

Public Assistance Reasonable Cost Evaluation Job Aid – Hazard Mitigation Grant Program Crosswalk

The Public Assistance (PA) Reasonable Cost Evaluation Job Aid (Job Aid) provides reasonable cost evaluation guidance. Since the reasonable cost requirements are the same for the Hazard Mitigation Grant Program (HMGP) and PA programs, HMGP adopted the Public Assistance Reasonable Cost Evaluation Job Aid (published on October 13, 2018)¹ and located ([here](#)) as applicable to determining reasonableness for HMGP management costs.

HMGP recipients and subrecipients should read and apply it in the context of HMGP management costs only. In general, recipients and subrecipients can substitute HMGP when references to PA are made. Exceptions and other considerations are noted in the crosswalk located below.

For more information, please email FEMA-HMA-Grants-Policy@fema.dhs.gov.

Page Number	Section	Existing Language	HMGP Considerations
Page 1	Opening Paragraph	The Job Aid includes a checklist in Appendix A: Validation of Applicant-Provided Cost Estimates, which FEMA staff must use to review and validate cost estimates submitted to FEMA for Permanent Work.	Completion of Appendix A is not required for HMGP management costs.
Page 1	Opening Paragraph	The Job Aid provides information to FEMA personnel on evaluating cost reasonableness for Federal funds expended.	For the purposes of HMGP, this applies when Federal funds are applied for, budgeted, and or expended.

¹ Available at www.fema.gov/media-library/assets/documents/90743

Page Number	Section	Existing Language	HMGP Considerations
Page 1	Applicability	The Job Aid provides general information to guide FEMA personnel in evaluating whether costs are reasonable including when necessary as the result of a financial review such as closeout or administrative appeals.	For the purposes of HMGP, this also applies to monitoring activities such as the review of claims and quarterly fiscal and progress reports and audits.
Page 1	Applicability	Cost eligibility is a basic component of PA Program eligibility, and in order for a cost to be considered allowable, it must be necessary and reasonable to accomplish the work properly and efficiently. (2 CFR Section 200.403)	For HMA, when determining if a cost is allowable, Program and Grants Management Staff will review costs to ensure they meet all program requirements. 2 CFR § 200.403 Cost Review is not limited to eligibility and reasonableness.
Page 3	Process to Determine Reasonable Costs	While Public Assistance (PA) costing specialists have the qualifications to determine reasonable costs, FEMA Office of Chief Counsel (OCC) has contracting and procurement qualifications and PA should engage OCC in such an evaluation whenever uncertain contract award selection questions arise.	HMGP does not use costing specialists. HMGP program specialists should consult with the Office of Chief Counsel for assistance with contract award selection questions. In addition, the Grants Management Specialist in the Grants Division should be consulted for allowability or 2 CFR Part 200 Subpart E requirements.
Page 4	2. Historical Costs and Average Weighted Unit Prices	FEMA's Cost Estimating Format (CEF) employs a nationally recognized economic inflation factor.	FEMA's Cost Estimating Format (CEF) is not used for HMGP.
Page 5	5. FEMA Cost Codes	FEMA maintains a national unit price listing called cost codes and periodically adjusts this listing to conform with geographical and disaster-specific needs.	Generally, FEMA Cost Codes are related to construction equipment and supplies and are not relevant for management costs. The use of the costs codes is not required.