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Disaster costs can be determined by the payroll and office expenses during the period of assistance. If the subapplicant must purchase new equipment, only the equivalent rental cost of this equipment for the period of assistance is considered a disaster cost. The revenues generated by fees for inspections or permits, whether collected or not, must be deducted. Normal costs can be determined from a monthly average of payroll and office expenses during the most recent 12-month period that does not include Federal, State, or local disaster declarations. If a community has already received Federal assistance for meeting emergency building inspection needs (such as determining habitability), these costs must be deducted in determining extraordinary costs.

## A.12 Advance Assistance

Advance Assistance is authorized by the SRIA, which allows advancing up to 25 percent of the **HMGP** ceiling or \$10 million to Applicants and subapplicants, whichever is less. The purpose of Advance Assistance is to provide States and federally-recognized tribes with resources to develop mitigation strategies and obtain data to prioritize, select, and develop complete **HMGP** applications in a timely manner. FEMA expects Applicants and subapplicants that receive Advance Assistance to submit complete project applications up to or over the **HMGP** ceiling by the application deadline.

### ADVANCE ASSISTANCE

FEMA may provide up to 25 percent (with a limit of \$10 million) of the amount of estimated **HMGP** costs to Applicants and subapplicants in advance of incurring eligible costs.

FEMA expects States that receive Advance Assistance to submit complete project applications up to or over the available **HMGP** ceiling by the final **HMGP** project application deadline.

FEMA will continue to implement Advance Assistance on a pilot basis for any State or federally-recognized tribe having a declaration with an open application period. Advance Assistance is not automatic. States and federally-recognized tribes may request Advance Assistance by submitting an **HMGP** application form to the Regional Mitigation Division Director. The application must identify the proposed use of the funds, including costs in sufficient detail for each proposed activity and milestones for submitting completed **HMGP** applications to FEMA. Advance Assistance is subject to the **HMGP** cost-share requirements and SFM (i.e., FEMA will not obligate funds until the Recipient has an immediate need for the funds). Advance Assistance is part of the **HMGP** ceiling amount.

Applicants and subapplicants may use Advance Assistance for the following activities:

- ◆ Obtain staff or resources to develop a cost-share strategy and identify potential match funding
- ◆ Evaluate facilities or areas to determine appropriate mitigation actions
- ◆ Incorporate EHP considerations early into program decisions
- ◆ Collect data for BCAs, EHP compliance, and other program requirements

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- ◆ Scope and prioritize hazard mitigation projects (including State coordination of local projects) to incorporate sustainability, resilience, and renewable building concepts
  - ◆ Develop hazard mitigation projects, including engineering design and feasibility actions
  - ◆ Incorporate SFM principles into mitigation project work schedules and budgets that will facilitate compliance with the legislative requirement to expend obligated funds within 24 months
  - ◆ Conduct meetings, outreach, and coordination with potential subapplicants and community residents to identify potential participants for property acquisition and demolition or relocation projects
  - ◆ Conduct engineering design and feasibility studies for larger or complex community drainage projects or critical facility retrofits (such as for phased projects)
  - ◆ Conduct hydrologic and hydraulic studies for unmapped flood zones or Approximate Zone A areas where communities propose to submit hazard mitigation projects
  - ◆ Perform professional cost estimation services to aid consistency in project budgeting across subapplications
  - ◆ Rectify data consistency needs for other project application categories, such as EHP compliance, cost-sharing mechanisms, and work schedules
  - ◆ Complete necessary documents for deed restricting properties such as acknowledgement of voluntary participation or *Model Acknowledgement of Conditions for Mitigation of Property in a Special Flood Hazard Area with FEMA Grant Funds* for property acquisition projects

Requirements and deliverables associated with Advance Assistance and resulting **HMGP** applications may include:

- ◆ **Documentation of Advance Assistance Accomplishments:** Applicants and subapplicants must submit documentation to FEMA to support that they accomplished all activities listed in their Advance Assistance application.
- ◆ **Submission of Projects up to the HMGP Ceiling:** FEMA expects States that receive Advance Assistance to submit complete project applications up to or over the available **HMGP** ceiling by the final **HMGP** project application deadline.
- ◆ **Accounting for Use of Advance Assistance Funds:** For accounting and audit purposes, the State must submit sufficient financial detail to demonstrate that no costs claimed under Advance Assistance are duplicated in subsequent **HMGP** project applications or in State Management Cost budgets.
- ◆ **Documentation of EHP Considerations:** The Applicant and subapplicant must document that effects to environmental and historic resources were considered early in the planning and project scoping processes. This requirement is in addition to ensuring EHP compliance.