

APPENDIX B: STATE MITIGATION PLAN REVIEW TOOL

This section is organized as follows:

- B.1 Plan Review Tool Summary
- B.2 Standard State Mitigation Plan Regulation Checklist
- B.3 Enhanced State Mitigation Plan Regulation Checklist
- B.4 Strengths and Opportunities for Improvement

FEMA uses the State Mitigation Plan Review Tool (“**Plan Review Tool**”) to document how the state mitigation plan meets the regulation. If plan requirements are not met, FEMA informs the state of the changes it needs to make in each of the Required Revisions sections.

The “**Strengths and Opportunities for Improvement**” summary offers FEMA an opportunity to provide more comprehensive feedback to the state.

INSTRUCTIONS: The Regulation Checklist must be completed by FEMA. The FEMA Plan Approver must reference the *State Mitigation Plan Review Guide* when completing the *Plan Review Tool*. The purpose of the Checklist is to identify the location of relevant or applicable content in the Plan by Element/sub-element and to determine if each requirement has been ‘Met’ or ‘Not Met.’

The “**Required Revisions**” summary at the bottom of each Element must be completed by FEMA to provide a clear explanation of the revisions that are required for plan approval. Required revisions must be explained for each plan sub-element that is ‘Not Met.’ Sub-elements should be referenced in each summary by using the appropriate number, where applicable. Requirements for each Element and sub-element are described in detail in the *State Mitigation Plan Review Guide*.

FEMA will provide a narrative summary of the review findings that includes a discussion of “**Strengths and Opportunities for Improvement**” as a means to offer more comprehensive feedback to the state to acknowledge where the plan exceeds minimum requirements as well as provide suggestions for improvements. FEMA will describe the strengths that are demonstrated and highlight examples of best practices.

FEMA may provide suggestions for improvement as part of the *Plan Review Tool* or in a separate document. FEMA’s suggestions for improvement are not required to be made for plan approval.

Required revisions from the Regulation Checklist are not documented in the “**Strengths and Opportunities for Improvement**” section.

B.1 Plan Review Tool Summary

State: Pennsylvania	Title and Date of Plan: Commonwealth of Pennsylvania State Hazard Mitigation Plan	Date of Submission: June 29, 2018
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Date Received in FEMA Region:	
FEMA Reviewer (Planning – Name / Title):	Date:
FEMA Reviewer (HMA – Name / Title):	Date:
FEMA Reviewer (Name / Title):	Date:
FEMA Reviewer (Name / Title):	Date:
FEMA Approver (Name / Title):	Date:
Plan Status (Not Approved, Approvable Pending Adoption, Approved):	Date:

SUMMARY	YES	NO
STANDARD STATE MITIGATION PLAN		
Does the plan meet the standard state mitigation plan requirements?		
REPETITIVE LOSS STRATEGY		
Does the plan include a Repetitive Loss Strategy? [see S6 / RL1; S8 / RL2; S9 / RL3; S10 / RL4; S13 / RL5; and S15 / RL6]		
ENHANCED STATE MITIGATION PLAN		
Does the plan meet the enhanced state mitigation plan requirements?		

B.2 Standard State Mitigation Plan Regulation Checklist

REGULATION CHECKLIST – STANDARD PLAN *M=Met; NM=Not Met	Location in Plan	M / NM*
STANDARD (S) STATE MITIGATION PLAN		
Planning Process		
S1. Does the plan describe the planning process used to develop the plan? [44CFR §§201.4(b) and (c)(1)]	Section 3.1, pg. 30 Section 3.3, pg. 48 Section 4.1, pg. 56 Section 5.1, pg. 552 Section 6.1, pg. 646 Section 6.4.4, pg. 767 Section 7.1, pg. 772	
S2. Does the plan describe how the state coordinated with other agencies and stakeholders? [44 CFR §§201.4(b) and (c)(1)]	Section 3.1, pg. 30 Section 3.2, pg. 44 Section 3.3, pg. 48 Section 3.4, pg. 53 Appendix C	
Required Revisions:		
Hazard Identification and Risk Assessment		
S3. Does the risk assessment include an overview of the type and location of all natural hazards that can affect the state? [44 CFR §201.4(c)(2)(i)]	Section 4.2.2, pg. 117 Section 4.3.1 to 4.3.16, pgs. 118-366	

<p>S4. Does the risk assessment provide an overview of the probabilities of future hazard events? [44 CFR §201.4(c)(2)(i)]</p>	<p>Section 4.3.X.4, see TOC for pages</p>	
<p>S5. Does the risk assessment address the vulnerability of state assets located in hazard areas and estimate the potential dollar losses to these assets? [44CFR §§201.4(c)(2)(ii) and 201.4(c)(2)(iii)]</p>	<p>Section 4.1.2, pg. 58 Section 4.3.X.6, see TOC for pages Section 4.2.2, Table 4.2.2-2, pg. 111 Appendix E</p>	
<p>S6. Does the risk assessment include an overview and analysis of the vulnerability of jurisdictions to the identified hazards and the potential losses to vulnerable structures? [44 CFR §§201.4(c)(2)(ii) and 201.4(c)(2)(iii)]</p>	<p>4.3.X.7, see TOC for pages</p>	
<p>S7. Was the risk assessment revised to reflect changes in development? [44CFR §201.4(d)]</p>	<p>Section 4.4, pg. 537</p>	
<p>Required Revisions:</p>		
<p>Mitigation Strategy and Priorities</p>		
<p>S8. Does the mitigation strategy include goals to reduce / avoid long-term vulnerabilities from the identified hazards? [44 CFR §201.4(c)(3)(i)]</p>	<p>Section 6.2, Table 6.2.4-3 pg. 713</p>	

<p>S9. Does the plan prioritize mitigation actions to reduce vulnerabilities identified in the risk assessment? [44CFR §§201.4(c)(3)(iii) and (iv)]</p>	<p>Section 6.2.2, pg. 652 Section 6.2.3, pg. 654 Section 6.2.4, pg. 654 Section 6.4.2, pg. 759</p>	
<p>S10. Does the plan identify current and potential sources of funding to implement mitigation actions and activities? [44CFR §201.4(c)(3)(iv)]</p>	<p>Section 5.3.3 pg. 579 Funding Column in Table 6.2.4-3 pg. 713</p>	
<p>S11. Was the plan updated to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities? [44 CFR §201.4(d)]</p>	<p>Section 4.4, pg. 537 Section 6.1, pg. 646 Section 6.2.3, pg. 654 Section 6.2.4, pg. 655 Section 7.1, pg. 772</p>	
<p>Required Revisions:</p>		
<p>State Mitigation Capabilities</p>		
<p>S12. Does the plan discuss the evaluation of the state’s hazard management policies, programs, capabilities, and funding sources to mitigate the hazards identified in the risk assessment? [44 CFR §201.4(c)(3)(ii)]</p>	<p>Section 5.2, pg. 552 Section 5.3.1, pg. 558 Section 5.3.2, pg. 576 Section 5.3.3, pg. 579 Section 5.3.4, pg. 596</p>	
<p>Required Revisions:</p>		

REGULATION CHECKLIST – STANDARD PLAN		Location in Plan	M / NM*
*M=Met; NM=Not Met			
Local Coordination and Mitigation Capabilities			
S13. Does the plan generally describe and analyze the effectiveness of local and tribal, as applicable, mitigation policies, programs, and capabilities? [44CFR §201.4(c)(3)(ii)]	Section 5.4.2, pg. 604 Section 6.2.4, Table 6.2.4-1 pg. 654 Section 6.3, pg. 746 Section 6.5, pg. 768		
S14. Does the plan describe the process to support the development of approvable local and tribal, as applicable, mitigation plans? [44 CFR §§201.3(c)(5) and 201.4(c)(4)(i)]	Section 6.3.1, pg. 746		
S15. Does the plan describe the criteria for prioritizing funding? [44 CFR §201.4(c)(4)(iii)]	Section 6.3.1.3, pg. 755		
S16. Does the plan describe the process and timeframe to review, coordinate and link local and tribal, as applicable, mitigation plans with the state mitigation plan? [44 CFR §§201.3(c)(6), 201.4(c)(2)(ii), 201.4(c)(3)(iii), and 201.4(c)(4)(ii)]	Section 5.4. pg. 601 Section 6.3, pg. 746		
Required Revisions:			
Plan Review, Evaluation, and Implementation			
S17. Is there a description of the method and schedule for keeping the plan current? [44 CFR §§201.4(c)(5)(i) and 201.4(d)]	Section 7.2, pg. 773		

<p>S18. Does the plan describe the systems for monitoring implementation and reviewing progress? [44 CFR §§201.4(c)(5)(ii) and 201.4(c)(5)(iii)]</p>	<p>Section 7.1, pg. 772 Section 7.2, pg. 773 Section 7.4.1, pg. 775 Section 7.4.2, pg. 776</p>	
<p>Required Revisions:</p>		
<p>Adoption and Assurances</p>		
<p>S19. Did the state provide documentation that the plan has been formally adopted? [44 CFR §201.4(c)(6)]</p>	<p>N/A</p>	
<p>S20. Did the state provide assurances? [44 CFR §201.4(c)(7)]</p>	<p>Section 1.5, pg. 5</p>	
<p>Required Revisions:</p>		
<p>Repetitive Loss (RL) Strategy</p>		
<p>RL1. Did Element S6 (risk assessment) address RL and SRL properties? [44CFR §§201.4(c)(2)(ii), 201.4(c)(2)(iii), and 201.4(c)(3)(v)]</p>	<p>Section 4.3.5, pg. 193 Section 4.3.5.7: Tables 4.3.5-9, pg. 228 and 4.3.5-10, pg. 230</p>	

<p>RL2. Did Element S8 (mitigation goals) address RL and SRL properties? [44CFR §§201.4(c)(3)(i) and 201.4(c)(3)(v)]</p>	<p>Section 6.2.1, pg. 649 Section 6.2.4, pg. 654 Section 6.4.2, pg. 759</p>	
<p>RL3. Did Element S9 (mitigation actions) address RL and SRL properties? [44 CFR §§201.4(c)(3)(iii) and 201.4(c)(3)(v)]</p>	<p>Section 6.2.3, pg. 654 Section 6.2.4, pg. 654 Section 6.4.2, pg. 759 Section 6.4.3, pg. 764</p>	
<p>RL4. Did Element S10 (funding sources) address RL and SRL properties? [44CFR §§201.4(c)(3)(iv) and 201.4(c)(3)(v)]</p>	<p>Section 5.3.3 pg. 579 Funding Column in Table 6.2.4-3 pg. 713 Section 6.4.2, pg. 744</p>	
<p>RL5. Did Element S13 (local and tribal, as applicable, capabilities) address RL and SRL properties? [44 CFR §§201.4(c)(3)(ii) and 201.4(c)(3)(v)]</p>	<p>Section 5.3.1.2, pg. 560 Section 5.3.2, pg. 576 Section 6.3.1.2, pg. 748 Section 6.4.3, pg. 764</p>	
<p>RL6. Did Element S15 (prioritizing funding) address RL and SRL properties? [44 CFR §§201.4(c)(4)(iii) and 201.4(c)(3)(v)]</p>	<p>Section 5.3.3 pg. 579 Section 6.3.1.3, pg. 755 Section 6.4.2, pg. 759</p>	
<p>Required Revisions:</p>		

B.3 Enhanced State Mitigation Plan Regulation Checklist

REGULATION CHECKLIST – ENHANCED PLAN		Location in Plan	M / NM*
*M=Met; NM=Not Met			
ENHANCED (E) STATE MITIGATION PLAN			
Meet Standard State Mitigation Plan Elements			
E1. Does the Enhanced plan include all elements of the standard state mitigation plan? [44 CFR §201.5(b)]	See Standard Element locations listed above		
Required Revisions:			
Integrated Planning			
E2. Does the plan demonstrate integration to the extent practicable with other state and/or regional planning initiatives and FEMA mitigation programs and initiatives? [44 CFR §201.5(b)(1)]	Section 4.1.6, pg. 79 Section 4.3.5.6, pg. 213 Section 5.5, pg. 619 Section 6.2.4, pg. 654 in Table 6.2.4-1, pgs. 655-708; Table 6.2.4-2, pgs. 709-711; and Table 6.2.4-3, pgs. 713-745		
Required Revisions:			
State Mitigation Capabilities			

<p>E3. Does the state demonstrate commitment to a comprehensive mitigation program? [44 CFR §201.5(b)(4)]</p>	<p>Section 5.3, pg. 558 Section 5.3.1.2, pg. 560 Figure 5.5.2-1, pg. 642 Section 6.3, pg. 746 Section 6.4.4, pg. 767 Section 6.5, pg. 768</p>	
<p>E4. Does the enhanced plan document capability to implement mitigation actions? [44 CFR §§201.5(b)(2)(i), 201.5(b)(2)(ii), and 201.5(b)(2)(iv)]</p>	<p>Section 6.2.4, pg. 654 in Table 6.2.4-1, pgs. 655-708 Appendix I and J</p>	
<p>E5. Is the state effectively using existing mitigation programs to achieve mitigation goals? [44 CFR §201.5(b)(3)]</p>	<p>Table 4.3.5-12, pg. 237 Table 6.3.1-1, pg. 750 Section 6.5, pg. 768 Section 7.4, pg. 775 Appendix J</p>	
<p>Required Revisions:</p>		
<p>HMA Grants Management Performance</p>		
<p>E6. With regard to HMA, is the state maintaining the capability to meet application timeframes and submitting complete project applications? [44 CFR §201.5(b)(2)(iii)(A)]</p>	<p><i>FEMA Past HMA Grants Management Performance Review</i></p>	

<p>E7. With regard to HMA, is the state maintaining the capability to prepare and submit accurate environmental reviews and benefit-cost analyses? [44 CFR §201.5(b)(2)(iii)(B)]</p>	<p><i>FEMA Past HMA Grants Management Performance Review</i></p>	
<p>E8. With regard to HMA, is the state maintaining the capability to submit complete and accurate quarterly progress and financial reports on time? [44 CFR §201.5(b)(2)(iii)(C)]</p>	<p><i>FEMA Past HMA Grants Management Performance Review</i></p>	
<p>E9. With regard to HMA, is the state maintaining the capability to complete HMA projects within established performance periods, including financial reconciliation? [44 CFR §201.5(b)(2)(iii)(D)]</p>	<p><i>FEMA Past HMA Grants Management Performance Review</i></p>	
<p>Required Revisions:</p>		

B.4 Strengths and Opportunities for Improvement

STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT

INSTRUCTIONS: The purpose of the “Strengths and Opportunities for Improvement” section is for FEMA to provide more comprehensive feedback on the state mitigation plan to help the state advance mitigation planning. The intended audience is the state staff responsible for the mitigation plan update. FEMA will address the following topics:

1. Plan strengths, including specific sections in the plan that are above and beyond the minimum requirements; and
2. Suggestions for future improvements.

FEMA will provide feedback and include examples of best practices, when possible, as part of the *Plan Review Tool*, or, if necessary, as a separate document. The state mitigation plan elements are included below in italics for reference but should be deleted as the narrative summary is completed. FEMA is not required to provide feedback for each element.

Required revisions from the **Regulation Checklist** are not documented in the **Strengths and Opportunities for Improvement** section.

Results from the **Strengths and Opportunities for Improvement** section are not required for Plan Approval, but may inform discussions during the Program Consultation.

Describe the mitigation plan strengths, including areas that may exceed minimum requirements.

- *Planning process*
- *Hazard identification and risk assessment*
- *Mitigation strategy*
- *State mitigation capabilities*
- *Local and tribal, as applicable, coordination and mitigation capabilities*
- *Plan review, evaluation, and implementation*
- *Adoption and assurances*
- *Repetitive loss strategy, if applicable*
- *Integrated planning process, if applicable*
- *Commitment to a comprehensive mitigation program, if applicable*
- *HMA grants management performance, if applicable*

Describe areas for future improvements to the mitigation plan.

- *Planning process*
- *Hazard identification and risk assessment*
- *Mitigation strategy*
- *State mitigation capabilities*
- *Local and tribal, as applicable, coordination and mitigation capabilities*
- *Plan review, evaluation, and implementation*
- *Adoption and assurances*
- *Repetitive loss strategy, if applicable*
- *Integrated planning process, if applicable*
- *Commitment to a comprehensive mitigation program, if applicable*
- *HMA grants management performance, if applicable*