



## Board Summary Report

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**File #:** 26-286

**Agenda Date:** 6/8/2026

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**To:** Board of County Commissioners

**Through:** Tyler Brown, Arapahoe County Sheriff

**Prepared By:**  
Nathan Fogg, Director, Office of Emergency Management

**Presenter:** Nathan Fogg, Director, Office of Emergency Management

**Subject:**  
1:15 PM \*Updates on FEMA restructuring and impacts to Arapahoe County

**Purpose and Request:**

Based on Executive Order 14180, a federal council was convened to conduct a systemic review of the Federal Emergency Management Agency (FEMA). The final report from the review was released on May 7, 2026. This study session aims to provide an overview of the final report and the most likely impacts to Arapahoe County and its Office of Emergency Management, covering structural, financial, and disaster preparedness cycle impacts, among others.

**Alignment with Strategic Plan:** Safe and Healthy Communities - Advance public safety by strengthening partnerships across law enforcement, emergency response, and community stakeholders.

**Background and Discussion:** The FEMA Review Council released its final report on May 7, 2026, establishing sweeping reforms to national disaster programs and directly affecting how Arapahoe County will prepare for, respond to, and recover from emergencies. The County's Impact Report synthesizes the changes indicated in the report and interprets their operational implications for the Board of County Commissioners (BOCC). The report explains significant changes across Public Assistance (PA), Individual Assistance (IA), hazard mitigation, environmental/historic review, audits, procurement, and national standards - together representing the most substantial shift in disaster management since the 1980s.

**Dramatically Increased Damage Thresholds:** The national PA Per-Capita Indicator rose from **\$1.89 to \$2.99**, a 1.582× increase. Applying the same proportional logic locally increases Arapahoe County's indicator from **\$4.72 to ≈ \$7.46**, raising the County's projected PA damage threshold to **≈ \$5.03 million**. This means small and moderate disasters are increasingly unlikely to qualify for federal assistance. This shift increases:

- Fiscal exposure to local budgets
- Need for mutual aid over federal surge support
- Internal planning around "state/local-only" incidents, which will become common

**FEMA Program Restructuring:** The FEMA Review Council final report replaces legacy programs with

streamlined, state-managed systems:

- **RAPID (Public Assistance)** - Fast cash block-grant model, state-run procurement and EHP, 1-year reconciliation, and 8-year closeout.
- **FAIR (Individual Assistance)** - Single direct payment to survivors; sheltering becomes fully SLTT-managed with **30-day damage assessment** requirements.
- **R3P (Hazard Mitigation)** - State-managed 5% Rapid Mitigation Advance and 10% Strategic Mitigation Allocation within 6 months. For Arapahoe County, these structures require new audit processes, strengthened EHP capacity, credentialed/typed resources, shelter coordination, and shovel-ready mitigation pipelines.

**Modernization of NFIP, CRS and Building/Land-Use Linkages:** Continued Risk Rating 2.0 implementation, potential NFIP marketplace shifts, and CRS modernization make local land-use and building codes more essential drivers of flood risk outcomes. These changes will place greater emphasis on local governments to maintain compliance and manage risk communication.

**Where This Impacts Arapahoe County (Operational Areas):** The Impact Report identifies eight major operational areas where the BOCC will see downstream impacts:

- **Finance/Audit Readiness:** New state-run audits under RAPID and FAIR require County-level audit playbooks, project accounting, training for PMs, and early documentation.
- **EHP & Procurement:** Local procedures must align with state-certified standards to avoid bottlenecks and remain eligible for funding.
- **Sheltering & Housing:** Counties assume expanded responsibility for congregate and non-congregate sheltering; MOUs and rapid intake systems must be expanded.
- **Mitigation Pipeline:** A ready-to-build project portfolio will be required to compete for R3P allocations.
- **Resource Typing & Credentialing:** Staff and ESU capabilities must meet national standards and be submitted to state/national catalogs.
- **Land-Use & Floodplain Management:** Ordinances and CRS strategies must realign to physical-risk-reduction outcomes.
- **EOC & ESF Structure:** The County's existing EOP (public base plan, internal annexes) complements SLTT-led doctrine but will require additional capacity for audits, procurement, and sheltering.
- **Stakeholder Integration:** HMP partners, GIS, Public Health, Public Works, and municipalities become critical in meeting the new timelines and delivering mission-ready capabilities.

**Alternatives:** N/A, this is in a informational report. OEM will continue to monitor the process, across the law making, regulatory, and policy landscapes at both the state and federal level.

**Fiscal Impact:** Based on the sum of past disaster damages none of the Stafford Act federal declarations, except COVID-19, would meet the threshold established by increased multipliers meaning nearly \$4 million of federal assistance would not have been available for recovery from previous flooding events. There remains, as of May 13, 2026, uncertainty on Colorado offering a 12.5% cost match upon state disaster declarations. Notably in the last 12 months most federal declarations have covered individual assistance and the initial response costs up to 75%. Public assistance to the County, cities, and special districts has largely not been approved.

**Alignment with Strategic Implementation Strategies:** N/A

**Staff Recommendation:** None. For informational purposes.

**Concurrence:** None required.