

6 Plan Maintenance

6.1 Method for Monitoring, Evaluating and Updating the Plan

6.1.1 Background

As directed by Executive Order No. 19, the Alabama Emergency Management Agency (AEMA) is responsible for maintaining the State Hazard Mitigation Plan, including all monitoring, evaluation, and update activities.

As part of the 2018 plan update process, AEMA reviewed the strategy detailed in the previous plan versions for monitoring, evaluating, and updating the plan and compared it to the plan maintenance activities that occurred since plan adoption. It has been modified over the years to best meet the State and SHMT needs. Beginning in 2007, the plan update called for AEMA to conduct an annual review of the plan and provide a summary of this review to the SHMT indicating whether an update was warranted. For 2010 plan update, this process remained but was adjusted to only provide a summary of the review to the SHMT if a change is warranted. In addition, the SHMT will only be reconvened if an update to the state plan is warranted or after a major disaster. If an update is warranted, it will be AEMA's discretion to determine if it is necessary to reconvene the entire team. Further, AEMA is committed to tracking mitigation action progress for the next plan update. This section of the plan describes how plan maintenance activities will be accomplished.

6.1.2 Method for Monitoring the Plan

Regular plan monitoring will be led by AEMA to track mitigation actions with the SHMT. These activities are described in Sections 6.2 through 6.4 below.

6.1.3 System for Evaluating the Plan

AEMA will conduct an annual evaluation of the plan, generally in the month of April. The evaluation will consider several basic factors including:

1. Changes in the level of risk to the State and its citizens.
2. Changes in laws, policies, or regulations at the State or local levels.
3. Changes in State agencies or their procedures that will affect how mitigation programs or funds are administered.

4. Significant changes in funding sources or capabilities.
5. Changes in the composition of the State Hazard Mitigation Team.
6. Progress on mitigation actions (including project closeouts) and new mitigation actions that the State is considering.
7. Major changes to local or multi-jurisdictional hazard mitigation plans.

In regards to tracking mitigation actions, AEMA will email SHMT members each year, at a minimum, to determine if there are any changes in status for the mitigation actions. The SHMT will also be encouraged to submit new mitigation actions. If an agency reports changes or submits a new action, AEMA will be responsible for incorporating those changes into the state plan.

Additionally, as described separately in Appendix C, AEMA will contact the Regional Planning Councils and local Emergency Management Agency (EMA) Directors (or other individuals and organizations as appropriate) to determine if updates have been made to certain elements of the local plans as part of the annual review process. The purpose of this effort is to ensure that local information about risk, goals, projects, and mitigation strategies included in the State Plan remains current.

If any party indicates that an update is warranted, then AEMA, in conjunction with the SHMT, will initiate the plan update process.

To further involve the SMHT in the ongoing mitigation planning process, the SHMT will be invited to attend AEMA's applicant briefing following a disaster. The SHMT will also be informed about disaster events via email. AEMA continues to advise agencies on how to incorporate mitigation into their planning efforts. Further, AEMA maintains weekly contact with several member of the SHMT including ADECA-OWR, ADEM, and the state's NFIP administrators. This ongoing communication and relationship will facilitate information sharing between agencies regarding mitigation activities.

6.1.4 System for Updating the Plan

The plan will be updated and re-submitted to FEMA for re-approval every five years, as required by law. The plan may also be subject to interim updates if any of the following conditions apply:

1. At the request of the Governor;
2. When significant new risks or vulnerabilities are identified; or
3. If the findings of the annual / post-disaster review and evaluation warrant.

The two sections below describe the procedures for interim and five-year updates, respectively.

6.1.4.1 Updates Resulting from Interim Evaluations

The nature of plan updates will be determined by the evaluation process described above. In general, AEMA will notify the SHMT that the Agency is initiating an interim plan update and describe the circumstances that created the need for the update. AEMA will determine if the full SHMT should be consulted regarding the potential changes. If it is determined that the SHMT

should be involved, the nature of the involvement will be at the discretion of AEMA. When interim updates are completed, AEMA will advise all SHMT members that the plan has been updated and describe the nature of the update.

6.1.4.2 Updates Related to the Required Five-year Plan Review

As required by law, every five years the plan will be updated for re-submission and re-approval by FEMA. In those years, the evaluation process will be substantially more rigorous and will examine all aspects of the plan in detail. It is anticipated that several meetings of the SHMT will be required, and that the plan will be formally readopted by the State. Between 6 and 12 months prior to the update deadline, AEMA will initiate the plan update process by contacting SHMT members and other appropriate agencies and organizations to determine a schedule and process for updating the plan.

The update process will entail a detailed and structured re-examination of all aspects of the original plan, followed by recommended updates. The recommendations will be presented to the SHMT for consideration and approval. It is expected that the Director of AEMA will approve the plan and adopt it on behalf of the Governor.

6.2 System for Monitoring Mitigation Measures and Project Closeouts

As described in the HMGP Administrative Plan, AEMA uses the following system for monitoring mitigation measures and project closeouts. AEMA reviewed this system as part of the 2018 plan update and determined that it is still effective and was still the preferred method for monitoring mitigation measures and project closeouts. Therefore, no changes have been made to the system.

6.2.1 Monitoring Mitigation Measures

Mitigation projects are generally monitored as follows.

- Each mitigation project or activity (such as planning) has an established period of performance that AEMA and FEMA monitor throughout the development and execution of the activity.
- AEMA conducts kick-off meetings for newly approved grants in cases where the subgrantee does not have much grant administration experience, or upon request, to discuss grant administration procedures and process to request reimbursement.
- AEMA regularly meets with representatives from FEMA Region IV to coordinate project monitoring activities.
- Every calendar quarter, AEMA sends letters to all subgrantees with open projects (i.e. ones that have been funded but are not completed), requesting a project progress update.
- Each of the subgrantees responds to AEMA request by preparing a standard report that details progress on individual mitigation projects and indicates percent complete.
- AEMA performs quarterly site visits on all open mitigation projects.

- AEMA compiles the subgrantee progress reports, and produces a consolidated quarterly report that is sent to FEMA Region IV for review.

6.2.2 Monitoring Project Closeouts

Mitigation project closeouts occur in the following sequence. These procedures were established in accordance with FEMA HMGP guidelines as set out in the HMGP Desk Reference and the State of Alabama HMGP Administrative Plan.

- Subgrantee indicates in a quarterly project progress report that a mitigation project is 100 percent complete.
- AEMA reconciles FEMA SmartLink account for the project (by disaster).
- AEMA initiates an internal financial audit of the project.
- AEMA resolves any issues discovered in the audit.
- AEMA sends FEMA Region IV a closeout letter that identifies the final eligible cost of the project and delineates any de-obligations that are required, as well as any monies that will be recovered from the subgrantee.

6.3 System for Reviewing Progress on Achieving Goals

In order to track progress on achieving the goals identified in this plan, AEMA will ensure that both the annual and five-year plan evaluations include a review and analysis of the goals, and the various actions that are intended to achieve them. This process will be substantially more rigorous and detailed during the formal plan update process. **Section 5** of the plan describes four hazard mitigation goals and includes a detailed table that lists the actions that the State is undertaking to address the goals. This table includes a column indicating the status of the various actions and a general indication of progress.

The system for reviewing progress on achieving goals will remain the same as it has proved successful over the last five years.

6.4 System for Reviewing Progress on Activities and Projects in the State Mitigation Strategy

As part of the annual evaluation, AEMA will email the SHMT to determine if there are any changes to the mitigation actions listed in the mitigation strategy section. In addition, members of the SHMT will be encouraged submit new actions at this time.

As part of the five-year update to the plan, AEMA will initiate a more detailed review and evaluation of all activities and projects noted in the mitigation strategy. AEMA will report its findings to the SHMT at meetings held as part of the plan update process. The results of these findings will be

included in the table of mitigation goals and actions included in **Section 5**. If requested by FEMA, AEMA will prepare a summary report describing the results of the review.

DRAFT