

# Community Assistance Program – State Support Services Element (CAP- SSSE) Evaluation: Findings and Recommendations

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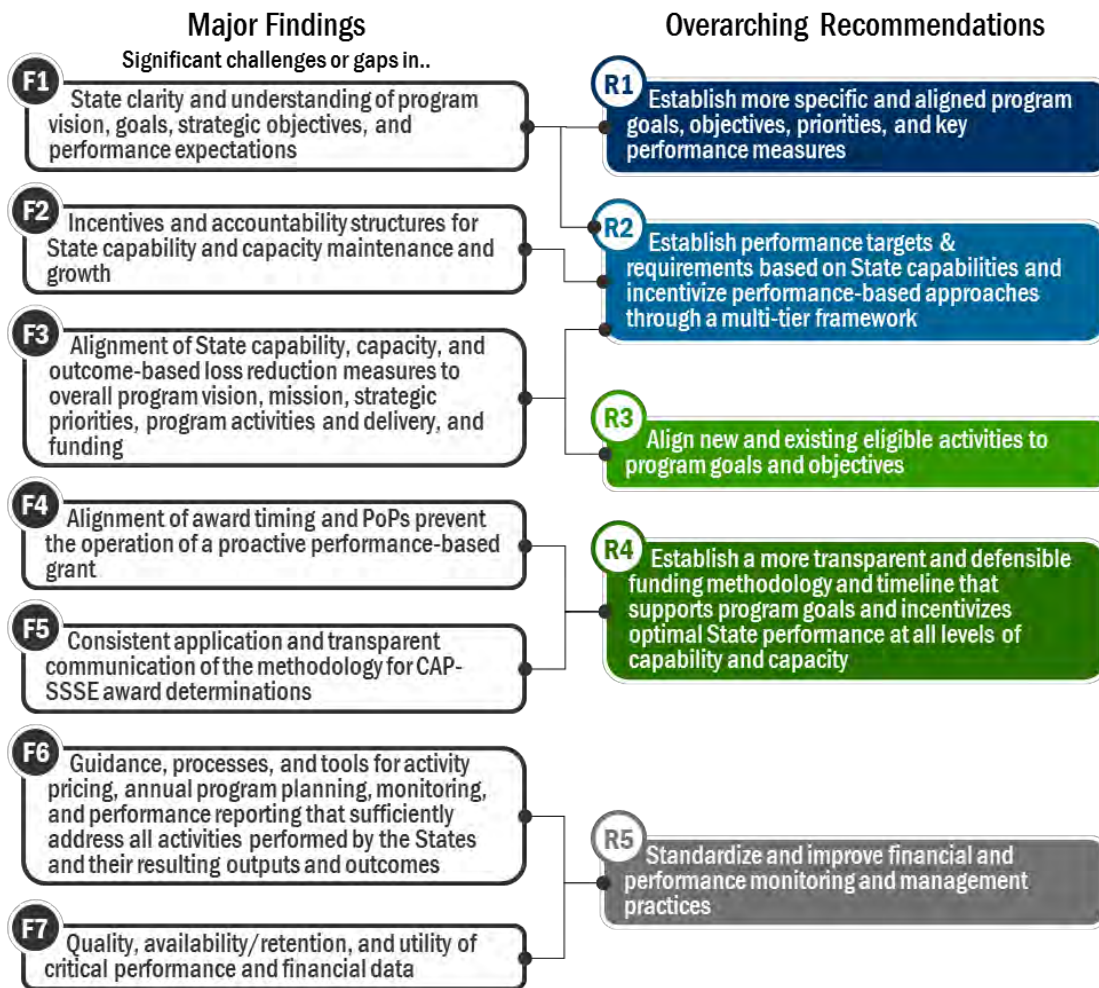
## EXECUTIVE SUMMARY

The Floodplain Management Division (FPMD) of the Federal Emergency Management Agency (FEMA) delivers a variety of services aimed at ensuring that the Nation's communities adopt and enforce standards that meet or exceed minimum National Flood Insurance Program (NFIP) floodplain management criteria. Floodplain Management staff in the FEMA Regional offices, and in the States and Territories through the Community Assistance Program – State Support Services Element (CAP-SSSE) grant program, provide direct implementation support through technical assistance to communities participating in the NFIP and through evaluation of community performance in implementing NFIP floodplain management requirements. The goals of CAP-SSSE are to:

1. Help to ensure that the flood loss reduction goals of the NFIP are met;
2. Build state and community floodplain management expertise and capability; and
3. Leverage state knowledge and expertise in working with communities.

There is an increasing need for programs that fall under the Federal Insurance and Mitigation Administration (FIMA), like CAP-SSSE, to demonstrate quantitative achievements and activities performed by its grantees and partners against national risk reduction goals. At the outset of Federal Fiscal Year (FY) 2017, FPMD completed a comprehensive evaluation of the CAP-SSSE program. The goal of the CAP-SSSE program evaluation was to assess the program's efficiency and effectiveness in developing State programs to perform the duties and responsibilities of State Coordinating Agencies as described in 44 CFR 60.25.

The qualitative and quantitative findings of the CAP-SSSE program evaluation support and expand upon previous evaluations and highlight areas of needed improvement across all levels of the CAP-SSSE model: strategy and planning; program implementation and evaluation; and enabling tools, processes, and resources. The major findings from this evaluation are summarized in the figure below, alongside a corresponding set of five overarching recommendations. In [Section 4](#) of this document, these recommendations are further delineated into considerations, proposed frameworks, and initiatives for each of the five overarching recommendations through a set of sub-recommendations.



When taken together, this set of recommendations could represent a markedly impactful transformation of the CAP-SSSE program. FEMA has made public commitments to make changes to CAP-SSSE for FY18; however, the implementation of the full set of recommendations could span several years. Ongoing socialization, coordination, co-creation, and testing with a variety of stakeholders, including the States and ASFPM, to appropriately design, plan, and implement these recommendations will be critical to their success.

## SECTION ONE INTRODUCTION

### 1.1 BACKGROUND

The Federal Emergency Management Agency's (FEMA) Floodplain Management efforts play a critical role in reducing the Nation's vulnerability to flood hazards and the consequences of flood disasters. The Floodplain Management Division (FPMD) delivers a variety of services aimed at ensuring that the Nation's communities adopt and enforce standards that meet or exceed minimum National Flood Insurance Program (NFIP) floodplain management criteria. At the national level, the program establishes the regulatory framework for communities that participate in the NFIP through the development of policy, guidance, standards, and technical publications. Floodplain Management staff in the FEMA Regional offices, and in the States and Territories through the Community Assistance Program – State Support Services Element (CAP-SSSE) grant program, provide direct implementation support to communities. This support includes encouraging new enrollments in the NFIP; monitoring and ensuring compliance through recurring community assistance engagements; helping to build community capability and capacity through training, outreach, and technical assistance; and incentivizing the adoption of higher floodplain management standards through the administration of the Community Rating System (CRS) program.

The functions performed by the NFIP State coordinating offices are critical to the overall effectiveness and efficiency of the NFIP and FEMA's Floodplain Management program. The CAP-SSSE program provides funding to States to provide technical assistance to communities participating in the NFIP and to evaluate community performance in implementing NFIP floodplain management requirements. The goals of CAP-SSSE are to:

1. Help to ensure that the flood loss reduction goals of the NFIP are met;
2. Build state and community floodplain management expertise and capability; and
3. Leverage state knowledge and expertise in working with their communities.

### 1.2 EVALUATION GOALS AND OBJECTIVES

With increasing public scrutiny on the NFIP, there is a greater need for the suite of programs under the Federal Insurance and Mitigation Administration (FIMA) to demonstrate quantitative performance against national risk reduction goals. FEMA relies on programs like CAP-SSSE to accomplish its mission and, therefore, is required to demonstrate the value of the activities performed by its grantees and partners as well as those performed by FEMA. In previous evaluations of the NFIP and floodplain management activities, a strong case has also been made that increased financial commitments to States through CAP-SSSE could improve performance against program objectives, specifically with respect to compliance.

At the outset of federal Fiscal Year (FY) 2017, FPMD completed a comprehensive evaluation of the CAP-SSSE program. The goal of the CAP-SSSE program evaluation was to assess the program's efficiency and effectiveness in developing State programs to perform the duties and responsibilities of State Coordinating Agencies as described in 44 CFR 60.25. The supporting evaluation objectives were to better understand and articulate:

- The overall program goals and strengths, challenges, opportunities, and risks;

- How important and influential guidance from FEMA as well as State preference and priorities are in driving how States plan work and apply for funding under CAP-SSSE;
- The process, including the information/data, strategic considerations, external drivers, or other inputs, FEMA uses to ultimately determine how much funding each State receives each year;
- How Cooperative Agreements are finalized, including what broader strategies are employed to ensure the appropriate work is completed across the entire Region, what negotiations occur between FEMA and the States, and which elements of Cooperative Agreements are driven by FEMA versus those that are driven by the States; and
- The degree to which States execute what is explicitly written in their Cooperative Agreements each year; the types of support and oversight FEMA provides to States throughout their Period of Performance (PoP); and the way State performance and contribution to program goals is measured.

### 1.3 ORGANIZATION OF THIS DOCUMENT

FPMD's evaluation of the CAP-SSSE model, including recommendations for optimizing the delivery and value of the program, are detailed in the subsequent sections of this report.

Beyond the introduction, this reports presents FPMD's:

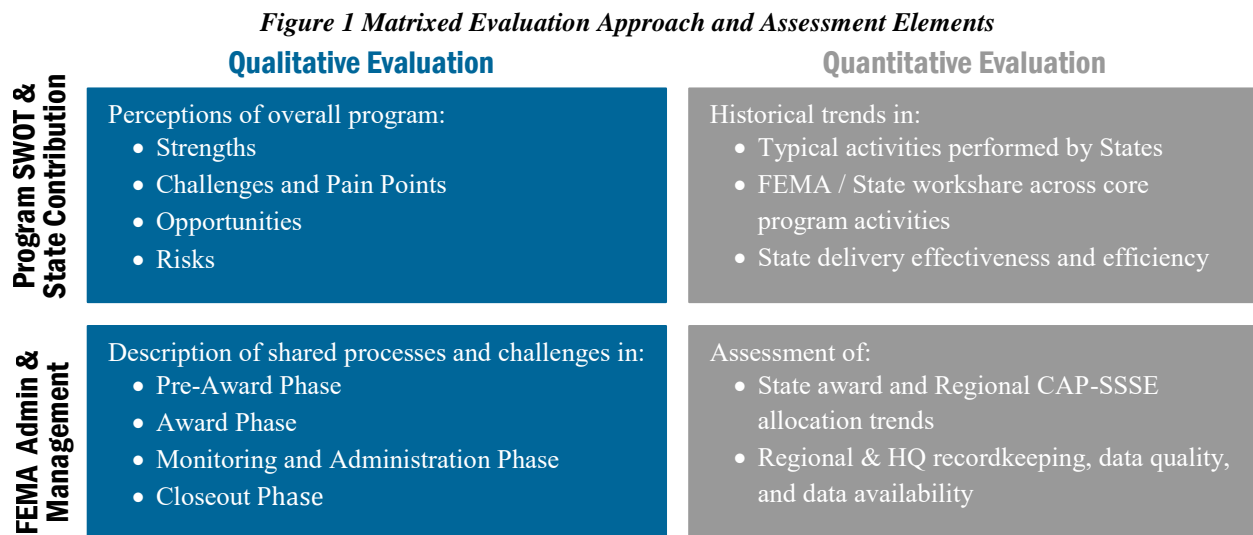
- Evaluation approach, including qualitative and quantitative data collection and synthesis;
- Key findings, including program strengths, challenges, risks, and historical financial and performance trends; and
- Recommendations, including detailed frameworks, proposed initiatives, and potential sequencing for program improvements.



## SECTION TWO EVALUATION APPROACH

### 2.1 MATRIXED EVALUATION APPROACH

To accomplish the goals and objectives of the CAP-SSSE program evaluation, FPMD developed a matrixed approach to data collection and analysis, leveraging qualitative and quantitative data to gather insights into the history and current state of the program. Figure 1 illustrates this concept below.



### 2.2 QUALITATIVE DATA COLLECTION AND ANALYSIS

To formulate a comprehensive and targeted qualitative evaluation, both FEMA and State input on the CAP-SSSE model’s strengths, challenges, opportunities, and risks was compiled and examined to evaluate the current state of the program. Additionally, evaluation of FEMA grant administration and management was conducted to identify challenges in current processes across the all phases of the grant lifecycle: pre-award, award, monitoring and administration, and closeout.

The qualitative evaluation focused on analyzing information gathered directly from individual stakeholders, focus groups, literature, and industry publications. For focus group and individual data collection, FPMD designed probing question sets (see Appendix A) and facilitated dialogue with stakeholders through group exercises, open discussion, live web-based and smartphone application polling, and E-mail exchange. These sources are cited together below in Table 1 to avoid redundant citations in the forthcoming sections.

**Table 1 Qualitative Data Sources**

| Source Type | Source  | Date               | Description   |
|-------------|---|--------------------|---|
| Focus Group | FEMA Regional CAP-SSSE Coordinator’s Meeting <sup>1</sup> | February 7-9, 2017 | Three-day focus group session to assess FEMA operations through each phase of the grant lifecycle; FEMA staff input to program SWOT analysis. |

| Source Type         | Source   | Date   | Description   |
|---------------------|--|--|---|
| Focus Group         | State NFIP Coordinator’s Training at the ASFPM Conference <sup>ii</sup>  | May 1, 2017                                    | Three-hour training and discussion session on CAP-SSSE execution and management at the State level.   |
| Focus Group         | State NFIP Coordinator’s Focus Group Session at the Hazard Mitigation Assistance (HMA) Workshop <sup>iii</sup>   | June 2, 2017                                   | 2.5-hour focus group session to gather State input on each phase of the grant lifestyle and the program SWOT analysis.  |
| Individual Feedback | Ongoing E-mail Feedback from State NFIP Coordinators   | May - July 2017                                | Written feedback on top challenges and opportunities from individual State Coordinators, including those located in Massachusetts, Iowa, Alabama, Illinois, and Maryland. |
| Literature          | ASFPM’s Floodplain Management 2010: State and Local Programs <sup>iv</sup><br><br>ASFPM’s Building Effective State Programs Strategic Planning Guide (2010) <sup>v</sup>           | 2010 and 2011 Reports<br><i>(respectively)</i> | Reports containing foundational principles for evaluating the strength of State programs.   |
| Literature          | AIR’s State Roles and Responsibilities in the National Flood Insurance Program, prepared as part of the 2001–2006 Evaluation of the National Flood Insurance Program <sup>vi</sup> | September 2006 Report                          | Report containing evaluation of State roles and responsibilities and insights into CAP-SSSE effectiveness.  |

Qualitative data was analyzed and key findings were formulated through the identification of: 1) common themes from the individual feedback and focus group discussions; and 2) alignment with previous evaluation insights from the Association of State Floodplain Managers (ASFPM) and the American Institutes for Research (AIR).

### 2.3 QUANTITATIVE DATA COLLECTION AND ANALYSIS

State performance data dating back to October 1, 2001 (FY2001) was compiled and examined to evaluate the States’ contribution to NFIP and FEMA Floodplain Management program goals. Additionally, grant award and scope of work (SOW) data was utilized to assess historical trends in the funding and delivery of floodplain management program activities to the nation’s NFIP communities. These data were collected from a variety of systems and sources which are cited together below in Table 2 to avoid redundant citations in the forthcoming sections.

**Table 2 Quantitative Data Sources**

| Source Type      | Source   | Date(s)      | Description  |
|------------------|--|--------------|--|
| Performance Data | Community Information System (CIS) <sup>vii</sup>  | Since FY2001 | Records of State delivery of longitudinally-tracked* program activities including CAVs, CACs, Ordinance Reviews, and General Technical Assistance (GTA) instances. |
| Performance Data | State Cooperative Agreements <sup>viii</sup> and Performance Reports <sup>ix</sup> – from FEMA Regional CAP Coordinators | 2008 - 2016* | State Scopes of Work (SOWs), Quarterly and Annual State Performance Reports  |

| Source Type      | Source  | Date(s)      | Description  |
|------------------|---|--------------|--|
| Performance Data | FEMA CAP GAP Analyses <sup>x</sup>  | 2009         | Sample of State CAP GAP Analyses from 2009 describing planned activities and corresponding resource needs                                    |
| Financial Data   | FEMA Integrated Financial Management Information System (IFMIS) – via FPMD Budget Staff <sup>xi</sup> | Since FY2001 | Initial State awards.<br><i>Not included – cost match or modifications such as deobligations, cost PoP extensions, or additional funding</i> |
| Financial Data   | 2011 Risk-Based Funding Formula <sup>xii</sup>  | 2011         | Methodology for State funding decisions established in 2011 and resulting award recommendations for each State                               |

\* Significant data gaps – detailed in Section 3.4 of this report

To formulate key findings, descriptive analyses of the performance and financial data were performed to develop a national-level characterization of State program delivery as a function of funding. One of the original intentions of the quantitative analysis was to analyze and compare historical State SOWs to the work performed and assess actual unit costs and efficiencies in State delivery of floodplain management activities. Significant data gaps were uncovered (detailed in [Section 3.4](#) of this report), however, which ultimately led the analysis to focus on the condition of FPMD’s data and recordkeeping practices. Therefore, the descriptive analyses were focused on depicting quantities and frequencies of longitudinally-tracked floodplain management program activities by provider (i.e., FEMA or the States), historical State awards as a percentage of total CAP-SSSE funding, and the availability and quality of historical CAP-SSSE performance and financial documentation.

## SECTION THREE KEY FINDINGS

### 3.1 PERCEIVED CAP-SSSE STRENGTHS AND CHALLENGES

Across the board, FEMA, the States, and other stakeholders and previous evaluators of the CAP-SSSE program agree that States play a critical role in the success of the NFIP. The long-standing partnership between FEMA and the States as well as the flexibility of the CAP-SSSE grant itself provide an important opportunity for States to utilize and apply their unique expertise and understanding to ensure their communities are safer and more resilient. It is clear, however, that many known and previously identified challenges and weaknesses with the program must still be addressed. The disparity between effective and less-effective State programs is described, at least anecdotally, as growing. This disparity, combined with significant challenges with award timing and award determinations, the program's reliance on institutional knowledge, and a perceived lack of alignment or focus on program strategy, priorities, and performance measures, has created a disincentive for State programs to plan or continue to grow and innovate. FEMA and State perceptions of the CAP-SSSE program's strengths, opportunities, challenges, and potential risks are detailed below in Table 3.

*Table 3 FEMA and State Perspectives on Overall Program Strengths and Challenges*

| <b>Strengths and Opportunities</b>   | <b>Challenges and Risks</b>   |
|--|---|
| <ul style="list-style-type: none"> <li>• States carry more trust and credibility with communities and have established working relationships.</li> <li>• States have more in-depth local knowledge about community needs, conditions, state laws, and unique processes.</li> <li>• The Floodplain Management program at-large carries a wealth of institutional knowledge.</li> <li>• The flexibility of the CAP-SSSE grant/cooperative agreement can allow for adaptation to State capabilities as well as community needs.</li> <li>• There are strong long-term partnerships between FEMA and States. Shared goals, risks, and rewards ensure all parties are committed to the success of the program, including designing and implementing potential changes.</li> </ul> | <ul style="list-style-type: none"> <li>• Program success relies heavily on institutional knowledge without sufficient documentation – staff turnover at FEMA and in the States often represents sharp capability and capacity declines.</li> <li>• There is not a transparent or defensible formula or criteria for award determinations. State funding and the work that States perform are not consistently or quantifiably linked to program strategy, past performance, capability, or capacity.</li> <li>• States and FEMA Regional staff lack data and tools for performance and financial analysis and strategic planning</li> <li>• Inflation has outpaced CAP-SSSE funding. States are doing more with less.</li> <li>• FEMA oversight/monitoring is perceived to be under-resourced.</li> <li>• There is a lack of Federal program and fiscal alignment to the States' budgetary and planning cycles. States are often "working on a promise" from October 1 until funds are obligated in late May/June.</li> </ul> |

## 3.2 STATE CONTRIBUTIONS TO PROGRAM GOALS

### 3.2.1 State Understanding and Buy-In for Program Goals and Objectives

The feedback received from both FEMA staff and the NFIP State Coordinators indicates that there are variations in the capability, capacity, and performance expectations of the States. Often, State Coordinators indicated that they felt they did not have a firm understanding of the program's goals, strategies, priorities, or metrics (beyond those required in the Notice of Funding Opportunity (NOFO)), which hindered their ability to plan their work effectively or develop aspirational plans to increase the capability or capacity of their State program. Though CAP-SSSE program documents establish three program goals (see Figure 2) that relate to flood loss reduction and capability building, there is a lack of sufficient detail on their alignment with eligible and required activities or performance measures and targets in the NOFO or other program guidance to enable the States to effectively plan, implement, monitor, or adapt strategies for increasing their capability, capacity, and the effectiveness of their program.

**Figure 2 CAP-SSSE Program Goals**

1. Help to ensure that the flood loss reduction goals of the NFIP are met
2. Build state and community floodplain management expertise and capability
3. Leverage state knowledge and expertise in working with their communities

This challenge manifested itself most notably when States were asked to define what a successful State floodplain management program looks like in measurable terms at the HMA Workshop in June 2017. Responses, tracked through live web-based polling, were cross-tabulated with an earlier introductory question about each State Coordinator's tenure in the program. The results, summarized in Figure 3, clearly showed a relationship between tenure and the way the State Coordinator defined success. This indicates that these staff are learning on the job and, often, it is taking years to orient them towards a focus on the ultimate goals of the program.

**Figure 3 Success Indicators as Defined by NFIP State Coordinators (SCs)**

| <b>NFIP SCs in their role for...</b> | <b>Defined "success" as...</b>                            |
|--------------------------------------|---|
| Less than 2 Years                    | Good relationships and increased contacts with the locals |
| Between 3-5 Years                    | Enforcement, meeting requirements and commitments         |
| Longer than 6 Years                  | Reduced damage, no damage, safe development               |

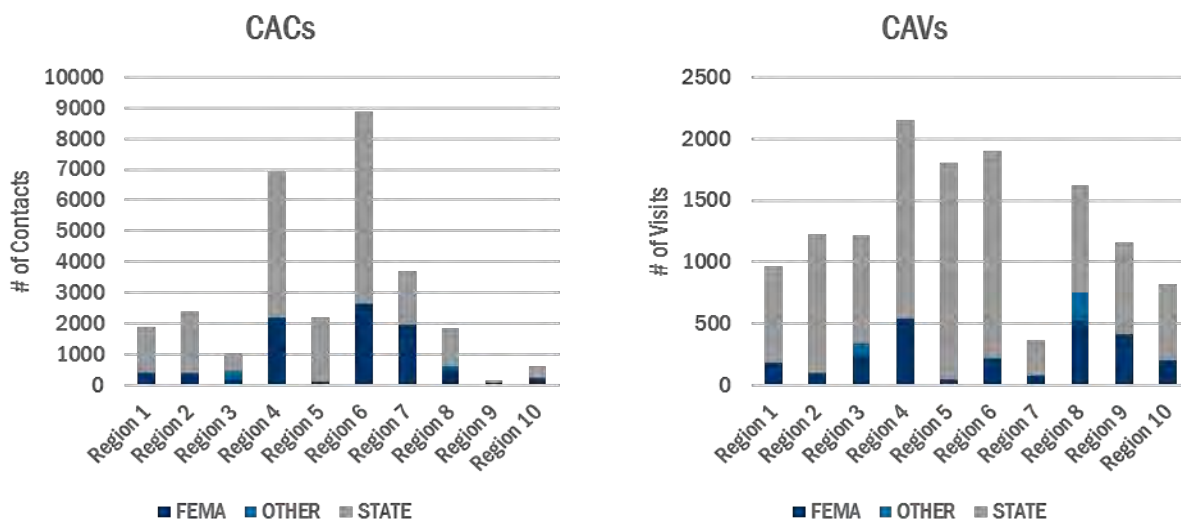
### 3.2.2 Floodplain Management Activities Delivered by the States

Currently, the program does not track or keep longitudinal measures of outreach, training, or coordination (internal or external) activities, even though these areas are where States describe they spend a large percentage of time and resources. However, longitudinally-tracked program activity data in CIS (nationwide since FY2001) indicates that, on average, States have been performing the large majority of the compliance work, ordinance reviews, and general technical assistance (GTA).

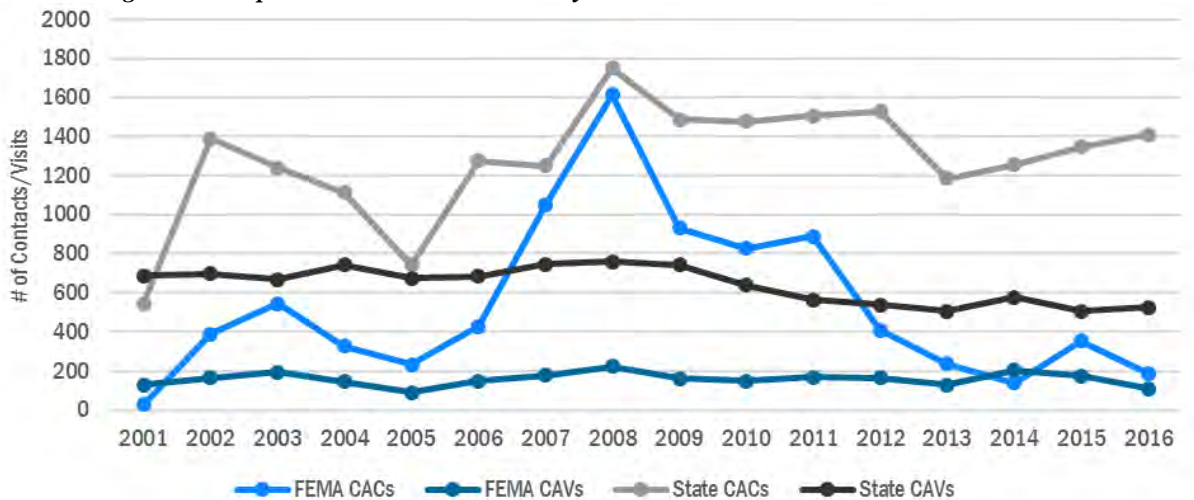
3.2.2.1 Compliance Activities

The Floodplain Management program has delivered 29,599 Community Assistance Contacts (CACs) and 13,226 Community Assistance Visits (CAVs) since FY2001. The States have performed 69.5 percent of the CACs and 78 percent of the CAVs. Figures 4 and 5 below depict this workshare by FEMA Region and by year.

**Figure 4 Compliance Workshare between FEMA and the States since FY2001 by Region**

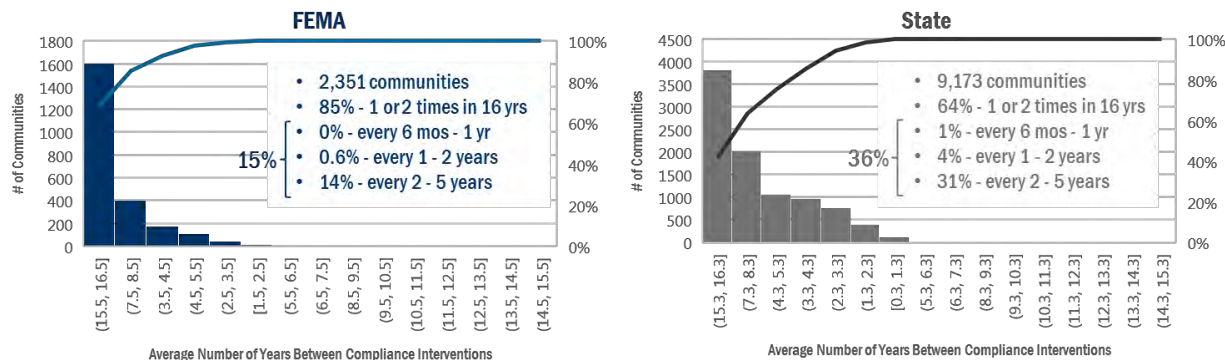


**Figure 5 Compliance Activities Executed by FEMA and the States Each Year Since FY2001**



Not only do the States provide the majority of the compliance contacts and visits, they tend to provide it more often and within the context of established community relationships. Figure 6 demonstrates the frequency by which the States execute compliance contacts and visits in their communities in comparison to FEMA since FY2001. Of the 9,173 communities where the State is the primary CAV/CAC provider, 36 percent are receiving compliance checks at least every five years.

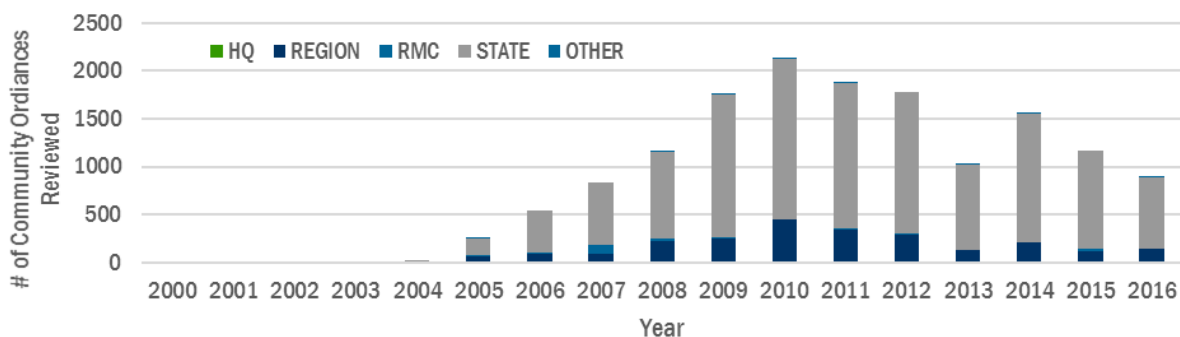
**Figure 6 Distribution of NFIP Communities by Frequency of CAVs & CACs by Primary Provider**



### 3.2.2.2 Ordinance Reviews

The Floodplain Management program has reviewed the ordinances in 15,020 communities in the last decade – roughly 68 percent of all NFIP communities. As depicted in Figure 7 below, the States have performed the vast majority (83 percent) of this work.

**Figure 7 Ordinances Reviewed by Provider and Year**



### 3.2.2.3 General Technical Assistance (GTA)

The Floodplain Management Program has provided general technical assistance (GTA) to more than 16,247 communities since FY2001, which is greater than 73 percent of all communities participating in the NFIP. The States have provided 61.5 percent of all the instances of GTA since FY2001.

Similar to the compliance findings, States provide the majority of GTA and they tend to provide it more often and within the context of established community relations. As depicted in Figure 8 below, trusted relationships between communities and the States are evident in the GTA data.



**Figure 8 Number of Communities Receiving GTA Since FY2001 by Primary Provider**

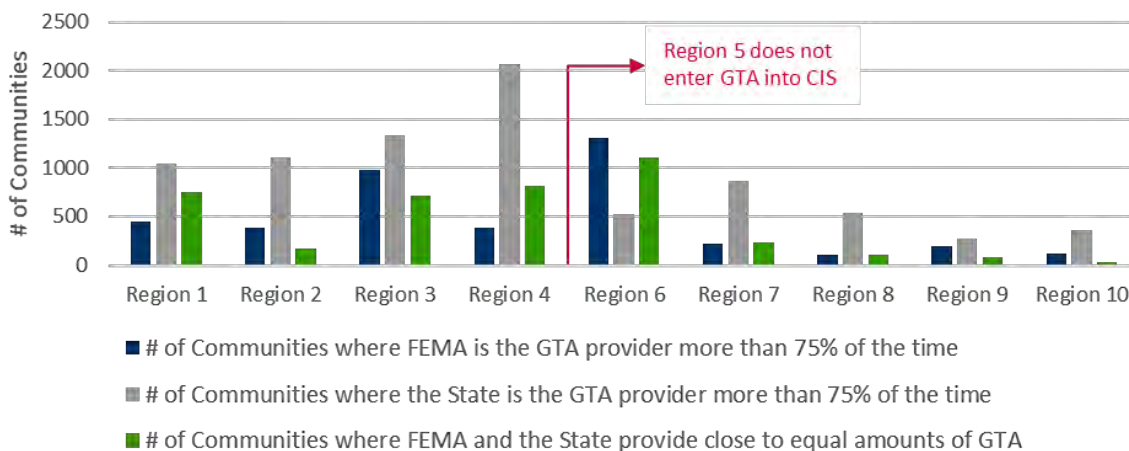
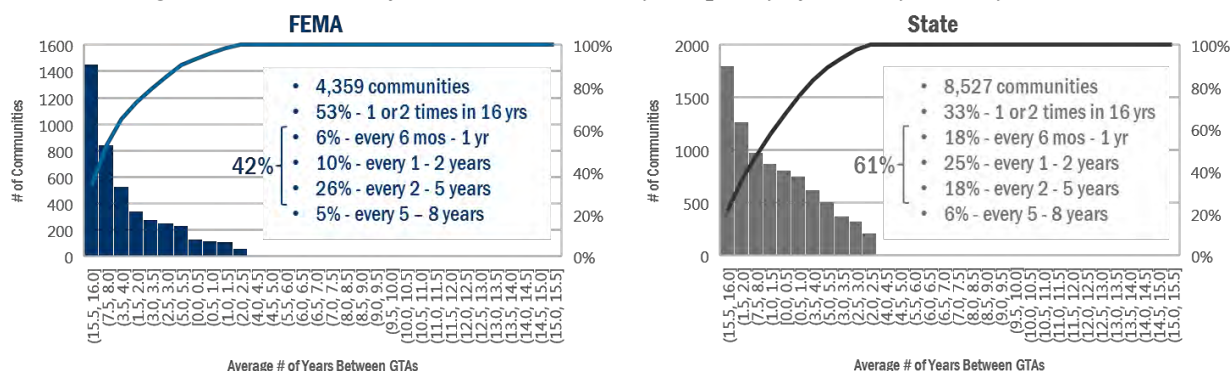


Figure 9 below demonstrates the frequency by which the States provide GTA to their communities in comparison to FEMA since FY2001. Of the communities where the State is the primary GTA provider, 61 percent are receiving GTA at least once every 5 years.

**Figure 9 Distribution of NFIP Communities by Frequency of GTAs by Primary Provider**



### 3.3 ADMINISTRATION OF THE CAP-SSSE GRANT

The sections below describe the current state of the annual CAP-SSSE grant lifecycle, highlighting typical roles, drivers and influencers, process pain points, inconsistencies across Regions, historical trends, and opportunities for improvement. These findings illustrate that there are significant challenges, established best practices, and success stories that represent opportunities for the CAP-SSSE to improve and evolve in the future.

#### 3.3.1 Pre-Award Phase

##### 3.3.1.1 Strategy and Priority Setting

The NOFO acts as a source of clarification and boundary setting with moderate prioritization. NOFO content is typically not revised annually to specifically motivate or incentivize activities, approaches, or products in support of broader program goals or strategies. FEMA and the States believe it could play this role in the future if priorities were established; however, there is not broad consensus on the value of being more prescriptive in the NOFO.



States indicate that they want to better understand program performance priorities and metrics so they can plan their work more effectively. They believe Regional strategic planning and prioritization should be discussed annually at venues such as the Regional CAP meetings. Additionally, many tenured State Coordinators believe that a strategic plan is a critical component of a successful State program and that it should be required in the NOFO.

### *3.3.1.2 Eligible Activities, Required Activities, and Scope Negotiations*

State SOWs are generally negotiated on an ongoing basis. State Specialists play an important role in collaborating with their States on what should be and will be accomplished in a given year. The State's preference and capability to perform certain types of work generally drives SOW development and negotiations. Draft SOWs submitted by States are typically always responded to with some edits, but they are generally minor since most States have already performed much of the work prior to the finalization of their Cooperative Agreement (see [Section 3.3.2.2](#)).

Beyond requiring CAVs, ordinance reviews, and CIS data entry, there is a concerted effort across many Regions to encourage perceived higher value activities such as outreach, capability building (advanced trainings), building code support, post-disaster studies, and intergovernmental relationship building. States agree that outreach, training and workshops (especially those with advanced content or that employ creative approaches), mapping coordination, and coordination with other agencies should be prioritized and funded at a level that is more aligned with their perceived value. There is also consensus around revisiting the manner by which the program delivers compliance activities. In general, this includes a desire to revisit the Tier 1 prioritization criteria and focus on providing more frequent technical assistance instead of formal compliance contacts or visits to ensure more communities are being touched by the program.

Other activities that were consistently raised as important for consideration in the NOFO (i.e., those that should be eligible for funding or required as part of the grant), included: State-wide CAVs; State Coordinator trainings, professional memberships, and certifications; websites or other web-based public outreach products; and grant management and administration.

### *3.3.1.3 Activity Pricing*

Activity pricing during the pre-award phase was consistently highlighted as a significant challenge. States often cited the inability to project or demonstrate how much time it takes to accomplish certain activities that either do not have measurable outputs or can vary significantly year to year. Additionally, there is wide variability in the unit costs of certain activities where complexity is a major resource driver, such as complex CAVs or mapping coordination and adoption for complex coastal communities.

While a small subset of Regions has developed and implemented activity pricing tools and methods based on the average hourly wage for the State Coordinators and the average number of hours estimated to complete program activities, this approach has been met with mixed reactions by other Regions and States given the aforementioned challenges related to complexity and

projection. This challenge has inhibited the program from broadly implementing any standard pricing tools or guidance (e.g., a Blue Book). Although, there is broad consensus that a standard approach is necessary.

### **3.3.2** Award Phase

#### *3.3.2.1 Final Scopes of Work*

FEMA's review of State proposals often includes a simple numerical validation check to ensure that the number of proposed activities and associated costs have been correctly calculated, as well as a subjective review of potential red flags, such as seemingly unreasonable quantities of activities given perceived State capacity, unusual or unallowable activities, or a preponderance of proposed activities where outcomes and effectiveness are not easily measured or articulated.

As noted above, and discussed in detail in the [Section 3.3.2.2](#), final SOWs are typically a reflection of activities that have already occurred given the timing of awards and obligations. While there is a concerted effort across the program to influence and monitor State delivery at all times, the program is largely operating retroactively – documenting and funding activities that have already been performed.

#### *3.3.2.2 Award Timing*

The single largest challenge that the States and FEMA consistently identified in the award phase was the timing of annual awards and obligations. Due to an increasingly uncertain Federal budget environment, FEMA's ability to release the NOFO, receive and review applications, issue awards, and obligate grant funds each year has shifted significantly towards the end of the Federal Fiscal Year. Award timing is also inconsistent each year and typically does not purposefully align to State fiscal planning cycles.

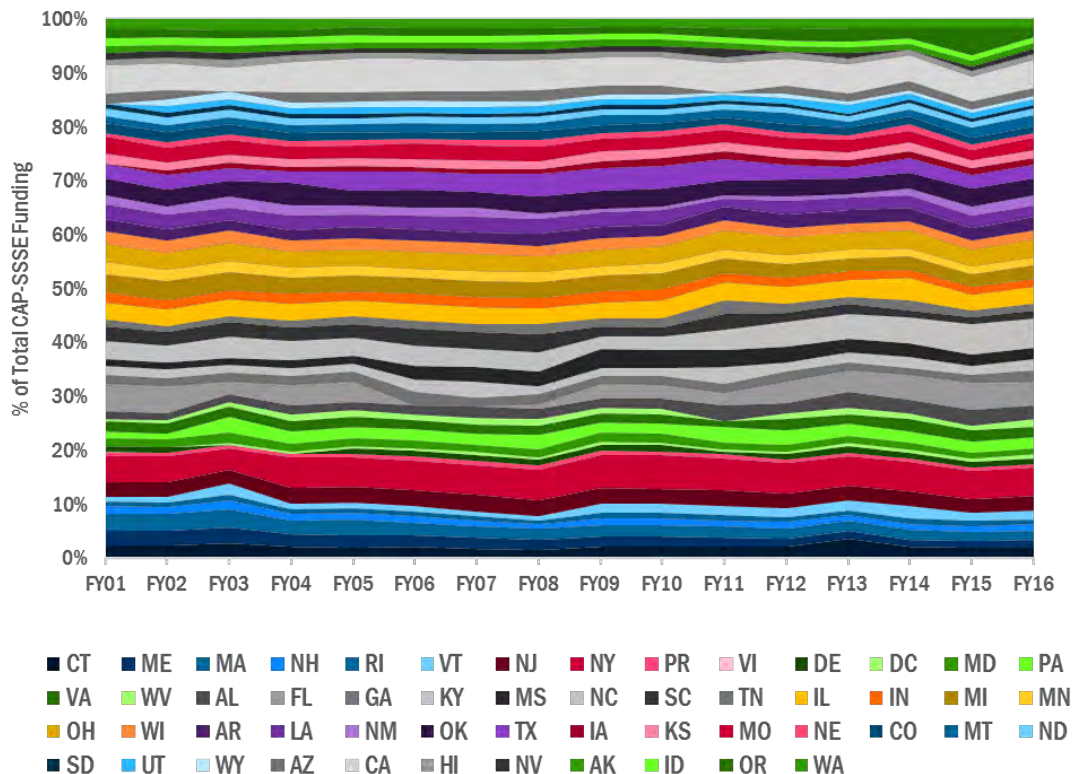
As a result, many States complete CAP-SSSE oriented work without secured funding from October through May or June. When the funding is received, it is applied retroactively and often comes with immediate PoP modifications. Beyond the inherent issue of operating what is essentially a reimbursement program, this annual process also presents an added administrative burden for FEMA program and grants staff. The challenge that inconsistent award timing has created for CAP-SSSE is particularly troublesome for States. While the grant is meant to fund floodplain management activities, the requirement for at least one NFIP State Coordinator in each State to execute those activities makes the grant one of the primary, if not the only, mechanisms by which the State funds the position (i.e., loaded salary and benefits). This construct tends to introduce personal and emotional dimensions to the partnership between FEMA and the States, which can unduly influence award determinations.

#### *3.3.2.3 Award Determinations*

The analysis of State awards since FY2001 show that each State's annual award amount as a percentage of the total CAP-SSSE funding has remained fairly consistent (see Figure 10 below) year over year. This data provides quantitative evidence to reinforce the qualitative feedback that

FEMA is simply funding most States at the same level every year. For example, if the overall program sees an increase in total dollars, every State seemingly gets an equal share of those increased funds.

*Figure 10 State Awards as a Percentage of Total CAP-SSSE Funding Since FY2001*



There are noticeable shifts in the award allocations in and around FY2009-FY2011, which coincide with the introduction of the 2009 CAP GAP Analysis methodology and the 2011 Risk-Based Funding Formula for CAP-SSSE. Around this time and into the more recent past, the award allocations in Region IV, in particular, begin to become much more dynamic, which may be a result of the activity planning and pricing tool that the Region implemented to ensure a more consistent, value-based approach to State funding each year.

The analysis of State awards at the national level brings to light important comparisons and questions about how and why certain States are being funded at their current levels and whether there is any evidence of a consistent and defensible rationale that takes into consideration States' risk profiles, capability, capacity, and past program performance (i.e., the effectiveness and efficiency with which they deliver the program's activities). With an equitable and defensible funding methodology, we would expect to see States with similar risk profiles, capabilities, capacity, and past performance funded at similar levels, but in many cases, that is not the reality of the way CAP-SSSE is administered today. Within each Region, a common set of considerations that reflect the intent and spirit of the grant is being applied with varying levels of formality to award determinations. This is a practice which could serve as the foundation to shift to a more standard national-level approach in the future.

Many FEMA CAP-SSSE Coordinators point to the political environment in the State as well as their personal relationship with State Coordinators as influential factors in award decisions. Cases of significant funding decreases are rarely seen unless there is an easily defensible and mutually agreed upon reason (e.g., a State has an unfilled State Coordinator position for an extended period of time, a State has consistently deobligated funds for several years in a row, etc.). States indicate that they have little to no visibility about how funding decisions are made. Therefore, there is little to no State incentive to make any strategic changes to the status quo of how they currently deliver the program.

### **3.3.3** Monitoring and Closeout Phases

#### *3.3.3.1 Performance Monitoring and Reporting*

Formal monitoring practices vary by Region. In most Regions, a review of State quarterly reports is the primary mechanism for validating that agreed upon activities are actually occurring. Typically, FEMA CAP Coordinators are also coordinating with FEMA State Specialists in their branch to understand if there are any existing or potential issues with State performance that should be addressed. Informal programmatic monitoring is occurring across all Regions on a regular and ongoing basis (e.g., monthly check-in calls). Some Regions have implemented standalone management tools and processes such as dashboards to ensure certain priority activities (e.g., CAVs) are being executed according to plans and expectations. Additionally, the Regions tend to also monitor changes in the built environment and other informal performance indicators (e.g., letter of map change and revision denials, absence of violations or other issues in CAV findings, visits to communities to observe land use and development changes, etc.) to stay in tune with the quality of State compliance and enforcement practices.

Quarterly performance reports are typically comprised of the CAP-SSSE report from CIS and a performance narrative for which there is no standard template. States consistently indicate that the current format of CAP-SSSE performance documentation and reporting does not provide them with the ability to demonstrate the delivery of activities and efforts that tend to require large amounts of time but do not have identified fields or measures in CIS. Today, quarterly reports are reviewed and used as a catalyst for performance discussions with States as necessary. The inability of the report to accurately and holistically capture the scope of activities completed in a given quarter inhibits the utilization of the reports for any other expressed quantitative tracking or analytical purposes.

#### *3.3.3.2 Roles and Responsibilities*

Monitoring roles and responsibilities across the FEMA Regional Floodplain Management and Insurance (FM&I) Branch and the Grants Management Division (GMD) require additional clarity and guidance. FEMA CAP Coordinators noted that each Region is monitoring the financial side of the grant differently and highlighted that there may be some potentially problematic assumptions being made in the Regions about who is primarily responsible and accountable for financial monitoring. CAP Coordinators broadly recommended finding opportunities for cross-training and rotational assignments with GMD to strengthen the relationship, develop a shared understanding of programmatic and financial monitoring processes, and clarify roles in each Region.

### 3.4 RECORDKEEPING PRACTICES, DATA AVAILABILITY, AND DATA QUALITY

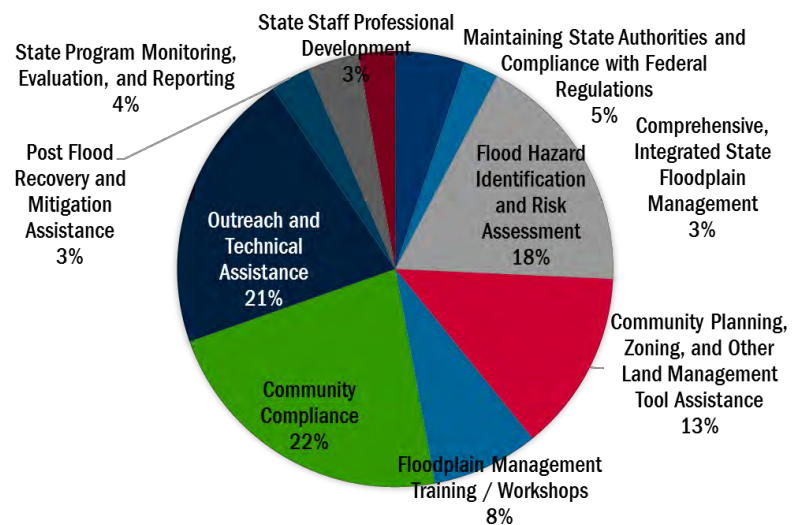
Recordkeeping practices are inconsistent across the FEMA Regions and Headquarters. There is a lack of infrastructure (e.g., tools and systems), standard processes, and guidance that ensure performance and financial data are kept centrally, in a consistent format that provides analytical utility, and for any set period of time. As a result, quantitative assessments of State program delivery as a function of funding are difficult to perform and may face credibility challenges from stakeholders.

For example, upon requesting State awards, SOWs, and performance reports for the last seven years for this evaluation, the resulting dataset included the following gaps:

- Missing most SOWs from 32 States prior to 2015
- Missing performance reports for 38 States from as recently as 2015
- Incomplete award information for every year, including as recently as 2016. Initial State award information was able to be pulled from IFMIS. However, it did not include any of the modification (e.g., deobligations, no cost PoP extensions, etc.) information that is captured in the qualitative analysis.
- No consistent information or central repository for cost match or award modification information.

Additionally, many activities that are captured in CIS are overwritten with each new entry, eliminating the ability of the program to track or understand the application of its resources beyond the current year. Notably, critical program activities such as training and outreach on which FEMA and the States allege to spend large portions of their time and resources (see Figure 11), are not inputted or captured consistently (if at all) in CIS and are not tracked longitudinally. This is especially problematic for floodplain management as most risk reduction outcomes at the community level are the result of the multiplying effects of years, perhaps decades, of program interventions.

*Figure 11 Average Distribution of Core State Floodplain Management Activities from Random Sample of 2009 State CAP GAP Analysis Inputs*



For CAP-SSSE, these documents and datasets are critical to both effective monitoring and the ability to determine strategic priorities, meaningful performance measures and targets, and identify necessary program delivery adjustments. In addition, record maintenance is a legal obligation, putting CAP-SSSE at risk of audit and penalty.

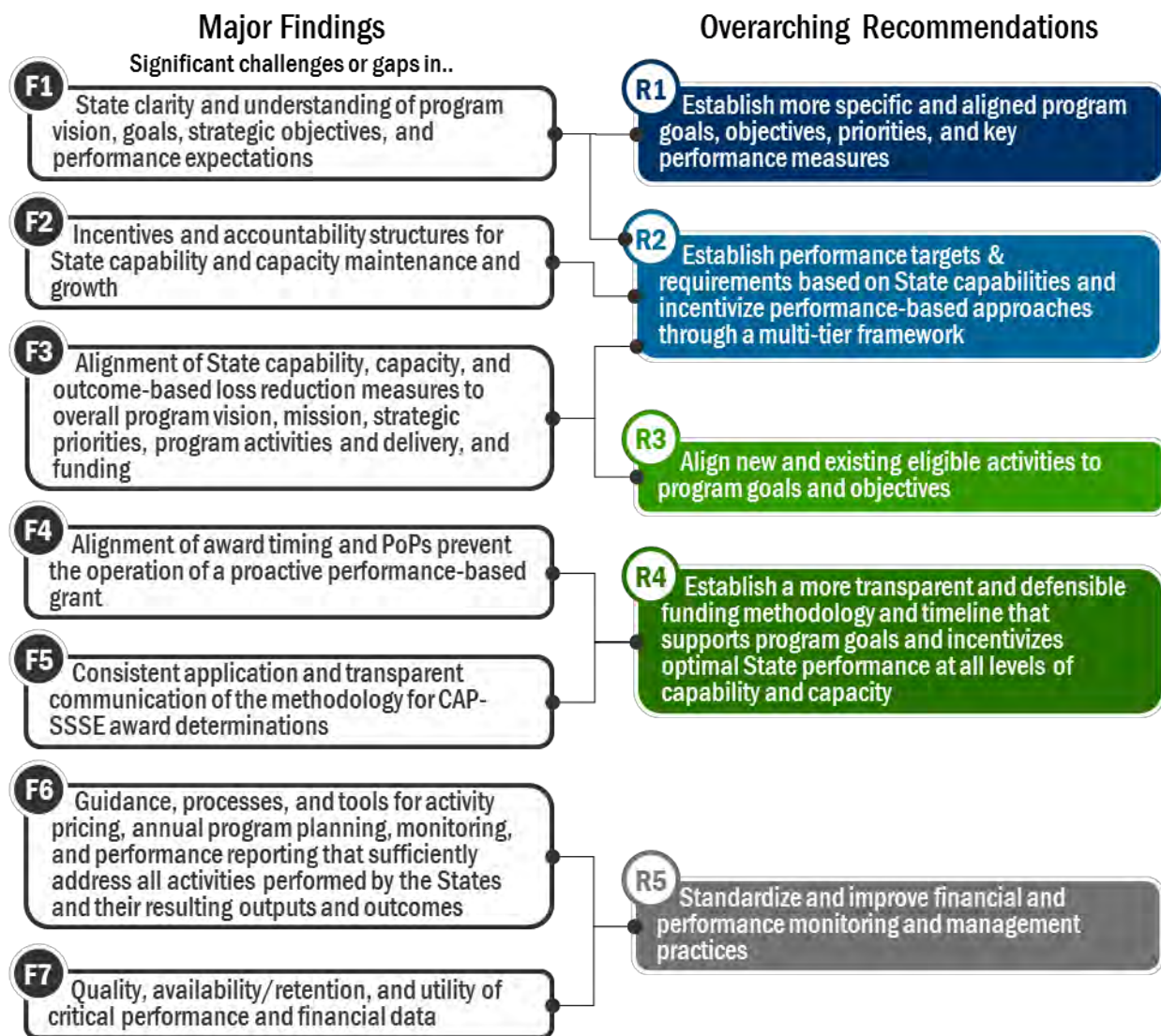


**SECTION FOUR** CONCLUSIONS AND RECOMMENDATIONS

4.1 SUMMARY OF KEY FINDINGS AND PROPOSED RECOMMENDATIONS

The qualitative and quantitative findings of the CAP-SSSE program evaluation support and expand upon previous evaluations and highlight areas of needed improvement across all levels of the CAP-SSSE model: strategy and planning; program implementation and evaluation; and enabling tools, processes, and resources. The major findings from this evaluation are summarized below in Figure 12 alongside a corresponding set of five overarching recommendations.

*Figure 12 Summary of Major Findings Aligned to Overarching Recommendations*



## 4.2 DETAILED RECOMMENDATIONS

Each of the subsequent sections provides detailed considerations, proposed frameworks, and initiatives for each of the five overarching recommendations through a set of sub-recommendations.

**4.2.1** Establish more specific and aligned CAP-SSSE program goals, objectives, priorities, and key performance measures

**Sub-Recommendation 1.1** Better integrate State capability and capacity building into CAP-SSSE based on ASFPM’s Effective State Programs Principles and those set forth in 44 CFR 60.25.

**Sub-Recommendation 1.2** Establish specific annual or multi-year strategic priorities for State delivery of compliance, technical assistance, interagency coordination, partnerships, training, outreach, mapping coordination, and CRS work under CAP.

***Sub-Recommendation 1.2.1*** Clearly define FEMA/State delineation of delivery responsibilities. Consider defining potential future Tribal participation in CAP-SSSE.

***Sub-Recommendation 1.2.2*** Clearly communicate how CAP-SSSE funding covers the delivery of core activities and supports the State in building capability and capacity to deliver advanced activities – all of which advance national program goals, objectives, and priorities.

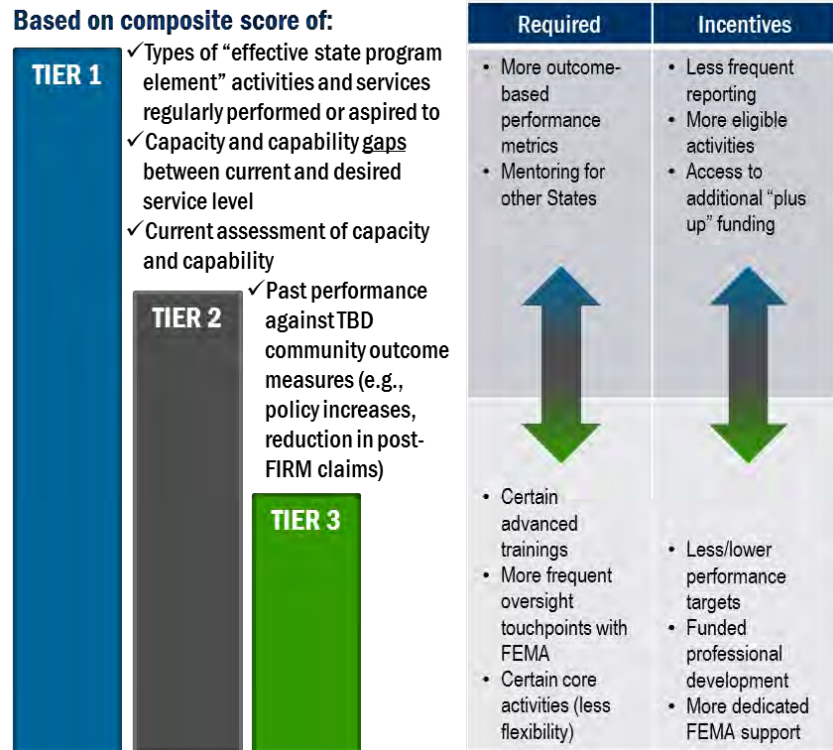
***Sub-Recommendation 1.2.3*** Assess existing and/or establish new key performance measures for each activity type/category, balanced across the program logic model (i.e., time/resource investments, activities and processes, outputs, and short, medium, and long-term outcomes).

**4.2.2** Establish performance targets and requirements based on State capabilities and incentivize performance-based approaches through a multi-tier framework

Establish a new foundational framework (see Figure 13) that aligns States to a capability and capacity tier which subsequently determines:

- Eligible activities
- Required activities
- Base-level funding allocation (combined with other risk-based factors)
- Performance metrics
- Training plans/requirements
- Performance reporting requirements
- Eligibility for other incentives that are to be determined

*Figure 13 Notional State Multi-Tier Concept*



**4.2.3** Align new and existing eligible activities to program goals and objectives

**Sub-Recommendation 3.1:** Incentivize innovative approaches to meeting program goals and objectives by revisiting eligibility or requirements for certain activities for certain tiers (e.g., high capability States might be eligible for funding for web-based outreach, training, and technical assistance; others might be able to substitute training and CACs for CAVs under certain circumstances; etc.).

**Sub-Recommendation 3.2** Require an annual strategic plan update, with a specific focus on a standardized State capability and capacity self-assessment.

**Sub-Recommendation 3.2.1** Revisit and update the CAP GAP methodology and tool or establish new criteria and a standardized template for State self-assessments. Capacity assessment should include CTP funding and perhaps other FEMA grant funding.

**Sub-Recommendation 3.2.2** Establish a deliberate procedure for utilizing State strategic plans and self-assessments to align each State to a tier and determine base-level funding amounts (with other risk-based factors).



**4.2.4** Establish a more transparent and defensible funding methodology and timeline that supports program goals and incentivizes optimal State performance at all levels of capability and capacity

**Sub-Recommendation 4.1** Shift the funding cycle from the Federal Fiscal Year to the majority of the States' Fiscal Years (July), if possible.

*Sub-Recommendation 4.1.1* Determine the feasibility of a one-time, 18-month to 24-month award to facilitate a shift to a July-start funding cycle and to ensure States do not experience a gap.

*Sub-Recommendation 4.1.2* Assess the potential downstream impacts of not aligning with the Federal FY (e.g., any delayed awards on the July cycle might run out of time and completely lose funding).

**Sub-Recommendation 4.2** Establish a composite risk, capacity, and capability-based funding formula to determine a base award amount for each State each year, based on established risk-based factors (e.g., population, land area, number of participating NFIP communities, etc.) and State self-assessment of capability and capacity (detailed in sub-recommendation 3.2).

*Sub-Recommendation 4.2.1* Assess the feasibility and timeline of reducing State allocations where there is not alignment with the risk, capacity, and capability-based formula.

**Sub-Recommendation 4.3** If possible, establish a competitive set-aside with the CAP-SSSE grant dollars that remain after the base award amount for each State has been determined to incentivize innovation and ensure program dollars are being used as effectively as possible.

*Sub-Recommendation 4.3.1* Determine competition criteria, possibly driven by tier. States could propose new projects and initiatives outside of currently eligible activities, or simply provide a justification for how additional funding could be immediately utilized to perform additional activities.

*Sub-Recommendation 4.3.2* Determine whether the competitive set-aside should be administered by HQ or the Regions.

*Sub-Recommendation 4.3.3* Establish a process for redistributing deobligations through the set-aside.

**4.2.5** Standardize and improve financial and performance monitoring and management practices

**Sub-Recommendation 5.1** Develop standard tools and templates that facilitate quantitative tracking and reporting

*Sub-Recommendation 5.1.1* Establish a customizable tool that can be used by the Regions and the States that facilitates activity pricing and SOW planning. This can be based on the Region IV tool, but must specifically address previously identified issues related to the inability to quantify resource-intensive activities, such as interagency coordination and mapping coordination.

***Sub-Recommendation 5.1.2*** Develop a new quarterly and annual report template that eliminates, to the degree practical, narrative performance reporting. Ensure that all types of performance measures are able to be tracked in a quantifiable manner, including dollars, activities or processes (e.g., time spent), products or outputs, and outcomes.

**Sub-Recommendation 5.2** Explore the feasibility of moving the administration of the CAP-SSSE grant to the Non-Disaster (ND) Grants system to facilitate standardized tracking and reporting.

**Sub-Recommendation 5.3** Ensure CIS infrastructure and functional coding supports longitudinal recordkeeping. Integrate findings and recommendations from program evaluations into the concept and requirements definition phase of planned CIS enhancements, including the need to document and track training, outreach, and coordination activities as well as year over year outputs and outcomes.

**Sub-Recommendation 5.4** Align FEMA staff resources to ongoing program management as well as implementation of recommendations.

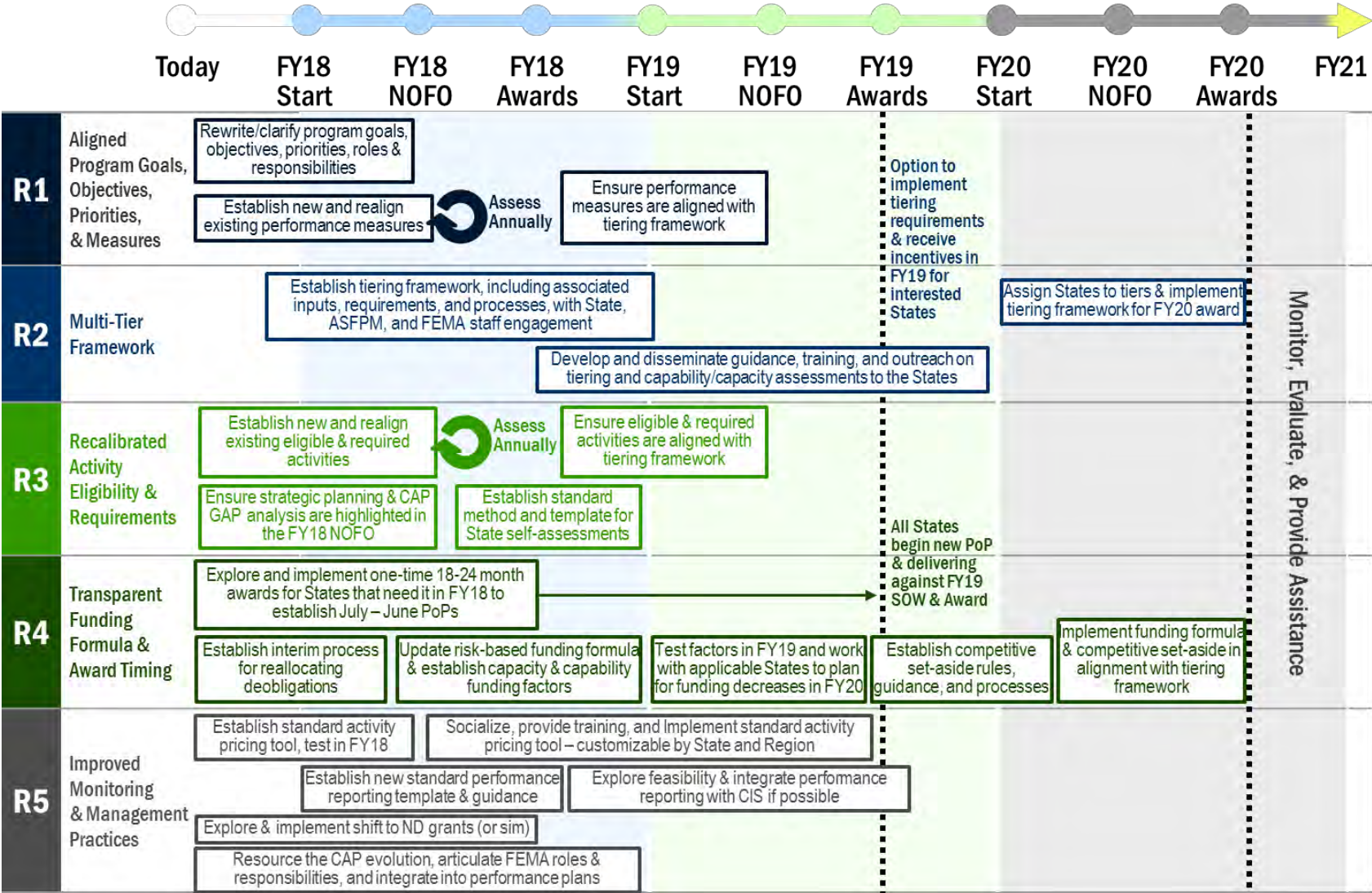
***Sub-Recommendation 5.4.1*** Ensure FEMA roles, responsibilities, and performance expectations are aligned with the CAP-SSSE program goals and requirements.

***Sub-Recommendation 5.4.2*** Ensure the appropriate amount of FEMA staff alignment and oversight to effectively identify, prioritize, and manage program risks and issues.

#### 4.3 IMPLEMENTATION CONSIDERATIONS

When taken together, this set of recommendations could represent a markedly impactful transformation of the CAP-SSSE program. FEMA has made public commitments to make changes to CAP-SSSE for FY18; however, the implementation of the full set of recommendations could span several years. Ongoing socialization, coordination, co-creation, and testing with a variety of stakeholders, including the States and ASFPM, to appropriately design, plan, and implement these recommendations will be critical to their success. A notional sequence and timeline that represents the critical path, estimated duration, and future milestones of the initiatives associated with these recommendations is illustrated in Figure 14.

Figure 14 Proposed Implementation Sequencing and Timeline (Pre-Decisional)



## SOURCES

- i (2017, February 7-9). FEMA Regional CAP-SSSE Coordinators Meeting. Tampa, FL.
- ii (2017, May 1). State NFIP Coordinator's Training at the ASFPM Conference. Kansas City, MO, USA.
- iii (2017, June 2). State NFIP Coordinator's Focus Group Session at the Hazard Mitigation Assistance Workshop. Emmitsburg, MD.
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- ix FEMA. (2008-2016). Quarterly and Annual State Performance Reports. Provided by: FEMA Regional CAP-SSSE Coordinators.
- x FEMA. (2009). 2009 State CAP GAP Analyses. Provided by: FEMA Headquarters Floodplain Management Division.
- xi FEMA. (2001-2016). CAP-SSSE Grant Awards by State. Available from: FEMA Integrated Financial Management Information System (IFMIS).
- xii FEMA. (2011). Risk-Based State Funding Formula for CAP-SSSE. Provided by: FEMA Headquarters Floodplain Management Division.

APPENDIX A – SAMPLE FOCUS GROUP QUESTION SETS

**Sample State Coordinator Focus Group Questions**

- What are your biggest challenges in each stage of the grant lifecycle?
- What activities do you think States should be required to perform as part of their CAP agreement?
- What are the best value activities that consistently lead to measurable risk reduction in your communities?
- What type of non-financial support do you need from FEMA to help you build and maintain the capacity and capability of your State program?
- In your opinion, what MUST change about CAP-SSSE in order for the program to be most successful in the long-term?
- What does a “successful” State program look like in measurable terms?

**Sample FEMA CAP Coordinator Focus Group Questions**

- From your perspective, why does CAP-SSSE exist? What is the value of States providing assistance to communities vs. FEMA?
- What are some examples of where the program has previously or is currently really working well?
- In general, how do/would you define “low” “medium” and “high” performing States? How does this correlate to how much time you spend with certain States or the type of support or direction you provide them?
- What recurring issues or challenges have you faced in operating CAP-SSSE? Which of these, if any, have known or well-defined solutions that have not been implemented?
- What do you perceive as the greatest risks (operational or strategic/philosophical) facing CAP-SSSE?
- Where, if at all, do you see examples of CAP-SSSE really not working the way it is supposed to?
- What does a “successful” State program look like in measurable terms?
- Do you provide input in the development/update of the annual NOFO to ensure Regional priorities are reflected? Would it be helpful if you did? Why/why not?
- Do you give any other formal (written) guidance to your States each year before they submit applications? How specific is the guidance?
- Do you routinely provide informal guidance in the way of discussions or negotiations to your States each year before they submit applications?
- In general, how often or how much do State applications/ proposals change as a direct result of:
  - Changes to the NOFO or any formal guidance given to them by FEMA?
  - Advanced negotiations or informal guidance given to them by FEMA?
  - The State’s own priorities?
- How rigorously do you stick to the CAP funding formula?
- How much are the workplans and budgets submitted by the States in their applications abided by when determining award amounts?
- Do you routinely consider all the work that should be accomplished (e.g., performance priorities) in a given year across all your States and the FEMA Regional staff when

determining award amounts? What does that process look like? What are some of your key considerations?

- Does funding for certain types of CAP activities often get prioritized over others (beyond mandatory CAVs/CACs and ordinance reviews)?
- How do you account for past performance and capability/capacity differences across your States when determining award amounts?
  - Do you routinely give more funding to higher capability/capacity States? Why/why not?
  - Conversely, do you routinely make a concerted effort to increase funding to lower capability/capacity States? Why/why not?
- How does the 25% cost match get considered in determining award amounts?
- Do any of your States present political or other challenges that often influence the amount of funding they receive through CAP?
- How often do you give the same award amount to a State year over year? Why? From your perspective, what are the benefits of that approach?
- In general, how much do State workplans change between what they submit in their applications and what is included in their final Cooperative Agreement?
- Does your Region follow a formal process for negotiating and finalizing Cooperative Agreements? What does that look like?
- Do you routinely consider all the work that should be accomplished (e.g., performance priorities) in a given year across all your States and the FEMA Regional staff when determining the type and quantity of activities that each State will perform? What does that process look like? What are some of your key considerations?
- What elements of the final Cooperative Agreements does FEMA generally direct or prescribe? What elements do you allow the State to determine?
- How does State past performance and capability/capacity influence what is ultimately included in their final Cooperative Agreements?
- Do you often prescribe different types of activities to certain types of States? Why?
- What types of activities are States choosing to do in addition to what they are required to do? What are the drivers for those choices?
- How often do States deviate from their agreed upon workplans?
  - What are the drivers that generally cause a State to deviate from their workplan?
  - How much of this is allowed by your Region?
  - Are there instances where deviation from the State's workplan might be encouraged (e.g., new approaches that might drive better outcomes)?
- In a disaster-scenario where resources might necessarily be reallocated to response and recovery activities, what activities in the original workplan are usually the first to be deprioritized?
- Is there a relationship between State adherence to planned activities and FEMA funding vs. leveraged/cost match funds (e.g., do States tend to be more creative with how they use their cost match funds)?
- When States deviate from their workplan, is it planned and approved in advance with FEMA? How does that negotiation generally play out?
- What type of recurring oversight do you provide to your States during the course of their PoPs?
- How much of your engagement with your States during the course of their PoPs is formal in nature? Informal?

- Do you require any reporting from your States that is beyond what is minimally required? If so, what does that look like?
- How effective are FEMA’s oversight activities during the course of a State’s PoP?
- How often are you catching issues and make course corrections throughout the year?
- In general, how is a State’s non-compliance with the terms of their award handled?
- What non-financial metrics are you holding your States accountable for each year?
- Are you setting specific targets and ensuring they are met? If so, how do you determine the targets for each State?
- In your opinion, are the States better than FEMA at certain activities? Do they get better or different results with the communities they work with? Why?
- In your opinion, what prevents States from being as successful as they could be with CAP dollars?
- What measures of State floodplain management program success, outside of the typical program performance metrics (e.g., CAVs conducted/closed, map adoption, etc.), do you generally monitor? Why?
- Do you measure and compare accomplishments between the use of CAP funds and leveraged/cost match funds? If so, How? What trends are you seeing?
- What are top 2-3 changes or improvements we should be targeting in each phase of the grants lifecycle?
- Of those, what are the 3-5 most important things we should do differently or better to enhance the effectiveness of CAP-SSSE? Why those things?
- What challenges/roadblocks have to be addressed today in order for us to move forward? What are the first steps to addressing them?