Table 6: Eligible and Ineligible Components of Residential and Community Safe Rooms

Building Systems & Components	Design Criteria	Residential Safe rooms 1- & 2-Family Dwellings	Non-Residential, Dual-Use Tornado Safe Room	Non-Residential, Single-Use Tornado Safe Room	Non-Residential, Dual-Use Hurricane Safe Room	Non-Residential, Single-Use Hurricane Safe Room
Systems and Components Defining the Safe Room Space						
Foundations, structural systems, walls, and ceilings/roofs (new construction and retrofit) that directly support or protect the building cladding, providing near-absolute, life-safety protection	Available criteria included in FEMA 320 and 361.	Eligible	Eligible	Eligible	Eligible	Eligible
Doors and Windows	Available criteria included in FEMA 320 and 361.	Eligible	Eligible	Eligible	Eligible	Eligible
Protection of exterior above-ground generators and/or electrical, ventilation, or communication equipment	Available criteria included in FEMA 320 and 361.	Eligible	Eligible	Eligible	Eligible	Eligible
Common "Best Practice" Components (Recommended by FEMA)						
Signage	Available criteria included in FEMA 320 and 361.	Ineligible	Eligible	Eligible	Eligible	Eligible
Communications	Required by FEMA 361 (Chapters 8 and 9 for emergency communications to and from the safe room).	Eligible	Eligible	Eligible	Eligible	Eligible
Local Area Network (LAN) drops and wiring	Not a design requirement of FEMA 320 or FEMA 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Components Where Function Meets FEMA Protection Criteria						
Alternate Source of Power (e.g., generator, battery)	As specified in FEMA 320 or 361 requirements. Capacity should be limited to the load required for life-safety protection: a minimum of 2 hours for tornadoes and 24 hours for hurricanes.	Eligible	Eligible	Eligible	Eligible	Eligible

Building Systems & Components	Design Criteria	Residential Safe rooms 1- & 2-Family Dwellings	Non-Residential, Dual-Use Tornado Safe Room	Non-Residential, Single-Use Tornado Safe Room	Non-Residential, Dual-Use Hurricane Safe Room	Non-Residential, Single-Use Hurricane Safe Room
Equipment and Supplies (i.e., fire extinguishers, first aid kits)	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Ineligible	Eligible	Eligible	Eligible	Eligible
Ventilation	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Permanent Electrical Lighting	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Emergency Electrical Lighting	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Permanent Electrical Outlets	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Emergency Electrical Outlets	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Upgrade of an electrical or ventilation system for protected portions of the structure (required for safe room installation)	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Upgrade of an electrical or ventilation system for unprotected portions of the structure (not required for safe room installation)	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible

Building Systems & Components	Design Criteria	Residential Safe rooms 1- & 2-Family Dwellings	Non-Residential, Dual-Use Tornado Safe Room	Non-Residential, Single-Use Tornado Safe Room	Non-Residential, Dual-Use Hurricane Safe Room	Non-Residential, Single-Use Hurricane Safe Room
Steps/stairs, elevators/lifts for safe room ingress-egress	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Americans with Disabilities Act (ADA) entrances for ingress-egress	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Toilets and Hand Washing Facilities located within the safe room	As specified in FEMA 361 criteria; and also in compliance with minimum local building code provisions.	Ineligible	Eligible	Eligible	Eligible	Eligible
Compliance with FEMA Safe Room Policy, FEMA 320, and FEMA 361 for Design Flood Criteria and Floodplain Management	As specified in 320 or 361 requirements, where compliant with minimum local building code provisions, and in accordance with MRR-2-09-1.	Eligible	Eligible	Eligible	Eligible	Eligible
Design and Construction Components						
Planning/Engineering/Architecture/Design Fees	Only planning/design costs required for the safe room, utility protection, and travel/time accessibility. Must comply with unit cost allowances.	Eligible	Eligible	Eligible	Eligible	Eligible
Engineering Peer Review of Safe Room Design Criteria (limited to systems and components providing life-safety protection). This cost may be included in the design cost/engineering fee but may also be singled out as a line-item cost.	Only additional engineering review of plans/design required for the safe room, utility protection, and occupant protection. Must comply with unit cost allowances for design fees.	Eligible	Eligible	Eligible	Eligible	Eligible
Excavation	As required for excavating the required foundation for the safe room, such as: interior foundation (e.g., interior column footing), exterior foundation, underground placement of safe room, or underground placement of electrical lines.	Eligible	Eligible	Eligible	Eligible	Eligible

Building Systems & Components	Design Criteria	Residential Safe rooms 1- & 2-Family Dwellings	Non-Residential, Dual-Use Tornado Safe Room	Non-Residential, Single-Use Tornado Safe Room	Non-Residential, Dual-Use Hurricane Safe Room	Non-Residential, Single-Use Hurricane Safe Room
Below-Ground Electrical Lines for Safe Rooms within Another Structure	Compliant with minimum local building code.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Below-Ground Electrical Lines from Structure to Exterior Safe Room	Compliant with minimum local building code.	Eligible	Eligible	Eligible	Eligible	Eligible
Moisture Protection	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Eligible	Eligible	Eligible	Eligible	Eligible
Surveys, Tests, Soil Borings, etc. for Protected Portion	As specified in FEMA 320 or 361 criteria. Compliant with minimum local building code provisions when used as a safe room or A-3 occupancy.	Ineligible	Eligible	Eligible	Eligible	Eligible
Generally Ineligible Components (Non-Essential to Protection)						
Safe Facility Maintenance	As per HMA Program Guidance, FEMA is not responsible for project maintenance.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Restroom fixtures that are not the minimum code required for toilet and hand washing facilities within the safe room	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Paint on walls and ceilings for the safe room	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Floor coverings – Subfloors as is appropriate and adequate for use in a safe room	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Floor covering for the unprotected portion of the project	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Finishes that enhance basic wall/ceiling paint or floor covering	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Removal of structures from developed land	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Kitchen cabinets, countertops, and kitchen equipment	See "Storage areas for food, water, and equipment" below.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible

Building Systems & Components	Design Criteria	Residential Safe rooms 1- & 2- Family Dwellings	Non-Residential, Dual-Use Tornado Safe Room	Non-Residential, Single-Use Tornado Safe Room	Non-Residential, Dual-Use Hurricane Safe Room	Non-Residential, Single-Use Hurricane Safe Room
Storage areas for food, water, and equipment	FEMA 361 includes the recommendation for food and water storage within the safe room in Section 8.6.1. FEMA 361 also identifies safe room equipment that should be stored within the safe room. See Sections 8.6.3 and 9.1.8, and Table 9.1.	Ineligible	Eligible	Eligible	Eligible	Eligible
Security cameras and EOC-type equipment	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Purchase of land	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Landscaping	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible	Ineligible	Ineligible	Ineligible
Site work not related to the protected portion (excavation, grading, parking, sidewalks, etc.)	Not a design requirement of FEMA 320 or 361.	Ineligible	Ineligible except for sidewalks necessary for access	Ineligible except for sidewalks necessary for access	Ineligible except for sidewalks necessary for access	Ineligible except for sidewalks necessary for access

Eligible Costs Table Notes:

1. Parking, and all non-building elements that support getting occupants from the parking area to the safe room area, are ineligible costs. These costs include, but are not limited to, the parking areas/surfaces, weather protection structures, walkways, stairs and railings, and signage otherwise not needed for pedestrian access unless required by the ADA.
2. Community-wide, mass notification systems are not eligible costs for safe room projects. Only warning systems necessary to notify prospective safe room occupants along with communications equipment directly supporting the safe room function are eligible costs.
3. Safe rooms must comply with minimum square footage requirement presented in FEMA 361 when applying for Federal funding. However, when additional space per occupant is provided, this typically reduces the BCR for the safe room project. Currently, no exceptions or provisions allow for the additional benefit to be credited due to the use of facility (such as an EOC, a hospital, a special needs shelter, etc.). FEMA 361 square footage criteria are net square footages (usable) for the safe room (protected) area.
4. When a safe-room is a single-use space or any other space that has not otherwise been classified for use or occupancy, the occupancy should be defined as A-3 as defined in Section 303 of the 2006 (or most current edition) of the International Building Code (IBC). This occupancy designation will provide the criteria needed for defining other non-safe room design parameters from the building code for the safe room space, including, but not limited to, lighting, toilet and hand washing fixtures, ventilation, etc.

Under the current Safe Room Policy, for each structure type, eligible project costs are limited to:

- **Protection by design components** (see Table 6), including and limited to the safe room portion of the envelope (walls, ceilings, doors, windows, as specified in FEMA 320 and 361).
- **Ancillary "best practice" components** (see Table 6) recommended by FEMA 320 and 361, including standby (backup) power, communications, and emergency electrical lighting limited to the safe room portion of the building.
- **Design and construction components** (see Table 6) for safe room portion only, including engineering fees and excavation.
- **Required features by function** (see Table 6) (necessary for safe room function and habitation) components, including ventilation, permanent electrical lighting, steps for ingress/egress, toilets and hand washing facilities, etc. for the normal use of the safe room when eligible according to Table 6. Some of these features may be recommended, but FEMA does not pay for these elements.

Ineligible costs are **non-essential components** including any above-code, code-required, or below-code components not necessary to provide for minimum life-safety protection in the safe room area. Table 7 presents examples of five safe room projects and their eligible costs.

Table 7: Example Eligible Costs by Safe Room Type

Residential Safe Room	**Tornado or Hurricane Safe Room, New Construction or Retrofit, Interior, or Exterior**	**Example:** Interior basement safe room, new construction. **Eligible Costs:** Eligible project costs include: • Protective safe room envelope (walls, ceiling, and door) • Required FEMA 320 best-practice components • Design and construction costs for safe room portion only • Required safe room components, such as permanent electrical lighting and ventilation, as specified in FEMA 320
Community Safe Room – Retrofit	**Single-Use Tornado or Hurricane Safe Room, Retrofit**	**Eligible Costs:** Costs eligible for FEMA cost share include: • Components or hardening activities that meet FEMA 361 wind mitigation criteria • Required FEMA 361 best-practice components including signage, communications, standby (backup) power sources • Construction and design fees • Required components, such as electrical lighting, ventilation, (may only be necessary for hurricane safe rooms), toilets and hand washing facilities as specified in FEMA 361 **Ineligible Costs:** Non-mitigation performing components not identified in FEMA 361.

Community Safe Room – Retrofit	**Dual-Use Tornado or Hurricane Safe Room, Retrofit**	**Eligible Costs:** Costs eligible for FEMA cost share (limited to designated mitigation-performing areas of the structure) include: • Costs to harden walls, floors, ceilings/roofs, windows in safe area only • Standby (Backup) power sources for safe room area only • Any local code-required items, including toilet and hand washing facilities, electrical lighting, and ventilation limited to the safe room area **Ineligible Costs:** Non-mitigation-performing components not identified in FEMA 361, including items relating to non-shelter use, **such as auditorium seating, sports equipment and fixtures, floor treatments, bathroom fixtures (other than code-required toilets and hand washing fixtures specified by the FEMA safe room publications), etc.**
Community Safe Rooms – New Construction	**Single-Use Tornado or Hurricane Safe Room, New Construction**	**Eligible Costs:** Costs eligible for FEMA cost share include: • Walls, floors, ceilings/roofs, doors, and windows included in the safe room • Required FEMA 361 best-practice components including signage, communications, standby (backup) power sources, and construction and design fees • Local code-required items, including toilet and hand washing facilities, electrical lighting, ventilation, ADA entrances (ADA entrances are federally mandated but also required by local code) **Ineligible Costs:** Non-mitigation performing components not identified in FEMA 361.
	Dual-Use Tornado or Hurricane Safe Room, New Construction	**Eligible Costs:** Costs eligible for FEMA cost share (limited to the safe room area of the structure) include: • Walls, floors, ceilings/roofs, doors, and windows included in the safe room portion of the facility • Required FEMA 361 best-practice components including signage, communications, standby (backup) power sources • Construction and design fees • Local code-required items, including toilet and hand washing facilities, electrical lighting, and ventilation **Ineligible Costs:** Non-mitigation-performing components not identified in FEMA 361, including items relating to non-shelter use, **such as auditorium seating, sports equipment and fixtures, floor treatments, bathroom fixtures, etc.**

C.4.3 Operations and Maintenance Plans

The Safe Room Policy requires Applicants and subapplicants to submit a descriptive statement regarding the O&M plan with any safe room grant application. The policy states in Section VII (page 3):

> *FEMA will consider an extreme wind event mitigation activity consisting of the retrofit or construction of a residential, nonresidential, or community safe room (single- or multi-use) to be an eligible project type for PDM and HMGP grant awards as follows:*
>
> - *[In the 7th bullet:] where adequate operations and maintenance planning are demonstrated;*

And further states in Section VII, Part E (page 9):

> *To be considered for funding, PDM and HMGP community safe room project applications will include a statement acknowledging that the requested community safe room will be operated and maintained in a manner that will achieve the proposed hazard mitigation. FEMA will only consider operations and maintenance plans that are*

consistent with criteria available in FEMA 361 Design and Construction Guidance for Community Safe Rooms Chapter 9 and the samples provided in Appendix C and D.

Community safe rooms, as defined by the Safe Room Policy, are built and operated for the purpose of immediate life-safety protection during extreme wind hazards. To achieve this purpose, community safe rooms must be built to the design criteria specified in Section VII, Part A of the Safe Room Policy, and they must admit occupants and provide them with the services they need in a timely manner. Consequently, the Safe Room Policy requires that all community safe room applications provide a clear and succinct statement acknowledging that the requested community safe rooms will be operated and maintained in manner that will achieve the proposed hazard mitigation. Therefore, it is essential that Applicants and subapplicants provide this information; otherwise, the application review may be delayed or an application rejected. In addition, a signed Draft O&M Plan will be provided at pre-construction and a signed Final Approved O&M Plan will be provided at closeout for evaluation of community safe room funding applications. Again, it is essential that this information be provided otherwise project implementation may be inhibited.

The following steps outline the O&M plan requirements for projects seeking FEMA grant funding, details for each step are provided in the subsections below.

- Step 1. (3.1) Descriptive statement of O&M plan (due at time of application);
- Step 2. (3.2) Draft O&M Plan (due prior to any retrofit or construction); and
- Step 3. (3.3) Final O&M Plan (due prior to project closeout).

C.4.3.1 Descriptive Statement of O&M Plans

A statement acknowledging the requirement for an O&M plan for the community safe room should be included in the grant application. At a minimum, it should include a description of the maintenance procedures, as well as a brief statement about the operation of the safe room when opened for use. The statement should also provide basic information about how the safe room will be used, including a description on initiating use, a discussion of the warning system, basic procedures for opening the doors to the public, and key components of the safe room maintenance procedures. Finally, the statement should identify the office that will be responsible for the O&M of the safe room.

C.4.3.2 Draft O&M Plans

The development of a Draft O&M Plan should be coordinated with the appropriate entities both using and operating the community safe room and signed by appropriate officials in these organizations.

A Draft O&M Plan must be submitted at pre-construction and, at a minimum, must include the items identified in the O&M component lists below. The Draft O&M Plan may be based on preliminary engineering drawings. FEMA 361, Chapter 9 and Appendices C and D, provide additional information on the O&M components. The O&M plans should include, but not be limited to, the following components:

Operations Components:

- Community organization(s) responsible for operating and maintaining the community safe room, such as the local emergency management office. Include contact information for the relevant office(s).
- Command and management roles and responsibilities for key individuals, such as the overall safe room manager and site coordinator and their essential duties; and/or the agency responsible for fulfilling these roles.
- Major tasks the safe room management team will perform during a tornado/hurricane watch issued by the National Weather Service.
- Major tasks the safe room management team will perform during a tornado/hurricane warning issued by the National Weather Service.
- General operation tasks performed in the community safe room from the time the emergency is announced to the time occupants may safely leave the community safe room.

Maintenance Components:

Assurance from the organization responsible for operating and maintaining the community safe room of the following during the useful life of the community safe room:

- Non-mitigation uses will not prohibit the use of the community safe room to perform its hazard mitigation purpose of life-safety protection. This will ensure the approved safe room occupancy is available at all times.
- Regular maintenance will be scheduled and performed by a designated party during the useful life of the community safe room.
- Basic exterior and interior signage will be posted as is necessary and appropriate for adequate safe room operations.
- A redundant power source, such as batteries or generators, is available to provide standby (emergency) power for lighting and ventilation for the community safe room in the event of primary power failure, as required.
- The community safe room inventory will include essential equipment and supplies such as communications equipment, emergency equipment, first-aid supplies, water, and sanitary supplies.

A Draft O&M Plan is required before any retrofit or construction activities begin. Draft O&M Plans must include:

- Both the operations and maintenance components listed above.
- The signature of the subgrantee for the approved application.
- The signature of authorized officials from the identified community organization(s) responsible for operating and maintaining the community safe room, if different than the subgrantee.

Grantee Review of Draft O&M Plan

The Safe Room Policy specifies that the Grantee affirm the Draft O&M Plan is consistent with FEMA 361 criteria by:

- Reviewing the draft plan to ensure it addresses both the operations and maintenance components, as well as the signature requirements listed above.
- Coordinating with the subgrantee to address any missing components and/or signatures not included in the draft plans.
- Transmitting the Draft O&M Plan to FEMA with a written statement affirming its consistency with FEMA 361 criteria.

FEMA Review of Draft O&M Plan

The Grantee will be informed in writing once FEMA has determined the Draft O&M Plan is consistent with FEMA 361 criteria. This will allow the Grantee to inform the subgrantee that it may begin retrofit or construction activities. FEMA comments on the Draft O&M Plan must be addressed before FEMA makes a final determination of consistency.

Additional information on plan components is provided in FEMA 361, Chapters 3, 5, 8, and 9:

- Maximum Occupancy (FEMA 361, 3.3.1, 3.4.1, and 3.5.1);
- Warning Signals (limited information in FEMA 361, 5.4 and 5.5);
- Access and Entry (FEMA 361, 4.4 and 8.4);
- Signage (FEMA 361, 9.4);
- Parking (FEMA 361, 5.4);
- Pets (FEMA 361, 5.4);
- Special Needs Populations (FEMA 361, 8.7);
- Emergency Provisions, such as food and water, sanitation management (FEMA 361, 8.9); and
- Identified non-mitigation uses of the community safe room (FEMA 361, 5.2.2).

C.4.3.3 Final O&M Plans

The development of a Final O&M Plan should be coordinated with the appropriate entities both using and operating the community safe room and signed by appropriate officials in these organizations.

A Final O&M Plan is required before project closeout. The Draft O&M Plan should be updated to reflect the actual design and construction of the safe room and include any other changes that may have been required due to construction, access issues, or other relevant factors.

Final O&M Plans must include:

- Operations and maintenance components listed above;
- The signature of the subgrantee for the approved application; and

- The signature of authorized officials from the identified community organization(s) responsible for operating and maintaining the community safe room, if different than the subgrantee.

Grantee Review of Final O&M Plan

The Safe Room Policy requires that the Grantee affirm that the Final O&M Plan is consistent with FEMA 361 criteria by:

- Reviewing the final plans to ensure they address both the O&M components, as well as the signature requirements listed above;
- Coordinating with the subgrantee to address any missing components; and
- Transmitting the Final O&M Plan to FEMA with a written statement affirming its consistency with FEMA 361 criteria.

FEMA Review of Final O&M Plan

The Grantee will be informed in writing once FEMA has determined the Final O&M Plan is consistent with FEMA 361 criteria. FEMA comments on the Final O&M Plan must be addressed before FEMA makes a final determination of consistency. Grantees not completing a Final O&M Plan at closeout will be subject to recoupment of grant funds as determined by FEMA.

C.4.4 Cost Effectiveness for Safe Rooms

The Safe Room Policy, Section VII, Part F (page 10), Cost Effectiveness states, "PDM and HMGP safe room projects requesting funding must demonstrate their cost effectiveness through an acceptable benefit-cost analysis (BCA)."

This section discusses the total project costs required for the purpose of demonstrating compliance with cost-effectiveness requirements. The total project cost for BCA purposes is equal to the sum of all eligible costs necessary to achieve life-safety protection. Applicants and subapplicants should refer to the Eligible Costs section of this guidance to help identify the full range of components that make up these necessary costs. As identified in the Safe Room Policy, project costs typically include:

- Design activities;
- Site preparation and building foundation materials and construction;
- Structural systems capable of resisting the design wind loads (including roof decking and roof support structures);
- Protective envelope components such as:
  - Walls, ceiling/roof systems, and doors; and
  - Other retrofit hardening activities that meet FEMA-approved performance criteria;
- Functional components such as:
  - Permanent electrical lighting, ventilation, heating/cooling, and toilets and hand-washing facilities consistent with FEMA-approved performance criteria;

- Signage, emergency communications equipment, and backup power generation for the safe area; and

- O&M plan development.

In some cases, the total project costs of a safe room for a large community may exceed the funding limits of the HMGP or PDM grant program. In these instances, the actual total project cost must be used in the BCA. The grant program funding limit (which would be less than the actual project cost) may not be used as the total project cost entered into the BCA.

Similarly, some applications may not request PDM or HMGP funds up to the available Federal cost share. In these cases, the application must still use the sum of all required, not just requested, costs necessary to achieve the hazard mitigation purpose of immediate life-safety protection.

C.4.5 Summary of Grant Application Requirements

To be eligible for FEMA grant funding, safe room applications and subapplications must provide documentation to show:

- Compliance with the FEMA Mitigation Safe Room Policy;
- Compliance with relevant HMGP and PDM program guidance requirements; and
- Compliance with local planning, zoning, building, and other applicable codes.

In addition to these three basic requirements, all applications and subapplications must include:

- Population at risk:
  - Documentation on the composition, size, and rationale for including each group designated as an at-risk population;
  - For tornado residential and community safe rooms, documentation must show how the designated population would reach the safe room within the prescribed time limit after notification; and
  - For hurricane safe rooms, documentation must demonstrate that each group comprising the at-risk population belongs to one of the categories specified in this guidance;
- Travel limitations:
  - For tornado community safe rooms, travel limits are 5 minutes for the occupants who will be walking or the maximum distance of 0.5 mile from the safe room for those driving. This means that the population relied upon as the potential occupants of the safe room must reside or work in buildings that are no more than 0.5 mile away from the safe room; and
  - For hurricane safe rooms, travel times are not limited;
- A BCA performed using the latest available and approved BCA tools;
- A description of the approach the subapplicant will use in preparing the O&M plan; and
- Closeout Requirements:

- Final approved O&M plan;
- Photos of the project site before and after construction;
- Latitude/longitude at the project site; and
- Vicinity map and map of SFHA if applicable.