

# Transforming Oklahoma's Hazard Mitigation Program: A New Era of Effectiveness and Transparency

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Aubrey Germ & Ned Fernandez, ICF**

September 23, 2025



# Agenda

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- Current State of FEMA Hazard Mitigation Assistance
- OEM's Priorities for Program Transformation
- OEM's Progress to Date
- Open Funding Opportunities



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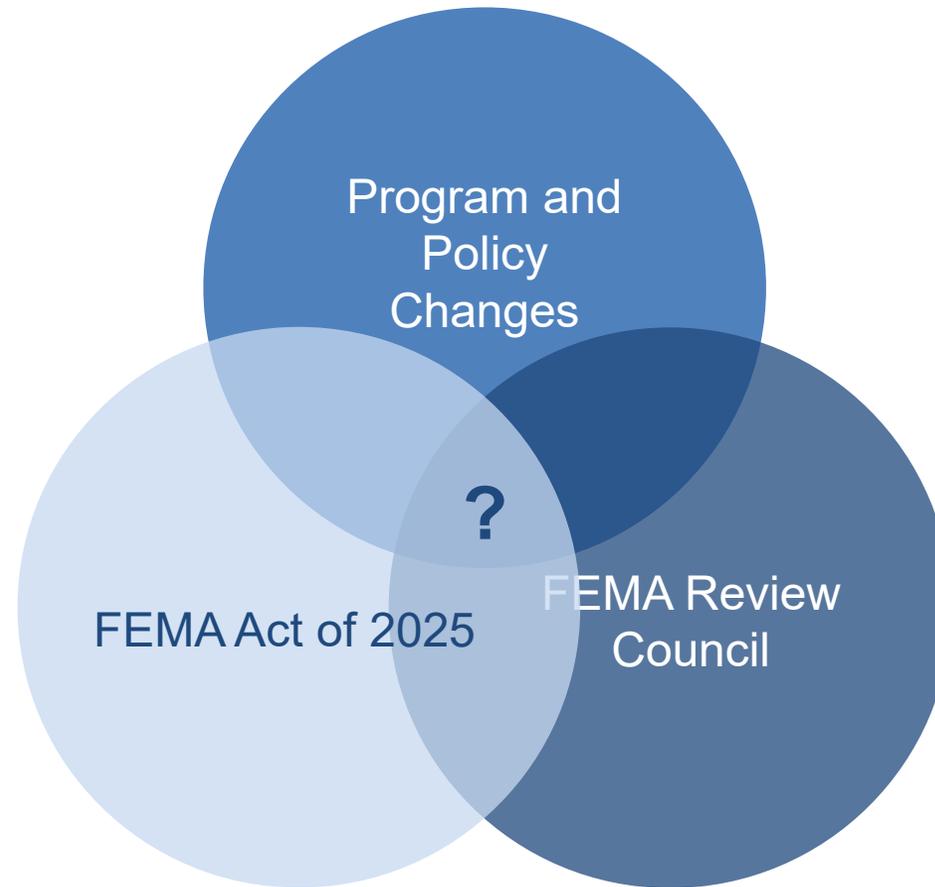
Project Manager  
Senior Management Consultant,  
ICF Strategic Resilience Practice



# Current State of Hazard Mitigation

# So, what's the current state of FEMA Hazard Mitigation Assistance (HMA)?

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# Program and Policy Changes (2025)

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## **Program Eliminations or Reallocations under Review**

In **April**, FEMA announced it was ending the FEMA BRIC program, and portions of the funding may be reallocated. Some states are pursuing litigation to preserve funds, and in **August**, a federal judge issued an injunction.

## **Benefit Cost Analysis (BCA) Discount Rate Reverted back to 7%**

In **April**, the OMB revoked the 3.1% discount rate and reinstated the older 7% rate. FEMA also tightened the use of social benefits in its analyses.

## **Delay in FMA and HMGP Funding Streams**

FEMA has delayed accepting applications for the Flood Mitigation Assistance (FMA) program and FEMA hasn't authorized the Hazard Mitigation Grant Program (HMGP) since **May**.

## **FEMA's Local Mitigation Planning Policy Guide (2025)**

Updated in **July**, this update removes climate change and equity requirements, streamlines regulatory references, and introduces a new companion handbook for locals.

## **FEMA HMA Program & Policy Guide Updated**

Version 2.1, released in **August**, incorporates regulatory updates, revised eligibility requirements, and alignment with recent executive orders to clarify program priorities

# Fixing Emergency Management for Americans (FEMA) Act of 2025 – Proposed HMA Reforms

## **Pre-Approved Mitigation Projects**

Proposes that states can submit mitigation project plans for preapproval. Approved projects qualify for expedited funding and a higher federal cost share (up to 85%).

## **Pre-Disaster Mitigation/BRIC Reform**

Proposes that the BRIC program shifts from competitive grants to formula-based funding: 40% baseline to all states; 20% based on risk; 20% on population and income; 20% for distressed, rural, and tribal areas.

## **Allows Matching Mitigation Dollars**

Proposes combining funds from different Stafford Act programs (BRIC, HMGP, etc.) for “large,” “innovative projects.” Provides upfront advances for homeowner retrofits, to prevent cost-reimbursement delays.

## **Consolidated Grant Application**

Proposes a single application covering Sections 203 (PDM), 404 (HMGP), FMA, and preapproved projects. This streamlines the application process and speeds up the obligation of funds.



# FEMA Review Council

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**In response to the FEMA Review Council's Request for Information (RFI), more than 400 responders emphasized the importance of federal support for pre- and post-disaster hazard mitigation programs.**

*“Mitigation is probably and perhaps the most misunderstood vertical of emergency management. Mitigation saves lives.”*  
– *FEMA Review Council Member*

*“FEMA's Hazard Mitigation and Homeland Security grants are essential for preparedness and faster recovery.”*  
- *FEMA Review Council Speaker*

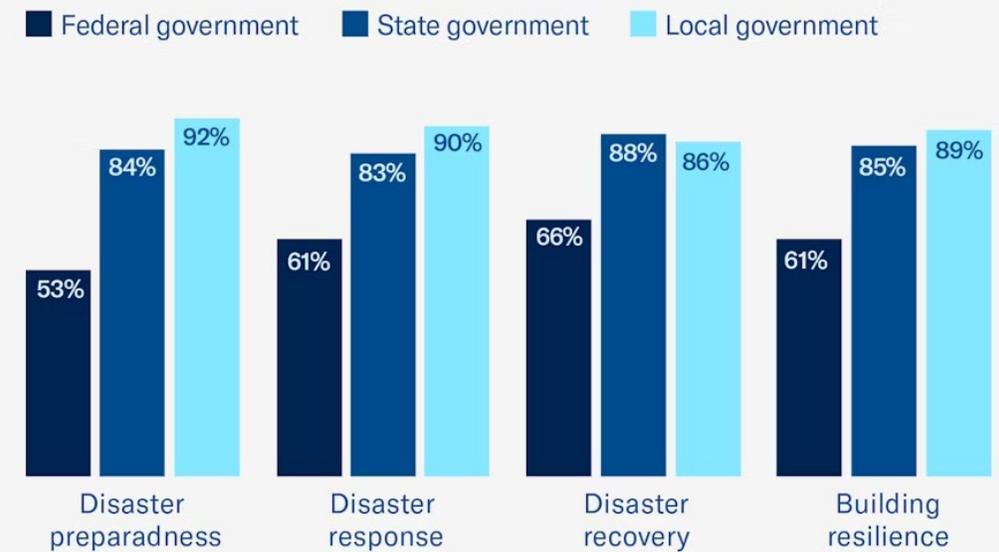
*“Mitigation saves lives, it protects property, it reduces the cost of future disasters.”*  
- *FEMA Review Council Member*

# So, what is the current state of FEMA Hazard Mitigation Assistance (HMA)?

1. Shifts in hazard mitigation program delivery are on the horizon - change is certain.
2. Hazard mitigation enjoys continuing, broad bipartisan support.
3. Future hazard mitigation delivery models will prioritize state-led implementation.
4. State programs must remain flexible to adapt to evolving priorities and designs.

## How much of a role should the following play in...

Percent Very/Somewhat Prepared



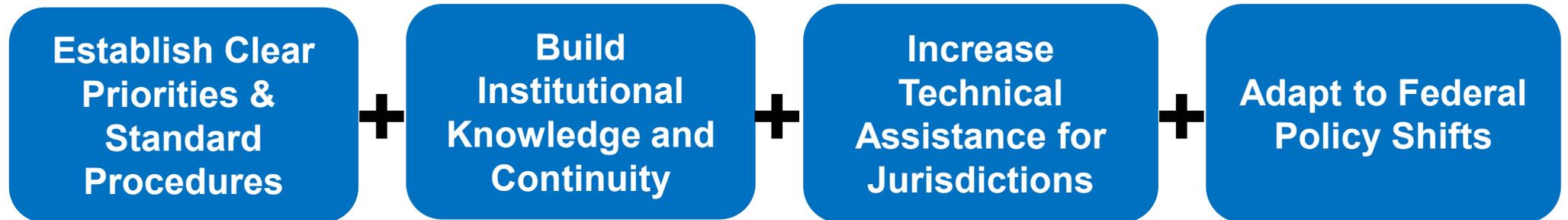
Source: US Chamber of Commerce Foundation



# Priorities for Mitigation Program Transformation

# Priorities for Transformation

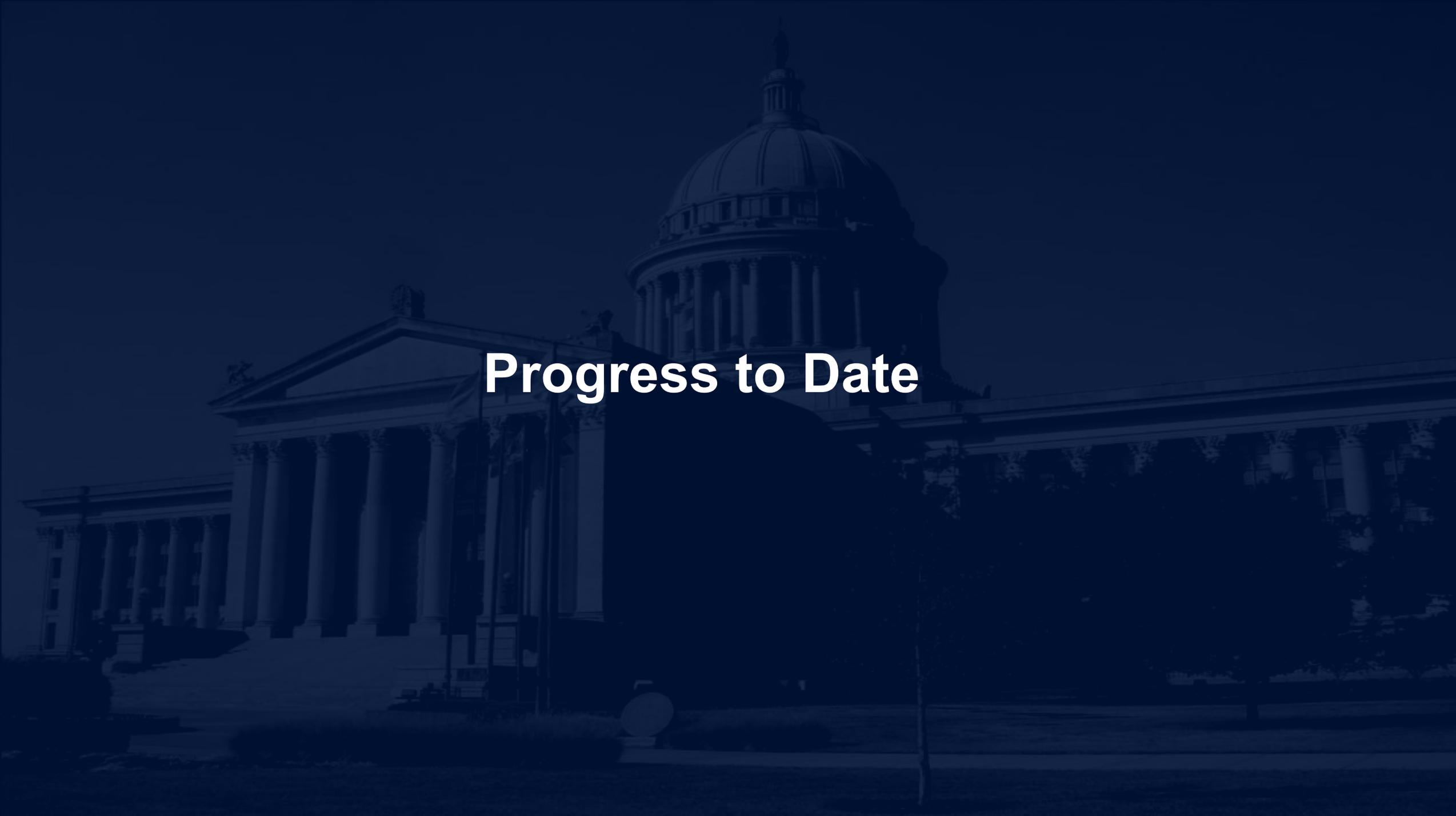
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# Goals of New Mitigation Program

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-  Build a more **transparent** and **effective** state mitigation program under the vision of OEM leadership
-  **Increase public awareness** of available mitigation funding
-  Streamline and **accelerate funding delivery** to communities
-  Simplify and improve **outreach, guidance, and technical assistance** for jurisdictions
-  **Build long-term capacity and adaptability** both internal and external to OEM



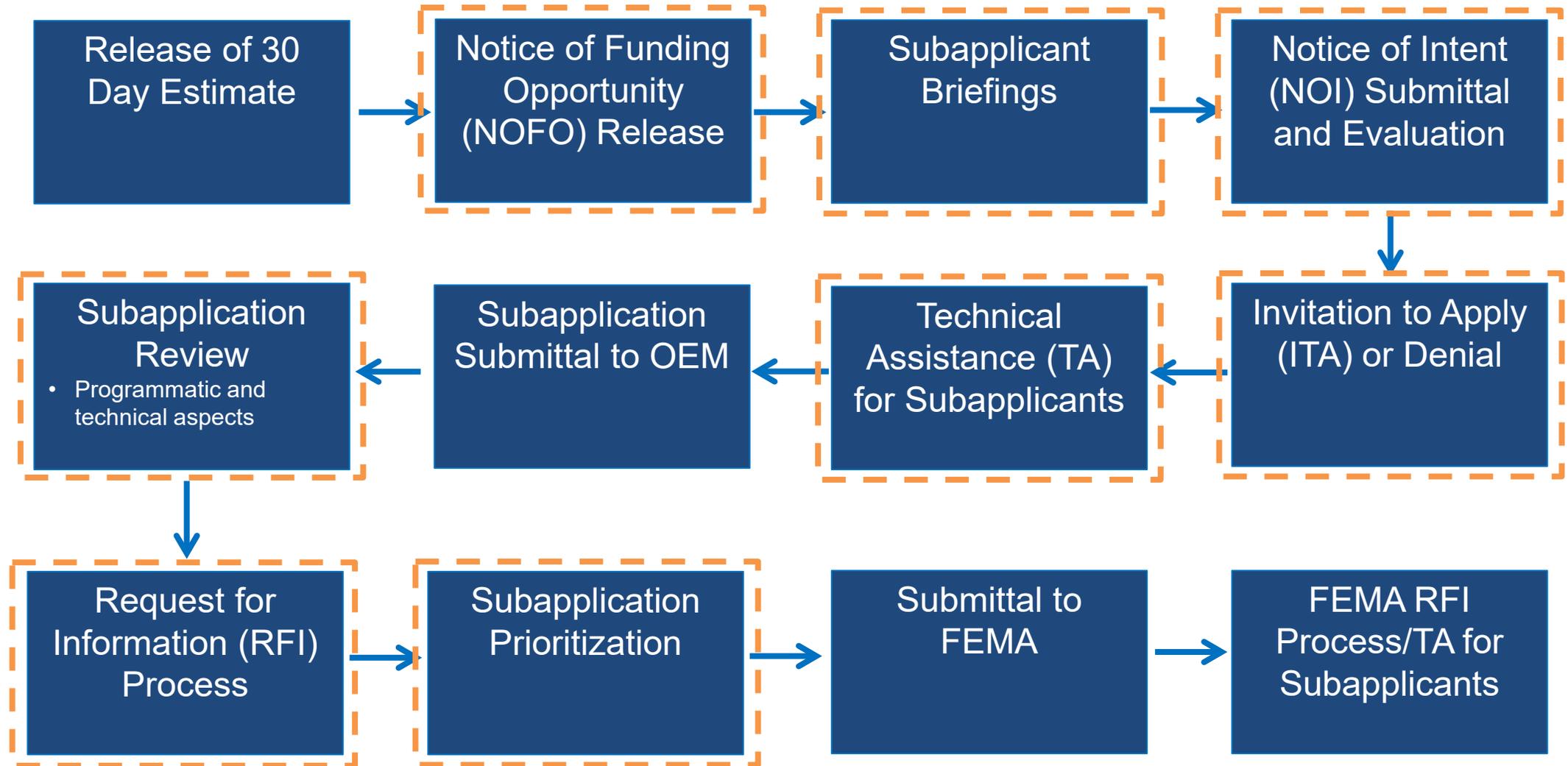
# Progress to Date

# Since February 2025, we have...

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-  Overhauled the HMGP subapplication outreach, intake, review, and submittal process beginning with DR-4791
-  Provided direct technical assistance (TA) to OEM staff, subapplicants, and subrecipients
-  Developed and implemented training for OEM staff on mitigation best practices
-  Developed templates, guides, and outreach materials for a comprehensive HMA Resources Page on OEM's website
-  Tested out new standard operating procedures (SOPs)

# New Intake Process Overview



# NOFO Publication + Briefings

- Funding Details
- Important Deadlines
- Eligibility & Priorities
- NOI & Application Submission Information
- Resources/Contact Information
- Technical Assistance
- Opportunity for Q&A



## Notice of Funding Opportunity (NOFO)

Hazard Mitigation Grant Program (HMGP)  
Oklahoma Severe Storms, Straight-line Winds, Tornadoes, and Flooding  
DR-4862-OK

Declaration Date:	March 18, 2025
NOFO Issue Date:	June 26, 2025
Subapplicant Briefing:	July 23, 2025
NOI Submission Deadline:	October 20, 2025
Subapplication Submission Deadline to OEM:	January 19, 2026
All RFI Responses from Subapplicants due to OEM:	March 4, 2026
OEM Submits all HMGP Subapplications to FEMA:	March 18, 2026
Anticipated Date for Award Announcement:	Summer 2026
Target Contract Start Date:	Fall 2026
Period of Performance End Date:	March 18, 2030
Incident Period:	November 2, 2024 through November 5, 2024



# New Resources Page

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New and more organized resources to help jurisdictions with application development:

- NOI submission user guide
- Project type checklists
- Budget workbook template & budget narrative sample
- Letter templates

## Helpful Forms

- [HM 2 CFR 200 Procurement Requirements Form \(signed\)](#)
- [SF-424 Application for Federal Assistance](#)
- [SF-424A Budget Info Non-Construction Projects](#)
- [SF-424B Assurances Non-Construction Projects](#)
- [SF 424C Budget Info Construction Projects](#)
- [SF 424D Assurances Construction Projects](#)
- [SF-LLL Lobbying Form](#)
- [FEMA Form 20-16C Certifications Regarding Lobbying, etc.](#)
- [SRMC Acknowledgement Form \(OEM\)](#)
- [FEMA Benefit Cost Analysis \(BCA\) Toolkit](#)
- [Request for reimbursement expense log workbook](#)
  
- [Download all forms](#)

## Templates

- [Archeological Survey and SHPO Consultation Letter Template](#)
- [Floodplain Management Consultation Letter Template](#)
- [FWS Consultation Letter Template](#)
- [HM OEM Maintenance Agreement](#)
- [Land Use and Farmland Preservation Consultation Letter Template](#)
- [Local Match Commitment Letter](#)
- [ODOT Consultation Letter Template](#)
- [OEM 2025 Budget Workbook Template FEMA HMA](#)
- [OEM Budget Narrative Sample](#)
- [Public Notice Letter Template](#)
- [RCRA and CERCLA Consultation Letter Template](#)
- [Subrecipient Management Costs Acknowledgement Template](#)
- [USACE Consultation Template](#)
  
- [Download all templates](#)

# Clear Prioritization Criteria

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- Jurisdictions **within declared counties** with significant damage.
- Projects addressing **principal hazards** of the disaster declaration.
- Projects with **greatest community benefit** (highest benefit-cost ratio (BCR), larger population served).
- Eligible jurisdictions outside declared counties.

# Technical Assistance (TA)

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OEM is happy to provide technical assistance to subapplicants. Please reach out to [hm@oem.ok.gov](mailto:hm@oem.ok.gov), for any assistance with:

- Project Identification
- Scope of Work Narratives
- Budget Workbook or Narrative
- Benefit-Cost Analysis Toolkit or Memorandum
- Environmental and Historic Preservation (EHP) Coordination Letters
- Certifications, Assurances and Required Documentation

Assistance is available to all interested jurisdictions!



# Open Funding Opportunities

# Funding Details for DR-4862 HMGP

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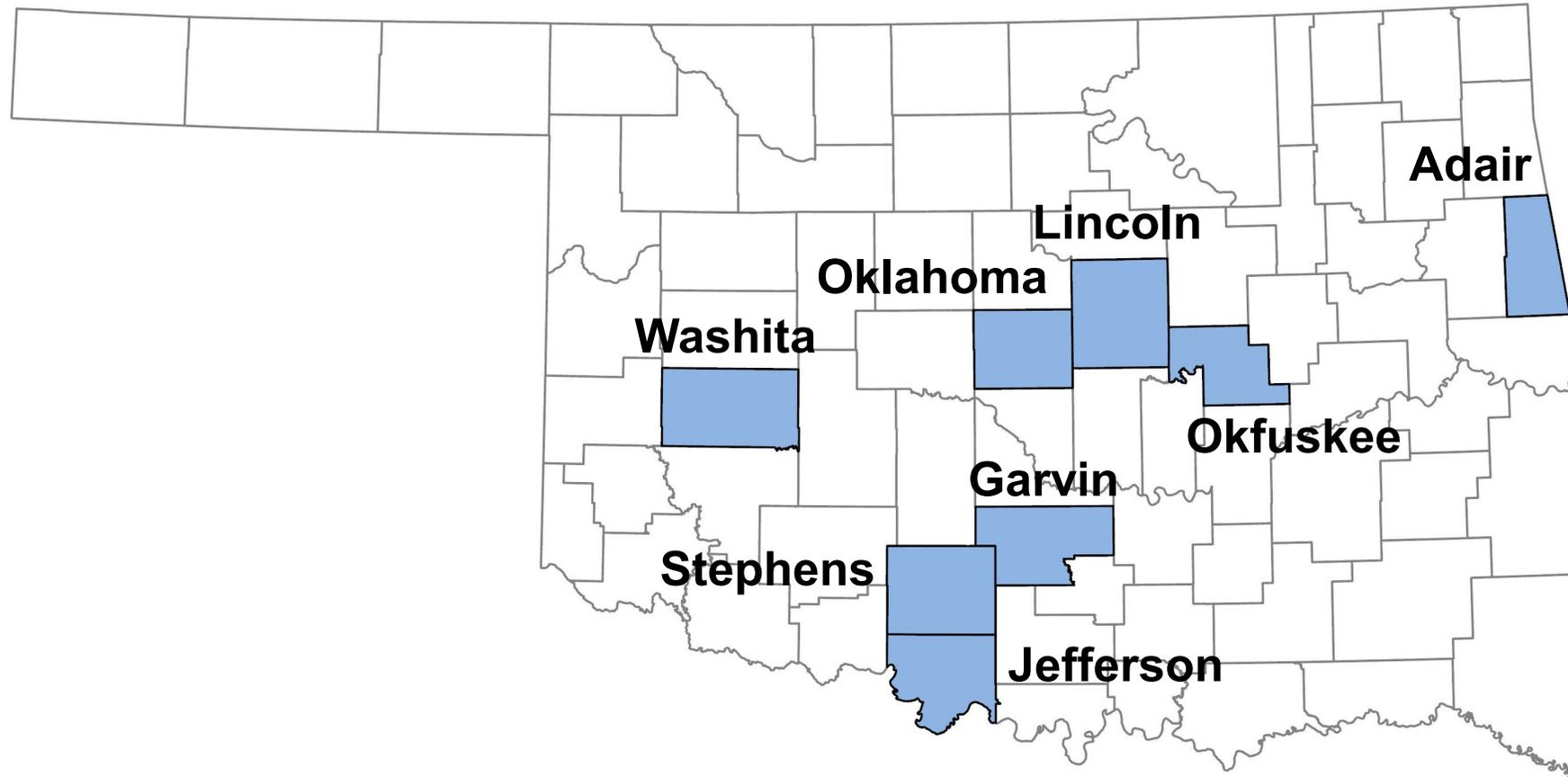
- Notice of Intent (NOI) Submittal Deadline: October 20, 2025
- Subapplication Submission Deadline to OEM: January 19, 2026
- All RFI Responses from Subapplicants due to OEM: March 4, 2026
- OEM Submits all HMGP Subapplications to FEMA: March 18, 2026
- Funding Amount: \$522,056.00 (30-day lock)\*

*See Page 1 of the Notice of Funding Opportunity (NOFO).*



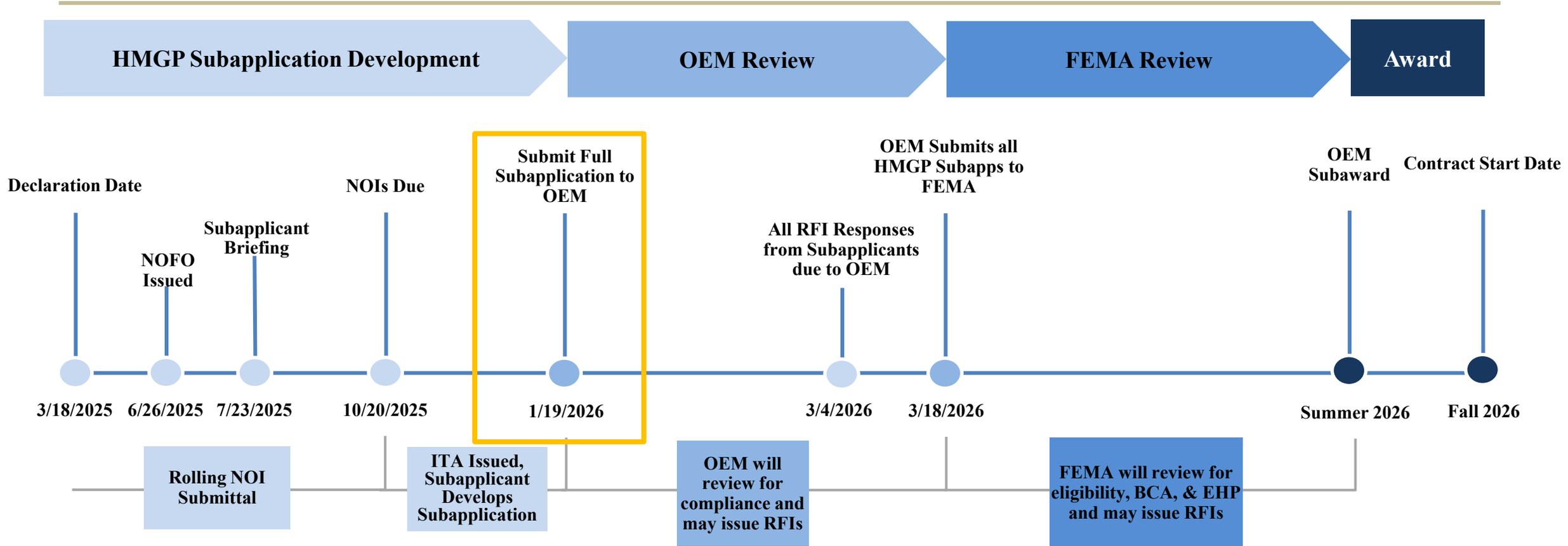
# Prioritized Counties

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*See Page 6 of the NOFO.*

# Timeline for DR-4862



See Pages 1 & 21 of the NOFO.



# Funding Details for 5543-PF HMGP-PF

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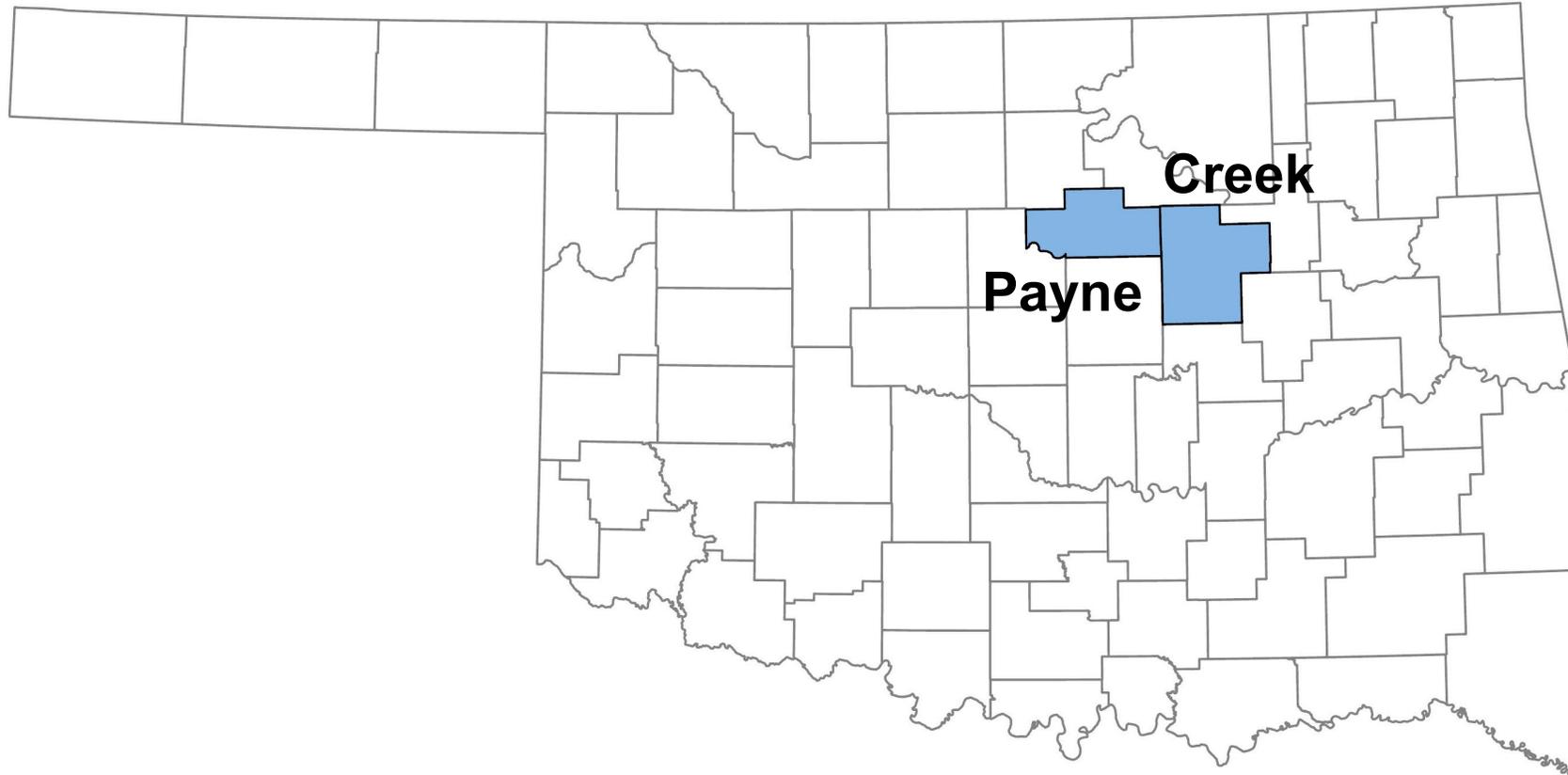
- NOI Submittal Deadline: October 31, 2025
- Subapplication Submission Deadline to OEM: February 2, 2026
- All RFI Responses from Subapplicants due to OEM: March 17, 2026
- OEM Submits all HMGP Subapplications to FEMA: March 31, 2026
- Funding Amount: \$1,927,846.00

*See Page 1 of the NOFO.*



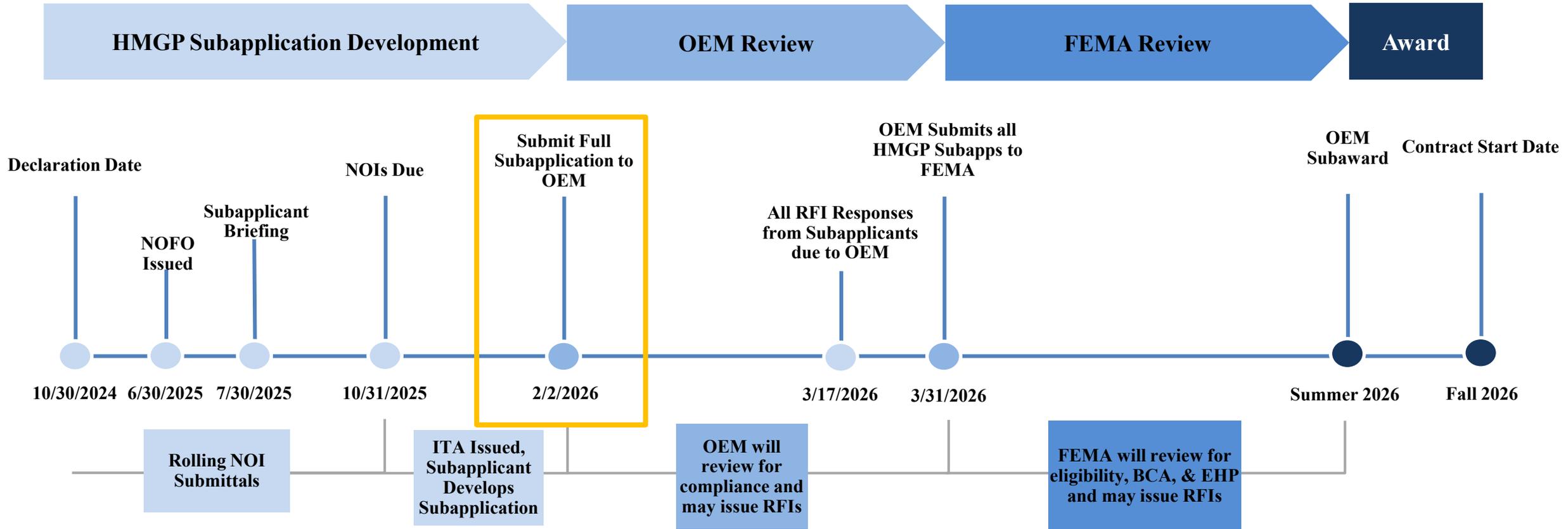
# Prioritized Counties

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*See Page 6 of the NOFO.*

# Timeline for 5543-PF



See Pages 1 & 21 of the NOFO.



# Contact Information

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Please reach out with any feedback.

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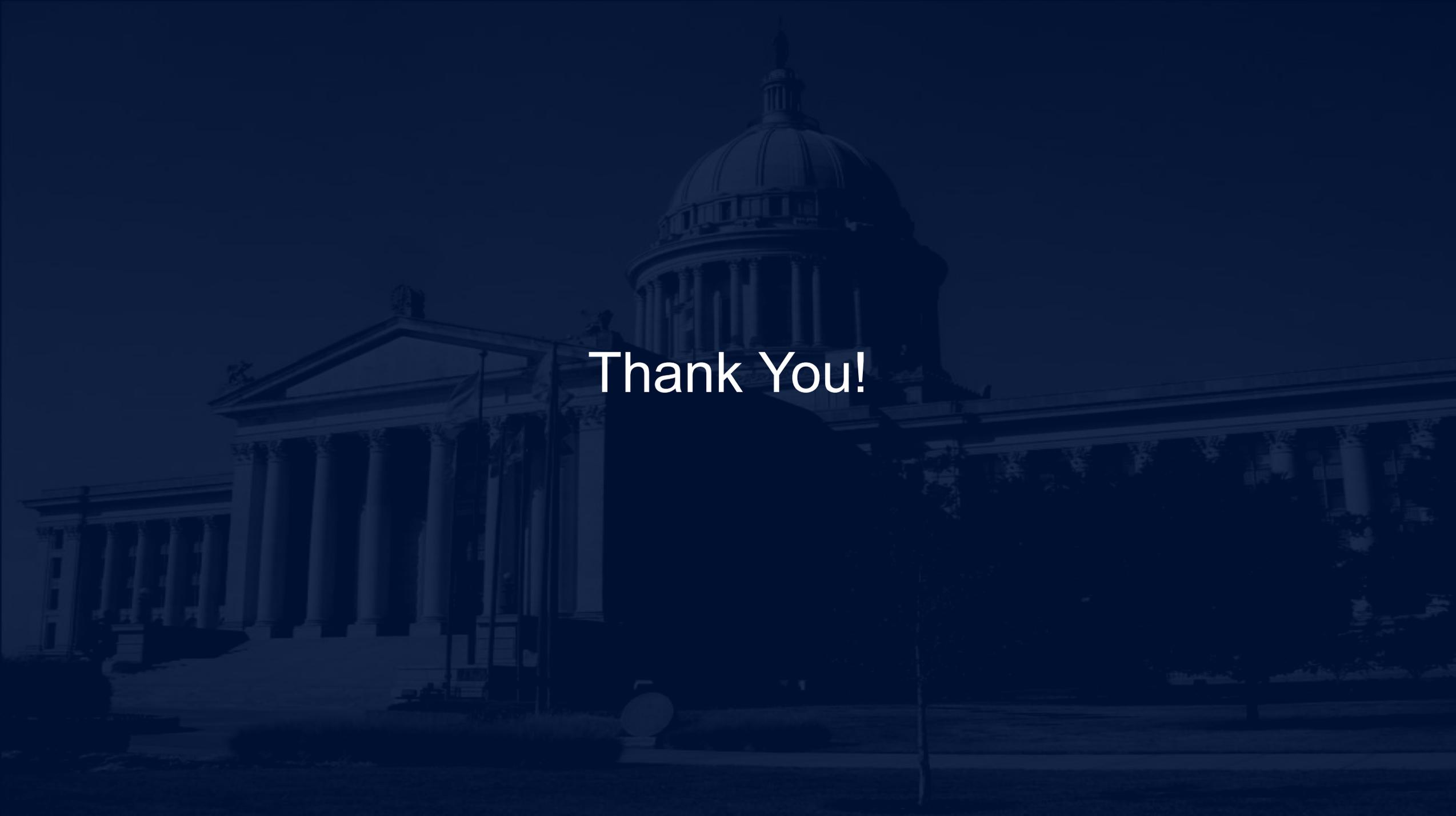
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Thank You!