions). During the

2010-2013 time-frame of this update BCA workshops and planning workshops were offered. In 2012 as part of the transition of FEMA mitigation plan reviewers located in the Iowa Closeout Center leaving FEMA Region VII planners conducted training in Iowa. This training was focused on state level review of local mitigation plans for the District Liaisons and other State employees. Iowa HSEMD conducted the Mitigation Planning Workshop for Local Governments course in Iowa City during November of 2011. In 2010 Iowa hosted and participated in a FEMA sponsored workshop for local governments and council of governments on Section 322. Topics included general requirements of Section 322, local planning requirements, and the four major phases of the mitigation planning process (organizing resources, assessing risks, developing the mitigation plan, and implementing and monitoring progress.) Identifying hazards, profiling hazards, assessing vulnerability, conducting a multi-jurisdiction risk assessment, developing a multi-jurisdiction plan, and plan update development were presented and discussed in detail. Additionally in 2013 FEMA released a new Local Mitigation Planning Handbook as well as a new Review Tool.

Iowa's strategy is that Local Hazard Mitigation Planning and resulting adopted local plans are a function of, and primary contributor to, the mitigation portion of the countywide multi-hazard plan adopted by the county emergency management commission. In this way, strategies developed, supported, and adopted by separate jurisdictions represented on the county emergency management commission can feed the commission strategy and State Hazard Mitigation Plan. One of the SHMT responsibilities is to advise the SHMO and review potential mitigation projects in the state and make a recommendation regarding feasibility and funding. With the SHMT overseeing the state's hazard mitigation program, this type of integrated planning is effective and is recognized and often rewarded with grant funds for projects.

Per Iowa Administrative Code, after a Presidential Declaration of Disaster the counties included are required to review, update, and certify their mitigation and recovery plans. This certification must occur within 180 days after the closing date of the disaster incident period. HSEMD will receive HMGP grant dollars from declared disasters, and these planning dollars will be used to promote that local level planning achieve DMA 2000 requirements. Meeting the DMA 2000 requirements will result in local governments being eligible for HMGP project grants.

1.2 Planning Grant Management Technical Assistance

As mentioned earlier, HMGP, FMA, and PDM are currently used to fund local planning efforts by Iowa jurisdictions. To support the development and adoption of Local Hazard Mitigation Plans by Iowa jurisdictions they are guided by:

- State of Iowa Administrative Plan; Annex 1.5-A
- FEMA Local Mitigation Planning Handbook
- FEMA Review Tool with recommendations
- Hazard Mitigation Grant Finance Methodology and Resources for Sub-grantees; Annex 1.5-C
- Hazard Mitigation Resources for Sub-grantees CD; see Annex 1.5-B

The above documents provide the legal basis and technical assistance required to manage Local Hazard Mitigation Planning grants provided through HSEMD. They establish the organization, policies, and procedures used to administer and manage grant funds and set out staffing and assignment of responsibilities, allowable costs for grantees and sub-grantees, eligibility requirements, a procedure for identifying and notifying grant applicants, and requirements for plan reviews and updates as a part of the grant process. Day-to-day technical assistance is provided by HSEMD in order to assist

sub-grantees with their post-award requirements and fiscal closeout procedures for planning grants that have been approved.

Pre-award activities include benefit-cost analysis, damage assessments, applicant briefings, and review or recertification of state or local plans to meet state and federal requirements. HSEMD provides initial technical assistance to the sub-applicant beginning with Pre-Award Grant Agreement Meetings to review the pre-application process and determine the potential for a mitigation project. The overall proposed project is evaluated and documentation is gathered from the sub-applicant representative and individuals involved with the proposed project. During these initial stages HSEMD meets with the sub-applicant to provide technical assistance involving the application development. At the completion of all pre-award activities, the grant monitoring process changes to the post-award monitoring activities.

Upon FEMA HMA project approval, a Grant Agreement Meeting is coordinated with the sub-applicant to establish strict performance guidelines and explain the requirements for grant completion. The grant agreement is reviewed in its entirety including budget and allowable costs, scope of work, legal requirements, and authorized representative prior to receiving signatures. Period of performance dates are re-enforced including plan approval dates and milestones as outlined in the application. The process for financial reporting and progress reporting is explained in detail. Budget, procurement procedures and the payment process are reviewed thoroughly to include methods of payment and match verification. Direction is provided on how to request budget amendments, change in SOW, and time extensions. The Financial Chart of Accounts is discussed with the sub-applicant and a walk through the Accounting Management System is presented.

Finally, Fiscal Closing Procedures are discussed and reviewed following the Mitigation Project Closeout Checklist and records retention and audit requirements are reviewed.

On-going monitoring activities are conducted during the performance period of the grant which is referred to as post-award monitoring activities. Post-award monitoring is broken into two specific types of monitoring activities including desk monitoring and on-site monitoring. Ongoing desk monitoring is subject to all grants and provides review of a sub-grantee's file to ensure all required documentation is complete or up-to-date and ensures that any issues are addressed and resolved.

Some of the activities found in general desk monitoring include; processes and procedures for draws and payments; support documentation review for payment requests; solicitation, review consolidation, validation, and submittal of sub-grantee quarterly reports; review and evaluation of sub-grantee procurement procedures and contract documents for compliance with federal regulations; day to day review and validation of federal data systems; changes with grant project amendments, versions, and overruns; and audit activity.

All grant programs require on-site monitoring visits. These site visits usually focus on finance, personnel, procurement, property, program, and projects. During these visits the sub-grantee's accounting system and financial management procedures are reviewed and use of funds is verified. A collection and review of the sub-grantee's personnel policies and procedures, position descriptions and qualifications statements for the project director and other key staff, compensation rates, and systems for staff recruitment and development are evaluated. Procurement procedures are discussed in detail with review of sub-grantee's files for demonstrating compliance with federal procurement procedures.

HSEMD staff may evaluate records for equipment/property where applicable to ensure they are maintaining and updating inventory for all equipment/property used on the grant and that they have proper controls in place to safe-guard equipment/property against loss, damage, and/or theft. HSEMD staff determines how well the program, as it is actually being implemented, reflects the goals, objectives, activities, and services described in the proposal. Finally, staff examines individual projects being implemented by the sub-grantee to achieve the overarching goals of the grant program. Technical assistance is provided to the sub-applicant throughout the duration of the grant period of performance. On site and desk top monitoring ensure that up to the point of payment request all state and federal project requirements are met. During the 2008 to 2013 time period, more than 1,160 pre and post award visits for monitoring/technical assistance were completed. An example Trip Report in Annex 1.5-D demonstrates the process used to document and describe each on-site visit with sub-applicants for tracking and documentation purposes.

HSEMD has developed the Iowa Hazard Mitigation Grant Program: Finance Methodology & Resources for Subgrantees. The supplement is in addition to requirements under Title 44 Code of Federal Regulations (44 CFR), Part 13, and Office of Management and Budget (OMB) 2 CFR, Part 225 and Circular A-102. The document outlines the requirements and information regarding compilation and analysis of financial information such as:

- Hazard Mitigation Subgrant Life Cycle; application development, application approval, period of performance, subgrant closeout, retention of records
- Procurement Methods and Documentation; small purchase, sealed bids, competitive proposals, noncompetitive proposals

- Payment Request Methods & Documents; payment advance, payment reimbursement, request for funds process
- Match; cash match, in-kind match
- Reporting Requirements
- Subgrant Close-out
- Additional Resources
- Appendices; payment request form, personnel activity report template, payment checklists, authorized representative resolution template, subgrantee procurement cover sheet, quarterly progress report

All documents for finance and project information pertaining to acquisition, infrastructure, planning, and safe room projects are burned onto a Mitigation References CD and are provided to the subgrantee. This information includes:

- Copies of 2 CFR 225, 2 CFR 215, 2CFR 230, 44 CFR 13, 44 CFR 80, 44 CFR 206 N, 49 CFR Part 24 and Federal Contract Clause Requirements;
- Financial tracking forms and resources;
- Financial forms related to budget changes, payment requests, closeout, and expense tracking;
- Time limits and extension tracking forms for beginning and completing projects;
- Quarterly financial reports, due for periods ending March 30, June 30, September 30, and December 30;
- Finance Methodology & Resources for Subgrantees with project closeout documents;
- Iowa Hazard Mitigation Plan, Multi-Hazard Mitigation Planning under DM2K June 2007 Bluebook, Local Mitigation Planning Handbook, FEMA How to Guides 1-8, Local Hazard Mitigation Planning Data Collection Sheet and Local HM Plan Crosswalks;
- Acquisition Duplication of Benefits documents and acquisition/demolition checklists;

- FEMA Publication 361: Design and Construction Guidance for Community Safe Rooms; safe room design checklist and documentation

Please see Annex 1.5-B to review specific documents included on the Mitigation Finance Guide for Subgrantees CD.

2. Local Plan Integration

44 CFR 201.4.(c)(4)(ii): [The section on the Coordination of Local Mitigation Planning must include a] description of the State process to and timeframe by which the local plans will be reviewed, coordinated, and linked to the State Mitigation Plan.

44 CFR 201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities...

The State of Iowa has been proactive in hazard mitigation planning and activities for many years. The state's planning process is driven by Section 322 of the Disaster Mitigation Act of 2000 (DMA 2000) and is synchronized through the coordination and integration of local hazard mitigation planning with interagency planning of the State Hazard Mitigation Team (SHMT). Both state and local planning form the core of the state planning process. Community and public involvement in this planning process is crucial and establishes the foundation of the state 322 Plan.

In Iowa, local plan integration is accomplished in multiple ways:

- Through compliance with provisions in both the Iowa Code and the Iowa Administrative Code (IAC)
- The Disaster Mitigation Act of 2000
- Through the State Hazard Mitigation Team

Local plans are reviewed for completeness upon receiving them from the Council of Government or independent contractor contracting with the local communities. The plans are

generally reviewed within 5-10 business days upon receipt and then returned with State comments or forwarded to FEMA for their formal review/comments and approval.

Local plans are reviewed for the hazards identified for the jurisdiction and mitigation strategy to include the mitigation measures (actions). Completed Local Hazard Mitigation Plan – Data Collection Sheets provide local proposed mitigation measures, completed or in progress mitigation measures, local capabilities summary, vulnerability assessment, critical facilities assessment, and hazard ranking to be used for the state plan update. The Data Collection Sheets are reviewed and documented upon receiving the local hazard mitigation plans. Upon the closing of the Iowa Recovery Center local plan reviews and coordination resumed using the state review process. The following process is currently used for local plan review and coordination in Iowa.

1. Review for completeness upon receiving plans from sub-applicants.
2. Review plans within 5-10 business days upon receipt. Upon completion of State review, plans will be forwarded to FEMA for their formal review/comments and approval. If during the review the State finds missing components, the plan would be sent back to the sub-applicant for revisions.
3. The data collection sheet will be reviewed upon receipt of the local plans and the following information will be gathered for integration into the State plan:
 - a. Proposed Mitigation Measures
 - b. Completed or In Progress Mitigation Measures
 - c. Local Capabilities Summary
 - d. Vulnerability Assessment
 - e. Critical Facilities Assessment
 - f. Hazard Ranking
4. This information will be integrated into the State Plan as necessary and will be used for updating the statewide mitigation goals, objectives, strategy, prioritization and

selection of mitigation actions, evaluation of the risk assessment process, and updating statewide inventory for state and local critical facilities.

2.1 Integration through Iowa Code

Through compliance with provisions in both the Iowa Code and the Iowa Administrative Code (IAC), local mitigation plans from both incorporated communities and unincorporated areas can be included in the development of the countywide mitigation plan.

The SHMT used the results of local planning efforts, specifically countywide hazard analysis and risk assessments, to integrate their lists of hazards into the state plan. The local mitigation plans are intended to form the base of the countywide plan. Iowa Code requires the development of a countywide mitigation plan that establishes interim and long-term strategies to eliminate hazards or reduce the impact of hazards that cannot be eliminated. A complete review with amendments as appropriate is required every five years. A review is also required within 180 days following a presidentially declared disaster in which mitigation assistance is requested. County emergency management coordinators are the primary point of contact with HSEMD on mitigation plan integration. HSEMD reviews and approves countywide plans written for compliance with Iowa Code.

Upon review and revision of county mitigation plans, required every five years or upon a presidentially declared disaster, HSEMD evaluates the mitigation actions for consistency with the state plan. If new actions are identified, they will be taken to the SHMT at its next regularly scheduled meeting for consideration and for inclusion into the state plan.

2.2 Integration through DMA 2000

In Iowa, HGMP funds are generally used for counties to complete multi-jurisdictional plans to the DMA 2000 requirements. The local planning process typically begins with a county or local jurisdiction sending a Notice of Interest (NOI) letter to HSEMD to apply for planning grants. The HMGP grant funds up to 75% of planning costs in developing the local hazard mitigation plan. The NOI is reviewed to consider the level of funding available under HMGP; how the proposed project fits within an overall plan for development and/or hazard mitigation in the community, disaster area, or State; and how the project addresses mitigation for the current disaster. Upon receiving the full application, HSEMD reviews the application to ensure the application and documentation meet the HMGP grant requirements, sends a letter of approval, signs a planning grant agreement with the county or local jurisdiction, and forwards the grant within 45 days of receiving it from FEMA.

After the county or local jurisdiction has developed and adopted the mitigation plan, the plan is submitted to the state. The state enters the plan into the tracking system, reviews it for completeness, provides technical assistance if necessary, and forwards it to FEMA Region VII. FEMA reviews the plan and returns the associated Review Tool to the state with, technical assistance comments, a letter of approval, or letter of non-approval. Upon receipt of the FEMA determination, the state notifies the local jurisdiction of the FEMA decision. If FEMA does not approve the plan, the process repeats until FEMA approves the plan.

As part of Local Plan Integration, HSEMD maintains a record of grant applications, NOI, and local plan alternatives submitted. This information is used to identify and use the local goals and objectives for incorporation into the state plan. An analysis of

the information indicates that the highest numbers of measures are:

- Planning
- Property Acquisition/Relocation/Elevation
- Tornado Safe Rooms
- Warning Systems/Generators
- Flood Protection

This information is used in state planning to assist in determining which actions may be the most feasible for addressing the identified needs. Quarterly, HSEMD evaluates approved local DMA 2000 Plans. Newly identified hazards and/or actions will be presented at the regularly SHMT meeting for consideration and for inclusion into the state plan.

2.3 Integration through the State Hazard Mitigation Team

The SHMT and plan writers used the results of local planning efforts, specifically county hazard analysis and risk assessments, to integrate and validate their lists of hazards in the state plan. This was accomplished through the process of identification described in Section 1.3 under Identifying Hazards and by use of the methodology used to assess impact or potential impact on people or property in the state that was discussed in Profiling Hazard Events. Following adoption of the plan, the process of revision, which is required over the next three years, will continue with the SHMT using the same format in order to assure a successful revised plan re-adoption within that three-year timeframe.

3. Prioritizing Local Assistance

44 CFR 201.4.(c)(4)(iii): [The section on the Coordination of Local Mitigation Planning must include a] criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs, which should include consideration for communities with the highest risk, repetitive loss properties, and most intense development pressures.

Further, that for non-planning grants, a principal criterion for prioritizing grants shall be the extent to which benefits are maximized according to a cost benefit review of proposed projects and their associated costs.

44 CFR 201.4(d): Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities...

Prioritizing local assistance in Iowa operates at two basic levels. The first involves the voluntary cooperative arrangements between state agencies on the State Hazard Mitigation Team (SHMT) and procedures that each agency uses in administering its own programs. The second involves funding and programs delivered through the Federal Emergency Management Agency (FEMA) for specific hazard mitigation purposes. In both cases, the SHMT is involved as an oversight component. The following narrative will describe how prioritization is accomplished generally by state agencies through the SHMT followed by the specific mitigation programs from the HSEMD.

The Governor's Executive Order creating the SHMT sets requirements for state agencies participation in hazard mitigation activities. The Order does not require that the agencies work together to prioritize local assistance in all of the programs and separate federal and state authorities that drive those other programs. Numerous state operated hazard mitigation programs are identified in the State Capability Assessment. In an ideal world, all prioritization would fall under the single authority of one interagency group like the SHMT. However, the various state agencies must retain their autonomy in determining the prioritization of local assistance in the administration of their programs.

Nevertheless, a number of state agencies voluntarily utilize the SHMT for prioritizing local assistance on a case-by-case or project-by-project basis. A major reason for doing so is the shared responsibilities linked to the SHMT hazard analysis and risk assessment and the monitoring of programs identified in the state capability assessment. The newly developed THIRA also seeks to tie decision making to actual risk from threats and hazards.

In the hazard analysis and risk assessment, the SHMT both identified the hazards that affect the State of Iowa and determined the ranking of those hazards using the profile methodology discussed in the Identifying Hazards and Profiling Hazard Events sections. In the state capability assessment, the agencies list and describe their programs that either directly or indirectly indicate eligible sub-grantees. Agencies use the SHMT for advice and assistance in prioritizing their programs by reporting the actions and initiatives of their programs, appropriate information on what program resources are utilized, how they are utilized, in which jurisdictions they are utilized, and the timeframes in which they are utilized.

State agencies generally base prioritization on risk and capability, although precise administrative steps vary from one agency to the next. Projects that are approved by the SHMT obtain those approvals because of the SHMT discussions, analysis, and decision-making on risk and capability. Communities with the highest risk, repetitive loss properties, and/or the most intense development pressures tend to be treated with the highest priority in terms of getting project applications approved. Additionally communities with highly vulnerable populations are considered.

The following examples demonstrate the coordination between agencies to share information on post-disaster funding for mitigation measures:

HSEMD in coordination with the IEDA developed a property acquisition program funded by CDBG. These funds were used to acquire properties in special flood hazard areas that would not qualify for the HMGP. The CDBG funding covered 100% of the non-federal share for both the IEDA program and the HMGP program buyouts. The program reflects the HMGP program and holds the same deed restriction requirements as HMGP. This program is likely to acquire more properties than the HMGP.

The Iowa Department of Transportation (IDOT) coordinates with the HSEMD following disaster declarations to review all properties that have the potential to be acquired through the HMGP. This review is used to determine if properties have been identified in IDOT plans for future roadways, bridges, right of ways, etc. If these properties are needed for future projects, the IDOT will purchase the properties using IDOT easement/right of way funds. HSEMD is notified by letter from the IDOT and those properties become ineligible for the HMGP.

NRCS coordinates with HSEMD on a site by site basis to determine properties where the Emergency Watershed Protection Program (EWP) can provide for floodplain easement. This program provides alternatives for farmers with frequently flooded and damaged farmlands to retire this property and eliminate the need for future disaster payments on frequently flooded cropland.

The Regional Flood Risk Management Team (RFRMT) was created to address regional flood response and recovery issues following the 2008 flood. This team is a partnership between federal and state agencies to provide a comprehensive approach to reducing the threat, vulnerability, and

consequences of flooding. The RFRMT is comprised of representatives from the states of Illinois, Iowa, Minnesota, Missouri, and Wisconsin. Other team members include representatives from the Federal Emergency Management Agency, National Resource Conservation Services, National Weather Service, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service and the U.S. Geological Survey.

For the specific hazard mitigation programs from FEMA, HSEMD establishes the criteria for prioritizing community and local jurisdictions that receive planning and project grants. This is also based on considerations of communities with the highest risk, most vulnerable populations, most repetitive loss and most intense development pressures in looking at likely future risk. The three HMA Programs administered by HSEMD under the direction of the State Hazard Mitigation Officer (SHMO) are the Hazard Mitigation Grant Program (HMGP), the Pre-Disaster Mitigation (PDM) Program, and the Flood Mitigation Assistance (FMA) Program. Eligible applicants for funding are state and local governments, private non-profit organizations, and Indian tribal governments as outlined in the 44 CFR Section 206.434.

Some of the prioritization considerations for planning grants or project grants are the following:

- Each project must conform to the Iowa State Hazard Mitigation Plan that is developed as a requirement of Section 322 of the Stafford Act.
- The project should have a beneficial impact upon the designated disaster area, whether or not located in the disaster area.
- It should conform to the 44 CFR, Part 9, Floodplain Management and Protection of Wetlands, and 44 CFR, Part 10, Environmental Considerations.

- The project should resolve a significant risk to public health and safety; it should not cost more than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future disasters occur.
- The project should be cost effective and substantially reduce the risk of further damage, hardship, loss, or suffering resulting from a major disaster.
- In determining cost effectiveness, all analysis are performed utilizing a FEMA approved Benefit-Cost-Analysis module and are in conformance with OMB Circular A-94.
- When a range of options are considered, the project that is chosen should be the one that is determined to be the most practical, effective, and environmentally sound alternative.
- The project should contribute to a long-term solution to the problem it is intended to address.
- The project should consider long-term changes to the areas and entities it protects, and has manageable future maintenance and modification requirements.

The PDM considers all these criteria for prioritization but also considers other factors. HSEMD prioritizes the use of PDM funds by establishing that the first priority is to offer PDM grants to communities that have demonstrated previous interest and commitment to developing Local Hazard Mitigation Plans. Particular consideration is given to communities that have previously developed plans in accordance with the state criteria and those that have identified hazard mitigation projects. These communities may be eligible for future grants under the Stafford Act or the National Flood Insurance Reform Act (NFIRA). At the same time, this does not negate the criteria on risk and capability that was discussed earlier.

Following a review by the SHMT, the State Hazard Mitigation Officer (SHMO) or the SHMO on behalf of the SHMT, makes a formal recommendation to the Governor's Authorized

Representative (GAR) or the Director of HSEMD, as to which projects should be selected for funding and the order in which they should be funded.

Finally, the SHMO and grant management staff work to ensure that all applicants are notified of the decision made relative to their proposed project. For those projects selected, the SHMO determines if the applicant still intends to carry out the project and with the level of funding tentatively approved. Projects approved but not selected can still be eligible under the Unmet Needs Program when funds are available.

According to Hazard Mitigation Assistance Unified Guidance, the state must rank each sub-application included in the grant application in order of their priority for funding based on the Applicant's Standard or Enhanced Hazard Mitigation Plan. First, each application is reviewed for eligibility. A team of four members rank the applications according to:

- Feasibility of the project
- Population benefiting from the mitigation activity, each member determines the feasibility of the project
- Quality of the application, etc
- Each sub-application must be assigned a unique rank (i.e., only one number from one to six , one being the highest rank).
- Review the project applications in E-grants (BCA), etc
- Plans given a lower priority
- The average rank from each of the four reviewers will be used to determine the final rank order of the projects that will be submitted as part of Iowa's grant application.

Under the HMGP, a review of available funding is considered in the ranking process. HSEMD's hazard mitigation staff prioritizes and ranks the projects in accordance to the criteria below based on the level of detail and documentation contained in the Sub-grantee's application.

- Measures that best fit within an overall plan for development and/or hazard mitigation in the community, disaster area, or state.
- Measures that, if not taken, will have a severe detrimental impact on the applicant, such as potential loss of essential services, damage to critical facilities, or economic hardship on the community.
- Measures that have the greatest potential impact on reducing future disaster losses.
- Measures that are designed to accomplish multiple objectives, including damage reduction, environmental enhancement, and economic recovery.
- Measures that provide the greatest benefit of avoided damages as documented by a FEMA approved Benefit Cost Analysis (BCA) methodology.

The following ranking process demonstrates the State's priority for property acquisition projects under HMGP 1763. Disaster 1763 was a Presidential Declaration due to catastrophic flooding in the summer of 2008. Due to the thousands of residential and commercial properties substantially damaged and destroyed from this disaster, projects being considered for funding under this disaster will be funded in the following order:

1. Acquisition/demolition of primary owner/occupied property that are certified as substantially damaged or condemned due to flooding.
2. Acquisition/demolition of rental property occupied at the time of the flood event as the renters primary residential property certified as substantially damaged or condemned due to flooding.
3. Acquisition/demolition of secondary or recreational property certified as substantially damaged or condemned due to flooding.
4. Acquisition/demolition of commercial property certified as substantially damaged or condemned due to flooding.
5. Open for other projects that will result in protection to public or private property, should sufficient funding be available to fully fund the above identified properties. Eligible projects include, but are not limited to:
 - Structural hazard control or protection projects;
 - Construction activities that will result in protection from hazards;
 - Retrofitting of facilities to include the construction of tornado shelters;
 - Development of state or local mitigation standards;
 - Development of comprehensive hazard mitigation programs with implementation as an essential component; and
 - Development of improvement of warning systems
6. Lastly, properties or projects that are not funded will be stacked for funding consideration should funds become available. The State will give consideration to modifying the above criteria in situations where the applicant demonstrates an overall property acquisition plan that includes specific acquisition target areas in the community that are particularly vulnerable to future flooding.