

SECTION SIX PLAN MAINTENANCE

This section of the Plan provides a framework for maintenance, monitoring, evaluation, and updating of the Plan in accordance with the requirements of the Disaster Mitigation Act of 2000. It provides a framework based on the same level of participation of all involved in the development of the Plan, but with specific roles and responsibilities clearly defined for action implementation.

Section Six consists of the following five subsections:

- 6.1 IFR Requirements for Plan Maintenance Process
- 6.2 Monitoring, Evaluating and Updating the Plan
- 6.3 Monitoring Mitigation Measures and Project Closeouts
- 6.4 Reviewing Progress on Achieving Goals
- 6.5 Reviewing Progress on Activities and Projects in the Territorial Mitigation Strategy

6.1 IFR REQUIREMENTS FOR PLAN MAINTENANCE PROCESS

§201.4(c)(5)(i-iii) of the Interim Final Rule (IFR) requires the Territorial Hazard Mitigation Plan to include a section that describes the Plan Maintenance Process that the Territory will use to ensure that the Plan is current. The specific language in the IFR states that *"the Standard State Plan Maintenance Process must include:*

- *An established method and schedule for monitoring, evaluating and updating the plan;*
- *A system for monitoring implementation of mitigation measures and project closeouts;*
- *A system for reviewing progress on achieving goals as well as activities and projects identified in the mitigation strategy."*

6.2 MONITORING, EVALUATING AND UPDATING THE PLAN

The US Virgin Islands Territorial Emergency Management Agency (VITEMA) is responsible for maintaining the Territorial Hazard Mitigation Plan. This section of the Plan describes the method by which VITEMA will accomplish this.

6.2.1 MONITORING THE PLAN

VITEMA, primarily the State Hazard Mitigation Officer, will monitor the Plan in accordance with the system described in the paragraphs below.

6.2.2 EVALUATING THE PLAN

The Plan will undergo annual evaluations. VITEMA will initiate the evaluations by contacting agencies identified as responsible parties in the Mitigation Action Plans, as well as other agencies and organizations that have been involved in developing the Plan. VITEMA and the three Island Hazard Mitigation Committees also have the prerogative to determine if other organizations should also be involved. The Hazard Mitigation Committees will be encouraged to recommend other agencies or organizations that should be included in the evaluation, for example those with specific technical knowledge about risks.

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On an annual basis, generally in the month of May (unless circumstances indicate otherwise), VITEMA will contact all the appropriate organizations to advise them that the Plan will be re-evaluated, and request their participation. The evaluations will consider several basic factors, plus any additional review indicated by VITEMA or the Hazard Mitigation Committees.

The factors include:

1. Changes in risk. The evaluation will examine the general list of hazards identified in the Plan, and determine if there have been changes in the level of risk to the Territory and its citizens to the extent that the Plan (in particular the strategies and prioritized actions the Territory is considering) should be modified.
2. Changes in laws, policies, or regulations.
3. Changes in Territorial agencies or their procedures that will affect how mitigation programs or funds are administered.
4. Significant changes in funding sources or capabilities.
5. Changes in the composition of the Hazard Mitigation Committees.
6. Progress on mitigation actions (including project closeouts) or new mitigation actions that the Territory is considering.

VITEMA also has the prerogative to update the Plan at times other than those identified in this section, under the following general conditions.

1. After a major disaster declaration.
2. At the request of the Governor.
3. When significant new risks or vulnerabilities are identified.

6.2.3 UPDATING THE PLAN

The Plan will be updated and re-submitted to FEMA for re-approval every three years, as required by law. The Plan will also be subject to interim updates as significant changes or new information are identified in the annual evaluations described in Section 6.3. VITEMA will initiate and lead all Plan updates. The two sub-paragraphs below describe the procedures for interim and three-year updates, respectively.

Updates Resulting from Interim Evaluations

The nature of Plan updates will be determined by the evaluation process described above. In general, VITEMA will notify the Hazard Mitigation Committees that the agency is initiating an interim plan update, and describe the circumstances that created the need for the update. VITEMA will determine if the Hazard Mitigation Committees should be consulted regarding potential changes. If it is determined that the Hazard Mitigation Committees should be involved, the nature of the involvement will be at the discretion of VITEMA.

When interim updates are completed, VITEMA will advise all Hazard Mitigation Committee members via email that the Plan has been updated, and describe the nature of the update.

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Updates Related to the Required Three-year Plan Review (by FEMA)

As required by law, every three years the Plan will be updated for re-submission and re-approval by FEMA. In those years, the evaluation process will be more rigorous, and will examine all aspects of the Plan in detail. It is anticipated that several meetings of the Hazard Mitigation Committees will be required and that the Governor will formally re-approve the Plan prior to its submission to FEMA. Based on the May 1, 2005 deadline for the initial plan, VITEMA anticipates that the submission date for the required update will be approximately May, 2008. Prior to that time, VITEMA will contact Hazard Mitigation Committee members and other appropriate agencies and organizations to determine a schedule for the Plan update.

The update process will entail a detailed and structured re-examination of all aspects of the original Plan, followed by recommended updates. The recommendations will be presented to the Hazard Mitigation Committees for consideration and approval.

6.3 MONITORING MITIGATION MEASURES AND PROJECT CLOSEOUTS

As described in the Hazard Mitigation Grant Program (HMGP, also known as "404") Administrative Plan, VITEMA uses the following system for monitoring mitigation measures and project closeouts.

6.3.1 MONITORING MITIGATION MEASURES

Mitigation projects are generally monitored as follows.

- Each mitigation project or activity (such as planning) has an established period of performance that VITEMA and FEMA monitor throughout the development and execution of the activity.
- VITEMA regularly meets with representatives from FEMA Region II to coordinate project monitoring activities.
- Every calendar quarter, VITEMA send letters to all subgrantees with open projects (i.e. ones that have been funded but are not completed), requesting a project progress update.
- Each of the subgrantees responds to the VITEMA request by preparing a standard report that details progress on individual mitigation projects, and indicates percent complete.
- VITEMA compiles the subgrantee progress reports, and produces a consolidated quarterly report that is sent to FEMA Region II for review.

6.3.2 MONITORING PROJECT CLOSEOUTS

Mitigation project closeouts occur in the following sequence. These procedures were established in accordance with FEMA HMGP guidelines as set out in the HMGP Desk Reference and the Virgin Islands HMGP Administrative Plan.

- Subgrantee indicates in a quarterly project progress report that a mitigation project is 100 percent complete.
- VITEMA reconciles FEMA SmartLink account for the project (by disaster).
- VITEMA initiates a comprehensive internal financial audit of the project.
- VITEMA resolves any issues discovered in the audit.

VITEMA sends FEMA Region II Caribbean Area Office (CAO) a closeout letter that delineates the final eligible cost of the project, and delineates any de-obligations that are required, as well as any monies that will be recovered from the subgrantee.

6.4 REVIEWING PROGRESS ON ACHIEVING GOALS

Subsection 201.4 (c)(5)(iii) of the IFR states that the Territorial Hazard Mitigation Plan must include a system for reviewing progress on activities and projects that are included in the mitigation strategy.

In order to track progress on achieving the goals identified in this Plan, VITEMA will ensure that both the annual and three-year Plan evaluations include a detailed examination and analysis of the goals, and the various actions that are intended to achieve them. In future versions of the Plan, VITEMA will prepare tables to indicate the status of the various actions, and a general indication of progress.

6.5 REVIEWING PROGRESS ON ACTIVITIES AND PROJECTS IN THE TERRITORIAL MITIGATION STRATEGY

Subsection 201.4 (c)(5)(iii) of the IFR states that the Territorial Hazard Mitigation Plan must include a system for reviewing progress on activities and projects that are included in the mitigation strategy.

As part of the yearly and three-year evaluations and updates to this Plan, VITEMA will initiate a review of all activities and projects noted in the mitigation strategy. The review will take place in stages.

1. In cooperation with the Hazard Mitigation Committees, VITEMA will assemble a Steering Committee to undertake a preliminary review and analysis of progress on activities and projects that are listed in the mitigation strategy section.
2. VITEMA and working group will prepare a draft report that describes progress, remaining tasks and projected time to complete.
3. The draft report will be presented to the Hazard Mitigation Committees during the meeting(s) related to the yearly (and three-year) updates.

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4. After Hazard Mitigation Committee review, comment and approval, results of the progress review will be included as a new or updated column in the table of mitigation goals and actions.
5. VITEMA will prepare a summary report describing the results of the yearly program evaluations and forward them to FEMA Region II CAO.