January 16, 2008

Dear Administrator Paulison:

The Association of State Floodplain Managers (ASFPM) totally supports FEMA’s Community Assistance Program – State Support Services Element (CAP-SSSE). This program provides, through agreement with the States, a means to ensure that over 20,000 communities participating in the National Flood Insurance Program (NFIP) are in compliance with NFIP requirements and achieving the flood loss reduction goals of the NFIP.

Currently, FY-08 CAP-SSSE funds have not been distributed to states from FEMA, despite the fact the federal Fiscal Year is well into the 2nd quarter. This is having a significant impact on the ability of state programs to assist the NFIP in these important activities. A delay in funding into the second and third quarters exacerbates the challenges of planning for state match amounts.

Due to many states’ budget constraints, travel by state staff to conduct CAP-SSSE activities is being curtailed or stopped. In addition, some states are indicating they may have no choice but to consider layoffs of experienced staff that perform the CAP-SSSE activities within the state if the federal funds designated for this purpose are not forthcoming.

With shrinking state revenues and the use of more state budget control mechanisms, most states do not have the same flexibility that they once had to “carry” or “float” delayed federal funds when payroll and staff expenses are incurred. Most states have switched to a more centralized budget process and management. Their programs must accurately project their quarterly needs for personnel, equipment, travel, and supplies. When allocations are not used for the intended match, the unspent funds may be reallocated to other program areas. Clearly, this will result in loss of state funding due to the delay in availability of the federal funding.

The delay of CAP-SSSE funds is also hampering some states’ ability to use these funds as an effective supplement to the Map Modernization activity. Many corollary activities that State programs conduct, like preliminary map releases, open house schedules for new maps, and ordinance assistance, are heaviest...
in the first and second quarter of the federal fiscal year. This makes CAP-SSSE funding vitally important to supporting the coordination and adoption of NFIP maps.

ASFPM and its 26 Chapters represent over 11,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation, including mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources, and insurance. All ASFPM members are concerned with working to reduce our nation’s flood related losses.

ASFPM urges you to immediately review this situation and take whatever action is possible to make certain that federal funds will be released to states for the CAP-SSSE Program. This will ensure that State programs continue to provide technical assistance to NFIP communities, to evaluate community compliance performance in implementing NFIP floodplain activities, and to build community floodplain management expertise and capability. Floodplain management and the resulting reduction of losses due to flooding is a critical component of the NFIP. The functions performed using CAP-SSSE funds are essential to flood loss reduction.

Calls or questions can be directed to me or the ASFPM office.

Sincerely,

[Signature]

Al W. Goodman, Jr., CFM
ASFPM Chair

cc: David Maurstad, Assistant Administrator, Mitigation Directorate, FEMA