

North Carolina Hazard Mitigation Grant Program (HMGP) Infrastructure Application Guidelines for Sub-Applicants

These guidelines provide detailed instructions for eligible sub-applicants preparing applications for the Hazard Mitigation Grant Program (HMGP) under recent disaster declarations, including DR-4827-NC (Tropical Storm Helene) and DR-4837-NC (Potential Tropical Cyclone 8). They focus on Infrastructure Projects, 5% Initiative Projects, and 7% Planning Projects. For Advance Assistance, refer to separate guidance on the NCEM website at ncdps.gov/hmgp.

HMGP is a FEMA-funded program administered by NCEM to reduce future disaster risks and build resilient communities. Funds support projects that address hazards like flooding, landslides and severe weather. Eligible sub-applicants are local governments (counties, municipalities, and tribes) with a current FEMA-approved local or regional Hazard Mitigation Plan (per 44 CFR Part 201). Private entities may partner with eligible sub-applicants but cannot apply directly.

Key Principles:

- HMGP is not a competitive grant; NCEM screens, prioritizes, and endorses applications to FEMA Region 4 based on eligibility, cost-effectiveness, feasibility, and state priorities.
- Projects must align with your approved Hazard Mitigation Plan—cite the specific action, page, and section in your application.
- No physical work (e.g., ground disturbance or construction) can begin before FEMA approval; starting early disqualifies the project and makes costs ineligible.
- Build America, Buy America (BABA) does not apply to HMGP.
- All applications must demonstrate there are no duplication of benefits and/or duplication of programs (e.g., no overlap with USACE, FEMA Public Assistance, or insurance).
- NCEM prioritizes projects in declared counties first, then statewide.
- Period of Performance (PoP): Up to 48 months from the application period close; sub-award PoPs must fit within this.
- Pre-award costs are eligible if incurred on/after the disaster declaration date, itemized separately, and supported by actuals (e.g., rates, hours, deliverables, invoices, or contracts). Round numbers raise red flags—be precise.
- Procurement must follow 2 CFR 200: Competitive, no geographic preferences, no cost-plus-percentage contracts.
- Management costs: Up to 5% for sub-applicants (100% federal, outside the 75/25 cost share and HMGP ceiling); separate from project budgets.

Application Timeline (for DR-4827 and DR-4837):

Letters of Interest (LOIs): Submit via Salesforce Portal by 5:00 PM, October 31, 2025. Early submission encouraged; multiple LOIs per sub-applicant allowed as needs evolve.

First Draft Applications: Due October 6, 2025 (via Salesforce after LOI approval).

Statewide Peer Review Panel: October 13–15, 2025. **Feedback/RFI Meetings:** November 17–19, 2025.

Final Applications: Due December 15, 2025. **Updates:** Check ncdps.gov/hmgp for changes.

Submission Process:

- 1. Submit LOI via Salesforce Portal (ncdps.my.site.com/EMGrants/s/login) by May 30, 2025. Include project type, location, estimated cost, hazard addressed, and alignment with your Hazard Mitigation Plan
- 2. If advanced, edit your LOI in Salesforce under "My LOIs" to upload full application attachments. If your LOI was submitted by email instead, you will need to create a new LOI in Salesforce and attach the full application to that as shown in the "How To Write A Winning HMGP Infrastructure Grant" webinar posted at www.ncdps.gov/hmgp. Note that the full application is made up of stand-alone attachments to the LOI, not a separate "application submission" in Salesforce.
- 3. Use specific naming conventions: e.g., DR4827_[Sub-Applicant Name]_*BCA.xls or DR4837* [Sub-Applicant Name] SOW.pdf.
- 4. All submissions after August 15, 2025, must use Salesforce—no email or paper.

Report any Salesforce technical issues by email to Kaine.Riggan@ncdps.gov no later than 11:00 a.m. ET on Monday, October 6. Late submissions will not be accepted due to technical issues unless a written extension is granted by NCEM-HM staff by 5:00 p.m. ET on October 6.

State Scoring Criteria (100 Points): NCEM uses this to prioritize applications. Align your submission to these criteria for stronger endorsement. Ensure that the **scoring prompts** for each criterion are addressed in the narrative and/or supporting documents.

Category	Points	Key Elements
Risk Reduction & Mitigation Merit	35	Clear hazard-mitigation link (not maintenance); quantified service continuity/population benefits (affected population); documented disaster history; alternatives analysis showing best option.
Community Impact	20	Quantifiable improvements in community resilience (e.g., number of households protected, critical facility uptime, or reduced downtime post-disaster), supported by data or modeling. Long-Term Sustainability.
Technical Feasibility & Scope Quality	15	Detailed SOW like contract summary; adequate drawings/maps; defined O&M/monitoring.
Implementation Readiness: Schedule, Permits, EHP	15	Feasible schedule within PoP; EHP details (disturbance, resources, staging); procurement plan.
Budget Reasonableness & Allowability	10	Independent cost basis (bids, RSMeans, engineer's opinion); separate management costs; proper pre-award costs.
Plan & Policy Alignment	5	Explicit citation to Hazard Mitigation Plan action; code compliance attestations

Tip: Use AI tools (e.g., ChatGPT) to check drafts against this framework. Ensure internal consistency (titles, costs, timelines) and cross-reference attachments.

SCORING PROMPTS

Risk Reduction & Mitigation Merit criterion (worth 35 pts)

A) Prove its mitigation (not maintenance) and that risk is reduced

- The applicant must state the specific natural hazard(s) causing the damages (e.g., 1% annual-chance flood, hurricane wind) and describe the failure mechanism(s) at the site (e.g., overtopping at elev. X, undersized culvert, back feed power loss).
- Narratives must include a plain-language explanation of how the proposed action increases the level of protection or otherwise produces a *long-term* reduction in future damages (e.g., "conveys 1% flood + 2 ft freeboard," "anchors equipment above BFE").
- Ensure that the submitted material explicitly distinguishes the project from routine O&M, repair, or like-for-like replacement (e.g., show capacity increase, higher design standard, or hardening feature), noting that activities addressing operation/deferred/future maintenance *without* increased protection are not eligible under HMA.
- The applicant must tie the project to the jurisdiction's FEMA-approved Hazard Mitigation Plan by quoting the relevant goal/objective/action ID and showing how the action directly reduces the vulnerabilities identified in the plan's risk assessment.

B) Quantify continuity of service and population benefits

- Narratives must include the size and characteristics of the benefitting population (customers/residents served; critical facilities dependent on the asset), with citations (utility service maps, census, regulatory reports).
- The applicant must quantify expected loss-of-function avoided (person-days or service-hours), including: (1) typical outage duration by event, (2) users affected, and (3) method/value used to monetize outages per FEMA BCA methods; place the calculation in a small table.
- Ensure that the submitted material identifies life-safety co-benefits (e.g., injury/fatality risk reduction for critical facilities) where applicable and cites the BCA method used to value them.
- Attachments must include clear maps (FIRM panels, depth grids, service area) and labeled photos showing the risk pathway and communities served to make the benefits intuitive at a glance.

C) Document disaster history and damages with evidence

- The applicant must present a table of prior events (date, hazard, damage mechanism, repair/replacement costs, outage hours, sources), escalated to current dollars and cross-referenced to invoices/PA worksheets/logs.
- Ensure that the submitted material links recurring damages to the proposed fix (e.g., "2018, 2020, 2023 floods overtopped culvert at elev. ____; proposed twin 36" culverts convey the 1% event, preventing washouts").

D) Show a rigorous alternatives analysis and why this option is best

- The applicant must present at least two action alternatives plus a No Action baseline, describing for each: scope, protection level, environmental considerations, constructability, schedule, and operations burden.
- Ensure that the submitted material includes a 1-page comparison matrix ranking alternatives on risk reduction, lifecycle cost, BCR, environmental soundness, and

- schedule risk; then state why the selected alternative is the "most practical, effective, and environmentally sound." (Use CFR language to align with eligibility criteria.)
- Narratives must include how the preferred alternative avoids or mitigates environmental/historic impacts and addresses the consequences of taking no action.
- E) Demonstrate cost-effectiveness and align the math with the story (note that the BCA and BCA methodology are not due until the final draft deadline in December. This item will not be scored in the October first draft review panel)
 - The applicant must show the Benefit-Cost Ratio (BCR) ≥ 1.0 using FEMA's BCA Toolkit (or the cost-effectiveness narrative if total project cost < \$1M), and attach an Input Documentation Log, or Technical Memorandum, substantiating and citing each input to a source (doc name, date, page). Project cost effectiveness must be considered through the lifespan of any HMGP.
 - Ensure that the submitted material explains any aggregation of benefits across components (how non-cost-effective pieces are justified within a cost-effective aggregate project).
 - Narratives must include consistency checks: BCA inputs (useful life, protection level, damages, populations, costs, discount rate) must match the SOW, Budget, and Schedule attachments.
 - The applicant must define annual maintenance costs associated with the project in the BCA Toolkit
 - The applicant must define post-mitigation risks associated with he project in the BCA toolkit

F) Specify protection levels, standards, and useful life (performance)

- The applicant must cite the target level of protection (e.g., "conveys 1% annual-chance storm + freeboard," "meets ASCE 24 for dry floodproofing," "secondary power sized for critical loads and duration") and the assumed useful life consistent with HMA/BCA.
- Ensure that the submitted material identifies governing codes/standards (e.g., ASCE 24, AWWA, FEMA P-guidance where applicable) and shows how those standards directly reduce hazard risk rather than performing normal upgrades.

G) Make the package easy to score (clarity, visuals, cross-walks)

- The applicant must structure the six stand-alone attachments (BCA Excel/PDF, BCA Methodology, SOW, Budget + Narrative, Schedule & Implementation Measures, EHP & Assurances) and add bold call-outs that literally mirror this Risk Reduction & Mitigation Merit criterion.
- Ensure that the submitted material uses tables/figures (hazard maps, outage/benefit tables, Gantt, deliverables list) and cross-references ("see Budget line X; see Schedule milestone Y; see EHP figure Z") so reviewers can find the evidence without hunting.
- Narratives must include an explicit "Not Routine Maintenance" call-out box in the SOW problem statement and project overview sections.

H) DR-4827/NC webinar alignment

- The applicant must frame the SOW as shovel-ready construction, not "studies" or "future determinations," and keep generator/secondary-power proposals focused on loss-of-function reduction for critical functions. Studies and future determinations must apply specifically to the 7% application track.
- Ensure that the submitted material reflects the key development tips from "How to Write a Winning HMGP Infrastructure Grant" (visual, scorable, title matters, not routine maintenance) and aligns with the state webinar video linked on the www.ncdps.gov/hmgp page.

Community Resilience Impact criterion (worth 20 pts)

- The applicant must quantify baseline vs. with-project resilience metrics (before/after): households protected, critical facility uptime (hours/%), average restoration time (MTTR), and days of reduced service for essential functions.
- Narratives must include a clearly defined benefiting population (counts of households, customers, and dependent critical facilities) with sources (service maps, utility records, census), and show how those counts tie to the benefits used in the BCA/service-disruption calculations.
- Ensure that the submitted material uses FEMA's Community Lifelines framing (e.g., Safety/Security, Food/Water/Shelter, Health & Medical, Energy, Communications, Transportation, Hazardous Materials) to state exactly which lifelines gain uptime or redundancy and by how much.
- The applicant must support claimed resilience gains with data or modeling (e.g., Hazus loss estimates, H&H/HEC-RAS depth grids, engineering reliability calcs), and include figures/maps that make the improvement visually obvious.
- Narratives must include a table showing annualized avoided downtime (users × hours avoided/event × expected events/year) and a short paragraph explaining how this rolls into the BCA.
- Ensure that the submitted material demonstrates reduction of a single point of failure (what it was, how the project removes/mitigates it) and, where applicable, adds redundancy (backup power, alternate routing, flood bypass capacity), with quantifiable performance targets.
- The applicant must connect resilience outcomes to the FEMA-approved Hazard Mitigation Plan goals/objectives and the plan's documented vulnerabilities for the affected service areas.
- Narratives must include a restoration timeline comparison (baseline vs. with-project) for each affected service (e.g., water treatment, lift stations, arterial roads)—showing expected time to 90–100% functionality after the design event.
- Ensure that the submitted material quantifies critical-facility continuity (e.g., hospital on backup power retains 100% acute care capacity for ≥72 hours; nursing home potable water maintained without boil notices) and ties these to benefit streams where allowable.
- The applicant must document disaster history (dates, outages, boil-water notices, detours, emergency measures taken) and show how the project cuts recurrence or severity of those service impacts.
- Narratives must include equity-aware detail where relevant (e.g., proportion of benefits to high-risk or medically dependent populations served by the project) and the evidence used (facility rosters, EMS runs, shelter logs).
- Ensure that the submitted material shows modeled exposure reduction (e.g., parcels or facilities moved out of mapped inundation/depth thresholds; lane-miles passable) using accepted methods (depth grids into Hazus, or stamped engineering calcs), with inputs and assumptions listed.
- The applicant must provide KPIs that can be verified post-construction (e.g., "<8 hours wastewater service loss in 1% event," ">99.5% substation uptime across 72-hour outage"), and name who will track them.

- Narratives must include a concise dependencies & cascading impacts section (e.g., "keeping Plant A
 online prevents citywide boil-water notices and emergency bottled-water distribution") with
 quantitative tiebacks where possible.
- Ensure that the submitted material contains a methods box listing every dataset/model used (versions, dates), any conservative assumptions, and why those choices are appropriate for FEMA review.
- The applicant must align all resilience claims with the SOW performance specs (level of protection, useful life) and keep numbers consistent across SOW, Budget, Schedule, and BCA (no contradictions in users served, load covered, durations, or costs).
- Narratives must include a short "What success looks like" paragraph at the end (bullet targets with dates), so reviewers can easily match points to evidence—mirroring the webinar's "make it visual and scorable" guidance.
- Ensure that the submitted material references the BCA Input Documentation Log where resilience metrics feed the calculation (e.g., service-disruption person-days), with page numbers so a reviewer can verify sources in under a minute.
- The applicant must include at least one figure or small table per benefit (households protected, uptime %, outage hours avoided) placed near the narrative so panelists don't have to hunt for it—matching the PowerPoint's "reader-friendly, scorable" design cue.
- Narratives must include a brief sensitivity check (e.g., if outage duration is ±20%, BCR remains ≥1.0 and lifeline uptime still improves to ≥X%), demonstrating that resilience gains are robust to reasonable uncertainty.

Technical Feasibility & Scope Quality (worth 15 pts).

- The applicant must provide a contract-ready Scope of Work (SOW) that reads like a concise contract summary: tasks, quantities, materials/specifications, methods, quality control/acceptance criteria, staging/phasing, access/traffic control, testing/commissioning, and closeout deliverables.
- Narratives must include a design basis and performance targets (e.g., conveyance of the 1% annual-chance event + freeboard; backup power sizing to critical loads for ≥X hours) tied to recognized codes/standards (e.g., ASCE 24 where applicable).
- Ensure that the submitted material contains sealed drawings (plan, profile, sections, and details) or, at minimum, 30% design—level sheets appropriate to the project type, plus a drawing index and legend. For DR-4827 HMGP, whether a project that is not fully designed by the application deadline may be submitted is at the discretion of the State Hazard Mitigation Officer (SHMO). If design is incomplete, include a clear timeline to design completion so the SHMO and NCDPS leadership can plan to transmit the complete design during FEMA's review period, which is expected to extend up to two years after the grant submission date.
- The applicant must include site maps and geospatial exhibits sufficient for technical and EHP review: FIRM panel(s) with site marked, flood depth grids (if available), disturbance footprint with depth of ground disturbance, staging areas, haul routes, and any sensitive resources.
- Narratives must include a succinct methods box listing each dataset/model used (e.g., HEC-RAS/Hazus, load calculations), versions, dates, and conservative assumptions so reviewers can replicate/validate feasibility.
- Ensure that the submitted material provides constructability analysis (access constraints, utilities conflicts, weather/environmental windows, outage planning) and the mitigation measures built into the schedule and SOW.
- The applicant must provide a realistic schedule (Gantt) with critical path and milestones for procurement, permits, right-of-way/easements, environmental clearances, long-lead equipment, mobilization, major work elements, testing/commissioning, and as-builts.
- Narratives must include an engineer's opinion of probable cost (itemized) matched to the SOW quantities and drawings; include contingency rationale and show consistency across SOW, Budget, and Schedule.
- Ensure that the submitted material documents permit requirements and status (agency, permit type, trigger, submittal/approval dates). If permits are pending, include timelines and any prerequisite

- studies or coordination letters. Note that permitting is not a part of the state's "shovel ready" definition at the time of the application given the expected duration of the review period.
- The applicant must describe QA/QC and acceptance testing (who inspects/tests what, pass/fail criteria, and corrective action procedures) and identify the responsible party (owner/engineer/contractor).
- Narratives should include a commissioning/turn-up plan (e.g., generator load bank test, SCADA integration test, valve exercise, pump startup curves) and the documentation that will be submitted at acceptance (O&M manuals, training rosters, test reports).
- Ensure that the submitted material provides a Long-Term Operations & Maintenance (O&M) plan that preserves mitigation effectiveness: task list and frequencies, inspections, responsible department, annual O&M budget/funding source, and triggers for major rehabilitation.
- The applicant must state the useful life of each major component and how the design/materials and O&M plan sustain functionality over that life (e.g., corrosion protection, debris management features, redundancy). Link this to the BCA inputs where relevant.
- Narratives must include a monitoring & performance verification plan with post-construction KPIs (e.g., "substation uptime \geq 99.5% during 72-hour outage," "<8 hours wastewater service loss in 1% event") and who will track/report them.
- Ensure that the submitted material clearly distinguishes mitigation from routine maintenance or likefor-like repair by describing the risk-reduction mechanisms the design achieves (capacity increase, hardening, relocation, redundancy).
- The applicant must include EHP-ready descriptions for each task (ground disturbance locations/depths, equipment footprints, vegetation removal, in-water work windows) and attach photokeyed figures—so EHP can be completed without RFIs.
- Narratives must include dependencies & cutover plans for keeping essential services online during construction (temporary bypass pumping, temporary power, traffic phasing) with responsible parties and contingency procedures.
- Ensure that the submitted material names third-party coordination (utilities, railroads, DOT, levee/dam owners, environmental agencies), dates of outreach, and any MOUs/encroachment permits required for feasibility.
- The applicant must present a risk register (top construction risks, likelihood/impact, and mitigations) and show where those mitigations appear in drawings/specs or schedule buffers.
- Narratives must include as-built and asset handoff requirements (record drawings, warranty
 information, preventive maintenance schedules, spare parts list), confirming the owner can sustain the
 improvement long-term.
- Ensure that the submitted material is visual and scorable—place small tables/figures next to claims (design basis, KPIs, O&M tasks) and cross-reference where evidence lives in the attachments—matching the webinar guidance to "make it easy to score."

Implementation Readiness: Schedule, Permits, EHP (worth 15 pts)

- The applicant must provide a Gantt or milestone schedule that finishes within the HMGP Period of Performance and clearly shows award → design/permitting → procurement → construction → commissioning → closeout; label the critical path and float.
- Narratives must include the requested Period of Performance and an explicit statement that all funded work will be completed no later than 48 months after the application period closes (for HMGP), with interim dates for each phase. NOTE: Currently the application period closes in December 2025, so start your timeline with January 2026 and be sure that the timeline includes at least an 18-month FEMA review period. During that review period, only the non-construction items you have clearly noted as pre-award costs may take place. Remember that no construction may begin prior to FEMA's award letter issuance. That really means that construction and close-out duration has a maximum of 30 months rather than 48 since the first 18 months is "pre-award". To reiterate, the POP starts in January 2026.

- Ensure that the submitted material ties each schedule milestone to a tangible deliverable (e.g., "executed construction contract," "permit issued," "as-builts submitted") so progress is objectively verifiable.
- The applicant must include a long-lead item plan (e.g., generators, switchgear, culverts, SCADA) with order dates, lead times, and contingency substitutions, reflected in the schedule.
- Narratives must include a risk & dependencies block (utility conflicts, seasonal in-water work windows, rail/DOT coordination, property access) and show how those risks are mitigated in the schedule buffers.

Permits & Property Readiness

- The applicant must list all required permits/authorizations, name the issuing agency, status (not started/in progress/issued), submittal/approval dates, and attach proof of submittal or approvals when available (e.g., USACE 404/401, floodplain development, building, DOT/rail encroachment).
- Ensure that the submitted material documents right-of-way/easements/landowner permissions (or a signed plan to secure them) with target dates and responsible party.
- Narratives must include a procurement plan aligned to 2 CFR 200 (methods, thresholds, and timelines), identifying when you'll use sealed bids for construction and how competition will be ensured; cite your local procedures and attach templates (IFB/RFP).

EHP Front-Loading (Environmental & Historic Preservation)

- Ensure that the submitted material provides a complete EHP narrative that can be reviewed without RFIs: describe what work, where, when, and how, and include maps and photos (site, service area, staging/laydown, haul routes).
- The applicant must include a ground-disturbance description (depth/width/length), note whether work is in previously disturbed vs. undisturbed areas, and identify any vegetation clearing.
- Narratives must include the EHP Checklist (completed and referenced) and identify potential triggers for Section 106, Endangered Species Act, wetlands/floodplains, CBRS, and other reviews; point to attachments (IPaC, SHPO screens, NWI/FIRM panels).
- The applicant must state plainly that no work will begin prior to FEMA EHP completion and written approval and acknowledge that funds are not released until EHP is complete; place this statement near the schedule.
- Ensure that the submitted material places EHP-dependent milestones (consultations, public notices, archaeology, biological windows) before ground disturbance and shows these on the Gantt with realistic durations.
- Narratives must include photo documentation (at least four compass-labeled site photos + aerial) keyed to a map so reviewers can visualize the footprint and resources.

Readiness to Execute & Monitor

- The applicant must map implementation measures to milestones (what will be submitted to the State/FEMA at each step) and identify the internal project manager accountable for schedule control and reporting.
- Ensure that the submitted material commits to Quarterly Progress Reports that track schedule, obligations, and EHP/permit status through the Period of Performance; include a one-page QPR template in the appendix.
- Narratives must include a cutover/continuity plan for keeping essential services online during construction (temporary power/bypass pumping/traffic phasing) with responsible parties and trigger points.

- The applicant must cross-check SOW-Budget-Schedule-EHP for full consistency (same quantities, locations, durations) and provide a "where to verify" table so reviewers can spot evidence in under a minute—mirroring the webinar's "make it scorable" guidance.
- Ensure that the submitted material follows the six stand-alone attachment structure and the Schedule & Implementation Measures and EHP & Assurances content emphasized in the state webinar/slide deck (use visuals, callouts, cross-references).
- Narratives must include the explicit note that no physical work may occur prior to grant award—and place that warning next to the early schedule bars.

Budget Readiness & Allowability (worth 10 points)

- The applicant must provide a clear, line-item budget and a companion Budget Narrative that proves every dollar is necessary, reasonable, eligible, and tied to deliverables and tasks in the Scope/Schedule.
- Narratives must include a cost basis for each significant line: at least one of (1) recent contractor bids/quotes, (2) RSMeans or equivalent published unit-price data with location factors, and/or (3) a sealed Engineer's Opinion of Probable Cost (EOPC). Cite sources and dates.
- Ensure that the submitted material demonstrates cost reasonableness per 2 CFR 200.404 by referencing market prices in the project's geographic area, sound business practices/arm's-length bargaining, and prudent decision-making at the time the costs were set.
- The applicant must avoid lump-sum ("one number") construction budgets; break out quantities, units, and unit prices and provide a Budget Narrative detailed enough for FEMA to determine allowability, allocability, and reasonableness.
- Ensure that the submitted material separates Subrecipient Management Costs (SRMC) as their own line(s) with a brief narrative of activities (e.g., procurement, reporting, grant accounting). Do not commingle SRMC within project construction/soft-cost totals. SRMC is not cost-shared.
- Narratives must include an explicit statement that HMGP management costs are funded at 100% federal share (no non-federal match required) and that SRMC will be tracked and drawn separately from project costs.
- The applicant must cap and justify contingency: if used, show basis (e.g., early design uncertainty, known bid volatility) and keep within the State's stated maximum; include how/when unused contingency will be de-obligated. (NC webinar/PPT: "Maximum allowable contingency is 5%.")
- Narratives must include pre-award cost handling: list each pre-award item in its own line with category (e.g., A&E), vendor, date completed/paid, and exact amount; confirm the costs would be allowable post-award and are limited to "paper only" (no ground disturbance). Reference 2 CFR 200.458.
- Ensure that the submitted material flags any pre-award items as occurring on/after the DR-4827 declaration date (Sept 28, 2024) and explains why they were necessary for efficient and timely performance.
- The applicant must exclude ineligible costs (routine maintenance, general governmental overhead not allocable to the project, landscaping for aesthetics, etc.) and say so explicitly in the narrative.
- Narratives must include a cost-share table showing Federal and Non-Federal shares and any leveraged funds; confirm no cost element will be paid twice (applicable credits/duplication of benefits) and explain how discounts/rebates will be credited per 2 CFR 200.406.
- The applicant must tie each budget line to Scope tasks and Schedule milestones so reviewers can "trace the dollar" to a deliverable and completion criterion.
- Ensure that the submitted material documents procurement assumptions and, where contracts exceed the Simplified Acquisition Threshold, includes or commits to a cost/price analysis and the required contract clauses per 2 CFR 200.317-327 (cite threshold and method).
- Narratives must include a short note on Build America, Buy America (BABA) applicability: state that HMGP is not subject to BABA and confirm that no BABA cost premium is claimed.

- The applicant must state whether indirect costs are claimed and, if so, clarify they are treated as management costs under HMA (not embedded in the project budget), with the appropriate rate or de minimis election disclosed.
- Ensure that the submitted material provides quantity takeoffs or bid tabs for major construction elements (e.g., LF of pipe, CY of excavation, SF of concrete, EA valves) and explains how overruns/underruns will be managed within the PoP.
- Narratives must include escalation assumptions (index used, time phasing aligned to schedule) for multi-year projects, and ensure they are reasonable for the market and period of performance.
- The applicant must identify third-party permits, testing, inspections, and construction support services in the budget (who performs; how costs were derived), and avoid double-counting with contractor costs.
- Ensure that the submitted material breaks out owner's soft costs (design, permitting, EHP studies, geotech, QA/QC, CM/CI, legal ads) with basis of estimate and timing relative to milestones.
- Narratives must include a budget risk note (e.g., utilities relocation, hazardous materials, dewatering) stating whether allowances are included, their basis, and how unused allowances will be credited at closeout.
- The applicant must cross-reference the Budget Narrative to the SOW, EHP, BCA inputs, and Schedule so reviewers can verify internal consistency (same quantities, same locations, same timing).

Plan & Policy Alignment (5 pts).

- The applicant must cite the FEMA-approved Regional Hazard Mitigation Plan (RHMP) by goal/objective/action ID, page, and section, and explain in 1–2 sentences how the project directly advances that action. Include the HMP adoption date and FEMA approval date.
- Narratives must include a scanned excerpt/screenshot of the exact RHMP action (or table) with the
 relevant text highlighted, and a cross-reference to where the same language appears in the SOW and
 Schedule so reviewers can verify alignment quickly. Please do not include the entire plan in your
 package.
- Ensure that the submitted material states whether the project is explicitly listed as an RHMP action or is clearly consistent with named goals/objectives; if the exact action is not listed, attach a governing board resolution affirming consistency with the approved RHMP.
- The applicant must include a letter or email from the local Floodplain Administrator confirming community participation in the NFIP and that the project will be permitted in compliance with the community's Flood Damage Prevention Ordinance (44 CFR 60.3).
- Narratives must include a code-compliance attestation (signed by the PE of record or Building
 Official) naming the adopted code editions/standards that will govern design (e.g., IBC/IPC/IFC year,
 ASCE 24 for flood-resistant design where applicable), and stating that the project meets or exceeds
 those standards.
- Ensure that the submitted material identifies any local or State policy overlays the design will meet (e.g., freeboard, critical-facility siting rules, local resilience standards) and where those requirements are documented (ordinance section, policy number).
- The applicant must tie the Operations & Maintenance (O&M) plan and useful life to the RHMP's mitigation strategy (who maintains; funding source; inspection frequency), demonstrating the improvement's long-term sustainability beyond construction.
- Narratives must include a brief "no conflict/duplication" statement confirming the project is hazard mitigation (not routine maintenance or a Public Assistance repair) and is consistent with plans/policies cited. Cross-reference the Alternatives Analysis to show

- Ensure that the submitted material lists related adopted plans that reinforce the project's policy fit (e.g., capital improvement plan, utility master plan, transportation plan) and provides a one-line linkage ("This culvert upsizing implements CIP item W-12 and RHMP Action 3.2.1").
- The applicant must include an attestation that they have not applied for funding for this same project under Advance Assistance 404,406

Section 1: Infrastructure Projects

These are construction-focused projects (e.g., flood risk reduction, infrastructure retrofits, landslide stabilization) requiring shovel-ready designs. Must demonstrate cost-effectiveness via BCA (Benefit-Cost Analysis) unless under \$1M total cost. Projects must tie to critical lifelines (e.g., utilities serving populations) and quantify benefits (e.g., reduced outages, population served).

Eligibility and Requirements

Project Types: Floodproofing, infrastructure mitigation (e.g., pump stations, culverts), landslide/slope stabilization, generators for critical facilities.

Cost Share: 75% federal / 25% non-federal.

BCA Requirements: Use FEMA BCA Toolkit v6.0 (7% discount rate). BCR ≥1.0 required. For <\$1M total cost: Narrative option allowed, describing risk reduction (e.g., pre-calculated benefits for hospital generators). Include all inputs/assumptions in a log tying to affected population (e.g., service connections). NCEM screens BCAs before submission—submit draft for coaching.

Generator Nuance: Large programs need full BCA; hookups/equipment may be eligible 5% Initiative **Phased Projects:** Not advanced by NCEM (state decision); submit shovel-ready or use Advance Assistance separately.

Contingency: Limit to 5% (state policy for scoring); justify narratively as necessary/reasonable (no FEMA cap).

Cost Reasonableness: Provide independent basis (e.g., recent bids, RSMeans, engineer's opinion with assumptions).

Required Attachments (Six Standalone Files)

Upload to Salesforce as PDFs/Excel. Name as: DR[Number]/Sub-Applicant] [Attachment Handle].

- 1. BCA Attachment One (Excel File)
- 2. **BCA Tool & Attachment Two (PDF):** BCA Toolkit's PDF Printout + supporting docs. Include input log with sources, assumptions, and population tie-in.

 Narrative for <\$1M: Explain risk reduction without full toolkit.
- 3. Attachment Three (Scope of Work SOW): Narrative like a mission statement: Who does what, where, when, why. Detail "how" with specs, quantities, methods. Not maintenance/modernization. Include executive summary, hazard description, problem statement, alternatives analysis (at least three, with homework on non-chosen options), proposed solution. Cross-reference other attachments. Technical report with drawings, maps, specs. Demonstrate feasibility, O&M plan, monitoring. Quantify population served, services maintained, outage reduction.
- 4. **Attachment Four (Budget Narrative):** Line-item budget tying to SOW/milestones. Separate management costs (up to 5%, 100% federal). Include pre-award costs (post-declaration). 5% contingency max (state preference). Evidence of reasonableness.

- 5. **Attachment Five (Schedule and Implementation):** High-level narrative + Gantt chart. Start within 3 months of award; complete ≤48 months. Milestones/deliverables tied to SOW/budget. Address dependencies (e.g., permitting), completion criteria.
- 6. **Attachment Six (EHP Attachments):** Visual/narrative for Environmental & Historic Preservation review. Use NCEM EHP Checklist (Q&A format). Include: Intro (where/how, staging); maps (topo, FIRM, aerial, service area); ground disturbance table (length/width/depth; disturbed vs. undisturbed; vegetation clearing); lat/long to six decimals; anticipated permits (e.g., 404/401, floodplain); photos (4+ angles, aerial/drone); compliance acknowledgment (no work before FEMA approval); assurances package (download template from website).

EHP Details (Right-Sizing): Start early—EHP delays reviews. Use checklist by project type. List agencies for coordination (FEMA handles). Address all sections: Scope/location, considerations (agency permits, species lists, studies), structure impacts (if applicable), vegetation/fuels, flood risks.

Common Pitfalls: Avoid "word soup"—be succinct. No inter-dependent projects (e.g., partial system mitigation). Ensure all sub-components eligible. Favor standalone solutions. When interpreting guidance, ensure neutral FEMA reviewer would agree.

Section 2: 5% Initiative Projects

Up to 5% of HMGP funds for innovative projects exempt from full BCA. Focus on risk reduction where data is limited (e.g., post-disaster).

Eligibility and Requirements

Project Types: Secondary power sources (generators), early warning systems/stream gauges, community storm shelters. Must address PTC-8/Helene impacts or similar hazards.

Cost Share: 75% federal / 25% non-federal.

BCA: Exempt; submit narrative methodology explaining expected risk reduction (e.g., population

protected, outage prevention).

Budget/Schedule: Same as Infrastructure, but simpler. 5% contingency max.

Required Attachments

Similar to Infrastructure, but no Attachment One:

1. **BCA Methodology** (Narrative PDF): Under "Upload Maps" in Salesforce. Explain cost-effectiveness via risk reduction narrative. 2–6. **Same as Infrastructure:** Adapt SOW, feasibility, budget, schedule, EHP to project type (e.g., generator hookups under 5%).

Section 3: 7% Planning Projects

Up to 7% of HMGP funds for planning (e.g., updating Hazard Mitigation Plans). No construction.

Eligibility and Requirements

Project Types: Plan updates, studies for future mitigation (not general—must tie to hazards).

Cost Share: 75% federal / 25% non-federal. **BCA:** Neither full BCA nor narrative required.

Deliverables: Specific (e.g., updated plan sections, timelines).

Required Attachments

Simplified: Similar to Infrastructure, but no Attachment One or Attachment Two:

Contact: For questions, email <u>Carl.Baker@ncdps.gov</u> and <u>kaine.riggan@ncdps.gov</u>. Reference watching the webinar for priority response. Good luck—let's build resilient NC!

Required Attachments for HMGP Sub-Applications in North Carolina

Based on the North Carolina Emergency Management (NCEM) Hazard Mitigation Section guidelines, webinar materials, and official resources from NCDPS and FEMA, the required attachments for HMGP subapplications vary slightly by project type (e.g., Infrastructure, 5% Initiative, or 7% Planning). However, all sub-applications are submitted via the Salesforce Portal as standalone files, with specific naming conventions (e.g., DR4827_[Sub-Applicant Name]_BCA.xls).

For **Infrastructure Projects** (construction-focused, e.g., flood risk reduction, generators), sub-applicants must submit **six standalone attachments**. These are the core requirements, with Attachment Six bundling Environmental and Historic Preservation (EHP) details alongside the assurances package. The assurances package is a downloadable template from the NC DPS website (www.ncdps.gov/HMGP), which includes standard federal forms like the SF-424 family and other compliance documents. It is marked as "REQUIRED ATTACHMENTS". NCEM handles the overall state application to FEMA, but sub-applicants must provide these to ensure eligibility.

For **5% Initiative Projects** (e.g., generators, early warning systems), the attachments are similar but simplified—no full BCA (Attachment One) is needed, just a narrative methodology.

For **7% Planning Projects** (e.g., plan updates), attachments are adapted with no BCA (Attachments One or Two) required, focusing on planning deliverables.

Additional Notes:

For All Projects: Include evidence of cost reasonableness, procurement plan, and no inter-dependent projects. If private land is involved, provide right-of-entry documentation.

Variations by Type: 5% and 7% use adapted versions of the six attachments (e.g., no full BCA). Advance Assistance (not covered here) emphasizes pre-construction development activities and those instructions are listed at the bottom of the page at www.ncdps.gov/hmgp.

Sources and Updates: This list aligns with NCDPS's webinar, NOFAs (DR-4827-NC, DR-4837-NC), and FEMA's Hazard Mitigation Assistance Program and Policy Guide v2.1 (January 2025). Check ncdps.gov/HMGP for templates, samples, and updates. If your LOI advances, NCEM provides feedback via RFI emails and meetings.

Tips: Name files consistently (e.g., DR4827_[YourName]_EHP.pdf). Ensure internal consistency across attachments. Contact NCEM for technical assistance, referencing the webinar password.