

## **CHAPTER 23**

### **PLAN MAINTENANCE AND IMPLEMENTATION**

The plan will be updated and submitted to the Federal Emergency Management Agency (FEMA) every three years, from the date of approval, as required by 44 CRF 201.4. In addition, review and update of the plan is suggested subsequent to a Presidential Disaster Declaration issued for Wyoming. In the interim, major policy or program changes may necessitate revision.

The Wyoming Office of Homeland Security (WOHS) is responsible for plan maintenance and updates based upon plan evaluations conducted by WOHS and the following entities:

- Pertinent Wyoming state government agencies;
- Pertinent federal agencies and not-for-profit organizations;
- County Homeland Security Coordinators; and
- Members and representatives of all cities, towns, and the general public.

#### **Three Year Plan Monitoring, Evaluation, and Update Process**

WOHS will serve this 2011 plan online at <http://wyohomelandsecurity.state.wy.us/>, with a request for comments and reviews to be supplied to WOHS. As a result, monitoring the plan over the three-year planning cycle will commence immediately after FEMA approval of the plan and will run continuously through the next revision due date. Comments received during this period will be incorporated, as appropriate, into the next draft plan revision. Critical and timely comments will be incorporated into the existing plan as soon as possible, after state and FEMA approval. The draft 2011 plan was also served online in January – February, 2011 in order to initiate the online serving and review process.

The formal plan evaluation will commence before the one-year period preceding the approval anniversary date, and will include pertinent Wyoming state government agencies, federal agencies, not-for-profit organizations, county Homeland Security Coordinators, local jurisdictions, and the general public. The draft update of the plan will be completed by WOHS and WOHS contractors, and will be based upon the online comments received, information contained in the county multi-hazard plans, and the formal evaluations with state/federal/local entities and the general public. The draft update of the plan will also be served online, with comments incorporated into the final plan.

As part of the evaluation process, the Wyoming Office of Homeland Security will conduct meetings with appropriate state and federal agencies, local jurisdictions, and members of the public as described in Chapter 2 and above. The following items will be addressed as part of the evaluation:

1. Consistency with the “Standard State Hazard Mitigation Plan Review Crosswalk” provided by FEMA. Ensure FEMA comments from the previous plan review are incorporated into the new plan.
2. Ensure risk assessment data is current. New information and maps will be incorporated

- into hazard profiles as needed. Hazard experts will validate the profiles.
3. Evaluate state mitigation strategies to include progress on achieving objectives and the status/effectiveness of each of the proposed state mitigation projects/measures listed in Chapter 21.
  4. Ensure mitigation measures address all natural hazards having occurred in state since approval of previous plan.
  5. Identify problems (technical, legal, financial, and other), which hinder or otherwise affect implementation of the plan and recommend action steps for resolving these issues.
  6. Recommend necessary revisions to risk assessment, objectives, proposed projects, and rankings, based on collection of new information, and update the plan to reflect major changes in policies, priorities, programs, and funding, as appropriate. Recommendations will include post-disaster hazard mitigation report findings.
  7. Incorporate, as necessary, information obtained from local multi-hazard mitigation plans, approved or unapproved by FEMA, which were submitted to WOHS since the most recent plan update to include documentation of local events, addition of recently collected geographic information systems (GIS) data, changes or additions of proposed mitigation projects, policies, codes, etc.
  8. Coordinate Multi-Hazard Mitigation Plan with other state plans identified in Chapter 2.
  9. Comply with all applicable Federal statutes and regulations in effect with respect to the periods for which the State receives grant funding, in compliance with U.S. Code 13.11(c) and will amend the plan whenever it is necessary to reflect changes in State or Federal laws and statues as required in U.S. Code 13.11(d).
  10. The WOHS will update/revise plan to reflect necessary additions and changes and submit the draft revision to all review and evaluation team members for their review and comments. Team members will re-rank hazards and proposed mitigation projects and measures as necessary.
  11. If substantial or policy changes are made to the plan, the revised plan will be submitted to the key state agencies for review. A final draft of the revised plan will be submitted to FEMA 45 days prior to the three-year anniversary date.
  12. After receiving FEMA review comments and any necessary changes are made to the plan, a copy of the revised plan will be placed on the WOHS website. State agencies, participating federal agencies, other planning partners, and the public will be invited to submit comments during a 14-day period. Based on a review of the comments, WOHS will incorporate any needed changes into the plan.

## **Annual Review**

An annual review and summary of the plan will be conducted by WOHS for the purpose of summarizing the status/effectiveness of each of the proposed state mitigation projects/measures listed in Chapter 22. Review and evaluation comments received during the previous year will be summarized.

## Changes in Plan Monitoring

It is important to stress the 2005 Multi-Hazard Mitigation Plan was constantly updated and modified after its release in 2005. There is also no longer a Multi-Hazard Task Force as addressed in Chapters 2 and 22. As such, the process for monitoring, evaluating, and updating the plan was modified from the approach in the 2005 and 2008 plans. Below the 2011 process is described first, followed by the 2005-2008 processes, which are included for historical purposes. Looking to the future, the 2014 update will incorporate mitigation strategies resulting from increased and improved communication between the Wyoming Office of Homeland Security, State and Federal governmental agencies, and each of the 23 counties. It is anticipated communication tools used will include face-to-face, pre-arranged meetings; informal meetings and gatherings; phone calls; and written communications to include informal e-mails and formal letters. The Wyoming Multi-Hazard Mitigation Plan update process has begun to reinstitute a Multi-Hazard Task Force and the task force will be re-established to address the 2014 update. In addition, the task force is anticipated to include the Wyoming Senior Advisory Committee.

Another goal for the 2014 update will be to incorporate analysis of one additional hazard, wind. In the process of completing the 2011 update the question was raised by internal staff at the Wyoming Office of Homeland Security about the inclusion of wind hazards in the State Multi-Hazard Mitigation Plan. Additionally, data from Wyoming's Risk Division revealed significant damage to state government property as a result of wind. In fact, wind ranks third in hazards generating damage to state property. Wind, because of its constant presence in Wyoming, is just dealt with by the population and often overlooked as a hazard. However, wind, in retrospect is both a damage-inducing hazard and is in the process of becoming a positive economic factor within Wyoming's economy. Given the damage it causes and the economic arm it is generating, straight-line wind hazards warrant an analytical review.

## 2011 Plan Update and Evaluation Methodology

The methodology used to monitor, edit, revise, and evaluate the Wyoming Multi-Hazard Mitigation Plan for the 2011 update was streamlined. The 2011 Wyoming Multi-Hazard Mitigation Plan update responsibilities were assigned to the Wyoming State Hazard Mitigation Officer (SHMO). The 2011 update was accomplished with the assistance of the Wyoming Office of Homeland Security internal resources, specifically the Services Unit, and resources with knowledge specific to the hazard chapters requiring detailed updating. Resources with hazard-specific knowledge included, but were not limited to, the Wyoming Geological Survey, the Wyoming Survey and Analysis Center, the Department of Fire Prevention and Electrical Safety, and the National Oceanic and Atmospheric Administration. Some updated Wyoming statistical data and updated Wyoming maps were located on the internet.

The process of re-establishing the Wyoming Multi-Hazard Task Force as a resource mechanism has begun. The members of the Multi-Hazard Task Force are established under Former-Governor Herschler's Executive Order 1985-6, wherein the regular members are listed as follows: 1) Wyoming Disaster and Civil Defense (now the Wyoming Office of Homeland Security) acts as chairman; 2) Fire Prevention and Electrical Safety; 3) Wyoming Highway Patrol; 4) Wyoming Geological Survey; 5) Department of Environmental Quality; 6) Economic

Development and Stabilization Board; 7) Department of Administration and Fiscal Control; 8) State Engineer; 9) Attorney General; 10) Department of Education; 11) Highway Department; 12) Public Service Commission; 13) Wyoming Agriculture Department; and 14) State Planning Coordinator. Other state agencies, under the same Executive Order, will participate on the Task Force on an ‘as needed basis.’

A resource currently established and expected to have a more significant role in the next Multi-Hazard Mitigation Plan update, is the Senior Advisory Committee (SACs). The Committee has a broad membership and meets regularly to review Wyoming Homeland Security priorities. SAC includes the following members: Wyoming Departments of 1) Health, 2) Agriculture, and 3) Wyoming Office of Homeland Security. Local agencies are also included in the SAC. They include local 4) law enforcement, 5) fire, 6) public health, 7) public works, 8) hospital and emergency medical services, and 9) homeland security agencies. Federal agencies included as members of the SAC are 10) the U.S. Attorneys’ Office, 11) FBI, 12) U.S. Air Force, and 12) the National Guard.

Additional, current collaborative efforts include input through serving the plan on the web site and actively requesting review and input. A contact list for each state, federal, local, and public entity has been established. The list is composed of the chain-of-command for each agency or organization, and typically contains the director, deputy director, and key division heads. Those entities are contacted for key decisions and input, including plan review. This ensures the management team in each agency or organization is current with planning or response activities of Wyoming Office of Homeland Security. Complete documentation of the revised planning and review structure is located in Chapter 2.

## **2008 Plan Update and Evaluation Methodology**

Due to resource allotment, the methodology used to monitor, edit, revise, and evaluate the Wyoming Multi-Hazard Mitigation Plan for the 2008 update was dissimilar to that originally projected. The initial change in update practices was due to a fundamental shift in responsibilities and organization at WOHS. The 2005 Wyoming Multi-Hazard Mitigation Plan assigned the update responsibilities to the Wyoming State Hazard Mitigation Officer (SHMO), who in turn convened the Wyoming Multi-Hazard Task Force. To expedite communication and responsiveness between WOHS and Wyoming responders and those responsible for statewide mitigation efforts, the Wyoming Multi-Hazard Task Force was disbanded in 2005. Additionally, as the time resources of agencies cooperating with WOHS became more restricted and in an effort to increase input from contributors, it was necessary to evolve the methodology of collaborative efforts. Previously, the 2005 Wyoming Multi-Hazard Mitigation Plan called for large, group meetings. These meetings would provide the environment to discuss plan updates and inform contributors of plan specifics. Instead of numerous committees, such as the Wyoming Multi-Hazard Task Force and Agency Representative Committee, responding to calls for assistance from the Wyoming Office of Homeland Security, one contact list for each state agency, federal agency, public entity, or organization was established. The list is composed of the chain-of-command for each agency or organization, and usually contains the director, deputy director, and key division heads. Those entities are contacted for all key decisions or input needed, including plan review. This ensures the management team in each agency or

organization is current with planning or response activities of WOHS. One-on-one meetings were conducted with all pertinent state, federal, local or public entities in order to review, evaluate, and revise the 2005 plan to create the draft 2008 plan. The draft 2008 plan was then served online for additional review and comment. After receiving and incorporating FEMA review comments, the draft 2008 plan was again served online for a final review. A complete documentation of the revised planning and review structure is located in Chapter 2.

## Monitoring Implementation and Project Closeouts

The WOHS will monitor projects identified in the Wyoming Multi-Hazard Mitigation Plan or projects for which Pre-Disaster Mitigation (PDM) or Hazard Mitigation Grant Program (HMGP) funds have been awarded. Quarterly reports, yearly reports, and reports for closeouts will be crosschecked against the list of proposed and funded state projects in Chapter 21. State and local mitigation projects, and changes to mitigation projects are accounted for in **Table 22.3**.

Visits, phone contact and/or e-mail communication with project points-of-contact and quarterly reports will be the primary means of monitoring progress on both PDM and HMGP projects. The WOHS's general responsibilities include (as detailed in the updated HMGP Administrative Plan):

- Assist GAR in executing all necessary applications and documents for HMGP by the appointed deadline following the declaration.
- Develop a strategy for implementation of Wyoming Hazard Mitigation Grant Program Administrative Plan.
- Coordinate activities with state, federal, and local agencies as related to implementation of the Wyoming Multi-Hazard Mitigation Plan.
- Submit an updated/revised HMGP administrative plan to the Regional Director for approval following each major disaster declaration. Amend this plan as regulation and policy changes require.
- Coordinate with the State Public Assistance Officer to schedule public meetings to provide potential HMGP applicants with information about the Stafford Act, Section 404, and application process.
- Coordinate the selection and operation of the HMGP project selection and ranking committee made up of appropriate representatives of state, federal, and local agencies.
- Monitor the quantity and quality of mitigation projects authorized by the FEMA Public Assistance Officer, and hazard mitigation activities carried out through all Human Services programs.
- Identify and select HMGP projects identified by sub-applicants with the assistance of the HMGP project selection team, to include review of proposed projects/measures listed in existing state and local hazard mitigation plans.
- Review and approve the sub-grantee applications and reports prior to submittal to the Regional Administrator.
- Notify potential applicants, establish priorities and procedures for evaluating and implementing HMGP projects, monitor projects and reporting procedures.
- Establish and administer project and financial management systems that will identify and track mitigation grant funds, and expenditure of state administrative and management

funds.

- Review and implement accounting procedures as required by federal regulations, the FEMA-State Agreement, and applicable state requirements.
- Ensure state and sub-grantee conformity with the requirements of 44 CFR parts 13, 14, and 206, and applicable state law.
- Process final claims for submission to the Regional Director with requests for final payment.
- Perform site inspections.
- Conduct project close-out and oversee final audit.

HMGP management responsibilities of the WOHS include (as detailed in the updated HMGP Administrative Plan):

- Awarding grants to sub-applicants qualifying based upon program regulations and guidance, fiscal accountability, reporting policy, qualifying projects, and appropriate staffing qualifications.
- Maintaining fiscal controls and appropriate stewardship.
- Maintaining documentation and records of activities taken.
- Properly filing quarterly reports.
- Approving appropriate and justified extensions of performance for sub-grantees.
- Approving appropriate and justified scope of work changes for sub-grantees.
- Approving appropriate and justified cost overruns for sub-grantees.
- Managing and allocating State management costs.
- Maintaining and practicing appropriate payment and fund allocation procedures.
- Withdrawal of HMGP support from sub-grantee projects if justified.
- Ordering and directing audits.
- Acceptance, examination of, and ruling on appeals from sub-grantees regarding any HMGP practices and procedures.

Each project submitted as part of the state's application must be separately closed out before the disaster grant as a whole can be closed out. WOHS maintains the following responsibilities and rights with HMGP Project and Disaster close outs (as detailed in the updated HMGP Administrative Plan):

- Inspection of projects to assure compliance with grant guidelines and policy.
- Final preparation and submittal of project and disaster closeout documentation.

PDM/FMA/RFC management and monitoring responsibilities include the following:

During the application and process:

- Coordinating solicitation of applications from target focus groups including city and county entities, state agencies and other grant eligible entities
- Determine and coordinate sub-applicant eligibility requirements

- Coordinate pre-screening of sub-applicant applications for suitability per the grant guidance to include eligibility of proposed project/plan
- Coordinate sub-applicant E-Grants access process
- Ensure completeness of application and consistency of planning/project activity with state goals
- Ensure adequacy of justification, completeness of statement of work, and cost estimate information
- Ensure cost share confirmation for the sub-applicant
- Ensure completeness of evaluation information

During the selection, pre-award process, and award process:

- Coordinate and monitor the selection and pre-award processes
- Consider the possibility of any reconsideration of applications as appropriate
- Monitor the award process to applicant and sub-applicants
- Initiate contract actions with sub-applicants and coordinate grant award agreement with sub-applicants consistent with state approved procedures

During the Performance Period:

- Monitor performance as outlined in the grant award agreement
- Consider more frequent reporting requirements as need dictates
- Ensure quarterly reports are submitted timely per the grant award agreement
- Ensure Federal Cash Transactions and Financial Status reports are accurately submitted for applicant and sub-applicant awards
- Ensure quarterly reports cover significant activities, completion of work, and cost management information per the award agreements
- Monitor activities to timely initiate extension actions as appropriately needed
- Project closeout will require final inspections as appropriate, final reports, and final documentation preparation per current Region closeout procedures and current award
- Compare quarterly reports and project progress to overall mitigation strategy for the state of Wyoming.
- Quarterly reports are available through the FEMA E-Grants System and/or at WOHS

## **Changes to Project Management**

Wyoming's HMA grant tracking process remains relatively unchanged since 2008. The State Hazard Mitigation Officer maintains current processes and tracking procedures, ensuring compliance with grant fiscal responsibility through the utilization of multiple fiscal software applications, and ensuring programmatic responsibility through site visits to county coordinators and others eligible to be HMA grant subgrantees, review of mitigation planning efforts, and project site visits.