

# Mitigation Reconstruction Closeout Checklist

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Purpose: Understand the FEMA process to successfully close out a mitigation reconstruction activity.

Mitigation reconstruction is the construction of an improved, elevated building on the same site where an existing building and/or foundation has been partially or completely demolished or destroyed. These activities include either total or partial demolition of the structure and result in the construction of code-compliant and hazard-resistant structures on elevated foundation systems.

This checklist outlines required closeout documentation, the FEMA process, recipient responsibilities, and subrecipient responsibilities needed for closeout. If additional clarifications are necessary to complete closeout, provide that information in the Notes section.

## Grant Award Information

<b>FEMA Region:</b>		<b>HMA Program:</b>	
<b>State:</b>		<b>Community:</b>	
<b>Project ID No.</b>		<b>FEMA Reviewer:</b>	
<b>Date (mm/dd/yyyy):</b>			



# FEMA

## Required Closeout Documentation

### Checklist - Required Closeout Documentation

Recipient closeout request letter signed by the Governor’s Authorized Representative (GAR) or equivalent certifying:

- The project was completed as outlined in the approved scope of work (SOW)
- The reported costs were incurred in the performance of eligible work
- The approved work was completed, and the mitigation measure is compliant with the provisions of the grant agreement (for non-disaster projects) or FEMA-State Agreement (for HMGP)

Final inspection report (with date of inspection and name and position of inspector) signed and dated. Depending on the type, location, or complexity of the project, FEMA program staff, along with technical support, may conduct a physical or virtual visit.

- Verify that the final inspection report includes color photographs of the complete project that are clearly labeled with the FEMA project number, subrecipient name, project address, source of color photographs, and latitude/longitude coordinates to the nearest six decimal places for comparison with the pre-mitigation photographs.

Final itemized budget summary that includes the federal share disbursed, match, any federal funds to be de-obligated, and final total project cost incurred.

An Elevation Certificate (FEMA Form 81-31) for each structure.

A certificate of occupancy for each structure.

An officially recorded copy of the property deed amendment that includes notice of flood insurance requirements for each structure.

Verification of flood insurance for each structure.

Signed “Acknowledgement of Conditions for Mitigation of Property in a Special Flood Hazard Area with FEMA Grant Funds” form for each structure.

Environmental Planning and Historical Preservation (EHP) Closeout Review:

- Include a statement in the recipient closeout request letter that states what action was taken to address each environmental condition or explain why an action was not required.
- Submit required permits, notices, correspondence, or other relevant documentation outlined in the environmental project conditions (if applicable).

Final Progress Report.

### Notes

The following space allows for the region to include any specific notes or comments to record about this application.

## FEMA Process

### Checklist - FEMA Process

Review financial reconciliation to determine if a de-obligation is needed.

Verify that there are no outstanding issues that could affect funding, such as appeals.

Verify that a Duplication of Benefits search was completed to ensure that the subrecipient did not receive federal assistance for the same purpose from another source. Documents should be included in the recipient's project files.

Verify that a Duplication of Programs search was performed to ensure that the subrecipient did not receive federal assistance for the same purpose from another source.

Verify that the SOW has been completed as approved by reviewing the closeout documentation and approved subaward application documents.

Verify that the final inspection report includes color photographs of the completed project that are clearly labeled with the FEMA project number, subrecipient name, project address, source of photographs, and latitude/longitude coordinates to the nearest six decimal places for each structure.

Verify that the latitude and longitude coordinates submitted at closeout are the same as the latitude and longitude coordinates approved during project award (or approved SOW changes).

Validate the final square footage is within 10 percent of the original structure square footage at the time of closeout.

Review the environmental conditions in the Record of Environment Consideration (REC) and/or Environmental Assessment (EA) to confirm conditions were met, and permits, notices, or other relevant documentation was submitted (if applicable).

- Note: The EHP team may conduct the environmental closeout review.

Verify that the final Quarterly Progress Report was submitted with the closeout request.

Request other documents as required by FEMA policies and procedures.

Ensure that the submitted data are accurate.

Verify that the subaward was updated in the system of record, i.e., eGrants, NEMIS, or FEMA GO.

Close the mitigation reconstruction project in the appropriate grant system.

Send the signed closeout approval letter notifying the recipient of successful project grant completion.

## Recipient Responsibilities

### Checklist - Recipient Responsibilities

Begin closeout when notification is received from the subrecipient.

Conduct final inspections: Prior to the end of the Period of Performance (POP), perform a site inspection of the completed project and complete a site inspection report including color photographs of the completed work. Color photographs must be clearly labeled with the FEMA project number, subrecipient name and address, sources of the color photographs, and latitude/longitude coordinates (six decimal places).

Validate subrecipient expenditures.

Review financial reconciliation to determine if a de-obligation is needed.

Resolve any negative audit findings (e.g., single, Office of Inspector General, state, or Grants Management Division).

Obtain final financial and progress reports from the subrecipient.

Validate the closeout activities with award requirements.

Verify that a Duplication of Benefits review was completed to ensure property owners did not receive federal assistance for the same purpose from another source (such as Increased Cost of Compliance or Individual Assistance).

Ensure submitted expenses are eligible and all costs were incurred during the POP.

Complete the final reconciliation (review the federal share disbursed, match, final total project cost, etc.). This can be included in the body of the closeout request letter or submitted as a separate document.

Confirm the subrecipient submitted the following for each reconstructed property:

- An Elevation Certificate (FEMA Form 81-31)
- A certificate of occupancy
- An officially recorded copy of the property deed amendment that includes notice of flood insurance requirements for each property
- Verification of flood insurance
- Verification that the final square footage is within 10 percent of the original structure square footage at the time of closeout

Describe any environmental and historic preservation conditions that were assigned to the subaward and actions taken to address those requirements. FEMA will send the signed Environmental Closeout Declaration back to the recipient.

- The statement should document that all environmental conditions outlined in the REC or EA were met during project completion.
- The recipient may be required to facilitate coordination with other agencies to obtain copies of permits, notices, etc.

### Checklist - Recipient Responsibilities

Submit a closeout letter signed by the GAR or equivalent with the following documentation:

- Statement that the SOW has been completed as approved and/or the work complies with award terms and conditions
- Site inspection report and color photographs of mitigated structure
- Final project costs including management costs that were incurred in the performance of eligible work (for subaward and federal award closeout) and any modifications, such as approved underrun and overrun requests
- Closeout statement and documentation including environmental information listed above
- Statement that no inventions were made or patents applied for in the implementation of the award (for federal award closeout only)
- Verification that any program income has been deducted from the total project costs as specified in Title 2 of the Code of Federal Regulations Section 200.307

After review and verification is complete by FEMA, send the subrecipient confirmation that the project has been officially closed by FEMA.

The recipient must maintain the complete federal award closeout records file for at least 3 years from the submission date of its final expenditure report.

Update of the property site information in the FEMA electronic application system and National Emergency Management Information System (NEMIS) database for each structure.

## Subrecipient Responsibilities

### Checklist - Subrecipient Responsibilities

Notify the recipient per recipient/subrecipient agreement that the project is ready for final inspection and closeout.

Certify that the SOW for the approved subaward was completed.

Ensure that all reimbursable expenses have been submitted.

Ensure that all Quarterly Progress Reports and financial reports have been submitted.

Verify that the recipient has sent confirmation that the project has been officially closed by FEMA.

### Checklist - Subrecipient Responsibilities

Upon completion of the mitigation reconstruction work, submit the following for each structure:

- A certificate of occupancy and Final Elevation Certificate for each structure in the project to certify that the structure is code compliant. FEMA will use the latest published edition of ASCE 24 or its equivalent as the minimum design criteria.
- A copy of a recorded deed for each property (book and page, stamped document, etc.), including maintenance and flood insurance requirements.
- Verification of NFIP insurance.
- A certification from a building official or licensed design professional verifying that the structure was designed and constructed to the minimum standard of the two most recently published editions of the International Codes, or latest edition. These documents must be submitted before closeout can be completed. If a subrecipient fails to provide these documents, FEMA should follow the remedies for non-compliance procedures with the recipient to correct the issue or consider another remedy such as recouping award funds provided for the project.
- Documentation that confirms the final square footage is within 10 percent of the original structure square footage at the time of closeout.

Gather all copies of permits and local inspection documentation.

List all environmental conditions that were met when the project was completed.

- Certification that all environmental conditions in the REC or EA are complete.
- Keep copies of all environmental permits.
- Provide copies of environmental and/or historic preservation compliance documentation if conditions were assigned to the project.

Report to the recipient Duplication of Benefits information for each property.

Prepare any other closeout documentation for submission to the recipient for review. The subrecipient should verify with the Hazard Mitigation Officer what additional documentation is required for closeout.

Maintain all records and receipts including the submitted Quarterly Progress Reports in a secure electronic and physical location.

Be prepared for possible audits of the closed project.