



Hazard Mitigation Strategy

FEMA-4547-DR-MI

Declared: July 9, 2020

Incident Period: May 16, 2020 - May 22, 2020

Public Assistance and Individual Assistance for 5 counties
Hazard Mitigation Statewide



FEMA

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INTRODUCTION

On July 9, 2020, President Donald Trump issued a Major Presidential Disaster Declaration FEMA-4547-DR-MI for severe storms and flooding. As a result of the declaration, Public Assistance (PA) and Individual Assistance (IA) have been made available in five counties, and Hazard Mitigation Grant Program (HMGP) funding will be available throughout the state. A map of the declared counties can be found in Attachment A. Additional designations may be made later if requested by the state and warranted by the results of further damage assessments.

PA and IA Declared Counties: Arenac, Gladwin, Iosco, Midland, and Saginaw.

PA provides assistance to state and local governments and certain private, non-profit organizations in the declared area, for emergency work and the repair or replacement of disaster-damaged facilities, as well as assistance for debris removal and emergency protective measures.

IA provides direct assistance to individuals and families in the designated counties whose property has been damaged or destroyed, and whose losses were not covered by insurance. It is meant to help with critical expenses that cannot be covered in other ways. It is not intended to fully restore damaged property to its condition before the disaster.

HMGP provides assistance to eligible state, local, tribal, and private-non-profit applicants for actions taken to eliminate or reduce long-term risk to life and property from natural hazards. All counties in the State of Michigan are eligible to apply for HMGP assistance.

PURPOSE

The Hazard Mitigation Strategy identifies action items and plans for activities following disaster declaration FEMA-4547-DR-MI. It provides steps for implementing short- and long-term, cost-effective actions to reduce statewide disaster damage from future events and provides guidance to the federal, state hazard mitigation and floodplain management staff.

This document is a multi-agency effort. For this disaster, Michigan State Police (MSP), Michigan Department of Environment, Great Lakes, and Energy (EGLE), Department of Insurance and Financial Services (DIFS), and FEMA coordinated to develop hazard mitigation strategies and priorities within this disaster. The priorities listed here are consistent with the State of Michigan Hazard Mitigation Plan, approved by FEMA on April 22, 2019.

DESCRIPTION OF EVENT

The incident period for this disaster declaration is May 16, 2020 - May 22, 2020. This event was caused by an area of low pressure that stalled across the Great Lakes region, bringing a prolonged period of rainfall to the State of Michigan. Widespread areal and river flooding occurred over the impacted area. The record flood levels along the Tittabawassee River were greatly exacerbated due to extra water from two catastrophic dam failures, the Edenville Dam (Gladwin and Midland counties) and Sanford Dam (Midland County). These dam failures created a 500-year flood event, requiring the evacuation of over 10,000 residents. Due to the swift actions and organized efforts of the local jurisdictions in responding to this disaster, no fatalities and only minimal injuries were sustained by residents of the affected counties.

On May 20, 2020 Gov. Gretchen Whitmer requested a joint preliminary damage assessment (JPDA) conducted by local, state, and federal emergency management officials. The JPDA estimated over \$20

million in public sector damages, and over 959 homes were either destroyed or had sustained major damage. It must also be noted that this historic flooding occurred during the worldwide public health crisis of COVID-19. The entire Hazard Mitigation field operation is anticipated to be conducted entirely virtually. PA and IA are being implemented almost entirely virtually as well. There is a minimal field footprint for site inspections and document drop-off.

HAZARD MITIGATION GOALS, OBJECTIVES AND TASKS

The mission of Hazard Mitigation (HM) Strategy includes short- and long-term efforts to reduce the impact of damage from future disasters through the implementation of HM programs. Post-disaster, this is accomplished through comprehensive efforts authorized by the Stafford Act, as amended by the Disaster Mitigation Act of 2000, the National Flood Insurance Act, the Flood Insurance Reform Act, and Executive Orders. In this event, DR-4547, the HM strategy goals are encompassed within each functional area; Floodplain Management and Insurance (FPMI), Grants and Planning (G&P), Hazards and Performance Analysis (HPA), and Community Education and Outreach (CEO).

Goals:

1. Identify mitigation opportunities and assist communities in the development of cost-effective and technically feasible mitigation projects;
2. Maximize financial resources, including the HMGP, PA Section 406 Mitigation, and other applicable state and federal programs;
3. Implement acquisition and demolition and/or floodproofing mitigation measures;
4. Promote effective floodplain management and the NFIP through outreach, education, and the provision of technical assistance;
5. Utilize virtual outreach methods to inform the public about ways to reduce risk of flood damage and encourage awareness and preparedness for future events.

Floodplain Management and National Flood Insurance Program (NFIP)

Community Participation in NFIP: Participation in the NFIP is voluntary and, therefore, not all communities participate or have floodplain management regulations in place. Communities identified by FEMA as being flood-prone that have not joined the NFIP within one year of being notified of their risk become sanctioned communities.

In sanctioned communities, property owners are not able to purchase NFIP flood insurance policies and existing policies cannot be renewed. Federal grants or loans will not be available in identified Special Flood Hazard Areas (SFHAs) under programs administered by federal agencies. Federal Disaster Assistance for flood damage will not be provided for permanent repair to insurable buildings located in identified SFHAs. Federal mortgage insurance or loan guarantees will not be provided in identified SFHAs. Federally insured or regulated lending institutions, such as banks and credit unions, may make conventional loans for insurable buildings in SFHAs of sanctioned communities. However, the lender must notify applicants that the property is in an SFHA and that the property is not eligible for Federal Disaster Assistance. Lenders may voluntarily choose not to make these loans.

At the time of the declaration there were 156 sanctioned communities in the State of Michigan with seven located in the designated counties. The list of the 156 sanctioned communities may be found as Attachment B.

Successes: One of the sanctioned communities in the designated counties expressed interest in joining the NFIP, Billings Township. Billings Township continues to work on application items needed to join the NFIP.

In order to support community resiliency, Mitigation Flood Insurance Program Specialists may be deployed to designated counties following a disaster declaration. Insurance program specialists facilitate community resiliency by providing outreach, training, and other support to state-licensed property and casualty agents; coordinate, communicate, and collaborate with state insurance commissions; support hazard mitigation operations in Disaster Recovery Centers; and provide opportunities for public education relating to the NFIP.

Enforcement of Local Floodplain Management Regulations: Long-term mitigation can best be achieved through comprehensive local floodplain management regulations and uniform enforcement. Communities that participate in the NFIP have adopted floodplain management regulations and agreed to enforce those regulations in exchange for the ability of their residents to purchase NFIP flood insurance policies. Local community officials are responsible for enforcing the local floodplain ordinance.

To effectively meet the substantial damage requirements of their local regulations, local officials will have to rapidly perform a large number of inspections and substantial damage determinations. The State of Michigan defines substantial damage as:

Damage of any origin sustained by a structure whereby the cost of restoring the structure to its pre-damaged condition would equal or exceed 50 percent of the market value of the structure before the damage occurred.

Development of standard procedures can help communities better manage post-disaster recovery. In support of the local officials, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and FEMA will provide technical assistance and training in enforcing the regulations, including the state-wide building code. Initial support will include General Technical Assistance (GTA) contacts done virtually, to evaluate the needs of the communities, training on substantial damage requirements and the Substantial Damage Estimator tool, and one-on-one technical assistance to develop procedures for making substantial damage determinations and permitting repairs. Follow-ups will include Community Assistance Contacts (CACs) or virtual Community Assistance Visits (CAVs) based on those communities with the most need, prioritized from the initial GTAs.

Promotion of high standards (i.e. dam failure analysis) adoption and enforcement and new Public Assistance Section 1206 funding reimbursement opportunities can help communities best manage long-term post-disaster recovery. FEMA will provide technical assistance and training as needed to support these enhanced resiliency opportunities.

Action Items:

Objective #1: Provide floodplain management compliance information and technical assistance to state, county, and community officials.

Mitigation Action	Lead Agency	Date Due
Provide outreach to sanctioned communities highlighting the benefits of the NFIP, what it means to be sanctioned, and the process of joining.	FEMA	Complete
Conduct new participating community CAC with Billings Township.	FEMA	TBD

Provide initial post-disaster outreach and training on substantial damage and permitting for all affected communities. FEMA (1 webinar) and MI EGLE (2 webinars)	FEMA & MI EGLE	Complete
Provide NFIP materials and information to communities as requested.	FEMA	As needed
Provide technical assistance to county and community officials to support Michigan-specific building code and floodplain management requirements, substantial damage requirements, and general NFIP support to participating communities to ensure continued NFIP compliance (may include one-on-one, virtual training, webinars)	FEMA & MI EGLE	As needed
Conduct General Technical Assistance (GTA) for NFIP compliance and substantial damage education to participating communities via email and virtual interviews.	FEMA	Ongoing
Conduct Virtual Community Assistance Visits (CAVs) or Community Assistance Contacts (CACs) in coordination with MI EGLE within the declared counties, via telephone or video conference, for communities needing additional compliance assistance based on initial GTAs.	FEMA	TBD
Provide section 1206 training to State and community officials, in coordination with Public Assistance, via webinar (at least 1).	FEMA	TBD
Promote higher standards in local floodplain management regulations, such as using dam failure analysis, to county and community officials, in coordination with State Floodplain Management and Emergency Management partners. Via webinar (at least 1).	FEMA	TBD

Conduct E-273 Managing Floodplain Development through the NFIP classroom training. (1-2 offerings). This item would only be available pending travel approval for in-person training or if EMI offered a virtual classroom option.	FEMA	TBD
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Hazard Mitigation Grant Program (HMGP) and Mitigation Planning

Michigan has a Standard State Mitigation Plan, that expires on April 21, 2024, as outlined in Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Stafford Act). Per the guidelines established under Section 404 of the Stafford Act, the State is eligible to receive funding under the Hazard Mitigation Grant Program (HMGP). This funding is based on 15 percent of the total estimated federal disaster assistance and is available to all eligible applicants statewide. All submitted project applications will be rated and ranked by the State based on the State's funding priorities. As part of the implementation of the Disaster Recovery Reform Act of 2018 (DRRA), FEMA has released the *FEMA Hazard Mitigation Grant Program Management Cost (Interim) Policy (FEMA Policy # 104-11-1)*. This policy applies to all major disasters declared on or after August 1, 2017. The policy offers the state greater flexibility to manage the HMGP by allowing for higher rates of reimbursement for their management costs. Through this interim policy, FEMA may provide 100% Federal funding for management costs based on actual costs incurred up to the following rates: 10% of the total HMGP award amount, excluding subrecipient management costs, for the recipient; and, 5% of the total award amount for each subrecipient.

The interim policy has been provided to the state. Additional guidance and technical assistance are forthcoming.

The State's HMGP priorities for FEMA-4547-DR-MI, are as follows:

1. Acquisition and demolition of substantially damaged properties in the floodplain of the declared counties and affected communities
2. Acquisition and demolition of repetitive loss and severe repetitive loss properties in the declared counties and affected communities
3. Acquisition and demolition of properties in the floodway/flood fringe in the declared counties and the affected communities
4. Acquisition of flood-prone properties outside the floodway/flood fringe in the declared counties and the affected communities
5. Other mitigation projects such as; minor flood control projects (e.g. detention ponds and storm sewer improvements); protection of utilities; etc. in the declared counties and the affected communities
6. Acquisition and demolition of any flood prone properties statewide
7. Development or update of local all-hazards mitigation plans
8. Other mitigation projects such as; minor flood control projects (e.g. detention ponds and storm sewer improvements); protection of utilities; etc. statewide.

The Michigan State Police Emergency Management and Homeland Security Division (MSP) will notify the availability of funding under HMGP starting at the designated counties and work outwards statewide. MSP will solicit targeted mitigation applications based on the above prioritization and will review all proposed activities. MSP and FEMA will jointly coordinate and conduct project and application development workshops as needed for eligible applicants. Based on pre-application reviews, MSP will contact selected communities to submit formal HMGP project applications. All HMGP project applications are due to FEMA within 12 months of the declaration date. FEMA will obligate funds to all approved projects.

A community must have an approved tribal or local hazard mitigation plan to be eligible for the HMGP and other Hazard Mitigation Assistance funding. MSP actively works with counties across the state to encourage planning and apply for planning grants. Because HMGP funds are available statewide, the state will target plan development and update for counties and tribes without plans or whose plans will expire soon. While most of the local and tribal mitigation plans are current, some of these plans have expired. A table displaying the local mitigation plan status for communities in the declared areas can be found in Attachment C.

The percent of the population in Michigan with an approved or approved pending adoption plan as of 8/23/20 is 50.1%. Approximately 10 counties have expired or no plan and are not already in the process of updating or developing their plan. About 15 counties have an approved plan expiring within the next 12 months and are not already in the process of updating their plan.

Tasks		Lead Agency	Date Due
HMGP REQUIREMENTS	Submit DR-4547 HMGP Administrative Plan ¹	MSP	October 1, 2020
	Review and approve the DR-4547 HMGP Administrative Plan	FEMA	October 8, 2020
	Conduct outreach to local communities to identify potential mitigation projects	MSP	Activity ongoing during application development period
	Provide technical assistance on HMGP for local/tribal officials using the Hazard Mitigation Assistance Unified Guidance and Addendum dated February 27, 2015 (i.e. provide assistance to local communities in developing mitigation project applications)	MSP	Activity ongoing during application development period
	Perform initial reviews of the HMGP applications for project eligibility and completeness to ensure that all information and documentation is provided	MSP	SEE HGMP TIMELINE – ATTACHMENT D
	Submit SF424 and Assurances for the disaster (Before July 9, 2021) ¹	MSP	
	Provide technical assistance to the State as needed (i.e. program interpretation, courtesy reviews, best practice guidance)	FEMA	

¹ Must be submitted and approved before obligations can occur

	Provide State with 30-day and 6-month estimates, and 1-year lock-in amounts	FEMA	
	Review and approve eligible, complete, technically feasible, and cost-effective applications submitted by the State	FEMA	
	Submit (MSP) and review/obligate (FEMA) initial request for State Management Costs (SMC)	MSP & FEMA	
Planning Tasks	Provide the Michigan Mitigation Planning Report	FEMA	8/24/2020
	Provide a Job Aid on how to request NFIP data for use in LHMP's	FEMA	8/28/2020
	Provide technical assistance to declared counties without approved plan.	FEMA	Activity ongoing during application development period
	Provide technical assistance to communities working on plan revisions requested by FEMA.	FEMA	Activity ongoing during application development period
	Send reminder to plan POC whose plan is in approvable pending adoption status, reminding them to adopt and submit resolution(s).	MSP	7/9/2021
	Send reminder to communities who have not yet adopted their approved plan, reminding them to adopt and submit resolution(s).	MSP	7/9/2021
	Cross reference list of communities interested in submitting a mitigation project with the community's plan status.	MSP	10/1/2020
	Establish plan review process	MSP & FEMA	8/28/2020

Subaward Application Process	Lead Agency	Date Due
Coordinate the delivery of a hazard mitigation workshops based on received pre-applications; format webinar based.	MSP & FEMA	Activity ongoing during application development period
Contact counties statewide that do not have an active plan including plans that have expired, or are at risk of expiring to encourage them to apply for a planning grant	MSP	Activity ongoing during application development period
Review, prioritize, and rank all proposed HMGP pre-applications	MSP	Activity ongoing during application

		development period
Based on pre-application results, send formal applications to subrecipients for completion and further grant consideration	MSP	Activity ongoing during application development period
The State will coordinate with Region V's insurance liaison to identify potential projects eligible for ICC Cost Share	MSP	Activity ongoing during application development period

Hazard Performance Analysis (HPA)

Making sound technical decisions post disaster is critical to disaster recovery and building back with greater resiliency. DR-4547 HPA staff is providing technical assistance through the issuance of the Available Flood Hazard Information Memo, coordination of the Dam Safety Incident-Specific Technical Assistance study (ISTA), assessing the need for regulatory and nonregulatory flood risk products, and implementation of the 406 Hazard Mitigation component of Public Assistance.

Available Flood Hazard Information Memo: FEMA is continuously working to update Flood Insurance Rate Maps (FIRMs) through Flood Insurance Studies (FISs). While a Flood Insurance Study is underway, FEMA may have flood hazard data available that is better than the flood hazard data published on the effective FIRM. This preliminary data is vital to understanding impacts to the post-disaster setting and can be used to guide mitigation and recovery. FEMA is committed to providing Available Flood Hazard Information to guide recovery and has distributed this information to stakeholders, attachment E.

Dam Safety Incident-Specific Technical Assistance study (ISTA): The FEMA National Dam Safety Program, FEMA National Integration Center, FEMA Region V, and Argonne National Laboratory jointly commenced a Dam Safety Incident-Specific Technical Assistance study (ISTA). This ISTA study will provide insights, analysis and lessons learned during response and recovery through various data collection and modeling methods that can be shared with the greater dam safety community to help jurisdictions improve mitigation planning, response efforts, and enhance inundation modeling techniques and practice.

Regulatory and nonregulatory flood risk products: FEMA has identified a need to conduct additional longer-term outreach to stakeholders in the DR-4547 declared counties regarding regulatory and nonregulatory flood risk products. This outreach is envisioned as a series of meetings over the coming year to understand needs and communicate mapping options with state and local emergency response, dam safety, and floodplain management officials, as well as those representing special districts charged with investigating post-disaster reconstruction feasibility. The objective of this outreach is to determine the need for hazard mitigation information to supplement current and future flood risk awareness, emergency response planning, and floodplain management regulation.

FEMA recognizes the need to deliver updated flood hazard information to supplement emergency management planning, preparedness, and recovery and rebuilding plans. The focus of this data development and analysis will be along the Tittabawassee and Tobacco Rivers in the vicinity and downstream of the two dam failures. Analysis will be coordinated with feasibility level assessments of the no action alternative and various dam reconstruction alternatives to restore Wixom Lake pool behind Edenville Dam and Sanford Lake pool behind Sanford Dam. Flood-prone areas in the declared jurisdictions that fall outside of this primary data and analysis development focus area and have provided comment or data to FEMA, such as high water marks, will be entered into the mapping priorities database for future assessment per FEMA Coordinated Needs Management Strategy (CNMS) policy.

406 Hazard Mitigation Implementation: 406 Hazard Mitigation is the Public Assistance (PA) funded mitigation program. PA has historically managed the implementation of 406 Hazard Mitigation. In October of 2019, Region V established a 406 Mitigation Team within the Region V Mitigation Division, which brings additional resources, expertise, and focus to PA mitigation efforts. The 406 Hazard Mitigation Team will work in partnership with MSP to implement 406 Hazard Mitigation with the shared goal of maximizing 406 Hazard Mitigation funding opportunities to ensure greater resilience.

Task	Lead Agency	Due Date
Provide the available flood hazard information via memorandum distributed to all program areas to support recovery and mitigation activities	FEMA	Completed
Introduce Incident-Specific Technical Assistance Study to state/local partners and participate in stakeholder interviews	FEMA/Argonne National Laboratory	8/31/2020
Provide access to and/or share data sources related to the dam incident with Argonne National Laboratory	FEMA/State/Local	Continuous
Conduct continued outreach at the state and local level to determine the need for near-term advisory mapping information for use in emergency response planning, and long-term updated flood hazard study and mapping	FEMA/State/Local	Continuous
Share final product with the dam safety community including state/local partners, containing new insights and recommendations to support planning, response, recovery efforts as well as enhance dam inundation modeling	FEMA/Argonne National Laboratory	2/1/2021
Participate in PA Recovery Scoping Meetings and Site Inspections; educate applicants on the potential for 406 Mitigation	FEMA	Continuous
Provide technical assistance to applicants developing hazard mitigation proposals	FEMA	Continuous
Complete benefit-cost analyses (BCAs), when required	FEMA	TBD

Coordinate 406 mitigation eligibility reviews with PA, the Consolidated Resource Center, and applicants	FEMA	Continuous
Evaluate the implementation of the Regional 406 Mitigation Team’s implementation of 406 Mitigation.	FEMA/ MSP	Continuous
Identify eligible mitigation measures by referring potential 406 Mitigation projects that were submitted under the HMGP to the 406 Mitigation	MSP	Continuous

COMMUNITY EDUCATION OUTREACH(CEO)

Hazard Mitigation (HM) Community Education and Outreach (CEO) promotes sustainable recovery and reduction of future hazard losses through its outreach and educational products and resources. This is accomplished by developing public and private partnerships to advance education, outreach, and community resilience in support of the Hazard Mitigation Strategy. The CEO group can assist communities and citizens with this by designing and implementing an intensive public awareness and education campaign geared toward disaster specific issues.

In the time of a pandemic, Disaster Recovery and Mitigation put into place virtual practices, which drastically reduced our footprint in the field. Instead of Disaster Recovery Centers, Individual Assistance set up Document Drop Centers in five locations throughout the declared counties where applicants could provide their application to be faxed into FEMA. CEO coordinated with IA to get Mitigation information out to the public including webinars to staff, voluntary agencies and insurance staff. CEO also developed “tool kits” so that local officials have the resources they need to inform their residents about mitigation choices.

This is the first completely virtual disaster recovery response in Region V with a declaration for Individual Assistance and Public Assistance. It is the fourth virtual disaster recovery operation in the nation, and it is CEO’s intent to be innovative and successfully inform the public about ways to reduce risk of flood damage and encourage awareness of preparedness for future events.

CEO OBJECTIVES:

1. Promote and market messaging on Mitigation Best Practices and activities
2. Coordinate with HQ, other regions, External Affairs and Individual Assistance to utilize the latest virtual practices to bring mitigation messaging to affected areas.

Task	Lead Agency	Due Date	Products
Coordinate with FEMA External Affairs to disseminate information on flood insurance to the public in the designated area	FEMA	Continuous	PSA, Substantial Damage
Provide staffing and resources to deliver information on relevant hazard mitigation topics	FEMA	July 15- Continuous	Local Official Outreach Tool Kit (shared with all EMs), General

			email address to receive inquiries and respond quickly
Conduct training to Individual Assistance staff in the JFO on the role of mitigation in a disaster, placing emphasis on the connections between Individual Assistance and Hazard Mitigation	FEMA	Aug. 20 Aug. 18	Delivered Mitigation information through webinars
Coordinate with FEMA Individual Assistance to provide a briefing to Michigan Voluntary Organizations Active in Disasters to share mitigation methods and techniques in rebuilding and repair of damaged structures	FEMA/State	Aug. 25	Coordinated session through Susan Jensen
Develop products for distribution to public and other stakeholders.	FEMA	Continuous	
Develop relationships with private-sector agencies and associations in order to share mitigation techniques for disaster recovery and preparedness information for future events.	FEMA	Continuous	
Capture and develop Best Practice and Success Stories	FEMA/State	Oct. 30	
Disseminate Best Practices through the FEMA and MSP/EMHSD websites, Michigan Hazard Mitigation Success Stories. Virtual Disaster Reality- What worked and what did not work. Stories. Virtual Disaster Reality- What worked and what did not work.	FEMA/State	Oct. 30	We are participating in the development of a CEO virtual disaster white paper.

DR 4547 Hazard Mitigation Strategy Addendum 10-07-2020:

The second objective in the Floodplain Management and National Flood Insurance Program (NFIP) section of the DR 4547 Hazard Mitigation Strategy was excluded in error. This addendum issued 10/7/2020 serves to add this selection to the DR 4547 Hazard Mitigation Strategy.

Objective #2: Provide flood insurance information and technical assistance to NFIP stakeholders and partners.

Mitigation Actions	Lead Agency	Date Due
Facilitate coordination calls with Region 5 Mitigation Division, EGLE, and MSP.	FEMA	06/18/2020
Host two flood insurance webinars for Michigan-licensed property and casualty agents.	FEMA	08/31/2020
Host five flood insurance webinars for local officials, lenders, realtors, and other NFIP partners and stakeholders.	FEMA	09/18/2020
Conduct NFIP training, education, and outreach for Long Term Recovery Groups and Voluntary Organizations Active in Disasters	FEMA	09/30/2020
Conduct insurance agent outreach, training, education, and technical support in the designated counties.	FEMA	09/30/2020
Conduct NFIP partner and stakeholder outreach, training, education, and technical support in the designated counties.	FEMA	09/30/2020
Support the Department of Insurance and Financial Services' National Preparedness Month campaign.	FEMA	09/31/2020
SFIP Coverage D (ICC) Outreach	FEMA	12/31/2020
Support the Department of Insurance and Financial Services' outreach efforts related to downstream dam risk.	FEMA	12/31/2020
Introduction to the National Flood Insurance Program for the Department of Insurance and Financial Services	FEMA	TBD
Group Flood Insurance Policy (GFIP) outreach	FEMA	07/09/2021
NFIP 1-year anniversary project (scope subject to approval, contract availability, and funding)	FEMA	07/09/2021