

Validate As You Go (VAYGo) Closeout Benefit

The VAYGo Closeout Benefit offers administrative relief to recipients in the amount of documentation required to be submitted to FEMA at project closeout. The benefit is available to recipients who successfully complete two VAYGo testing cycles with an error rate equal to or less than 1.5 percent.

VAYGo Closeout Benefit (VCB) Requirements

- A recipient must successfully complete two consecutive testing cycles (two total years) with an error rate equal to or less than 1.5 percent.
- The benefit only applies to large projects for hurricanes Harvey, Irma and Maria, and all large projects for disasters declared in fiscal year 2020 and forward, including COVID-19.

Benefits

- When a Recipient qualifies for the VCB, there is no need to submit financial documentation for all events/ disasters declared on or after October 1, 2019 to include COVID-19.
- Recipients will only be required to submit a certification for any projects submitted for closeout during the eligible period.
- Specifically, a recipient will not need to provide the normally required financial documents such as force account labor, force account equipment, materials and supplies, contracts, etc. These documents tend to be voluminous in nature, therefore eliminating the need to submit these to FEMA represents an administrative relief to qualified recipients.

Information Required at Project Submittal

- Certification that costs were validated and expended in accordance with the obligated Scope of Work. Cost summaries with proof of payment information will not be required.
 - FEMA will accept the recipients' provided certification for cost expenditures, rather than having to provide full or detailed cost documentation.



FEMA

- Documentation which demonstrates that any conditions placed on the project during reviews have been fulfilled (e.g., Environmental and Historic Preservation (EHP) permits, Insurance Obtain and Maintain documents, etc.).
 - Sub-recipients must comply with EHP laws, regulations, and Executive Orders, including but not limited to, the Endangered Species Act, National Environmental Policy Act, and the National Historic Preservation Act. Applicants must afford FEMA the opportunity to perform EHP reviews prior to starting any work that has potential to impact the environment or historic properties, including archaeological resources. FEMA must ensure that the project complies with appropriate EHP laws, regulations, and executive orders. If an applicant starts work prior to FEMA's completion of the EHP review, it jeopardizes Public Assistance funding for the entire project. Such situations may compel FEMA to revoke federal funding for those portions of the project that fail to meet the EHP compliance requirements.
- Information associated with any cost overrun. If an overrun is requested, recipients must provide supporting documentation to validate and include proof of cost.
 - Recipients will submit any documentation to include cost and a detailed explanation of why the overrun is being requested.

Notification of Eligibility for Participation

- Recipients who are eligible for the VCB will be identified by OCFO VAYGo HQ.
- Region PA/Closeout teams will notify recipients who have qualified for the VCB and inform them of the documentation and information that must be included with the closeout package for each project.

Testing Above 1.5 Percent During VCB Participation

- If a recipient is participating in the closeout benefit process and subsequently does not achieve the 1.5 percent or less error rate, that recipient will lose the opportunity to participate in the process.
- However, a recipient will be able to participate in the process once again if it successfully completes the VAYGo testing process for **one cycle** (rather than the two cycles originally required to participate), meeting the 1.5 percent error rate.

Standard Closeout Documentation Versus Closeout Benefit Documentation

- The table below demonstrates the documentation required under the standard closeout process and that which is required under the VAYGo Closeout Benefit.

Table 1.1 Table of closeout documentation versus closeout benefit. (“Y” indicates a requirement, “N” indicates the item is not a requirement)

Documentation Needed	Standard Closeout	VCB
Summary of work performed	Y	Y*
Summary of Expenditures	Y	Y*
Force account labor (time sheets, fringe benefits, etc.)	Y	N
Force account equipment (proof of ownership, hours used, operators’ hours, etc.)	Y	N
Materials and supplies (invoices, inventory, proof of payment, disposition)	Y	N
Contract expenses	Y	N
Insurance documentation (full insurance policy and final Statement of Loss)	Y	Y
Project-related correspondence (Alternate/Improved project approval, etc.)	Y	Y
Contracting and Procurement documentation, if applicable (e.g. change orders, advertisements, bid tabulations, evaluation)	Y	N
Under/Overrun Information	Y	Y
Personnel pay policies, if applicable	Y	N
Applicable codes and standards	Y	Y
Documentation required to demonstrate compliance with EHP conditions	Y	Y
Sampling results necessary to support claimed costs (e.g. invoices, timesheets, work orders, trip tickets, etc.)	Y	N
Mutual aid agreements, if applicable	Y	N
Photos, if applicable	Y	Y

*Summary of work performed, and expenditures will be captured in the VCB certification form.