BRIC Qualitative Evaluation Criteria

This Program Support Material (PSM) provides detailed information about the six qualitative evaluation criteria that will be used in the Building Resilient Infrastructure and Communities (BRIC) national competition. Information to guide applicants and subapplicants in the development of their subapplications and to assist panelists in the qualitative review of projects is described below. Additionally, application instructions are included for each respective criterion to guide information submission in FEMA Grants Outcomes (FEMA GO).



BRIC National Competition Qualitative Criteria and Point Values

Background

As described in the BRIC Notice of Funding Opportunity (NOFO), FEMA will convene a National Review Panel to score subapplications submitted to the national competition based on a qualitative review. As referenced in the NOFO:

If needed based on the number of subapplications submitted to the BRIC program, FEMA will use the technical evaluation criteria scoring as a program priority screening tool for the qualitative evaluation criteria review. FEMA will send subapplications valued at twice the amount of available funding to the BRIC National Review Panel.

FEMA will ensure that at least one eligible subapplication from each applicant will be sent to the National Review Panel for review.

In order to increase transparency in decision-making while building capability and partnerships, FEMA will convene a National Review Panel to score subapplications based on qualitative evaluation criteria. The qualitative evaluation criteria are narrative submissions to allow subapplicants the flexibility to fully



explain the strengths of the proposed project. Qualitative evaluation criteria have graded scales of point scoring.

FEMA developed the qualitive evaluation criteria based upon comments received through stakeholder engagement efforts. For example, comments indicated support for holistic project evaluation beyond economic metrics alone as well as for incentivizing partnerships and high-quality community engagement.

More information on stakeholder engagement efforts can be found on the FEMA BRIC webpage.

In accordance with the BRIC program's guiding principle of promoting equity and in implementing the Justice40 Initiative, the BRIC program is prioritizing assistance that benefits disadvantaged communities as referenced in Executive Order (EO) 14008 and subsequent guidance.

A disadvantaged community may be characterized by variables including, but not limited to: low income, high and/or persistent poverty, high unemployment and underemployment, racial and ethnic segregation, linguistic isolation, high housing cost burden and substandard housing, distressed neighborhoods, high transportation cost burden and/or low transportation access, disproportionate environmental burden and high cumulative impacts, limited water and sanitation access and affordability, disproportionate climate impacts, high energy cost burden and low energy access, and all geographic areas within Tribal jurisdictions.

For more information on BRIC's equity efforts, please refer to the Justice 40 PSM.

TIP: In your narrative Define the disadvantaged community and detail how the project directly benefits that community. Provide relevant documentation that supports your details on the disadvantaged community (e.g., Centers for Disease Control and Prevention (CDC) Social Vulnerability Index [SVI], U.S. Census Data).

Four of the six BRIC qualitative evaluation criteria ask subapplications to speak to how the project will benefit disadvantaged communities: Risk Reduction/Resilience Effectiveness, Population Impacted, Community Engagement and Other Outreach Activities, and Leveraging Partners. Point allocation and criteria content have evolved to be more inclusive of the proposed subapplication benefits to disadvantaged communities.

Evaluation Process and Scoring

Each panelist will assess the degree to which subapplications meet the six BRIC qualitative evaluation criteria: (1) Risk Reduction/Resilience Effectiveness, (2) Climate Change and Future Conditions, (3) Implementation Measures, (4) Population Impacted, (5) Community Engagement and Other Outreach Activities, and (6) Leveraging Partners. Each criterion will be scored using the options provided in Table 1. The subapplication's final qualitative score for each criterion will be calculated by averaging the qualitative scores from each panelist.

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Table 1: Qualitative Criteria Scoring Options

Scoring Option	Description
Not at all	The subapplication does not address the criterion at all.
Minimally	The subapplication addresses the criterion, but information in the subapplication may be confusing, unclear, and/or incorrect. The degree to which the subapplication demonstrates the criterion is minimal, and references to the criterion do not include substantive information.
Partially	The subapplication partially addresses the criterion, but the subapplication may lack clarity and/or strong support, have some minor inconsistencies, or not address all components of the criterion. The degree to which the subapplication demonstrates the criterion has been met is mediocre.
Mostly	Although the subapplication may include a few minor inconsistencies or areas that need more clarity, there is strong support for most components of the criterion. The degree to which the subapplication demonstrates the criterion has been met is acceptable.
Entirely	The subapplication is clear, concise, and complete; provides examples; and is supported by data. It addresses all components of the criterion and may have a particularly compelling narrative. The degree to which the subapplication demonstrates the criterion has been met is excellent.
Exceeds	In addition to addressing all components of the criterion, being clear, concise, complete, and supported by data, the subapplication articulates the impact of the project in catalyzing broader efforts (such as legislative action or project type awareness) as they relate to the criterion. The degree to which the subapplication demonstrates the criterion has been met is beyond excellent.

The National Review Panel will apply the scoring options listed in Table 1 to all six qualitative criteria. Note that point values vary among each criterion. The graded scoring and point scales for each criterion are included later in this document.

Application instructions are included below for each respective criterion to guide information submission in FEMA GO. More information on navigating the FEMA GO system and the full application process can be found on the Grants Guidance webpage on FEMA.gov.

Prompts are included for each qualitative evaluation criterion to serve as a helpful starting point for applicants and subapplicants. These prompts are designed to clarify terms and provide guiding questions for applicants and subapplicants to consider as they write the subapplication. This information will be provided to panelists to foster a common frame of reference. Please note that answering every question, while informative, will not necessarily guarantee an "Exceeds" score. Finally, prompts included here are by no means mutually exclusive or exhaustive; any additional information to support the merit of the subapplication is welcome. This information supplements the information regarding qualitative evaluation criteria that can be found in the BRIC NOFO.

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FEMA encourages applicants and subapplicants to include information regarding the qualitative criteria in the specific section within FEMA GO as outlined below (in Criterion 1,2,3,4,5, and 6). Applicants and subapplicants are encouraged to highlight attachments within the narrative.

Tip: If you cite an attachment within the subapplication, include the attachment name and location within the description and/or narrative, and be sure to implement proper naming conventions and ensure all attachments are relevant.

For each of the six qualitative criteria, the prompt following the criterion is similar to the scoring prompt that panelists will use when they provide a score. Applicants and subapplicants that are developing subapplications must ensure they speak clearly and directly to each criterion. Subapplications are reviewed by a diverse make up of panelists from all over the country with different types of experience and years of experience. Ensure the subapplication is written clearly so that panelists with varying levels of experience can understand the information.

To achieve maximum points, applicants/subapplicants are encouraged to delineate clearly and completely the following for the project:

- Risk Reduction/Resilience Effectiveness
- Climate Change and Other Future Conditions
- Implementation Measures
- Population Impacted
- Community Engagement and Other Outreach Activities
- Leveraging Partners

Qualitative Evaluation Criterion 1: Risk Reduction/Resilience Effectiveness (35 possible points)

FEMA defines resilience as the ability to prepare for anticipated hazards, adapt to changing conditions, and withstand and recover rapidly from disruption.

The score received for Criterion 1 will depend upon how well the subapplication details the following elements: (1) effective risk reduction, (2) effective increase in community resilience, (3) the provision of ancillary benefits, and (4) the leveraging of innovation. Ancillary benefits could include how the project will address inequities and provide the greatest support to those with greatest need.

Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	7	14	21	28	35

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Applicants and subapplicants should include Risk Reduction/Resilience Effectiveness information in the Scope of Work Section of FEMA GO. Additional attachments related to this criterion should be uploaded in the Scope of Work section of FEMA GO and labeled accordingly.

Prompts for Risk Reduction/Resilience Effectiveness Criterion

Additional considerations for completing the application/subapplication.

Interpreting Responses to Effective Risk Reduction

The subapplication should detail how the project will reduce risk. The details should identify the risk being reduced and state what action will reduce the identified risk. The details should be clear and reasonable. The benefits calculated through the Benefit-Costs Analysis (BCA toolkit) are suitable for inclusion in the subapplication. However, FEMA does not limit evaluation of risk-reduction to those that are quantifiable. FEMA encourages alternative explanations of risk-reduction here. How will the proposed project reduce risk(s) and to what level?

For example, a proposed project could be designed to provide 100-year-level flood protection to a neighborhood with 250 people, 135 homes, and 15 publicly owned structures that support several Community Lifelines, and a variety of cultural, historic, and environmental resources. Additionally, subapplicants may have high Building Code Effectiveness Grading Schedule (BCEGS) scores that show a commitment to reducing risk through strong building code adoption and enforcement activities.

Interpreting Responses to Increases in Resilience

The subapplication should indicate how the proposed project will improve resilience. Resilience refers to the ability to prepare for anticipated hazards, adapt to changing conditions, and withstand and recover rapidly from disruption.¹ Detail how the project will increase resilience. The details should identify the aspects of resilience being increased and state what action will increase the identified resilience. The details should be clear and reasonable.

For example, a project designed to retrofit a library to serve as a tornado shelter could include tornado (and other hazards) preparedness, resilience, and hazard mitigation information. This could enhance the community's resilience by educating the public about the natural hazard risks they face, as well as build a culture of preparedness.

Interpreting Responses to Ancillary Benefits

Ancillary benefits refer to benefits other than the project's primary risk reduction objective, which should be identified in the Scope of Work and BCA, if applicable. Ancillary benefits are benefits related to water/air quality, habitat creation, energy efficiency, economic opportunity, reduced social vulnerability, reduced carbon emissions, cybersecurity, cultural resources, public health, mental health, supports mission areas of Non-Governmental Organizations (NGOs), community-based groups, and other partners, etc.

¹ This definition is used by the <u>National Institute of Standards and Technology</u>.

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Subapplicants should consider the following: What ancillary benefits will the project provide and how? Does the project consider multiple hazards (e.g., wind/storm surge, wildfire/mudslides) to address risks beyond the proposal's primary risk reduction objective? Ancillary benefits should include how a project will lead to equitable outcomes and provide the greatest support to those with greatest need. Ancillary benefits could also address climate-related benefits.

Interpreting Responses to Leveraging Innovation

Innovation in one community can look very different from innovation in another community. Subapplicants should consider the following: How does the project leverage or demonstrate innovation for the community? What new ideas or approaches is the project incorporating? Does the project leverage collaborations and resources with NGOs, community-based groups, and other partners? The details should be clear and reasonable.

For example, a proposed project in a rural community that has seen an increase in development and impervious surface might include nature-based solutions that have not previously been used. Details should include how the project will leverage innovation. The details should identify the aspects of innovation being leveraged and state what project aspects incorporate this element.

Qualitative Evaluation Criterion 2: Climate Change and Other Future Conditions (20 possible points)

Future Conditions by their inherent nature are difficult to predict. However, to not acknowledge potential climate change impacts when designing a project would be a mistake. Planning with climate change and future conditions in mind helps a community invest in choices that protect lives and property for a longer time. Hazard mitigation projects that account for changes in future conditions can minimize damage and losses and save or restore the benefits of natural systems.

The score received for Criterion 2 will depend upon how well the subapplication details how the project will: (1) enhance climate adaption, (2) respond to the effects of climate change,² (3) respond to the effects of other future conditions (population/demographic/land use, etc.), and (4) cite data sources, assumptions, and models. The BRIC program may also accept the definitions of climate change of National Aeronautics and Space Agency (NASA)³ and

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² Climate change is defined as "Changes in average weather conditions that persist over multiple decades or longer. Climate change encompasses both increases and decreases in temperature, as well as shifts in precipitation, changing risk of certain types of severe weather events, and changes to other features of the climate system" (Fourth National Climate Assessment).

³ NASA defines climate change as "a change in the usual weather found in a place. This could be a change in how much rain a place usually gets in a year. Or it could be a change in a place's usual temperature for a month or season. Climate change is also a change in Earth's climate. This could be a change in Earth's usual temperature.

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the U.S. Environmental Protection Agency (EPA).⁴ The subapplicant should indicate which definition of climate change is being used in its project narrative.

According to the EPA: Climate change involves significant changes in average conditions—such as temperature, precipitation, wind patterns, and other aspects of climate—that occur over years, decades, centuries, or longer. Climate change involves longer-term trends, such as shifts toward warmer, wetter, or drier conditions. These trends can be caused by natural variability in climate over time, as well as human activities that add greenhouse gases to the atmosphere like burning fossil fuels for energy.

Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	4	8	12	16	20

Applicants and subapplicants should include Future Conditions information in the Evaluation Section of FEMA GO. Any additional attachments associated with this criterion should also be uploaded in the Evaluation Section of FEMA GO and labeled accordingly. Be sure to include relevant information supporting this criterion, including data sources, studies, models, etc.

Prompts for Climate Change and Other Future Conditions Criterion

Additional considerations for completing the application/subapplication.

What anticipated future conditions are relevant for the project?

Examples of future conditions include, but are not limited to, the following: expected population changes, land use and development shifts, aging population, shifts in income or employment, changes in housing needs, increasing temperatures, increased wildfire risk, sea level rise, more frequent high tide flooding, more intense rainfall events, increasing storm frequency, persistent and prolonged droughts, changing groundwater tables, etc.

- How is the project responsive to any identified anticipated changes? Does the project integrate the consideration of future conditions into design, planning, and operations workflows?
- How was the project informed by, or connected to, plans and planning efforts and the assessment of future conditions? Relevant plans may include Hazard Mitigation Plans, Comprehensive Plans, Climate Adaptation Plans, Long-Range Transportation Plans, Small Area Plans, Coastal Zone Management Plans, Capital Improvement Plans, etc.
- What data sources and assumptions are used to guide the project? For example, when citing a sea level rise projection, what time period and what scenario of sea level rise are assumed?

⁴ <u>EPA defines climate change</u> as "any significant change in the measures of climate lasting for an extended period of time. In other words, climate change includes major changes in temperature, precipitation, or wind patterns, among others, that occur over several decades or longer."

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Qualitative Evaluation Criterion 3: Implementation Measures (15 possible points)

Proper implementation requires that a subapplicant understand what is expected of them, ensure the human capital and financial resources needed to complete the project are in place, and develop a realistic timetable. If Implementation Measures are thoroughly developed, the subapplicant has a roadmap to successfully meet overall project objectives.

The score received for Criterion 3 will depend upon how well the subapplication describes: (1) how the costs will be managed, (2) how the schedule will be managed, (3) how the project will be successfully implemented, and how innovative techniques to facilitate implementation will be incorporated, and (4) in its Scope of Work, the technical and managerial staff and resources available to successfully implement this project, and (5) whether and how strong labor standards are incorporated to ensure high-quality work, avert disruptive and costly delays, and promote efficiency.

Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	3	6	9	12	15

Applicants and subapplicants should include Implementation Measures information in the Scope of Work Section of FEMA GO. Any additional attachments associated with this criterion should be uploaded in the Scope of Work Section of FEMA GO and labeled accordingly.

Prompts Statements for Implementation Measures Criterion

Additional considerations for completing the application/subapplication.

- Does the application inspire confidence that the project can be completed successfully as designed, given the stated implementation measures?
- What potential implementation challenges and obstacles are identified (e.g., technical, political, financial, public support, environmental/permitting, constructability) and what implementation solutions are proposed to address these challenges?
- Are the proposed project costs and schedule realistic? How do project cost estimates and the schedule identify and address potential challenges and obstacles?
- What pre- and post-implementation monitoring strategies are proposed for the project? What specific evaluation elements are proposed to measure progress and ensure the project is executed as designed?
- What technical and managerial staff and resources are available to successfully implement the project? How will anticipated staff and resource gaps be filled?
- Are examples of successfully completed projects included to demonstrate effective implementation measures?

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Are strong labor standards incorporated? For example, the use of project labor agreements (PLAs), requiring workers to be paid wages at or above the prevailing rate; use of local hire provisions; using a directly employed workforce (as opposed to a subcontracted workforce); use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded); and use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure).

Qualitative Evaluation Criterion 4: Population Impacted (25 possible points)

While the intensity of a hazard is important, of equal or greater importance is the identification of the population impacted, many of whose demographic or socioeconomic characteristics may place its members at greater risk of harm before, during, and after a disaster.

The score received for Criterion 4 will depend upon how well the subapplication describes: (1) community-wide benefits, (2) the proportion of the population that will be impacted, including a description of the disadvantaged communities as referenced in EO 14008, (3) how the project was selected and designed to maximize positive impacts and minimize negative impacts to any disadvantaged populations as referenced in EO 14008, and (4) how the proposed project clearly benefits a disadvantaged community.

A disadvantaged community may be characterized by variables including, but not limited to: low income, high and/or persistent poverty, high unemployment and underemployment, racial and ethnic segregation, linguistic isolation, high housing cost burden and substandard housing, distressed neighborhoods, high transportation cost burden and/or low transportation access, disproportionate environmental burden and high cumulative impacts, limited water and sanitation access and affordability, disproportionate climate impacts, high energy cost burden and low energy access, and all geographic areas within Tribal jurisdictions.

If a population impacted as demonstrated by the subapplication does not include a disadvantaged community, then the highest point allotment available is Partially. Subapplication(s) that clearly state the proposed project is benefiting a disadvantaged community can score Mostly or Higher.

Subapplicants are encouraged to document their designation as an Economically Disadvantaged Rural Community (as referenced in 42 U.S.C. § 5133(a) as a small impoverished community) and if their community has a <u>Centers for Disease Control and Prevention SVI</u> of .6 or higher.

Subapplications that demonstrate a direct positive impact to a disadvantaged community will receive a score of Mostly, and subapplications that thoroughly describe the population impacted and demonstrate a high positive including a high positive impact on a disadvantaged community will merit a score of Entirely or Exceeds.

Tip: FEMA recommends clearly describing disadvantaged communities within the narrative and uploading documentation relevant to disadvantaged communities outlined in the subapplication.

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Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	5	10	15	20	25

Applicants and subapplicants should include the Population Impacted information in the Scope of Work Section of FEMA GO. Any additional attachments associated with this criterion should be uploaded in the Scope of Work section of FEMA GO and labeled accordingly.

Prompts for Population Impacted Criterion

Additional considerations for completing the application/subapplication.

- Community size, scale, and definition can look very different in different local contexts. Explain what "community-wide" means in the context of the proposed project.
- Describe what quantity (e.g., percent) of the population will directly benefit from the project (i.e., experience direct community-wide benefits) and how the estimate was calculated. The subapplication should include percentages of the community's population that will directly and indirectly benefit from the project.
- Explain who are the most vulnerable members of the community where the project is proposed and describe how the project will minimize negative impacts to disadvantaged members of the community.
- Explain whether the project will maximize positive impacts to disadvantaged members of the community, as
 indicated below. Impacts can be directly related to the risk reduction activity or indirectly related, such as
 with ancillary impacts (i.e., social, environmental, economic impacts).

Superstorm Sandy: People in wheelchairs who rely on electricity to leave and enter buildings in New York City (i.e., electric elevators and wheelchair lifts) were not adequately considered during local emergency planning efforts as per a 2013 court ruling. Without backup power systems in place or evacuation measures for people in wheelchairs, the widespread power outages caused by Superstorm Sandy led to people in wheelchairs being stranded across the City (Calma 2017).5

Qualitative Evaluation Criterion 5: Community Engagement and Other Outreach Activities (5 possible points)

A key element in the hazard mitigation process is the discussion it promotes among community members about creating a safer, more disaster-resilient community. Community Engagement and Other Outreach Activities that

⁵ See the following resource for considerations for people with disabilities in hazard mitigation: FEMA's Guide to Expanding Mitigation | Making the Connection to People With Disabilities (March 2022): https://www.fema.gov/sites/default/files/documents/fema_r2-making-connection-people-disabilities.pdf.

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capture a community's values and priorities are likely to result in a project having greater legitimacy and support, leading to greater success in implementation.

The score received for Criterion 5 will depend upon how well the subapplication describes: (1) the outreach strategy and supporting activities appropriate to the project and community that advance hazard mitigation, (2) the types of community planning processes leveraged, 3) how input from a diverse range of stakeholders, including people from disadvantaged communities, was gathered and incorporated into project conception and design, and (4) how community planning and stakeholder input will continue to be used to help direct project execution

Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	1	2	3	4	5

Applicants and subapplicants should include information about Community Engagement and Other Outreach Activities in the Scope of Work Section of FEMA GO. Additional attachments related to this criterion should be uploaded in the Scope of Work section of FEMA GO and labeled accordingly.

Prompts for Community Engagement and Other Outreach Activities Criterion

Additional considerations for completing the application/subapplication.

- To what extent did stakeholders and/or stakeholder groups contribute to this project? What stakeholder collaboration activities occurred? What information regarding outreach has been included in the subapplication?
- What planning processes were leveraged during the development of the project proposal to advance mitigation? How did the project planning process ensure that the disadvantaged in the community were involved in the planning and decision-making processes?

For example: Were Townhalls conducted with communities impacted by the project? How many stakeholder groups were represented? Suggestion: document attendance and outreach efforts.

- What information (e.g., resilience goals and outcomes, partnership opportunities, project implementation progress) will be shared with the public? What public outreach and engagement strategies will be used to disseminate project information to and gather feedback from stakeholders and members of the community?
- What support or conflicts emerged through the project planning process? How will conflicts be resolved as the project is implemented?
- What are the connections between your hazard mitigation plan and local land use requirements and how does the linkage make your community more resilient?

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Qualitative Evaluation Criterion 6: Leveraging Partners (15 possible points)

Leveraging Partners allows subapplicants to access complementary strengths from neighboring communities, states, the federal government, and non-profit and private partners. This potentially helps the subapplicant from a cost basis and serves the local community's greater good.

The score received for Criterion 6 will depend upon how well the subapplication incorporates: (1) partnerships (e.g., state, territory, Tribal, private, district, local community) that will ensure the project meets community needs, (2) an explanation of how these partnerships benefit disadvantaged communities, and (3) an explanation on the anticipated outcome of those partnerships (e.g., leveraging resources such as financial, material, and educational resources, coordinating multi-jurisdictional projects, heightened focus on equity related issues).

Not at all	Minimally	Partially	Mostly	Entirely	Exceeds
0	3	6	9	12	15

Applicants and subapplicants should include information about Leveraging Partners in the Evaluation Section of FEMA GO. Additional attachments related to this criterion should be uploaded in the Evaluation Section of FEMA GO and labeled accordingly.

Prompts for Leveraging Partners Criterion

Additional considerations for completing the application/subapplication.

- What partners were involved in the project design? How did partners contribute to the application? What partners will contribute to the implementation of the project? Partnerships can take many different forms. For example, partners may contribute financially, support and promote the proposed project, help generate community-wide awareness of the risks the proposal is designed to address, etc.
- To what extent were non-governmental organizations, including those organizations that represent disadvantaged groups, universities, or other government entities consulted for advice or assistance? How has collaboration with surrounding jurisdictions supported project development?
- To what extent have other federal programs or funding sources been leveraged for the project? To what extent have partners provided funding that increases the non-federal cost share?
- How have partnerships been used to increase community resilience? What community groups will participate in this project? What potential exists for partnerships to continue beyond implementation of the project?

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