2023 Stakeholder Engagement Report Building Resilient Infrastructure and Communities (BRIC)

August 2024

FEMA

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1. Introduction

1.1. Purpose

1.1.1. PROGRAM OVERVIEW

In October 2018, the Disaster Recovery Reform Act (Pub. L. 115-254, Division D) was signed into law. It introduced more than 50 provisions to improve disaster preparedness, mitigation, response, and recovery programs and outcomes. Section 1234 amended Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act to create a new funding mechanism that set aside up to 6% of federal post-disaster grant funding in support of a new pre-disaster hazard mitigation grant program: Building Resilient Infrastructure and Communities (BRIC). This set-aside ensures funding is available every year, thus removing the uncertainty associated with the annual appropriations process that funded the Pre-Disaster Mitigation (PDM) grant program.

Administered by FEMA, BRIC supports states, local communities, tribes, and territories (SLTT) as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards. The program also provides funding and nonfinancial technical assistance to build capability and capacity of local communities and Tribal Nations to improve resilience to natural hazards, including for underserved communities most vulnerable to the impacts of climate change. The program's guiding principles include supporting communities through capability and capacity building (C&CB); encouraging and enabling innovation; promoting partnerships; enabling large infrastructure projects; maintaining flexibility; and providing consistency.

As a program, BRIC aims to categorically shift the federal focus away from reactive disaster spending and toward research-supported, proactive investment in community resilience. BRIC projects demonstrate innovative approaches to partnerships, such as shared funding mechanisms, and/or project design. For example, an innovative project may bring multiple funding sources or in-kind resources from a range of private and public sector partners, or it may offer multiple benefits to a community in addition to the benefit of risk reduction. Through BRIC, FEMA continues to invest in a variety of mitigation activities with an added focus on infrastructure projects benefitting disadvantaged communities, nature-based solutions (NBS), climate resilience and adaptation, and adopting hazard-resistant building codes.

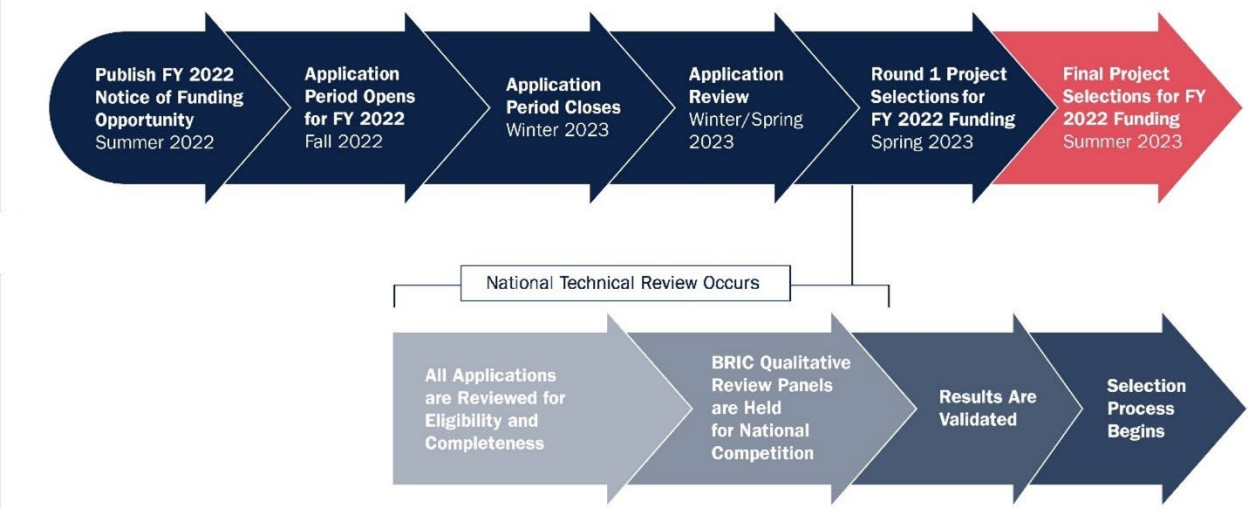

Figure 1. Fiscal Year 2022 BRIC Application Review Cycle. This is the review cycle that was active during the engagement period.

BRIC provides proactive investment in resilience for communities annually so they are better prepared and remain resilient prior to a natural disaster. The timeline for BRIC application and selections has remained relatively the same over the years. Once the Notice of Funding Opportunity (funding opportunity) is published, the application period for the BRIC funding cycle opens in the fall and closes in early winter.

From there, subapplications are reviewed by FEMA for eligibility and completeness. Subapplications submitted to the National Competition that pass the eligibility and completeness review are then scored using technical evaluation criteria. If needed, based on the number of subapplications submitted, FEMA uses the technical evaluation criteria scoring as a program priority screening tool.

Based on this screening, a subset of projects undergoes qualitative evaluation by a National Review Panel and National Technical Review. Once selections are announced in the summer following the application period, subapplications enter the pre-award programmatic review process where additional review and information may be gathered prior to award.

Cost Share

A cost share is required for all subapplications funded under BRIC. The non-federal cost share funding may consist of cash, donated or third-party in-kind services and materials, or any combination thereof. FEMA will provide 100% of the federal funding for management costs. Cost share amounts are as follows:

- Generally, the cost share for this program is 75% federal cost share funding/25% non-federal cost share funding.
- Hazard mitigation projects performed within, and/or that primarily benefit, a designated Community Disaster Resilience Zone are eligible for an increase in BRIC cost share up to 90%

federal/10% non-federal with the goal to lessen the financial burden on communities to perform resilience-related activities.

- Economically Disadvantaged Rural Communities (EDRCs) are eligible for an increase in funding, up to a 90% federal cost share/10% non-federal cost share. These are communities of 3,000 or fewer people, identified by the applicant, with residents having an average per capita annual income no more than 80% of the national per capita income, based on the best available data.
- For insular areas—including American Samoa, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands—FEMA automatically waives the nonfederal cost share for the recipient when the nonfederal cost share for the entire award is under $200,000. The applicant may request the waiver when they apply.
- FEMA provides 100% federal cost share funding for management costs.

Areas of Prioritization

FEMA's priorities for BRIC are to:

- Incentivize natural hazard risk reduction that mitigates multi-hazard risks to public infrastructure and disadvantaged communities as referenced in Executive Order 14008: Tackling the Climate Crisis At-Home and Abroad.
- Incorporate nature-based solutions, including those designed to reduce carbon emissions.
- Enhance climate resilience and adaptation.
- Increase funding to applicants that facilitate the adoption and enforcement of the newest editions of building codes.

The BRIC program also encourages Tribal Nations and local communities to participate in the Direct Technical Assistance (BRIC DTA) initiative. BRIC DTA provides tailored support to local communities and Tribal Nations that may not have the resources to begin climate resilience planning and project solution design on their own.

Through the initiative, FEMA offers wide-ranging, nonfinancial support to local communities and Tribal Nations, including climate risk assessments, community engagement, partnership building, and mitigation and climate adaptation planning. This type of support ranges from pre-application activities to grant closeout.

1.1.2. 2020 REPORT

In 2019, to support the development of the BRIC program, FEMA engaged in a comprehensive stakeholder engagement process to solicit feedback on the experience of applicants and subapplicants with the existing Pre-Disaster Mitigation grant program. These engagements helped FEMA learn about challenges stakeholders face when implementing mitigation programs and

projects and gather ideas and recommendations for how BRIC can be responsive to the complex resilience needs of states, locals, tribes, and territories. During this engagement process, FEMA received over 5,000 comments, 55 formal letters, and 20 letter-format emails from stakeholders that brought to light the challenges stakeholders face and ideas for how BRIC can address complex needs. The resulting report, *Summary of Stakeholder Feedback: Building Resilient Infrastructure and Communities (BRIC)* was published in March 2020.

1.1.3. 2023 REPORT

This 2023 report details the stakeholder feedback gathered during a three-month period from June to August 2023. During this time, the fiscal year (FY) 2022 funding application period had closed, and the review cycle was underway. In FY22, FEMA received 803 subapplications totaling more than $4.6 billion from 55 states, territories, and the District of Columbia. Of these submissions, FEMA received subapplications from 127 Economically Disadvantaged Rural Communities, a 15% increase from the previous year.

In May 2023, FEMA announced initial selections of 325 subapplications totaling $136 million across 55 states and territories and 34 tribes. This funding opportunity provided up to $2 million for every state and territory. This is double the amount of federal funding available in the previous year and a significant increase from the $600,000 available in 2020.

In addition, FEMA announced the selection of 46 diverse communities, Tribal Nations, and territories set to receive nonfinancial BRIC DTA to help build community-wide resilience.

In late August 2023, FEMA announced the selection of 124 competitive projects. These projects are across all 10 FEMA regions in 115 communities, including one tribe, in 38 states and territories, and the District of Columbia.

The stakeholder engagement detailed within this 2023 report signals FEMA's continued commitment to continuous improvement. The effort gathered feedback and perspectives from applicants and subapplicants as they navigated through the BRIC program. This effort aimed to assist FEMA to identify strengths and opportunities that can help shape and inform future recommendations that the BRIC program can adopt to support stakeholders as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards. This report contains no evaluation of any particular feedback or recommendation, nor does it indicate what changes FEMA may or may not decide to implement in the future but it will serve as a useful resource as BRIC expands its support across the nation.

During the 2023 stakeholder engagement effort, FEMA conducted a comprehensive engagement effort with stakeholders across all levels of government and stakeholders, including citizens and officials from other federal agencies, states, territories, tribes, businesses, critical infrastructure sectors, non-profits, academic institutions, and philanthropic organizations. FEMA solicited feedback on the BRIC program through a variety of channels that included four focus groups with 103 individuals, survey responses from 240 stakeholders, along with six letter-format emails. In total,

over 4,000 unique comments were gleaned from the effort. Each engagement activity was analyzed separately. The intent of this report is to detail the key feedback identified by stakeholders and to summarize their recommendations.

The report is organized into eight broad topics that emerged from the analysis and include:

- Application process
- Benefit-cost analysis (BCA)
- Nature-Based Solutions
- Building codes
- Capacity and Capability Building
- BRIC Direct Technical Assistance
- Equity
- Tribal-specific feedback

Each topic is contained within its own chapter and comprises its own set of stakeholder feedback and recommendations developed from all three engagement activities (survey, formal letters, and focus groups).

The stakeholder recommendations detailed in this report will be considered by FEMA in its continuous improvement of the BRIC program and benefit process improvements across FEMA's Hazard Mitigation Assistance (HMA) grant programs.

1.2. Key Stakeholder Feedback and Recommendations

The feedback from the survey, focus groups, and formal letters were coded and distilled into six cross-cutting themes that are woven throughout each of the key topic areas covered in this report. These themes include awareness, collaboration, eligibility, complexity, resolution, and transparency. While not a cross-cutting theme, we paid special attention to feedback from Tribal Nations and those that work with them.

1.2.1. AWARENESS

Stakeholders provided positive feedback on BRIC's success in building awareness around the topic of mitigation and the educational resources produced by the program. Several emphasized that the program's existence is vital to furthering the conversation in communities around the need to incorporate stronger mitigation activities in annual planning and recognized the first few years of implementation as building blocks for continued improvements. As one summarized, "The systemic approach for resilience is so important and it takes many years to socialize. Simply by doing it, you

are setting the stage and conversation, and the program's consistency and advancement will continue to help support this."

Although stakeholders were pleased with the improvements FEMA has made to its training sessions and webinar offerings, feedback regarding their awareness of the BRIC program largely focused on the **desire for better tools and resources** to assist applicants. At a basic level, many hoped that FEMA would create step-by-step guides for the application or provide standardized templates. Others wished for concrete examples of successfully funded projects or samples of successful application narratives.

Section 2.1.1, Stakeholder Feedback No. 2, provides a more detailed explanation.

1.2.2. COLLABORATION

Overall, stakeholders shared that **the process of applying for BRIC funding is an effective way to increase engagement in local communities**. For many stakeholders, the BRIC application process is rooted in collaboration. This is especially true for communities submitting as a subapplicant to their state or territory. Collaboration is required since the state or territory is assisting the local community with the application and is providing a first look at the community's project regarding eligibility.

Several stakeholders indicated the process facilitated communications and the knowledge of partnerships that otherwise may not have taken place, building community awareness around the importance of mitigation and planning. One stakeholder shared: "A significant aspect of the BRIC program that can be highlighted as a success is its innovative approaches to partnerships and the incorporation of nature-based solutions. By fostering partnerships and collaboration among various stakeholders, the BRIC program encourages collaboration and the pooling of resources to achieve more comprehensive and impactful mitigation efforts." Another stated, "I think it's helped to get locals to acknowledge hazards and mitigation to be more proactive than just reactive."

Although many reported the mitigation planning process itself is a good tool for fostering collaboration and coordination between local communities and state, tribal, and federal organizations, some noted they felt that the **lack of engagement between their state agency and themselves** resulted in their subapplication not being forwarded from the state to FEMA. Stakeholders want more ways to encourage more collaboration between local communities and their state, tribal, or territorial organizations, and this may be accomplished at the regional level.

Section 2.1.1, Stakeholder Feedback No. 5, provides a more detailed explanation.

1.2.3. ELIGIBILITY

Stakeholders from all types of organizations—local, state, tribal, and consultants applying for others—stated that they desired more clarity from FEMA regarding **what types of projects are eligible (and competitive) for BRIC funding**. Overall, stakeholders recommended FEMA develop more guidance regarding what types of projects are eligible (especially for nature-based solutions). Additionally,

stakeholders desired more clarity on **what a vulnerable, underserved, or disadvantaged community is**.

The two areas of the application stakeholders stated needed more clarification were the benefit cost-analysis and building codes criteria. For the BCA, **stakeholders found the content to be complicated, difficult to complete, and cost prohibitive**. As such, recommendations centered on creating more tools and training opportunities to assist applicants (Section 1.2.1, Awareness), waiving BCA requirements for budgets under a pre-determined threshold or offering more technical assistance to applicants (Section 1.2.5, Resolution).

Although some stakeholders praised the inclusion of scoring criteria for statewide building codes—"Advancing disaster resistant building codes through FEMA policies, programs, guidance, communications, and partnerships with state and local code officials are critical steps toward achieving a resilient nation"—others stated they **perceive that they are uncompetitive for BRIC funding since they live in a state without a statewide building code**. Given the number of states without mandatory statewide building codes, many stakeholders requested FEMA provide alternative scoring weights for communities in states without them.

The following sections provide a more detailed explanation:

- Section 2.1.1, Stakeholder Feedback No. 2
- Section 2.2.1, Stakeholder Feedback No. 7
- Section 2.7.1, Stakeholder Feedback No. 14
- Section 2.7.1, Stakeholder Feedback No. 15
- Section 2.8.1, Stakeholder Feedback No. 17

1.2.4. COMPLEXITY

The greatest concentration of stakeholder feedback and recommendations focused on issues and opportunities related to application complexity, especially as it relates to creating equity for vulnerable, underserved, and disadvantaged communities. Many stakeholders found the **application to be too complicated for internal staff to complete** and **necessitates the procurement of grant writing or engineering consultants** to successfully apply. Importantly, **procuring outside consulting staff is costly and inequitable** for many vulnerable, underserved, and disadvantaged communities. Completing the BCA was particularly challenging for applicants to complete without consultant assistance. Stakeholders recommended that FEMA increase its technical assistance to communities, specifically for grant writing and BCA assistance.

Others noted that **incorporating cost-effective and affordable nature-based solutions within their applications was complex**. Challenges around nature-base solutions included determining the benefits or the lack of data to support their assumed benefits, the cost of these activities (and how

to prove their worth within the BCA), and the need for additional budget to maintain these benefits after construction (which BRIC currently does not support). To support applicants incorporating nature-based solutions into their resiliency projects, stakeholders recommended FEMA provide clear guidelines or a platform of appropriate data sets for applicants to use, adjust the BCA to better account for these project activities, and include ongoing, post-construction maintenance costs in BRIC funding.

The following sections provide a more detailed explanation:

- Section 2.1.1, Stakeholder Feedback No. 1
- Section 2.2.1, Stakeholder Feedback No. 7
- Section 2.2.1, Stakeholder Feedback No. 8
- Section 2.7.1, Stakeholder Feedback No. 15
- Section 2.8.1, Stakeholder Feedback No. 18

1.2.5. RESOLUTION

Many stakeholders reported the length of time from application to award as a significant barrier. Some stakeholders reported the award timeline is impactful because their submitted **budgets are no longer adequate** to complete their proposed project. **This delay places the burden of extra costs on the communities**, which may result in vulnerable, underserved, and disadvantaged communities no longer being able to complete their proposed project.

Additionally, the time from application to award can create strain. One stakeholder shared the difficulties they encountered in maintaining engagement throughout the application process: “The main burden is the length of time from applications are due and the actual award of the grant. We have seen applicants lose interest or compete with other priorities to administer the grant. There have been a few times where the applicant has withdrawn their project, hence we lost out on another mitigation opportunity.” Other stakeholders highlighted the need for better communication regarding application milestones: “It is a burden to have to constantly check in with the State to see where we are in the process.”

With the goal of increasing equity for all applicant communities, stakeholders suggested that FEMA either allow successfully funded applicants to modify their budgets after awarding or standardize its review period so applicants can adjust budgets to account for inflation and rising costs in their applications.

The following sections provide a more detailed explanation:

- Section 2.1.1, Stakeholder Feedback No. 4
- Section 2.8.1, Stakeholder Feedback No. 19

1.2.6. TRANSPARENCY

Stakeholders requested continued and expanded transparency by FEMA regarding BRIC program eligibility and the award process: "The review process needs transparency. Every applicant should receive their technical and qualitative scores after the review is completed." These stakeholder feedback and recommendations echo other findings including stakeholder desire for greater transparency by FEMA on **what types of projects are eligible** for funding and the **length of the review cycle** as it relates to funding and match requirements.

The greatest number of comments focused on how costly it is to apply, report on, manage, and implement BRIC projects. Although communities are willing to shoulder these costs, they stated they hoped FEMA would explore opportunities to enhance transparency regarding application and implementation requirements, along with feedback on why their projects were denied funding. Some indicated that while FEMA's existing webinars, support materials, and technical assistance were helpful, they hoped the agency would expand on these activities to better assist communities.

The following sections provide a more detailed explanation:

- Section 2.1.1, Stakeholder Feedback No. 1
- Section 2.1.1, Stakeholder Feedback No. 4
- Section 2.7.1, Stakeholder Feedback No. 15

1.2.7. TRIBAL-SPECIFIC FEEDBACK

From language barriers to a lack of access to technology and grant writers, Tribal Nations stated they face unique obstacles when navigating the BRIC application process. Although responses from Tribal Nations or those developing an application for a Tribal Nation were varied, common issues revolved around the **accessibility of the application, challenges related to Tribal Nations' differing governance structures**, and difficulties in qualifying for funding given **match requirements**.

Tribal representatives expressed challenges with the BRIC application period closing in January because this conflicted with the cycle for some tribal leadership elections. The current timeline creates an obstacle for Tribal Nations getting buy-in or approval from newly elected leaders on existing grant applications. They recommended shifting the closing date for the grant application to a later date (e.g., in February or beyond).

Section 2.8 provides a more detailed explanation.

1.3. Data Collection and Analysis

The BRIC program is committed to continuous improvement and enhancing customer experience. Therefore, it undertook a three-pronged approach to solicit insights and feedback from stakeholders. FEMA gathered feedback from stakeholders across all levels of government and organizations,

including citizens and officials from other federal agencies, states, territories, tribes, businesses, critical infrastructure sectors, nonprofits, academic institutions, and philanthropic organizations.

1.3.1. STAKEHOLDER SURVEY

The first method used to gather feedback was through the BRIC 2023 Stakeholder Engagement Survey, which was published on SurveyMonkey, an online survey tool, and comprised 42 open-ended questions that covered the following topic areas:

- BRIC Application Process
- Equity
- Benefit-Cost Analysis
- Climate Resilience and Nature Based Solutions
- Infrastructure & System-Based Mitigation
- Building Codes Adoption & Enforcement
- Capability and Capacity Building
- BRIC Direct Technical Assistance
- Delivery of Federal Assistance and Resource Management
- Knowledge transfer

FEMA issued the BRIC 2023 Stakeholder Engagement Survey from June 21 – Aug. 31, 2023. The survey covered the preceding topic areas and received responses from 240 stakeholders. The exact response rate of the survey is unknown since the link to the survey was published on the BRIC website and was not distributed to a discrete number of individuals. Additionally, all questions within the survey were optional.

Although some respondents replied to every question, not all provided answers or data. Forty-two percent of stakeholders did not provide their affiliation and another 43% stated they were members of state or local government. Other represented sectors included federal, tribal, utility/transit, nonprofit, and industry/consulting, but none accounted for more than 4% of respondents.

Regarding geographical distribution, 46% of stakeholders did not provide information regarding which FEMA region they fell within. Of the 52% of stakeholders who did provide regions, representation across the 10 regions was very balanced as each region comprised between 4% and 6% of all survey stakeholders.

The remaining respondents (2%) reported being nationwide or stated that they represented multiple FEMA regions. No single region was disproportionately overrepresented in the survey analysis. Figure-2 shows the number of responses from each region.

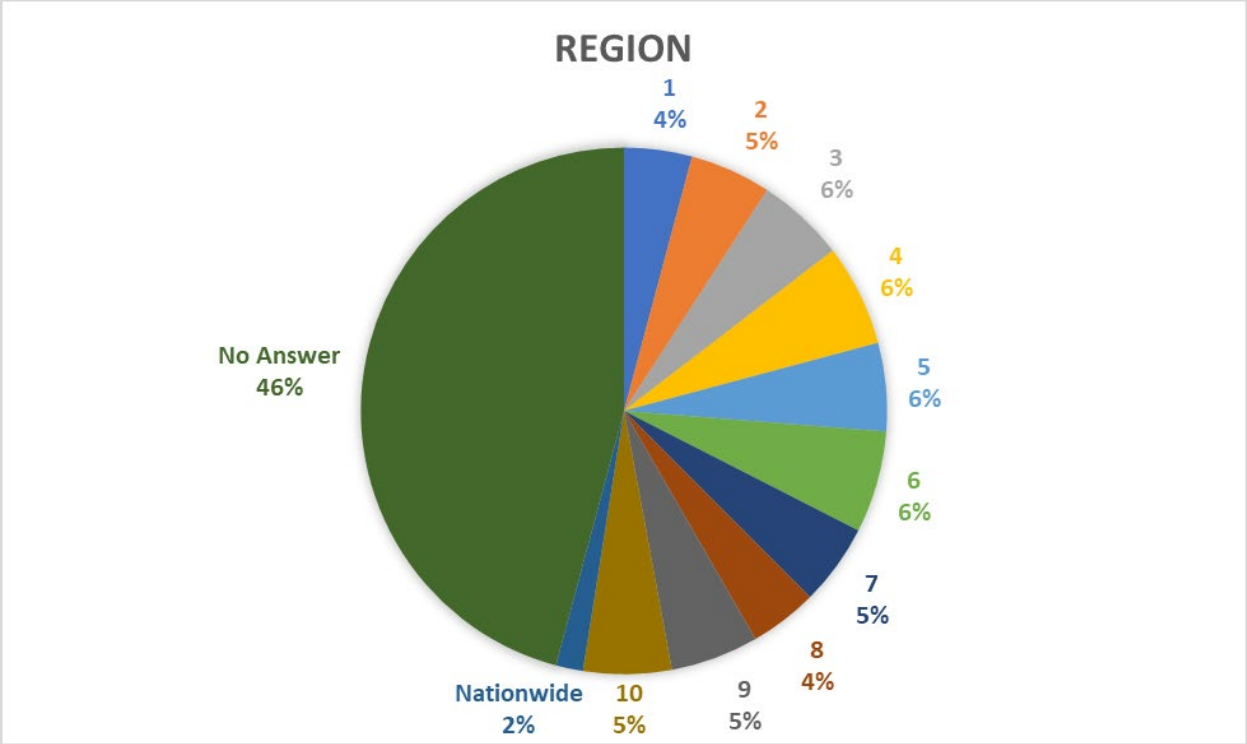

Figure 2. Survey Geographical Distribution by FEMA Region

Since the survey was distributed electronically, those without adequate technological access may have been prevented from participation. As discussed in Section 2.8.1, Stakeholder Feedback No. 16, this may account for the lack of tribal feedback in the survey.

To analyze the survey responses, each comment was cataloged electronically to include the full text of the response, the date, and, if provided, the respondent's affiliated organization and FEMA region. Initially, the comments were qualitatively coded by an interpretive code and further distilled into descriptive codes as part of the overall thematic analysis. Appendix B provides the full list of questions that were part of the BRIC 2023 Stakeholder Engagement Survey.

1.3.2. FOCUS GROUPS

FEMA conducted four focus groups throughout June – August 2023. A total of 103 participants provided feedback to FEMA during these sessions. Table 1 includes additional details for each focus group.

Table 1. BRIC Stakeholder Focus Groups

Date	Event	Approximate Number of Participants
June 6, 2023	Hazard Mitigation Assistance External Stakeholder Working Group (ESWG) Meeting	10
July 9, 2023	Natural Hazards Workshop Listening Session	30
July 13, 2023	National Hazard Mitigation Association (NHMA) Practitioners Meeting	30
August 16, 2023	Inter-Tribal Emergency Management (ITEMC) Summit	33
	Total Participants	**103**

To analyze the feedback gathered from the focus groups, each comment was cataloged electronically to include the full text of the response, the date, and, if provided, the respondent's affiliated organization. Initially, the comments were qualitatively coded by an interpretive code and further distilled into descriptive codes as part of the overall thematic analysis. Appendix C provides the full list of questions that were part of each focus group.

1.3.3. FORMAL LETTERS

FEMA created a dedicated inbox (FEMA-BRICFeedback@fema.dhs.gov) for stakeholders to share their experiences and feedback with the BRIC program. FEMA received six formal letters from June 29 - Aug. 31, 2023. Letters were received from emergency management, utility and builders' groups, and organizations. Appendix D provides a full list of organizations that submitted formal letters.

These letters were reviewed in their entirety and the feedback within them was summarized into key themes that were further distilled into strengths, challenges, and recommendations.

2. Stakeholder Feedback and Recommendations

Eight broad topics emerged from the analysis of the 2023 BRIC Stakeholder Engagement. The topics are: 1) Application; 2) Benefit-Cost Analysis; 3) Nature-Based Solutions; 4) Building Codes; 5) Capability and Capacity Building; 6) BRIC Direct Technical Assistance; 7) Equity; and 8) Tribal-Specific Feedback. This section explores each of the topics and its respective themes and recommendations.

2.1. Application Process

Cross-Cutting Themes	Stakeholder Feedback
Application Process	
Complexity	Stakeholders reported that completing an application required significant resources including hiring external consultants and that this may be inequitable for many small, rural, and disadvantaged communities.
Complexity, Awareness, Transparency	Stakeholders reported that resources currently available to support application development have been useful. However, they also expressed a desire for more standardized resources to reduce the complexity of the application process.
Complexity	Stakeholders reported that the application period falls during a time when many staff are on holiday and personal leave, which makes it more difficult for communities to apply.
Resolution, Transparency	Stakeholders explained that a lengthy application review period results in a gap between proposed budgets and actual costs at the time of award funding.
Collaboration	Although some stakeholders described positive relationships and support from state emergency management agencies (EMAs), stakeholders more commonly reported that needing to work through state EMAs created challenges.
Complexity	Stakeholders requested improvements to enhance the experience of submitting a subapplication.

Stakeholders shared feedback and recommendations regarding the application process related to the six cross-cutting themes found across the stakeholder engagement: awareness, collaboration, eligibility, complexity, resolution, and transparency. Overall, stakeholders reported challenges related to the complexity of the application process, the duration of the application review period, and missed opportunities for applicants and subapplicants to collaborate with local, state, regional, and other government agencies that could otherwise strengthen their grant application.

As discussed at greater length in Section 2.1.1, Stakeholder Feedback No. 1, and Section 2.7.1, Stakeholder Feedback No. 15, the number one concern stakeholders noted was the application's

complexity often necessitated the hiring of external consultants to write the grant or provide support to complete sections like the Benefit-Cost Analysis. Many noted this need for external support may impact the application success of small, rural, and disadvantaged communities and recommended that FEMA "provide application development assistance to lower income communities."

Some stakeholders praised FEMA's work at reducing application complexity by creating webinars, trainings, manuals, and other materials: "The program priorities and eligibility are adequately explained in the NOFO and accompanying webinars." However, many others requested the creation of additional materials such as checklists, templates, and lists of types of eligible or ineligible projects.

Regarding application deadlines, several stakeholders requested FEMA reassess its deadlines and potentially shift them away from the end of the calendar year. They noted that many staff took time off around the holidays, which reduces their capacity to successfully complete and submit applications.

Others specifically requested FEMA reassess its review period for applications: "The timeline for the BRIC grant application process can be lengthy, leading to delays in funding decisions and project implementation." Stakeholders commented a lengthy review period leads to a gap between the initially proposed budget and the actual cost of labor and materials once funding is awarded, which sometimes results in communities abandoning projects because of a lack of local funding. To alleviate this concern, stakeholders requested that FEMA either allow applicants to amend budgets after funds are awarded or provide a standardized review period that allows applicants to adjust their proposed budgets to forecasted inflation.

Another stakeholder concern related directly to collaboration: some applicants expressed worry their lack of engagement with state EMAs or other regional partners may hinder their applications' success. Sometimes, stakeholders perceive that states may not prioritize BRIC applications: "The process of routing the application process through the State Emergency Management Office is cumbersome and it is not always seen as a priority at the State level."

Although stakeholders did not recommend any proposals for FEMA to consider regarding strengthening the relationship between stakeholders and their state partners, some did suggest it would help if FEMA published a resource page of all types of federal funding opportunities for communities to apply. This clearinghouse could support those stakeholders who perceive they may not be able to rely on state partners to direct their projects to the appropriate funding opportunity, BRIC or otherwise.

Finally, stakeholders suggested FEMA review FEMA Grants Outcomes (FEMA GO) for technical (information technology [IT]) issues that included missing information that the applicant had originally included, applicant error notifications, and redundant fields and questions to enhance the overall user experience as applicants and subapplicants complete the BRIC application.

2.1.1. STAKEHOLDER FEEDBACK

1. Stakeholders reported that completing an application required significant resources including hiring external consultants and that this may be inequitable for many small, rural, and disadvantaged communities.

***Theme(s):* Complexity**

"BRIC is a complicated application that requires significant staff, time, resources, and capacity to submit. Research has repeatedly found that rural and lower capacity communities do [not] have the resources to access BRIC."

As also discussed in Section 2.7.1, Stakeholder Feedback No. 15, the number one concern regarding equity and the application process was that small, rural, and disadvantaged communities do not have enough staff to support the successful submission of a BRIC application. Because of this, many stakeholders felt awards were only going to large, well-funded cities with extensive staff including grant writers and engineers.

Although some reported they have dedicated staff to complete their applications, most stakeholders stated they either needed to hire consultants, or they were the consultants (the stakeholders), to complete applications for local communities. However, for those with adequate staff, the amount of time they stated required to complete the application was substantial: "One staff member devotes almost 100% of their time from about October to December to complete an application(s). The staff engineer completing the BCA also devotes multiple months to completing it" and "The last application took 100 hours of a staff member to complete."

Respondent concerns regarding the need to hire consultants included the following:

- "We spent tens of thousands to get a consultant's assistance with completing BRIC last year."
- "In one application we assisted with, the engineering costs for the feasibility study for the project cost over $100,000. The grant writing and community engagement for the project was provided to the community pro bono but likely cost over $20,000."
- "Developing a BRIC application demands significant resources, such as staff time, technical expertise, and financial investments. The level of effort to prepare the necessary documents can amount to up to almost 1.5 to 2 years of full time equivalent (FTEs) of staff time or over $100,000 of consultant fees. Smaller organizations and disadvantaged communities with limited resources may find it challenging to allocate sufficient resources for the application process, particularly given the risk of rejection."

Stakeholders recommended that FEMA create a pathway for small, rural, and disadvantaged communities to request more robust technical assistance to complete applications. One recommendation was that FEMA "Supply a grant writer for all communities under 10,000 population" or that FEMA should "Provide application development assistance to lower income

communities." Others suggested that FEMA "Potentially consider a rural, small community track that comes with an easier application and some initial funding support and guidance to help get a project off the ground." There was broad agreement that additional technical assistance would help reduce application complexity for applicants with fewer resources.

2. Stakeholders reported that resources currently available to support application development have been useful. However, they also expressed a desire for more standardized resources to reduce the complexity of the application process.

***Theme(s):* Complexity, Awareness, Transparency**

"The BRIC application takes months to prepare. It is by far the most detailed, technical and complicated application of any my organization has sought."

FEMA provides various resources and tools to help stakeholders navigate application development and project implementation. Program support materials (PSMs), job aids, webinars, and other resources are available to inform and reduce the complexity of the BRIC program for applicants and subapplicants. Many stakeholders indicated that when developing subapplications, the training sessions and webinars provided vital opportunities to engage with and understand important components of the application process.

During a focus group, one stakeholder commented, "Breaking down steps in webinars has been helpful to complete subapplications." Other stakeholders pointed to the importance of leveraging these trainings post-session, sharing, "I like that they are recorded to go back and watch if we're not available to make the live session," while some "use screenshots from those to create our own state-produced webinars."

Others emphasized the funding opportunity, technical evaluation criteria (TEC) and qualitative evaluation criteria for program support materials, and the HMA Guide were also helpful. One commented, "The Job Aids and NOFO [frequently asked questions] have been extremely helpful at understanding the program at a quick glance, and we refer to them often when explaining things to subapplicants." Some stakeholders highlighted the importance of robust technical support materials, sharing, "The Qualitative and Technical criteria documents are long and complicated, but they have ultimately been helpful."

Constructive feedback was shared regarding the overall complexity of the application process itself. Many reported they felt the BRIC application requirements were unclear. As one stated, "I was not sure how much detail/information was needed for certain sections. For example, I think it was the budget narrative. I was not sure of the format or how much information is needed. It was also unclear where to upload documents as it relates to certain categories."

This lack of clarity was echoed by other stakeholders who hoped for better prompts on what types of documents to upload in each section in FEMA GO or what types of codes and standards were required to be included in engineering designs. One proposed that creating "an all-encompassing

application guide that walks you through a suggested step-by-step process for completing various application types, not just a FEMA GO guide" would simplify the overall process.

Several stakeholders requested that a standardized template be created for applicants to "plug and play" information. These responses included the following:

- "FEMA can create standardized application templates for each attachment, including predefined sections, headings, and formats to ensure consistency across applications."
- "There should be a downloadable template of the full subapplication (including clarifying the logic-based questions that arise when you respond to different questions)."

Stakeholders also recommended FEMA create a simple, standardized checklist of application requirements. Several stakeholders suggested the ways in which this tool would be helpful: "There needs to be a detailed checklist with all the expected elements and references to where the documentation on what is needed for that element is located along with if it is required or not" and "Provide a checklist of required support documentation within FEMA GO and require completion of the checklist."

Others requested that FEMA publish a list of the different types of projects that are ineligible for funding. Responses included, "On the FEMA fact sheet, insert a text box with types of projects that are ineligible" and "Define the project types, what is and isn't allowable." Additionally, when applications are denied, stakeholders requested that FEMA provide clear answers as to what components of the project were ineligible for funding.

One recommendation was to provide applicants with the scoring matrix for their application post-denial, sharing that they would like to see "What the scoring matrix is. Why some projects are selected over others." Another suggestion was for FEMA to create "A repository of approved projects and how they scored - full application - that can be viewed by project developers."

Additionally, some stakeholders wanted more communication about the time it takes for FEMA to review and approve or deny an application: "The biggest piece of missing information is clear expectations about how long it will take to be awarded. There's not a good source of information about timelines." More discussion regarding time to resolution for applications can be found in Section 2.1.1, Stakeholder Feedback No. 4.

Overall, several participants agreed that the application experience had improved over time. Stakeholders shared the number of requests for information (RFIs) was significantly reduced: "It means a lot to us. The first time we applied, we had a lot of RFIs, and now we have none. I don't know if that's us learning or the process overall getting easier. But that speaks volumes to becoming navigable. This time we had a department that never participated in these grants prior to this year, but they were able to get it in."

3. Stakeholders reported that the application period falls during a time when many staff are on holiday and personal leave, which makes it more difficult for communities to apply.

Theme(s): Complexity

"The timing of the application being pulled together over Thanksgiving and December holiday's isn't a great time to have as a deadline.

In addition to struggling with having enough qualified staff to complete the application (Section 2.1.1, Stakeholder Feedback No. 1, and Section 2.7.1, Stakeholder Feedback No. 15), several stakeholders emphasized the constraints they faced in completing the BRIC application during the end of the calendar year, specifically during November and December. This is when staff are given holiday time, and many take extended paid time off to be with their families and friends. As one stated, "The deadline/submittal date means applicant (and subapplicant) staff are not able to have family time during the holiday season and also provide quality applications."

These stakeholders recommended that FEMA shift its application deadlines: "The application process is very involved, and it would be helpful to shift the BRIC time period so that it does not fall during the holidays. At the very least it would be helpful to extend the FEMA deadline out to March or April."

4. Stakeholders explained that a lengthy application review period results in a gap between proposed budgets and actual costs at the time of award funding.

Theme(s): Resolution, Transparency

"The delays in the award of projects has been extremely challenging for implementation. Local budgets are planned around certain timelines, and FEMA's delays in granting awards cause major delays and challenges for budgeting and project planning."

Similar to the feedback gathered in the 2020 Summary of Stakeholder Feedback, the primary message regarding the application timeline was that stakeholders want more time to complete the application and swifter review periods. As one stated, "The main drawback is how slow they are. You have to wait a year to get funded, then do the scoping, which takes another year, then apply for the project which IF SELECTED takes another year or two to be funded."

One concern regarding the lengthy review period is when an application was submitted, a very detailed, technical budget was prepared to support the proposed project. However, when it takes over 12 months for the project to be selected, the budget was no longer appropriate, especially given the national increases in both labor and equipment costs. One respondent stated, "It's taking way too long and this impacts the project timelines and budgets, and ultimately whether the projects can even move forward." Another respondent stated that because of this process, "It is very difficult for all but the most resourced communities to maintain the match fund set-aside for the 3-5 years projects are in FEMA review."

Stakeholders proposed that the release of funds from FEMA takes no more than 24 months. A second suggestion was to build in a standardized budget adjustment for all projects that are funded: "FEMA should allow for a +10-15-percent adjustment buffer in the initial application to cover unanticipated cost changes to service contracts that may take place during BRIC's lengthy award distribution process."

5. Although some stakeholders described positive relationships and support from state Emergency Management Agencies, stakeholders more commonly reported that needing to work through state emergency management created challenges.

Theme(s): Collaboration

"The process of routing the application process through the state Emergency Management Office is cumbersome and it is not always seen as a priority at the state level."

Stakeholder feedback was mixed regarding the successes and challenges of collaborating with state entities during the application process. Some reported positive relationships with their state EMAs: "State staff provide a pre-application and BCA review prior to submittal and support communities in understanding and implementing recommended changes or additions" and "Our state National Database for Emergency Management (NDEM) is and has assisted us in the guidance so far."

This successful engagement was most noted by state-level stakeholders who reported that they provide assistance to localities regarding project eligibility for BRIC or other grant funding opportunities. One noted, "As a state emergency management office, we solicit project proposals from subrecipients throughout the state. When we receive proposals, we determine if Flood Mitigation Assistance would be an option. In most cases, it is not. If we have available [Hazard Mitigation Grant Program] funding, then we determine if an application will be more successful in BRIC or [Hazard Mitigation Grant Program]." However, some detailed the need for greater transparency in application progress and appropriateness to improve applications for future opportunities, as one applicant summarized: "We typically refer to other mitigation programs and we also work with the [U.S.] Environmental Protection Agency (EPA) state revolving fund for projects not selected with FEMA. We do try to see if the application can be improved to apply the next year. However, with little or no feedback from FEMA, this is very difficult."

Other stakeholders noted that local communities sometimes lack strong relationships with their state EMA and, as a result, feel they are less successful in being selected for submission to FEMA. As one stated, "Local governments must apply through the State. If the State Office of Emergency Management does not adequately communicate requirements (for example ours did not have the updated FEMA BRIC guidance or application materials on their website but they emailed them out only to a select few) it is difficult to understand the process and requirements." Additionally, some applicants perceived the BRIC application was not a priority for their state and, as a result, they were not provided the assistance that was required to submit the application: "The process of routing the application process through the state Emergency Management Office is cumbersome and it is not always seen as a priority at the state level."

Very few recommendations regarding this concern were given by stakeholders, with most expressing a general request for more coordination and engagement. Several requested FEMA expand its existing engagement activities to include more regional partners like coastal programs and public health organizations. One encouraged FEMA "to collaborate with coastal programs through the mitigation planning process and in delivering technical assistance, encourage the use of nature-based solutions, and improve the clarity of BRIC evaluation criteria." Another remarked, "While public health is mentioned in BRIC materials, there is potential for more partnership and involvement by public health departments, hospitals and other health care facilities in BRIC projects." One stakeholder noted the recommendation at its most basic level is for FEMA's continued engagement across all levels of partners: "Communities really struggle to find the right grant program to fund their project. Given the massive increase in federal funding over the last few years, many communities have anxiety that they're 'missing out.' Our organization tries to match communities with the right grant program, but we are constantly learning about new funding sources. Federal agencies must coordinate better across agencies and work in partnership with communities to make sure that no one is being left behind."

6. Stakeholders requested improvements to enhance the experience of submitting a subapplication.

Theme(s): Complexity

"Present the criteria and priorities in very basic to understand language."

Stakeholders reported the BRIC application contained many technical issues, typos, and redundancies. Although they did not explicitly recommend FEMA fix technical issues or remove typos and redundancies, their recommendation is implicit within their statements.

Regarding technical issues, some expressed frustration with the user experience of FEMA GO: "I needed help from IT. It was also frustrating that the form could not be saved before it was completely done" and the BCA Toolkit "is buggy and crashes on my team when we try to use it. We have called the BCA help line and followed their instructions but kept running into bug after bug." Addressing system errors that prevent applicants from accessing, submitting, or resubmitting would prevent communities from expending additional time and resources to apply.

In addition to the technical issues, some asked that FEMA review its flow of questions to determine if there is a way to streamline RFIs. One respondent requested that FEMA "Create [an] application that creates a flow of information about the project instead of bouncing around from topic to topic and then circling back around to slightly different questions that requires the same information and response."

Some stakeholders were frustrated by redundant questions and RFIs within the application. One stakeholder stated, "The application included a Scope of work and a budget with corresponding tasks. After submittal we were asked for a 'Budget Narrative', which seemed a little redundant. Is it possible to structure the application forms so that requirement is clear and not a repeat of other information."

Finally, several requested that FEMA review its application to remove all jargon to help applicants better understand eligibility requirements. To address equity, simplifying language makes the application more accessible to applicants from all backgrounds. The request to "Use simple and direct language" was repeated, in various terms, by multiple stakeholders.

2.1.2. STAKEHOLDER RECOMMENDATIONS

- Create a pathway for small, rural, and disadvantaged communities to apply for and gain access to technical assistance for grant writing and engineering studies.
- Create the following tools and resources to assist applicants:
    - Step-by-step guides on how to complete each section and what types of documents and data are required for each section
    - Standardized application template for applicants to use when developing their application
    - Checklist of all requirements for the application
    - Standardized list of links to data tools and resources for applicants to access
    - Examples of successfully funded projects and samples of their applications
    - List of types of projects that are ineligible for funding
- Move the application period away from November to December of each year to allow communities to ensure that they have the proper staff on hand to complete applications.
- Standardize the review period of each application and allow for communities to forecast inflation and other rising costs in their submission.
- Continue to prioritize partnerships and collaboration across departments, agencies, and applicants/subapplicants to create efficiencies in the application process.
- Review the application for the following items:
    - Technical issues such as typos, bugs, and broken links
    - Jargon or other technical language that may not be clear to applicants who are not well versed in FEMA terminology
    - Redundant questions and RFIs

2.2. Benefit-Cost Analysis

Cross-Cutting Themes	Stakeholder Feedback
BCA	
Eligibility, Complexity	Although stakeholders gave positive feedback on BCA enhancements and tools, many stakeholders reported that the BCA is complicated, difficult to complete, and cost prohibitive.
Eligibility, Complexity	Stakeholders reported struggling to find data to support the inclusion of nature-based solutions into the BCA.

The BCA has been a requirement of some BRIC subapplication types and is a method that determines the future risk reduction benefits of a hazard mitigation project and compares those benefits to its costs. Within this method, the resulting benefit-cost ratio (BCR) is considered cost-effective when it is 1.0 or greater. To help stakeholders complete a BCA, FEMA developed the BCA Toolkit, a macro-enabled Excel template that assists applicants in estimating annual hazard risks, evaluating mitigation cost-effectiveness, and developing aggregate benefit-cost models.

In the 2022 application cycle, the implementation of the BCA was changed in three significant ways. First, the cost-effectiveness test for projects was expanded to allow certain subapplicants the ability to use a 3% discount rate.

Second, FEMA allowed highly socially vulnerable communities with a Social Vulnerability Index (SVI) rating of 0.80 or higher to request help from FEMA to perform the BCA during the national technical review process. This BCA assistance also applied to tribal projects, territories, and Economically Disadvantaged Rural Communities.

Third, the social benefits allowed in the BCA Toolkit was expanded so any project could include social benefits without needing the engineering loss of function BCR to be above 0.75, the requirement in the past for including social benefits. However, some of these changes had not been implemented for all applicants in an application period when stakeholders responded to the survey, focus groups, and letters (FY22 funding opportunity).

For these stakeholders, the major concern was that they found the BCA to be complicated, difficult to complete, and cost prohibitive. A secondary concern was that many found it difficult to incorporate nature-based solutions into the BCA itself because of a lack of appropriate climate change data or the expenses associated with constructing and maintaining nature-based solutions.

Recommendations mirrored those discussed in Section 2.1.1, Stakeholder Feedback No. 2, and largely focused on the request for FEMA to provide more technical assistance to applicants to ensure they know how to complete the BCA accurately. Some suggested the creation of more guides and tutorials, while others requested more “hands-on” learning opportunities, whether in person or

online. One recommendation summed it up holistically, asking for, "Training videos and supplemental guides, offer additional technical assistance--even as far as sitting with an expert live to help them walk through it."

Other recommendations requested FEMA waive the BCA requirement for projects under a pre-determined budget threshold to promote equity for all applicants. As noted above, this was addressed in the FY23 funding opportunity, but the feedback and recommendations are still included within this section.

Regarding the difficulties some found with incorporating nature-based solutions into the BCA, recommendations focused on FEMA providing more guidance regarding what climate change data sets to use and also reviewing and adjusting its BCA criteria to better account for the unique costs associated with constructing and maintaining nature-based solutions. One stakeholder commented, "It would be helpful if FEMA had sample runs or more information regarding standard values that can be used for nature-based solutions. Also, more information about preferred nature-based solutions/materials or best practices."

2.2.1. STAKEHOLDER FEEDBACK

7. Although stakeholders gave positive feedback on BCA enhancements and tools, many stakeholders reported that the BCA is complicated, difficult to complete, and cost prohibitive.

Themes(s): Eligibility, Complexity

"The BCA is so complicated that I would recommend having a consultant who does these conduct the BCA."

As with the complexity of the application process (Section 2.1.1, Stakeholder Feedback No. 1), stakeholder feedback regarding the overall complexity of the BCA was mixed. Several reported that the "BCA was not difficult," that it "set a standard for work completed that's easy to use and templated," and that "the toolkit makes it easy to enter in structures and utilities and calculate benefits generated by the mitigation activity."

Additionally, some stakeholders emphasized "the alternate methods have made it a bit easier to determine cost effectiveness" and that the inclusion of pre-calculated benefits was helpful. For some, "pre-calculated benefits for generators have helped in several cases where providing outage data from utilities proved difficult," and "pre-calculated benefits have greatly increased the efficiency and ease of review for acquisition and elevation submissions." These types of stakeholders reported feeling "heartened by the way FEMA is changing the BCA."

However, other stakeholders found the BCA complicated, difficult to complete, and cost prohibitive. This feedback aligns with Section 2.1.1, Stakeholder Feedback No. 1, in which stakeholders reported the application was complicated and cost prohibitive. Feedback centered on the cost of procuring external contract support to complete the BCA: "The most resource intensive pre-award cost is the benefit-cost analysis for construction projects, which often requires contractual support." Some

reported having staff on hand to complete the BCA, but others reported the cost of hiring a consultant cost as much as $50,000. As one explained, “For an under-resourced community, it may be too expensive to pay for a BCA or considered too risky, as the application may not be successful.”

Some stakeholders pointed out that other grant programs outside of FEMA calculate cost-effectiveness differently. Stakeholders noted the U.S. Department of Transportation and the U.S. Department of Housing and Urban Development (HUD) offer different project cost-effectiveness guidance and methodologies. Many stated that when non-FEMA programs require a value analysis or BCA as part of the application process, it is either less involved or is not required for projects under a certain budget threshold. One respondent stated, “For many grant programs at agencies outside of FEMA, project cost must meet a certain threshold for an applicant to be required to justify its cost-effectiveness. This saves the applicant time and money by allowing them to forgo a detailed BCA for smaller or more routine projects.”

Other stakeholder recommendations included having FEMA consider “a HUD designed equation that estimates low to moderate income levels via census data and bases funding allowability for a project on a dollar amount per percentage point up to a specified limit” like state-level Community Development Block Grant programs or incorporating “qualitative future values with larger variations of projected amounts and impact numbers” like U.S. Department of Transportation programs.

As also noted in Section 2.1.1, Stakeholder Feedback No. 2; Section 2.7.1, Stakeholder Feedback No. 15; and Section 2.8.1, Stakeholder Feedback No. 18, stakeholders recommended that FEMA provide technical assistance to help under-resourced applicants complete a BCA. One respondent stated that it would be helpful if FEMA provided an “updated guide that identifies and explains the necessary inputs for EACH project type, so the applicant doesn't have to develop their own methodology and criteria that ultimately gets rejected).”

More hands-on assistance like online or in-person trainings for the BCA were requested as well: “Conduct training on how to find the input quantities. Conduct training on how to calculate the recurrence interval, population serviced numbers, delay time for rerouted traffic. Explain terms like ‘ecological benefits’ and ‘pre-mitigation damages.’ Help us use the tools and data we have to repackage it the way you want to see it.”

Some stakeholders also suggested waiving the BCA for communities submitting smaller projects under a certain budget threshold. This would specifically promote equity to vulnerable, underserved, or disadvantaged communities: “minimum project cost for BCA requirement would vastly reduce the burden on smaller communities with less capacity.” This recommendation was addressed by FEMA in its FY23 funding opportunity.

8. Stakeholders reported struggling to find data to support the inclusion of nature-based solutions into the BCA.

Theme(s): Eligibility, Complexity

"It would be helpful if FEMA could provide data sources acceptable to use to document climate change impacts for the purposes of the BCA."

Many stakeholders reported difficulties in finding the correct data to support the inclusion of nature-based solutions the BCA. This lack of data frustrated those who wanted to adequately prove the benefits of their proposed projects in the application. These stakeholders reported overall that climate change data is varied and often not granular enough to support local projects, especially for communities not located along the coast. Comments included the following: "we might know that the state as a whole can expect a certain change, but knowing the localized impact is harder." Others reported a "lack of experts in climate change and nature-based solutions for the desert areas" and that "the midwest doesn't have the datasets the coastal areas do."

Stakeholders indicated that, because of this lack of localized climate change data and the BCA's existing formulas, it was difficult to show the benefits of nature-based solutions. Stakeholders stated that the "BCA toolkit was not detailed enough and not flexible enough to allow for input of many nature-based solutions' benefits." One specific request for more guidance on the BCA was specific for applicants in heat-impacted areas: "I think FEMA needs to provide more guidance for heat projects (resiliency hubs, heat proofing assets, etc.). What is eligible and not? How can we put together FEMA compliant BCAs for heat?" Overall, concerns centered on whether n nature-based solutions fully show a positive cost-benefit ratio. The reasons why, including construction and maintenance costs for nature-based solutions, are discussed further in Section 2.3.1, Stakeholder Feedback No. 10.

Regarding the concern of a lack of applicable climate change data for inclusion in the BCA, stakeholders recommended FEMA clarify its data expectations: "we would appreciate more clarity from FEMA on what climate change datasets and models are appropriate to use to effectively demonstrate the impact in BRIC applications." Another suggested, "It would be helpful if FEMA could provide data sources acceptable to use to document climate change impacts for the purposes of the BCA." Including preferred data sources within a guideline (Section 2.1.1, Stakeholder Feedback No. 2, provides further discussion) would help applicants use the most accurate data to support their proposed project plans.

Stakeholders also recommended FEMA adjust BCA criteria to better account for nature-based solutions. Since these project types and activities are often more expensive than traditional projects, entering their costs into the BCA tends to render them cost-ineffective. Recommendations included requesting FEMA "allow subapplicants to subtract/discount nature-based solutions costs from the BCA" or "improve the BCA multiplier for nature-based solutions projects, this would lower the barrier for good projects using NBS." Additionally, a respondent stated, "It would be great if certain nature-

based projects could be automatically considered cost-effective because we KNOW they are good for the environment and will help alleviate flooding."

2.2.2. STAKEHOLDER RECOMMENDATIONS

- Promote equity among applicants from vulnerable, underserved, or disadvantaged communities by waiving the BCA requirement for budgets under a pre-determined budget threshold.
- Provide technical assistance to applicants to ensure that the BCA is being completed accurately.
- Create more tutorials, guidelines, and training opportunities to help applicants understand how to complete the BCA.
- Provide guidance regarding what climate change data sets should be used to support applications incorporating nature-based solutions.
- Adjust the BCA criteria to better account for nature-based solutions.

2.3. Nature-Based Solutions

Cross-Cutting Themes	Stakeholder Feedback
NBS	
Eligibility, Complexity	Some stakeholders expressed that they are hesitant to include nature-based solutions in proposed projects because there is not a consensus on how climate change impacts their communities.
Complexity	Although stakeholders agreed nature-based solutions would be viable in their communities, stakeholders reported that construction and maintenance costs may make these project types infeasible for some communities.

Nature-based solutions weave natural features and processes into a community's landscape through planning, design, and engineering practices. They can promote resilience and adaptation while being integrated into a community's built-in environment (for example, a stormwater park) or its natural areas (for example, land conservation). While nature-based solutions have many hazard mitigation benefits, they can also help a community meet its climate, social, environmental, and economic goals.

Throughout BRIC's history, approximately half of all funded projects incorporate nature-based solutions. This is important because nature-based solutions help reduce the loss of life and property resulting from some of the nation's most common natural hazards such as flooding, storm surge, drought, and landslides.

As future conditions, like climate change, amplify these hazards, nature-based solutions can help communities adapt and thrive. Additionally, the ecosystem and economic and social benefits associated with nature-based solutions are wide-ranging, including improved water and air quality, healthier wildlife habitats, increased property values, improved tax bases, the creation of green jobs, cooler localized temperatures, and improved public health.

Overall, stakeholders agreed with the importance of including nature-based solutions in projects and appreciated that "it is an advantage in the scoring system." However, some noted that many, including both applicants and local leadership, "do not understand nature-based solutions despite discussing green infrastructure."

Two major concerns were raised by stakeholders regarding nature-based solutions. First, some expressed difficulties in securing buy-in from local leadership on nature-based solutions because of a lack of consensus about the effects of climate change. To address this issue, stakeholders recommended FEMA provide examples of successfully funded projects to promote the use of nature-based solutions in BRIC application projects.

The second, more commonly voiced, concern was that nature-based solutions may not be feasible for communities to develop because of their construction and maintenance costs. One noted that barriers to applying nature-based solutions in applications included, "Up-front costs, engineering and design expertise, maintenance for years after installation (time, resources, staffing, training on proper maintenance); funding is often restrictive to either just grey infrastructure and/or no maintenance included, so nature-based solutions are not even considered or are valued out." From the cost of developing designs to the construction and ongoing maintenance of nature-based solutions, many stakeholders indicated their biggest challenge in promoting NBS is their costs.

Recommendations to address the high costs of designing, constructing, and maintaining nature-based solutions included lowering match requirements for projects incorporating these features or project types and expanding funding opportunities to cover the ongoing, post-construction maintenance associated costs. One stakeholder commented, "the simplest solution would be to offer more of a match percentage for nature based or sustainable aspects of a submitted project but don't disqualify infrastructure projects that do not have those additional qualifiers built in."

Finally, stakeholders also found it difficult to incorporate nature-based solutions into the BCA. Section 2.2.1, Stakeholder Feedback No. 8, provides more information on that feedback and its recommendations.

2.3.1. STAKEHOLDER FEEDBACK

9. Some stakeholders expressed that they are hesitant to include nature-based solutions in proposed projects because there is not a consensus on how climate change impacts their communities.

Theme(s): Eligibility, Complexity

"There is still a lack of awareness and understanding among stakeholders, including decision-makers, about nature-based solutions."

Some stakeholders reported it could be difficult to promote a project that incorporates nature-based solutions to address changing weather patterns and sea level rise. One of the respondents stated, "Perceptions around cost of action being too great, particularly when consequences of inaction are uncertain and potentially far in the future" make it difficult for planners and engineering staff to procure buy-in from necessary leadership and decision-makers. A stakeholder commented, "Social acceptance of climate change is one of the largest hurdles." Additionally, for small, rural, and disadvantaged communities, "the challenge to understanding the impacts [of climate change] is the fact that these communities are simply too busy trying stay functional to plan ahead."

In addition to securing buy-in on climate change and the need for nature-based solutions, some stakeholders reported they found it challenging to explain what these project types are and how they could help their communities. To address this need for greater community awareness of nature-based solutions, stakeholders recommended that FEMA provide examples of successfully funded NBS so they could review these projects and present them to their communities to foster support.

One respondent urged FEMA to "Advertise what right looks like. Case studies, examples. . .Communities are trying to walk backward into BRIC projects with great ideas all of that is happening in isolated ways." Another stated, "Consideration should be given for guidance documents/publications that provide guidance on the types of nature-based solutions, where they best perform, and what types of issues they best address as well as a process for successful identification and early stakeholder engagement." Stakeholders indicated that examples of funded projects may help them secure necessary community support for costly and long-term solutions to combat climate change.

Notably, one letter writer specifically recommended "FEMA work together with coastal programs and state emergency management agencies to coordinate implementation of the BRIC program's planning, capability- and capacity-building (C&CB), and technical assistance objectives in the coastal zone." Within the letter, the writer requested that FEMA increase its collaboration with organizations such as itself to prioritize the promotion of clearly defined nature-based solutions. Furthermore, to assist state agencies who work with subapplicants, the organization suggested that FEMA revise its BRIC qualitative evaluation criteria to help state agencies better understand what project types qualify and are competitive for BRIC funding.

10. Although stakeholders agreed nature-based solutions would be viable in their communities, stakeholders reported that construction and maintenance costs may make these project types infeasible for some communities.

***Theme(s):* Complexity**

"Cost in using nature-based solutions is the biggest hurdles."

Stakeholders noted that these solutions also bring unique challenges regarding construction and maintenance costs. Nature-based solutions can require more land than traditional projects (e.g., living shoreline versus a traditional bulkhead). One of the respondents stated, "Natural solutions generally take significantly more land area to be effective." For urban applicants, these solutions may not be viable because of land constraints. One stakeholder stated, "Most urban hazard mitigation projects cannot incorporate nature-based solutions without removing entire neighborhoods from the floodplain."

Although land may be more readily available in rural areas, its acquisition contributes to project costs. Even with some of these challenges, some urban areas have been leading the way in successfully applying nature-based solutions. Because projects that incorporate nature-based solutions often serve multiple goals, they can also attract multiple stakeholders and cost-sharing opportunities.

Stakeholders stated that nature-based solutions costs more to design and construct than traditional projects. In the design stage, permitting or planning review can be a barrier: "Permitting of nature-based solutions can also be a large, expensive, long-lead time effort," and "Nature-Based solutions may require significant (time consuming) Technical and Environmental and Historic Planning Reviews."

Many also found the required match for nature-based solutions to be an obstacle. "Funding is often restrictive to either just grey infrastructure and/or no maintenance included, so nature-based solutions are not even considered or are valued out. . .Cost-match requirements for many funding opportunities, communities may not have the resources to put a large amount of funds into efforts to even apply for the opportunity."

For communities struggling to procure agreement on climate change impacts and the importance of using nature-based solutions, the significant budget match requirement can be a barrier: "It's a struggle for our community to afford the 30% match (instead of the 25% so we can get extra consideration) for our basic drainage projects." The scoring criteria that rewarded additional points for increased local cost match above 30% was included in the FY22 funding opportunity; however, it has since been removed from the FY23 grant cycle.

Furthermore, stakeholders reported that nature-based solutions can require ongoing maintenance after construction which necessitates both staff to complete the maintenance and funding to carry it out. For communities struggling to retain employees or operating on limited budgets, the backend

maintenance costs may prevent them from applying for BRIC with nature-based projects. Additional feedback from stakeholders included:

- **"**The effectiveness of nature-based solutions often depends on long-term monitoring and maintenance activities, including vegetation management, erosion control, and habitat restoration, etc. A lack of resources and long-term maintenance plans can undermine the success and sustainability of nature-based projects."
- "Projects that include nature-based solutions require different maintenance than communities are used to, and deferred maintenance means that the project is not functioning to capacity. . ."

To promote the application of projects that incorporate , nature-based solutions stakeholders recommended FEMA reduce its match requirements for these types of solutions and expand funding to cover ongoing, post-construction maintenance costs. One suggested FEMA should "Allow fund to cover all aspects of nature-based solutions including funding for maintenance for [the] first 3-5 years post installation and also training or staffing costs."

Another stated, "The simplest solution would be to offer more of a match percentage for nature based or sustainable aspects of a submitted project but don't disqualify infrastructure projects that do not have those additional qualifiers built in." Stakeholders suggested that these types of additional financial incentives would empower applicants to secure buy-in and successfully construct and maintain nature-based solutions.

2.3.2. STAKEHOLDER RECOMMENDATIONS

- Provide examples of successfully funded nature-based projects for stakeholders to use when procuring buy-in from community leadership.
- Lower match requirements for projects incorporating nature-based solutions.
- Expand funding opportunities to cover the ongoing, post-construction maintenance costs associated with nature-based solutions.

2.4. Building Codes

Cross-Cutting Themes	Stakeholder Feedback
Building Codes	
Eligibility	While stakeholders support FEMA's emphasis on building codes, they expressed a concern that states without mandatory statewide building codes are at a competitive disadvantage.

Section 1234 of the Disaster Recovery Reform Act of 2018 amended Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act to include provisions about building codes, including expressly authorizing BRIC to provide funding: ". . .to establish and carry out enforcement activities and implement the latest published editions of relevant consensus-based codes, specifications, and standards that incorporate the latest hazard- resistant designs and establish minimum acceptable criteria for the design, construction, and maintenance of residential structures and facilities that may be eligible for assistance under this Act for the purpose of protecting the health, safety, and general welfare of the buildings' users against disasters (42 U.S.C. § (e)(1)(B)(iv)."

To implement these statutory changes, the importance of building code activities is an explicit part of the BRIC program and funding opportunity. Specifically, these "support the adoption and enforcement of building codes, standards, and policies that will protect the health, safety, and general welfare of the public taking into account future conditions, prominently including the effects of climate change, and have long-lasting impacts on community risk reduction, including for critical services and facilities and for future disaster costs."

Figure 3. BRIC Capability-and Capacity-Building Activities

As referenced in the BRIC funding opportunity, building code adoption and enforcement efforts are eligible as capacity and capability building activities under the BRIC State or Territory Allocation and Tribal Set-Aside.

This emphasis on building codes was reinforced by stakeholder feedback gathered during the development of the BRIC program, which indicated strong support for building code activities. To further demonstrate the importance of building codes, in the 2023 funding opportunity, FEMA set aside an additional amount of funding for states, territories, and Tribal Nations dedicated to building codes called a "plus-up."

This change occurred after the engagement period, but it provides additional funding for eligible building code adoption and enforcement activities such as (1) evaluate adoption and or implementation of codes that reduce risk, (2) enhance existing, adopted codes to incorporate more current requirements or higher standards, or (3) develop professional workforce capabilities related to building codes through technical assistance and training.

Many stakeholders supported FEMA's emphasis on building codes to enhance the resilience of communities, such as through incorporating building codes adoption in strategic priorities.

However, stakeholders also noted the BRIC funding opportunity may not provide a compelling incentive for states to promote statewide building code adoption. Some stated that updating such codes at the state level is a multiyear effort, and minor code changes year over year can make it difficult for states that do want to keep up. One respondent stated, "Passing building codes is a challenging and often politically fraught endeavor.

BRIC funding is often not a large enough incentive for a community to pass building codes. While we understand what FEMA is trying to do by including building codes in the scoring criteria, in practice those criteria create a disadvantage for applicants who don't have building codes but desperately need mitigation funding. We recommend removing this criteria from the scoring."

The most significant feedback about building codes was that stakeholders in states without mandatory statewide building codes perceive they are not competitive for funding, expressing "Scoring criteria…is outside of our control (statewide building code) and makes us uncompetitive despite what our actual project is." To address this concern, stakeholders recommended FEMA modify its scoring weights to provide accommodation to states without a statewide building code.

Despite this feedback, stakeholders were able to name examples in which they believe the program had inspired greater adoption in several states and believed these served as examples for others to follow suit.

Some noted awareness of and interest in the program was central to preventing code regression in some regions: "Furthermore, BRIC's support for strong codes has played a central role in rebutting efforts to roll back and slow future adoptions. For example, Nebraska adopted statewide codes in 2019 (Nebraska Revised Statute 71-6403), Colorado in 2023 (SB23-166), and Illinois in 2023 (SB2368). In North Carolina in 2023, Governor Cooper vetoed HB488 because it risks freezing the state's 2015 era residential code through 2031 and would have had implications for the state's BRIC competitiveness. This aspect of BRIC is critical because efforts to slow or rollback future code adoption means less residency and greater risk in disaster events."

2.4.1. STAKEHOLDER FEEDBACK

11. While stakeholders support FEMA's emphasis on building codes, they expressed a concern that states without mandatory statewide building codes are at a competitive disadvantage.

Theme(s): Eligibility

"An important challenge we have experienced in the application process and implementation of large-scale infrastructure projects involves building codes. The way the scoring criteria has been implemented so far for BRIC grant applications results in a state that lacks the required updated higher standards of building codes scoring lower than states that do (rendering them unable to compete)."

Some of the most discussed feedback across the stakeholder engagement was the perceived issues stakeholders face in applying to BRIC as applicants in a state without a statewide building code. These states adopt building codes at the local level not at the state level. Many expressed concern that their projects would not be competitive for funding because of the scoring criteria for state building code adoption:

- "The building code adoption at the statewide level is NOT equitable for all states. Nearly half of the country does not have statewide building code adoption."
- "The technical scoring criteria on building codes is weighted in such a matter to bar sub applicates from the states without a mandatory statewide building code."

Several stakeholders also voiced that while sometimes local codes were on par with the program's requirements, the statewide requirement created a disincentive: "This requirement is meant to incentivize adoption of building codes, but in a state where there is no state requirement for building codes, it disincentives cities and counties to adopt building codes. Why bother when they will not get the points because the state does not have a requirement?. . .That not only is a disincentive for them to adopt a building code for their jurisdiction, but also it is a disincentive for them to develop a mitigation project to propose to be funded by BRIC."

Although stakeholder comments were numerous, there was almost unanimous consensus regarding recommendations. Nearly all recommendations were a variation on the request that FEMA modify its scoring criteria to accommodate projects in states without statewide building codes: "Provide a simple framework for demonstrating equivalency to State Building Codes so that home rule states can have a fair opportunity to participate in BRIC."

Whether this means accepting applications for code-related projects from building departments directly or simply allowing local-level codes to take the place of state-level codes on the application, stakeholders were unanimous in their request for FEMA to review the statewide building code criteria and provide alternatives for applicants in states without such codes. Section 2.2, Benefit-Cost Analysis, provides details on additional changes that were released during the FY23 funding opportunity, which provided applicants credit for local code adoption.

2.4.2. STAKEHOLDER RECOMMENDATIONS

- Modify the scoring weights to provide accommodation to states without a statewide building code.

2.5. Capability and Capacity Building

Cross-Cutting Themes	Stakeholder Feedback
C&CB	
Collaboration, Complexity	Stakeholders reported challenges to implementing capacity and capability building activities because of resource limitations within their organizations.

These activities enhance the knowledge, skills, and expertise of the current workforce to expand or improve the administration of mitigation assistance. This includes activities in the following subcategories: building codes, partnerships, project scoping, and hazard mitigation planning-related activities.

Throughout the feedback gathered from the survey, focus groups, and formal letters, stakeholders voiced that a high percentage of funding was awarded to large, high-capacity jurisdictions. One respondent stated, "The competitive category of funding is impossible for our state to be able to compete against larger more developed states." Since the program launched and increasing in each funding cycle, FEMA has included or refined equity-related program criteria to prioritize disadvantaged communities.

Additionally, direct technical assistance was offered at the launch of the program, which provided tailored support to communities and Tribal Nations that may not have the resources to begin climate resilience planning and project solution design on their own. FEMA has increased BRIC DTA support (nearly doubling) year over year to expand its support to local communities, territories and Tribal Nations.

In FY23, FEMA increased its funding for capacity and capability building efforts and provided up to $2 million per state or territory for these activities in addition to up to $2 million for the building code plus-up. If maxing out these opportunities, that means that states and territories could apply for up to $4 million of capacity and capability activities.

For tribal applicants, $25 million was made available for the building code plus-up for tribes. Another $50 million was made available for tribal applicants in the tribal set-aside (where a tribal subapplicant could not exceed $2 million of capability and capacity building activities).

Stakeholder recommendations included increasing state set-asides to accommodate more projects and providing additional funding to hire and train staff with supplemental resources to execute

awarded projects. As one stakeholder commented, "Recruitment and retention activities assistance" would support these activities within their community.

2.5.1. STAKEHOLDER FEEDBACK

12. Stakeholders reported challenges to implementing capacity and capability building because of resource limitations within their organizations.

Theme(s): Collaboration, Complexity

"As a state emergency management organization, the primary challenge for building capability and capacity is staff funding stability. There are many funding opportunities through FEMA for staffing but mostly they are for recipient management costs and are disaster or fiscal year BRIC/Flood Mitigation Assistance specific. This makes it challenging to build capacity because these grants generally have a 3-year performance period and all activities for staff hired with these funds need to be specifically dedicated to managing the grants from that funding source."

The 2024 HMA Guide states that all capability and capacity building activities should result in a resource, strategy, or tangible mitigation product that will reduce or eliminate risk and damage from future natural hazards, increase resilience and public safety, and promote a culture of preparedness (Part 10.C.2.1.1). Stakeholders shared a broader resource challenge that includes these activities when it comes to hiring and retaining the proper staff to execute projects. For some, this means there is a need for "Continuous funding for emergency management and grant administrative staff. Communities are not able to hire and train the right person for these positions when the community cannot guarantee continuous funding." For others, it would help for FEMA to "Provide a path to be able to mitigate the lack of workforce housing for capacity building, especially in socially vulnerable jurisdictions." Although the concerns are varied, they are centered around issues regarding a lack of local funding to develop capability and capacity building within the community.

To address these concerns, stakeholders recommended FEMA provide more training opportunities to assist communities in building staff capabilities. As one noted, "FEMA may consider providing training in hazard mitigation and resilience, along with technical assistance and mentorship from experienced professionals." The need for additional training support is covered at length in Section 2.1.1, Stakeholder Feedback No. 2; Section 2.2.1, Stakeholder Feedback No. 7; and Section 2.8.1, Stakeholder Feedback No. 18, but it does apply to capability and capacity building support as well.

Others recommended FEMA re-examine the funding structure of the program to create additional opportunities to support more long-term projects to maintain continuity across staffing and programming. One applicant suggested "We need more funding to train and educate new code and safety professionals.

It takes years to become knowledgeable and experienced enough to participate in the code adoption process as well as to enforce codes. BRIC program funding to local jurisdictions could help improve capability and capacity at the local level. We also need more funding for efforts to modernize the

building code and safety departments. Part of the complaints about permitting requirements are the timelines because departments do not have a modern system and they are understaffed. Improving technology and staffing would go a significant way to reduce the concerns about building code adoption and enforcement, while also improving hazard mitigation and resiliency."

2.5.2. STAKEHOLDER RECOMMENDATIONS

- Increase state set-asides to support additional capability and capacity building activities.
- Provide additional funding to hire and train staff resources to execute awarded projects.

2.6. BRIC Direct Technical Assistance

Cross-Cutting Themes	Stakeholder Feedback
BRIC DTA	
Awareness Eligibility, Complexity, Transparency	Stakeholders reported that the timing of the current BRIC Direct Technical Assistance request cycle hinder efforts to support communities.

BRIC provides direct technical assistance to communities and Tribal Nations that may not have the resources to begin climate resilience planning and project solution design on their own. Through process-oriented, hand-in-hand assistance, FEMA partners with communities interested in enhancing their capability and capacity to design holistic, equitable hazard mitigation solutions that advance community-driven objectives.

Even though the number of communities, territories and Tribal Nations selected varies from year to year, FEMA has increased its support with each grant cycle. In May 2023, FEMA announced 26 additional communities and 20 Tribal Nations that were selected for this initiative. FEMA will provide support to selected communities and Tribal Nations for up to 36 months. Eligible entities can request BRIC Direct Technical Assistance by submitting a letter of interest to FEMA.

As a prerequisite to eligibility, FEMA requires that technical assistance recipients identify at least two potential community partners to generate deeper community engagement, including from a disadvantaged community or communities as identified by the Climate and Economic Justice Screening Tool (CEJST). Communities, territories and Tribal Nations submit a letter of interest during the BRIC application cycle, typically from fall to early winter of each calendar year, and FEMA announces its selections each spring or summer.

Stakeholders reported various requests for expanded direct technical assistance, including the creation of additional training resources, help with completing applications, and assistance in developing strategies to address social and cultural inclusion. Except for social and cultural inclusion, these requests are addressed at length in Section 2.1.1, Stakeholder Feedback No. 2; Section 2.2.1, Stakeholder Feedback No. 7; and Section 2.8.1, Stakeholder Feedback No. 18.

Regarding assistance for developing strategies to address social and cultural inclusion, one stakeholder commented they needed direct technical assistance in this area because "when considering which specific services or forms of assistance align with a community's vision for resilience planning and community engagement, it is important to prioritize the challenges and needs that are most relevant in the local context."

Stakeholders also suggested FEMA could continue to build on its successes in expanding BRIC direct technical assistance by developing awareness campaigns to reach more communities. One reported, "I haven't heard of this program, it needs to be explained to potential subapplicants better." Others stated, "we know it's out there, but we don't understand it." Developing further awareness and outreach materials, such as those proposed in Section 2.1.1, Stakeholder Feedback No. 2, to reach more possible interested stakeholders.

The main feedback from stakeholders was the BRIC direct technical assistance timing of the request cycle does not support community resilience needs. One stakeholder stated, "Many people are on vacation in November and December, which makes collaboration difficult." As with the BRIC application deadline (Section 2.1.1, Stakeholder Feedback No. 3), stakeholders recommended that FEMA reassess its request deadline and either expand it past the holiday season or change it to a rolling year-round cycle.

2.6.1. STAKEHOLDER FEEDBACK

13. Stakeholders reported that the timing of the current direct technical assistance request cycle hinder efforts to support communities.

Theme(s): Awareness, Eligibility, Complexity, Transparency

"This needs to be an ongoing opportunity as times for assistance do not always fall in that window."

Stakeholders reported that the timing of the current direct technical assistance request cycle does not support their community's needs: "Communities work on different timelines, and some need more time to prepare an application. The most effective solution to provide robust support to communities is to always have this assistance available, not just on a specific timeline."

Stakeholders emphasized the benefits a longer period of assistance would bring, with several suggesting technical assistance should be available year-round or on a rolling basis. One respondent elaborated, "If it is only in this timeframe, it can be difficult. Would be great to have something available more frequently or on a rolling basis. Would be helpful then when new projects come about throughout the year."

This seemed especially important for disadvantaged communities, with one stakeholder indicating, "based on our work with communities in all aspects of resilience planning (hazard identification, mitigation scenario development, hazard mitigation planning, grant application, and delivery of mitigation projects), we feel that direct technical assistance is something that communities should

be able to access year-round and should not be bound by a limited cycle. This is especially important as underserved and underrepresented communities require barrier-free access to technical assistance."

If a year-round request cycle is not feasible, some stakeholders proposed FEMA extend its request cycle to February or March, while others recommended the submission window begin earlier in the year before the BRIC application period. In both cases, stakeholders cited logistical timing issues or overlap with predictable disaster season: "PLEASE PLEASE PLEASE move cycle out of our monsoon window. We have annual FEMA certification due in October and storm conditions until ~ early October. We also have stormwater due date for annual reporting due in September to State [Department of Environmental Quality] DEQ, and other deadlines. If Cycle was shifted so it was not within June – October, that would work for us. Thanks for asking."

2.6.2. STAKEHOLDER RECOMMENDATIONS

- Build an awareness campaign explaining the benefits of BRIC direct technical assistance to reach and serve more communities.
- Extend the direct technical assistance request cycle or allow it to be completed year-round to align with stakeholder capacities.

2.7. Equity

Cross-Cutting Themes	Stakeholder Feedback
Equity	
Eligibility, Transparency, Awareness	The ways that FEMA defines vulnerable, underserved, or disadvantaged communities are too limited for some stakeholders.
Eligibility, Complexity, Resolution, Transparency	Stakeholders reported that resource constraints may limit rural and disadvantaged communities from applying and that additional resources could support these communities.

In 2021, President Joseph R. Biden, Jr. issued Executive Order (EO) 14008, *Tackling the Climate Crisis at Home and Abroad*. This EO created the Justice40 Initiative, which promotes equity by aiming to deliver 40% of the overall benefits of climate, clean energy, affordable and sustainable housing, clean water, and other investments to disadvantaged communities that are marginalized, overburdened, and underserved.

Programs in FEMA covered by the Justice40 Initiative include the BRIC and Flood Mitigation Assistance competitive annual grant programs, which both provide FEMA's hazard mitigation to states, tribes and territories to make communities more resilient from natural hazards. Also included are FEMA Risk Mapping, Assessment and Planning (MAP) and the Regional Catastrophic Preparedness Grant Program, which help to ensure that communities are informed of the risks they face and prepared for disasters.

Given FEMA's focus on equity, it was a theme repeated across the stakeholder engagement. Stakeholders provided feedback on the role equity plays in the application process, including community engagement and application development. While BRIC has taken good strides in advancing equity in its funding process, stakeholders expressed that there is still not a good understanding among applicants as to what qualifies as a vulnerable, underserved, or disadvantaged community.

To determine whether proposed subapplications fall within BRIC's vulnerable, underserved, or disadvantaged community criteria, stakeholders reported using a variety of tools such as the Centers for Disease Control and Prevention (CDC) SVI and Environmental Justice Index, the EPA Environmental Justice Screening and Mapping Tool (EJScreen), Justice40, census data, FEMA's mapping tools such as the National Risk Index, Risk MAP, and the Resilience Analysis and Planning Tool.

Stakeholders recommended FEMA provide a singular platform for applicants to use to access data sets to identify communities that meet FEMA's criteria of vulnerable, underserved, or disadvantaged communities: "FEMA needs to provide data about equity as opposed to assuming that communities know about these tools and know how to leverage them for strategic grant writing." FEMA's recently released Grant Equity Threshold Tool may alleviate some of the concerns expressed; however, no stakeholders referenced using it.

Many stakeholders emphasized that relationship building within their own communities is more useful in both identifying and serving these types of communities. One stakeholder commented, "We interface directly with contacts at the county, tribal, and local levels to get subject matter expertise in helping us identify vulnerable communities." The type of community outreach varied, but generally it was conducted through both digital platforms (social media, community websites, email newsletters) and in-person outreach events like public meetings, training sessions, and tabling at festivals.

Additionally, municipal partners were leveraged by applicants to reach the public, like municipal housing programs, libraries, and regional planning commissions. Another stakeholder explained, "We

use existing connection with other municipal programs and elected officials to build trust with these communities."

When municipal staff were unavailable or did not exist because of resource constraints, many local and state stakeholders indicated they partnered with local nonprofits, advocacy groups, churches, and schools to reach disadvantaged community members. This allowed for greater reach regardless of language, education, or affiliation: "We actively collaborate with nonprofits and community-based organizations who represent folks."

Another concern expressed by stakeholders was that resource constraints may limit rural and disadvantaged communities from applying: "Building a project for anything that isn't fixing something that is damaged or broken is quite difficult in rural areas (qualified communities) due to the fact that there is no extra monies, time, or support for doing anything that is above and beyond subsistence."

Stakeholders made several recommendations to address this concern. First, stakeholders would like to see greater flexibility with the definitions used within the scoring criteria for vulnerable, underserved, or disadvantaged communities to account for the unique challenges that vulnerable, underserved, or disadvantaged communities face. For example, expanding the eligibility criteria for Community Disaster Resilience Zones and Economically Disadvantaged Rural Communities to assist and reach more communities that would greatly benefit from these changes.

There was also a desire for FEMA to provide additional technical assistance to help these communities navigate the BRIC application. Moreover, as discussed in Section 2.1.1, Stakeholder Feedback No. 2, stakeholders stated that it would help if FEMA provided examples of the types of projects or applications awarded for funding, so these communities have a better understanding of how to be competitive.

Finally, stakeholders requested FEMA modify its match requirements to encourage these communities to apply. However, FEMA administers cost share requirements as authorized by statute. This means that a change to current law would be required to adjust cost share requirements.

2.7.1. STAKEHOLDER FEEDBACK

14. The ways that FEMA defines vulnerable, underserved, or disadvantaged communities are too limited for some stakeholders.

Theme(s): Eligibility, Transparency, Awareness

"FEMA needs to provide data about equity as opposed to assuming that communities know about these tools and know how to leverage them for strategic grant writing."

Stakeholders expressed the desire for tailored tools and resources that are relevant to their local communities and Tribal Nations. Some found that the existing tools "don't seem to adequately reflect realities from either an equity or risk perspective on the ground."

For stakeholders, one of the disadvantages of the equity screening tools suggested for use within the BRIC application was equity screening tools are imperfect at identifying disadvantaged communities. Unincorporated areas or pockets of communities within zip codes or counties can be overlooked by screening tools that rely on census tracts or county/city boundaries. As one respondent stated, "Zip codes and/or census track that are very large, casting a wide net and unable to target specific populations at a smaller level."

Additionally, with so many different tools available for use (Justice40, CEJST, CDC SVI, census data, etc.), applicants found they wanted clearer guidance from FEMA on which ones to use and/or for FEMA to provide the data itself on one platform. Compounding the issue, some tools use different metrics: "different metrics for Justice40 and certain FEMA programs creates confusion."

Some stakeholders requested that FEMA adjust the definitions used in the scoring criteria to account for the unique challenges that vulnerable, underserved, or disadvantaged communities face. One proposed, "Allow for more flexibility in definitions. Our jurisdiction doesn't fit the scoring for being disadvantaged, nor rural, so miss about 95% of any federal funding opportunities, yet still have gaps."

Others suggested FEMA "reconsider the formulas used for BCA and/or weigh other factors (damage to public infrastructure, frequency of events, cleanup costs (e.g, mold, etc.), cost of doing nothing) as being just as important" or simply "remove the cost-benefit analysis." Section 2.2 provides a detailed discussion on feedback and recommendations regarding the BCA.

To help alleviate these issues, stakeholders recommended creating a singular platform for applicants to use to access data sets on disadvantaged communities that meet FEMA's criteria: "Create a single-stop tool that combines all the resources named above into one platform." FEMA could provide "Criteria for determining a disadvantaged community" or "provide a list per State of the vulnerable, underserved and disadvantaged communities," which would assist applicants in providing complete information.

15. Stakeholders reported that resource constraints may limit rural and disadvantaged communities from applying and that additional resources could support these communities.

Theme(s): Eligibility, Complexity, Resolution, Transparency

"Our communities have very limited resources. Staffing, funding for engineers to scope the projects, funding for match, and the technical ability to complete the applications are all limiting factors."

Notable feedback expressed by stakeholders regarding equity was many vulnerable, underserved, or disadvantaged communities have limited resources and capital to dedicate to BRIC applications. Overall, stakeholders perceived that they could not compete against large, well-funded municipalities with grant writers and engineering staff, with one stakeholder stating, "Agencies that have the resources to pursue grant applications are not typically agencies that are in need."

For subapplications to be successfully funded by BRIC, the recipient must provide between 10% and 25% of the total project budget to receive the remaining funds from FEMA, dependent upon their status as a vulnerable, underserved, or disadvantaged community. For communities with limited resources, especially tribes and rural or small towns, this required match meant that some who could most use BRIC assistance did not apply. One respondent explained, "The local match is a huge challenge for our most economically vulnerable communities, making it almost impossible for them to accept and complete projects even if they are awarded."

In addition, as discussed in detail in Section 2.1.1, Stakeholder Feedback No. 4, the lag time between application submission and award tends to result in budget mismatch and the need for local communities to shoulder the burden of increased labor and expenses: "The time delay is the biggest negative. A lot of funds are spent developing a project and an application only to sit on the shelf for many years and by that time the prices are outdated."

Several stakeholder recommendations were provided to alleviate the challenges that vulnerable, underserved, or disadvantaged communities face in applying to BRIC. Stakeholders also proposed FEMA should provide additional technical assistance, whether through direct technical assistance or other means, to help vulnerable, underserved, or disadvantaged communities navigate the BRIC application. This is discussed at length in Section 2.6, but within questions related to equity, stakeholders expressed they could use "Direct Technical Assistance outside of the application period," "support personnel who can assist with any questions during the process," or "Subject Matter Experts to facilitate discussion and provide technical assistance."

Stakeholders stated it would be helpful if FEMA provided examples of the types of projects and applications funded so that they have "Clear, consistent guidance for the types of projects that FEMA is prioritizing." This would be particularly helpful for vulnerable, underserved, or disadvantaged communities because they would have the ability to identify relevant projects that could be applied to support their communities. Knowing this would enable communities to prioritize the deployment of staff and capital resources to complete the application. Noted by one respondent, "I think it would be beneficial to see some of the applications that have been chosen in the competitive category so we can identify areas of improvement that we might be able to incorporate into our applications for a better chance at success." This is also discussed at length in Section 2.1.1, Stakeholder Feedback No. 2.

Finally, stakeholders proposed FEMA further modify the match requirements for qualified vulnerable, underserved, or disadvantaged communities to encourage these communities to apply. This may require FEMA to create additional set-asides for vulnerable, underserved, or disadvantaged communities in addition to tribes. The following suggestions were included: "Implementing something like the [Hazard Mitigation Grant Program] 5% for BRIC would be extremely helpful for getting important projects funded" or "Having funds for Scoping, then set-aside funds for a financial advance, and have the ability to waive the match (25%) based on communities that are underserved or disadvantaged."

2.7.2. STAKEHOLDER RECOMMENDATIONS

- Create a singular platform for applicants to use to access data sets to identify communities that meet FEMA's criteria of vulnerable, underserved, or disadvantaged communities.
- Adjust the application scoring criteria to account for the unique challenges that vulnerable, underserved, or disadvantaged communities face.
- Provide more technical assistance to help vulnerable, underserved, or disadvantaged communities navigate the BRIC application.
- Provide examples of the types of projects and applications funded so that vulnerable, underserved, or disadvantaged communities better understand the types of projects that FEMA prioritizes for funding.
- Modify the match requirements for qualified vulnerable, underserved, or disadvantaged communities to encourage these communities to apply.

2.8. Tribal-Specific Feedback

Cross-Cutting Themes	Stakeholder Feedback
Tribal-Specific Feedback	
Awareness, Collaboration, Complexity, Eligibility	Stakeholders reported that while the resources FEMA provides are helpful, the application process and gaps in receiving information may be a barrier to entry for tribes who have different governance structures than states and municipalities.
Eligibility	Tribal stakeholders reported being deterred by building codes.
Eligibility, Complexity, Transparency	Stakeholders reported that more technical assistance is needed to support capability and capacity building activities for tribes.
Complexity, Resolution	Stakeholders expressed that the cost share requirement may be a burden for tribes with limited budgets and resources.

The BRIC program makes federal funds available for states, the District of Columbia, U.S territories, federally recognized tribal governments, and local governments for natural hazard mitigation activities. During the outreach engagement efforts FEMA conducted in the summer of 2019, as detailed in the *2020 Building Resilient Infrastructure and Communities (BRIC) Summary of Stakeholder Feedback Report*, tribal representatives emphasized the unique challenges they face, including varying levels of understanding of the grant application process and a wide range of natural hazard mitigation needs. They also expressed interest in capacity and capability building and support for hazard mitigation planning, project scoping, and application development.

Under the BRIC program, federally recognized tribal governments may apply as (1) an applicant for the Tribal Set-Aside or national competition or (2) a subapplicant to an eligible state or territory that is an applicant for national competition and subsequentially, the State or Territory Allocation. Federally recognized Tribal Nations are eligible to submit a request for BRIC's nonfinancial direct technical assistance. Other tribal groups that are not federally recognized can apply as a subapplicant to an eligible state or territory but not as an applicant.

During the 2019 stakeholder engagement period, specific focus groups were conducted with Tribal Nations to listen to tribal feedback. During this 2023 stakeholder engagement period, one focus group was conducted with tribal community members to gain insights into their experience with the BRIC program.

Given the unique challenges and opportunities faced by tribes, careful attention was given during the analysis of stakeholder feedback to identify tribal-specific input and recommendations so they could be provided independent of state, district, territorial, or local government feedback.

Regarding equity, tribal representatives and those assisting tribes with applications wanted to remind FEMA that many tribes self-identify as vulnerable, underserved, or disadvantaged communities. As one state-level stakeholder commented, "In our state, the most vulnerable communities are tribes and rural communities. We reach out specifically to all the tribes both individually and through the state tribal emergency management association."

Tribal Nations expressed a desire for more collaboration with FEMA to help FEMA better understand tribal challenges and opportunities. For example, in developing nature-based solutions guidance, one stakeholder commented, "Honoring the sacredness of nature can be a foreign value to folks advising us on what projects to peruse so it makes it hard to know if our project has merit." Another stated, simply, that "Tribes need more consultation on climate resiliency."

Tribal stakeholders shared that some experience the application process and requirements as a barrier to entry because they have different resources and governance structures than states and municipalities. One stated, "Language barriers in native Alaskan communities, lack of permanent or validated addresses in rural Alaskan communities, lack of support staff to assist in-person during application process" all limit tribal applications. Tribal stakeholders did not specifically propose recommendations to address this barrier to entry. Sections 2.1, 2.2, and 2.6 provide recommendations that may apply to tribes.

Similarly, other tribal-specific feedback mirrored those expressed by state and local-level stakeholders. For example, tribal stakeholders expressed a need for more direct technical assistance to increase capacity and capability building activities (Section 2.5). Finally, some tribal stakeholders noted the existing cost share requirements may be burdensome and limit project scale, which is noted in Section 2.7.1, Stakeholder Feedback No. 15.

2.8.1. STAKEHOLDER FEEDBACK

Application Process

16. Stakeholders reported that while the resources FEMA provides are helpful, the application process and gaps in receiving information may be a barrier to entry for tribes who have different governance structures than states and municipalities.

Theme(s): Awareness, Collaboration, Complexity, Eligibility

"We don't know what we don't know. Choctaw Nation does a really good job at making sure we know about things, but across the state, we don't have that. The state relies on getting info from FEMA, but that doesn't always work, and we can't always rely on them. Opens the doors if we can get connected with the nations since we the jurisdiction own the facilities."

The tribal responses (or responses from those supporting an application for a tribe) were varied. A common theme was that the application process and requirements may be a barrier to entry for tribes with a different governance structure than states and municipalities. Some stakeholders shared that FEMA's outreach and resources were helpful in completing an application.

One stakeholder shared in detail, "All the website resources have been used to complete my first application. Having specific tribal contacts in FEMA does help. I believe we had some issues in the submission process and the response time was the same day response. That resource was beneficial. I downloaded a lot of resources to help build my knowledge of the project. Specific resources would be the Tribal Planning Handbook, the National Tribal Strategy, the Tribal Mitigation Plan Review Guide, Tribal Planning Worksheets, and the READY Business resources as well."

Others stated they faced barriers in collaborating with state-level partners, commenting the requirements for a subapplication to the state were difficult to navigate given governance structures and the lack of existing relationships: "Tribes can be a subapplicant, but they lack the awareness of the program and the cost-share. The state doesn't disseminate information and FEMA information isn't reaching saturation. The lack of knowledge is the primary barrier to entry."

Lack of knowledge also impacts those advising tribal communities. Although FEMA is clear regarding the eligibility of tribes for BRIC funding, one respondent was told by various experts that they were not eligible to apply: "I was told over and over by many people that we would not be approved for the BRIC grant because we are a Tribal Nation. This came from many federal sources." A local jurisdiction suggested FEMA allow local jurisdictions to be a subapplicant to a tribal applicant because they were not prioritized with state's application. The Tribal Nation viewed this as a benefit because their tribal members use the infrastructure and live off the land.

Additionally, there may be a general lack of qualified resources for tribes to use when developing an application. From language barriers to a lack of access to technology to a lack of grant writers, tribes face unique obstacles when navigating the BRIC application process. One respondent stated their barrier to entry was multifold: "Language barriers in native Alaskan communities, lack of permanent

or validated addresses in rural Alaskan communities, lack of support staff to assist in-person during application process."

A consultant hired to apply for a tribe found technology was a barrier for the tribe they represented and stated, "I was hired to submit electronic applications (one reason I was hired) that my older supervisor felt was an obstacle. The age of users needs to be considered. The younger populations (under 47) have the most experience in digital experiences. Senior-aged workers may not have the skills to navigate another system." Tribes reported problems with technology: "Gaining access to the application website was challenging at both the State & Federally recognized Tribal government" and that the "State-specific application process/portal limit tribal applicants from seeking assistance."

Stakeholders did not provide specific recommendations to address these concerns. However, recommendations discussed in Section 2.1.1, Stakeholder Feedback No. 2, such as creating more tools and resources to assist applicants and prioritizing partnerships and collaboration, or in Section 2.6 would also assist tribes.

Building Codes

17. Tribal stakeholders reported being deterred by building codes.

> ***Theme(s): Eligibility***
>
> *"We tried [to apply for building code activity projects] but were discouraged by the requirements, the process and feeling like our project didn't have merit. It wasn't until recently that we saw some examples in the website of some grants going to Tribal groups that we considered trying again."*

Tribal stakeholders noted that tribal governments do not have building codes and suggested this requirement may place them at a competitive disadvantage. For others, this and other application requirements was a reason another stakeholder shared they had felt discouraged: "We tried [to apply for building code activity projects] but were discouraged by the requirements, the process and feeling like our project didn't have merit. It wasn't until recently that we saw some examples in the website of some grants going to Tribal groups that we considered trying again." Another said, "Many tribal governments do not have building codes."

Another stakeholder shared how building codes are complicated by the tribes' governance structure. "We have unique situations where we're a tribe that encompasses 10 counties and non-tribe and other tribes. The building codes only apply to our tribe's buildings. We have higher building codes than the state of Oklahoma and several jurisdictions, but how far does that go if it doesn't apply to non-citizens who don't have to adhere to the building codes?"

One respondent shared, even without building codes, "we are working towards making all public buildings [Americans with Disabilities Act] accessible," while another noted, "The job prior to my current job was as the Realty Officer for the Tribe. My responsibility was to know the building codes but rarely was I asked to enforce the codes."

Tribal stakeholders did not provide specific recommendations to alleviate these concerns, but the recommendations provided in Section 2.2 would apply.

Capability and Capacity Building

18. Stakeholders reported that more technical assistance is needed to support capacity and capability building activities for tribes.

Theme(s): Eligibility, Complexity, Transparency

"Match requirements limit tribal applicants from seeking assistance."

Tribal stakeholders discussed the barriers they face in capacity and capability building, sharing that there is a need for more tribal-specific project scoping and partnership activities: "Smaller communities and tribes are at a disadvantage because of a lack of knowledge about these resources."

Capacity to provide technical assistance from the state or federal level is sometimes perceived as inadequate. One stakeholder commented, "In our state, we work with a lot of the tribes and local governments and it's a capacity issue. The PSMs are universally available, but someone has to tell people they are available and updated, and not just to the states. It's not the state withholding information, it's just not good dissemination of information. There's also a listserv that will update you, too."

Another stated, "Two Regions expressed capacity issues among Tribal Liaisons. Few Tribal Liaisons to support and prioritize tribal needs and engagement."

Tribal stakeholders did not provide specific recommendations to alleviate these concerns, but the recommendations provided in Section 2.5 would apply.

Additionally, one stakeholder commented tribes could potentially serve as resources to help FEMA orient its assistance materials and training to tribes: "I've been very successful in developing plans, projects, and requests but I'm alone… I have served to assist by teaching but help a girl out? Let me develop a Tribal HM curriculum that makes sense to my Leadership, Community and Family! Let me develop it for my Tribal relatives without the 'beads & feathers' and how systematically this all works together."

Equity

19. Stakeholders expressed that the cost share requirement may be a burden for tribes with limited budgets and resources.

***Theme(s):* Complexity, Resolution**

"Many tribes have not felt comfortable submitting to national competition. When it comes to cost share, tribes can't always meet it. A lot of tribes don't have a tax base. The cost share should be in the tribal agreement with the government."

Cost share was identified as a common barrier to application for many tribal stakeholders. One stakeholder stated they wanted to propose larger projects, but that their scoping possibilities "are reduced by cost-share needs." Other funding considerations were identified as obstacles.

Additionally, one stakeholder proposed FEMA review recommendations on how to modify the cost share: "We need to be creative and do things like cost-share waivers and require tribal consultations." The recommendations proposed in Section 2.7.1, Stakeholder Feedback No. 15, apply to this concern.

3. Conclusion

This 2023 BRIC Stakeholder Engagement Report summarizes the feedback that was collected from a variety of stakeholders to examine strengths and opportunities with the BRIC program. This report contains no evaluation of any particular feedback or recommendation, nor does it indicate what changes FEMA may or may not decide to implement in the future. Instead, this report aims to assist FEMA in identifying strengths and opportunities that can help shape and inform future recommendations and courses of action that the BRIC program can adopt to support government entities as they undertake hazard mitigation projects, reducing the risks they face from disasters and natural hazards.

Throughout the BRIC engagement efforts during the summer of 2023, stakeholders expressed satisfaction with FEMA's continued support and outreach. Similar to the 2019 BRIC engagement efforts, stakeholders found the outreach and engagement sessions informative and appreciated the opportunity to provide feedback on their experience with BRIC program.

Across the various topics and engagement platforms, stakeholders consistently expressed the desire for continued high-quality engagement and outreach from FEMA as the BRIC program continues to expand and mature. Stakeholders want to feel heard but also want to see steps and actions taken, where possible, to address their feedback while strengthening areas and processes that are currently working well across the BRIC program.

Overall, stakeholders are optimistic with the BRIC program and have seen improvements in their experience as they continue to apply for additional funding. A key takeaway that was shared by many is the value and desire to increase awareness of the BRIC program and directing applicants and subapplicants to existing tools and resources that are available to them as they navigate through the application process.

Although this report does not attempt to detail every point of feedback and recommendation voiced by stakeholders, it does seek to summarize the key themes that were identified from the survey, focus groups, and formal letters. FEMA recognizes the value and importance of engaging stakeholders from a variety of backgrounds and expertise to maximize project benefits of the BRIC program and will continue to explore solutions to provide impactful assistance to applicants and subapplicants across all states, territories, and Tribal Nations. This engagement process will continue to inform FEMA's BRIC program in the coming years.

Appendix A: Key Findings and Recommendations Summary

No.	Cross-Cutting Themes	Stakeholder Feedback	Stakeholder Recommendation
Application Process			
1	Complexity	Stakeholders reported that completing an application required significant resources including hiring external consultants and that this may be inequitable for many small, rural, and disadvantaged communities.	▪ Create a pathway for small, rural, and disadvantaged communities to apply for and gain access to technical assistance for grant writing and engineering studies. ▪ Create the following tools and resources to assist applicants: ○ Step-by-step guides on how to complete each section and what types of documents and data are required for each section ○ Standardized application template for applicants to use when developing their application ○ Checklist of all requirements for the application ○ Standardized list of links to data tools and resources for applicants to access ○ Examples of successfully funded projects and samples of their applications ○ List of types of projects that are ineligible for funding ▪ Move the application period away from November to December of each year to allow for communities to ensure that they have the proper staff on hand to complete applications. ▪ Standardize the review period of each application and allow for communities to forecast inflation and other rising costs in their submission.
2	Complexity, Awareness, Transparency	Stakeholders reported that resources currently available to support application development have been useful. However, they also expressed a desire for more standardized resources to reduce the complexity of the application process.	
3	Complexity	Stakeholders reported that the application period falls during a time when many staff are on holiday and personal leave, which makes it more difficult for communities to apply.	
4	Resolution, Transparency	Stakeholders explained that a lengthy application review period results in a gap between proposed budgets and actual costs at the time of award funding.	
5	Collaboration	Although some stakeholders described positive relationships and support from state EMAs, more commonly stakeholders reported that needing to work through state EMAs created challenges.	

No.	Cross-Cutting Themes	Stakeholder Feedback	Stakeholder Recommendation
6	Complexity	Stakeholders requested improvements to enhance the experience of submitting a subapplication.	▪ Continue to prioritize partnerships and collaboration across departments, agencies, and applicants/subapplicants to create efficiencies in the application process. ▪ Review the application for the following items: ○ Technical issues such as typos, bugs, and broken links ○ Jargon or other technical language that may not be clear to applicants who are not well versed in FEMA terminology ○ Redundant questions and Requests for Information
BCA			
7	Eligibility, Complexity	Although stakeholders gave positive feedback on Benefit Cost Analysis enhancements and tools, many stakeholders reported that the BCA is complicated, difficult to complete, and cost prohibitive.	▪ Promote equity among applicants from vulnerable, underserved, or disadvantaged communities by waiving the BCA requirement for budgets under a pre-determined budget threshold. ▪ Provide technical assistance to applicants to ensure that the BCA is being completed accurately. This aligns with Recommendation 1. ▪ Create more tutorial, guidelines, and training opportunities to help applicants understand how to complete the BCA. This aligns with Recommendation 2. ▪ Provide guidance regarding what climate change data sets should be used to support applications incorporating nature-based solutions. ▪ Adjust the BCA criteria to better account for nature-based solutions.
8	Eligibility, Complexity	Stakeholders reported struggling to find data to support the inclusion of nature-based solutions into the BCA.	

No.	Cross-Cutting Themes	Stakeholder Feedback	Stakeholder Recommendation
NBS			
9	Eligibility, Complexity	Some stakeholders expressed that they are hesitant to include nature-based solutions in proposed projects because there is not a consensus on how climate change impacts their communities.	▪ Provide examples of successfully funded nature-based projects for stakeholders to use when procuring buy-in from community leadership. ▪ Lower match requirements for projects incorporating nature-based solutions. ▪ Expand funding opportunities to cover the ongoing, post-construction maintenance costs associated with nature-based solutions.
10	Complexity	Although stakeholders agreed nature-based solutions would be viable in their communities, stakeholders reported that construction and maintenance costs may make these project activities infeasible for some communities.	
Building Codes			
11	Eligibility	While stakeholders support FEMA's emphasis on building codes, they expressed a concern that states without mandatory statewide building codes are at a competitive disadvantage.	▪ Modify the scoring weights to provide accommodation to states without a statewide building code.
C&CB			
12	Collaboration, Complexity	Stakeholders reported challenges to implementing capacity and capability building because of resource limitations within their organizations.	▪ Increase state set-asides to support additional capacity and capability building activities. ▪ Provide additional funding to hire and train staff resources to execute awarded projects.

No.	Cross-Cutting Themes	Stakeholder Feedback	Stakeholder Recommendation
BRIC DTA			
13	Awareness, Eligibility, Complexity, Transparency	Stakeholders reported that the timing of the current BRIC direct technical assistance request cycle hinder efforts to support communities.	▪ Build an awareness campaign explaining the benefits of BRIC direct technical assistance to reach and serve more communities. ▪ Extend the BRIC direct technical assistance request cycle or allow it to be completed year-round to align with stakeholder capacities.
Equity			
14	Eligibility, Transparency, Awareness	The ways that FEMA defines vulnerable, underserved, or disadvantaged communities are too limited for some stakeholders.	▪ Create a singular platform for applicants to use to access data sets to identify communities that meet FEMA's criteria of vulnerable, underserved, or disadvantaged communities. ▪ Adjust the application scoring criteria to account for the unique challenges that vulnerable, underserved, or disadvantaged communities face. ▪ Provide more technical assistance to help vulnerable, underserved, or disadvantaged communities navigate the BRIC application. ▪ Provide examples of the types of projects and applications that are funded so that vulnerable, underserved, or disadvantaged communities better understand the types of projects that FEMA prioritizes for funding. ▪ Modify the match requirements for qualified vulnerable, underserved, or disadvantaged communities to encourage these communities to apply.
15	Eligibility, Complexity, Resolution, Transparency	Stakeholders reported that resource constraints may limit rural and disadvantaged communities from applying and that additional resources could support these communities.	

No.	Cross-Cutting Themes	Stakeholder Feedback	Stakeholder Recommendation
Tribal-Specific Concerns			
16	Awareness, Collaboration, Complexity, Eligibility	Stakeholders reported that while the resources FEMA provides are helpful, the application process and gaps in receiving information may be a barrier to entry for tribes who have different governance structures than states and municipalities.	▪ Not applicable.
17	Eligibility	Tribal stakeholders reported being deterred by building codes.	
18	Eligibility, Complexity, Transparency	Stakeholders reported that more technical assistance is needed to support capability and capacity building activities for tribes.	
19	Complexity, Resolution	Stakeholders expressed that the cost share requirement may be a burden for tribes with limited budgets and resources.	

Appendix B: Building Resilient Infrastructure and Communities 2023 Stakeholder Engagement Survey Questions

Topic 1: BRIC Application Process

1. Please explain the barriers and impacts of the application requirements when applying to BRIC, if any.
2. Please describe how FEMA can make the application process for BRIC grants more efficient, if at all.
3. Please describe the required elements for program eligibility which need better explanation from FEMA to avoid submittal and denial of ineligible activities, if at all.
4. Please describe the pre-award resources required of staff and contractual support to develop and submit your BRIC application to FEMA, if any.

Topic 2: Equity

1. Please describe the factors, tools or resources you use to identify vulnerable, underserved, or disadvantaged communities, if any.
2. Please describe your organization's outreach to vulnerable, underserved, or disadvantaged communities.
3. Explain what challenges you are facing with identifying and scoping mitigation projects that advance equity, if any.
4. Please describe any resources or tools FEMA can provide to help identify projects that advance equity for your jurisdiction, if any.

Topic 3: Benefit Cost Analysis (BCA)

1. Please describe ways that alternative BCA methods have improved the application process, if at all.
2. Please explain how the applicants and subapplicants of non-FEMA funded grant programs demonstrate cost-effectiveness for other infrastructure investments, if at all.
3. Please describe the specific tools, resources or methods you would recommend to assist applicants conducting a FEMA BCA or which improve the cost effectiveness process, if any.

Topic 4: Climate Resilience & Nature Based Solutions

1. Please explain the challenges to understanding the impacts of climate change, if any.

2. Please explain the challenges to including nature-based solutions in hazard mitigation projects, if any.
3. Please describe what additional resources or support can FEMA provide to incentivize inclusion of nature-based solutions in hazard mitigation proposals, if any.

Topic 5: Infrastructure & System-Based Mitigation Projects

1. Please explain whether the technical assistance provided by FEMA to applicants in applying for and implementing infrastructure mitigation projects has met expectations.
2. Please explain what challenges you have experienced in applying for an implementing large infrastructure projects through the National Competition, if any.
3. Are you familiar with benefits of a System-Based Mitigation approach for community resilience?
4. Please explain how the BRIC program can incentivize projects to incorporate a more holistic System-Based Mitigation approach to improve community resilience.

Topic 6: Building Codes & Enforcement

1. Has your jurisdiction previously applied for building code activity projects using BRIC funding? Please explain.
2. Please describe how BRIC application scoring criteria has impacted building code adoption considerations in your jurisdiction, if at all.
3. Please describe any additional local or statewide activities that facilitate community resilience equal to that of relevant consensus-based hazard-resistant building codes that should be considered by BRIC for applicant scoring, if any.
4. Please explain your challenges in building code adoption and enforcement, if any.
5. Please explain how FEMA can help improve local or statewide building code adoption and enforcement, if at all.

Topic 7: Capability & Capacity Building (C&CB)

1. Please describe how effective the mitigation planning process & available planning funding resource have been in meeting the need for community resilience, if at all.
2. Please describe how effective mitigation planning processes have been in including community partners capable of serving the most socially vulnerable, underserved and disadvantaged populations, if at all.
3. Please describe your experiences with mitigation planning and any other planning related process to identify community risk and its effectiveness to improve resilience, if any.
4. Please describe what challenges exist when building capability and capacity within your jurisdiction, if any.

5. The BRIC program presently funds Capability & Capacity Building (C&CB) activities which include projects for Building Codes, Partnerships, Project Scoping, and Hazard Mitigation Planning Activities. Please describe any additional activities FEMA should consider eligible to support building community capability and capacity, if any.
6. Please describe the barriers you have experienced in seeking BRIC funding for Project Scoping or Partnership activities, if any.

Topic 8: BRIC Direct Technical Assistance (DTA)

1. Please describe the specific services or forms of assistance which best support your community's vision for resilience planning and community engagement.
2. Please detail whether the current BRIC Direct Technical Assistance request cycle (end of September to end of January annually) supports your community's resilience needs. If not, please describe what other time frame DTA should consider.
3. Please explain how the BRIC Direct Technical Assistance (DTA) initiative can be improved, if at all.

Topic 9: Delivery of Federal Assistance & Resource Management

1. Please describe which aspect(s) of the BRIC program you would highlight as a success, if any.
2. Please describe your organization's process for determining the appropriate grant program funding source for a project, if any.
3. Please detail whether you prefer your project applications to other agencies for funding consideration before submitting to or after non-selection by FEMA. If so, please describe which agencies.
4. Please explain the administrative burden which has resulted from implementing BRIC projects through the grant lifecycle, if any, and the impact on your organization, if at all.

Topic 10: Knowledge Transfer

1. Please identify the specific BRIC program support material and resource which you found helpful to developing your subapplication(s).
2. Please describe what additional program support material or resource could BRIC develop to support applicants or subapplicants, if any.
3. Please detail whether you share or re-share BRIC program support materials, resources, or tools within professional networks and if so, please describe which platforms are most beneficial for reaching stakeholders.

Topic 11: Participant Demographics & Feedback (Voluntary)

1. Please describe the type of organization you represent, if any.

2. Please identify which FEMA Region you are geographically located in. Refer to this webpage on FEMA's website for regional areas.
3. What topics related to improving the BRIC program did we miss? Please tell us about any other suggestions for program improvement that were not captured in the survey topics.

Appendix C: Questions Asked During Building Resilient Infrastructure Focus Groups

FEMA conducted four focus groups throughout June-August 2023.A total of 103 participants provided feedback to FEMA during these sessions. Table 2 includes additional details for each focus group.

Table 2. BRIC Stakeholder Focus Groups

Date	Event	Approximate Number of Participants
June 6, 2023	Hazard Mitigation Assistance External Stakeholder Working Group (ESWG) Meeting	10
July 9, 2023	Natural Hazards Workshop Focus Group	30
July 13, 2023	National Hazard Mitigation Association (NHMA) Practitioners Meeting	30
August 16, 2023	Inter-Tribal Emergency Management (ITEMC) Summit	33
	Total Participants	**103**

Hazard Mitigation Assistance External Stakeholder Working Group (ESWG) Meeting

1. Please explain if the application process has become easier for you or your constituents, if at all.
    a. Is it useful that the NOFO is released six weeks prior to the application window opening?
2. Please describe how the application can be improved, if at all.
3. Please describe the impact, if any, that the increase in funds dedicated to the allocation has had on stakeholder or tribal participation.
4. Please explain any changes that you feel are necessary to increase the use of these funds, if any exist.
5. Please share which resources you have used to assist with developing applications, if any. Did they make the process easier?
    a. Are the Program Support Material (PSM)s helpful? Is there anything that we need more PSMs for?
    b. Reviewing the list of PSMs, are you aware of these resources?
6. Please express whether you have utilized your Regional FEMA Tribal Liaison for assistance or support.

7. Please describe any additional resources and TA support, including DTA, that BRIC could provide for applicants and subapplicants, if any.
8. Please describe additional activities BRIC should consider eligible for C&CB funding to build capacity, if any.
    a. Is there a reason why you stay away from some C&CB projects and not others?
9. Please describe any changes needed to increase the utility of these funds, if any.
10. Please explain how the BRIC program can better partner with jurisdictions and Tribal Nations to increase the applications for building code adoption and enforcement activities and partnership activities, if at all.
    a. Building codes are a main priority for BRIC. Over half of the country does not have building codes despite it being a great resilience measure. What changes would allow for more building code projects?
11. If there was a dedicated funding amount for building codes, would this help?
12. Please express if you consider including NBS in your mitigation strategies, when feasible. Please explain why or why not.
13. Please explain how FEMA can improve awareness of NBS and support integration into more projects, if at all.
14. Please express your thoughts on the strengths of the BRIC program, if any.
15. Please explain challenges you have experienced with the BRIC program, if any.
16. Please share what you would change about BRIC, if anything at all.

Natural Hazards Workshop Focus Group

1. Please express your thoughts on the strengths of the BRIC program, if any.
2. Please explain challenges you have experienced with the BRIC program, if any.
3. Please share what you would change about BRIC, if anything at all.
4. Please explain any changes that you feel are necessary to increase the use of these funds, if any exist.
5. Please describe any changes needed to increase the utility of these funds, if any.
6. Please explain how the BRIC program can better partner with jurisdictions and Tribal Nations to increase the applications for building code adoption and enforcement activities and partnership activities, if at all.
7. Please describe any additional resources and technical assistance support, to include BRIC DTA, that BRIC could provide for applicants and subapplicants, if any.

8. Please share which resources you have used to assist with developing applications, if any. Did they make the process easier?
9. Please explain if the application process has become Easier for you or your constituents, if at all.
10. Please explain how FEMA can improve awareness of nature-based solutions and support integration into more projects, if at all.

National Hazard Mitigation Association (NHMA) Practitioners Meeting

This session was facilitated in person with an open question and answer session with the audience. No specific questions were included as part of this discussion.

Inter-Tribal Emergency Management (ITEMC) Summit

1. Please express your thoughts on the strengths of the BRIC program, if any.
2. Please explain challenges you have experienced with the BRIC program, if any.
3. Please share what you would change about BRIC, if anything at all.
4. Please explain any changes that you feel are necessary to increase the use of these funds, if any exist.
5. Please describe any additional activities BRIC should consider eligible for C&CB funding to build tribal capacity?
6. Please describe any changes needed to increase the utility of these funds for Tribal Nations, if any.
7. Please describe any additional resources and technical assistance support, to include BRIC DTA, that BRIC could provide to assist Tribal Nations, if any.
8. Please share whether you have used the BRIC Tribal Program Support Materials (PSM) to assist with developing applications, if at all. Did it make the process easier?
9. Please explain if the application process has become easier for you or your constituents, if at all.

Appendix D: Formal Letters Submitted Regarding Building Resilient Infrastructure and Communities

Stakeholder Organization	Organization Type
AEC-Science & Technology	Private Sector
Air Conditioning Contractors of America	Non-Governmental
Alliance for National & Community Resilience	Non-Governmental
American Concrete Institute	Non-Governmental
American Council for an Energy-Efficient Economy	Non-Governmental
American Institute of Architects	Non-Governmental
American Property Casualty Insurance Association	Non-Governmental
American Society of Civil Engineers	Non-Governmental
American Society of Interior Designers	Non-Governmental
American Supply Association	Nongovernmental
ASHRAE	Non-Governmental
Attachments Energy Rating Council (AERC)	Non-Governmental
BuildStrong Coalition	Non-Governmental
Building Performance Association	Non-Governmental
Coastal States Organization	Non-Governmental
Concrete Masonry and Hardscapes Association	Non-Governmental
Congressional Fire Services Institute	Non-Governmental
E4TheFuture	Non-Governmental
Environmental and Energy Study Institute	Non-Governmental
EPDM Roofing Association	Non-Governmental
Extruded Polystyrene Foam Association (XPSA)	Non-Governmental
Federal Alliance for Safe Homes (FLASH)	Non-Governmental
Flood Mitigation Industry Association	Non-Governmental
Floodproofing.com	Private Sector
Florida Division of Emergency Management	Government

Stakeholder Organization	Organization Type
Green Building Initiative	Non-Governmental
Inland Empire Utilities Agency	Private Sector
Institute for Market Transformation	Private Sector
Insurance Institute for Business and Home Safety (IBHS)	Non-Governmental
International Association of Fire Chiefs	Non-Governmental
International Association of Structural Movers	Non-Governmental
International Code Council	Non-Governmental
International Institute of Building Enclosure Consultants	Non-Governmental
Knauf Insulation	Private Sector
Modular Building Institute	Non-Governmental
National Association of Mutual Insurance Companies	Non-Governmental
National Association of State Energy Officials (NASEO)	Non-Governmental
National Council of Structural Engineers Associations	Non-Governmental
National Environmental Health Association	Non-Governmental
National Fire Protection Association	Non-Governmental
National Institute of Building Sciences	Non-Governmental
National Institutes of Health	Government
National Insulation Association	Non-Governmental
North American Insulation Manufacturers Association	Non-Governmental
Polyisocyanurate Insulation Manufacturers Association	Non-Governmental
Reinsurance Association of America	Non-Governmental
Roof Coatings Manufacturers Association (RCMA)	Non-Governmental
Sheet Metal and Air Conditioning Contractors National Association (SMACNA)	Non-Governmental
Simpson Strong-Tie Company Inc.	Private Sector
Single Ply Roofing Industry	Non-Governmental
Smart Vent	Private Sector

Stakeholder Organization	Organization Type
Solar Energy Industries Association	Non-Governmental
Structural Insulated Panel Association (SIPA)	Non-Governmental
UL Solutions	Private Sector
U.S. Green Building Council	Non-Governmental

Appendix E: Acronyms and Abbreviations

%	Percent
BCA	Benefit-Cost Analysis
BCR	Benefit-Cost Ratio
BRIC	Building Resilient Infrastructure and Communities
C&CB	Capability and Capacity Building
CDC	Centers for Disease Control and Prevention
CEJST	Climate and Economic Justice Screening Tool
DTA	Direct Technical Assistance
EDRC	Economically Disadvantaged Rural Community
EMA	Emergency Management Agency
EPA	U.S. Environment Protection Agency
ESWG	External Stakeholder Working Group
FEMA	Federal Emergency Management Agency
FEMA GO	FEMA Grants Outcomes
FY	Fiscal Year
HMA	Hazard Mitigation Assistance
HUD	U.S. Department of Housing and Urban Development
ITEMC	Inter-Tribal Emergency Management
MAP	Mapping Assessment and Planning
NBS	Nature-Based Solutions
NHMA	National Hazard Mitigation Association
NOFO	Notice of Funding Opportunity
PDM	Pre-Disaster Mitigation

PSM	Program Support Material
RFI	Request for Information
SLTT	State, Local, Tribal and Territorial
SVI	Social Vulnerability Index
TEC	Technical Evaluation Criteria