



Hazard Mitigation Assistance Grant Monitoring Field Guide

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FEMA

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ON THE COVER:
San Francisco Underground Bay Area
Rapid Transit (BART) Center

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1. Purpose

The purpose of this Hazard Mitigation Assistance (HMA) field guide is to provide all Federal Emergency Management Agency (FEMA) HMA staff with a consistent process for the monitoring of HMA mitigation activities. The HMA field guide is a tool staff use to reference the roles and processes needed to implement non-disaster and post-disaster HMA grant program requirements for grants previously awarded and for grants to be awarded in the future.

FEMA performs financial and program monitoring of all grant programs in accordance with federal regulations.¹ All HMA financial procedures must be followed in accordance with those appropriate program regulations, authorities, and requirements. This document is applicable to all five HMA grant programs:

- Building Resilient Infrastructure and Communities (BRIC)
- Flood Mitigation Assistance (FMA) Program
 - Flood Mitigation Assistance
 - Severe Repetitive Loss (SRL)
 - Repetitive Flood Claims (RFC)
- Hazard Mitigation Grant Program (HMGP)
- HMGP Post Fire
- Pre-Disaster Mitigation (PDM) Program

2. Document Organization

This field guide contains descriptions of process steps and supporting reference material for successful execution of monitoring activities. The document begins with a high-level description of roles and responsibilities, which is followed by a discussion of the required monitoring activities. The appendices contain detailed reference information, including [acronyms and abbreviations](#), [program descriptions](#), [authorities](#), and more.

¹ [Title 44 of the Code of Federal Regulations \(CFR\) Part 13](#), [Title 2 CFR Part 200](#), the Grants Management Manual (FEMA Manual 205-0-1), the Grant Programs Directorate (GPD) Enhanced Monitoring Plan, and GPD Closeout Standard Operating Procedure (SOP). The FEMA Grants Management Manual provides staff with an overview of the policies and procedures that govern FEMA's grant awards, cooperative agreements, and other federal financial assistance.

3. Responsibilities

3.1. FEMA Regional Personnel

FEMA's responsibilities for coordinating with the recipient concerning monitoring activities include the following:

- Support recipients and provide technical assistance as needed
- Review quarterly progress and financial reports from recipients and follow up on any issues raised
- Review audit reports and follow up as necessary
- Conduct on-site or desk monitoring visits as needed
- Maintain financial and program records as required and as specified in Title 2 of the Code of Federal Regulations (CFR) Sections 200

4. Monitoring Overview

Award and subaward monitoring facilitates uncovering and resolving potential issues early, reduces the chances of jeopardizing a recipient's federal funding, fosters proactive management of those awards, results in timely closeout of the award and subaward, and creates a means to apply lessons learned to improve award management practices.

Designated FEMA staff monitor recipients to ensure that administrative processes, policies and procedures, budgets, program, and other related award and subaward criteria comply with federal government and FEMA regulations. Regular communication between FEMA and recipient staff can aid the monitoring process and proactively identify issues. HMA awards span numerous years and are bound by those regulations, guidance, and manuals in effect at the time of the award or disaster declaration.

Subawards using disaster funding are required to be entered into a spend plan tracker by Regional program staff, including details such as the subapplication title, the subapplicant, the subaward amount, and the projected date of obligation. Monitoring spend plan trackers can help to identify potential issues pre-award, if the project obligation is delayed, which could include the need for a period of performance (POP) extension, Environmental Planning and Historic Preservation (EHP) condition issues, treatment measures, or changes in the recipient's priorities.

After an award or subaward is made, both the recipient and the subrecipient are required to monitor and evaluate the progress of the mitigation activity in accordance with law, regulation, policy, and guidance. Spend plan trackers can be used as a basis to create a monitoring plan, develop a milestone timeline, and/or identify items or areas to monitor and include:

- Approved scope of work, work schedule/timeline, and Record of Environmental Consideration
- Terms and conditions of the award
- Approved budget
- Applicable administrative requirements based on award date²
- Applicable recipient requirements

Monitoring within FEMA is a joint process involving designated HMA and grants management staff. Additionally, some activity types require monitoring to continue after closeout. For example, some mitigation activities funded through FMA must maintain flood insurance for the life of affected structures. Similarly, acquisition-demolition of properties requires open space management in perpetuity, and every three years, certification must be made to the Regional Administrator that the properties will continue to be maintained as open space.

4.1. Monitoring Process

4.1.1. Overview

Program monitoring occurs in several different ways, and designated FEMA staff can adapt tools and techniques that work best for them, such as reports from systems, trackers, grant management tracking programs, and/or discussions with recipients and among program and Grants Management Division staff.³ The monitoring process enables FEMA staff to identify and address issues before they become serious, provide technical assistance, and/or take other appropriate action. Below are the high-level process steps of the monitoring process for FEMA staff:

4.1.2. Process

- The Regional Administrator designates the program and/or grants management staff responsible for carrying out the monitoring activities.

² The administrative requirements include: 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; 44 CFR Part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments (applicable for awards made and major declarations declared before December 26, 2014); 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Super Circular) (applicable for awards made from December 26, 2014 through November 11, 2020); 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Updated) (applicable for awards made after November 11, 2020); 44 CFR Part 78, Flood Mitigation Assistance; 44 CFR Part 79, Flood Mitigation Grants; 44 CFR Part 80, Property Acquisition and Relocation for Open Space; 44 CFR Part 206, Federal Disaster Assistance; 44 CFR Part 209, Supplemental Property, Acquisition and Elevation Assistance; applicable HMA Guidance based on award date or declaration date; and applicable FEMA Grants Management Manual procedures.

³ Reference the FEMA Financial Monitoring Plan for guidance on financial monitoring processes.

- Financial and program monitors are identified in accordance with the grant's Designation Memorandum; however, adjustments may be necessary depending on Regional needs.
- FEMA staff conduct monitoring through a variety of methods, including reviewing quarterly progress reports, reviewing Federal Financial Reports (FFRs), conducting site visits, completing desk reviews of awards and subawards, and/or reviewing audit findings.
 - For more information on monitoring subawards, see [Section 4.2. Monitoring Subawards](#).
 - For more information on monitoring awards, see [Section 4.3. Monitoring Awards](#).
- If an issue is identified, designated FEMA or recipient staff may provide technical assistance as necessary.
- Designated FEMA staff also provide a written report of the findings that may include actions that the recipient must take to address noncompliance.
- Based on a review of the subaward and award progress and financial reports, FEMA may notify the recipient of the deficiency and request that the issue be corrected following procedures in the Grants Management Manual.
- If compliance cannot be achieved, FEMA applies one of the remedy actions allowed in the Remedies of Noncompliance identified in the Grants Management Manual, Chapter 5.

4.2. Monitoring Subawards

4.2.1. Quarterly Reports

The reporting process involves actions to ensure that a recipient is meeting financial and program performance requirements in accordance with its approved applications, plans, and other terms and conditions of the award.

- The Regional Administrator designates the program and/or grants management staff responsible for carrying out the activities below.
- Designated FEMA staff review, analyze, and evaluate quarterly reports as outlined in the FEMA Grants Management Manual. This evaluation of the quarterly report should include a comparison with the reported project completion status, subrecipient expenditures, drawdown amounts, disbursed amounts, project amounts, and obligated amounts. FEMA staff review to ensure the recipient is:
 - Making adequate progress
 - Meeting any requirements for matching or cost-sharing
 - Spending funds only for allowable and reasonable costs

- Maintaining adequate financial systems
- Accounting for federal or federally generated resources, such as program income, federally owned property, or property acquired under the award
- HMA Regional staff complete the review of the quarterly report.
- HMA Regional staff discuss any findings with the recipient related to progress, issues, and/or questions about the status of the subawards.

4.2.2. General Progress Analysis

Uniform administrative requirements, including those at Code of Federal Regulations Title 44 Part 13 or Title 2 Code of Federal Regulations Part 200, identify post-award reporting and monitoring requirements that are applicable to all federal agencies, including FEMA.

Designated FEMA staff carry out the following tasks when analyzing performance reporting requirements:

- Identify reporting requirements as outlined in the terms and conditions of the award
- Monitor the status of required reports (timely or delinquent)
- Perform timely analysis of data and document results, including:
 - Collecting any on-site technical inspection documents or data, as well as other relevant submissions, including on-site photographs documenting progress
 - Analyzing and assessing information collected through review of required reports, supplemental documentation, and possibly on-site review
 - Taking appropriate actions to resolve issues or concerns when noted
- Notify appropriate parties (e.g., recipient, program office) of any issues identified
- Track resolution of any issues identified and maintain documentation in an audit readiness monitoring file

Tools such as Validate as You Go (VAYGo) or using the scope of work and schedule to monitor subaward progress can further assist to identify issues that might prevent timely subaward closeout.

4.2.3. Validate As You Go

In accordance with the [HMGP Management Costs \(Interim\) FEMA Policy # 104-11-1](#), recipients validate subrecipient management costs quarterly, and FEMA validates recipient and subrecipient costs quarterly. This process could be applied to other Hazard Mitigation Assistance grant awards.

This type of monitoring can identify program and financial issues sooner and potentially allow corrective action to be initiated to prevent any loss of funding.

FEMA reviews a sampling (by category and dollar amount) of the submitted costs and compares it to the supporting documentation. The specific process is established at the Region. If after review, no issues are found with the sampling, all other costs for that quarter are deemed allowable, allocable, and reasonable. If issues are found, then further sampling is done. FEMA sends correspondence to the recipient regarding the results of the validation for that quarter by specific project. The process continues until the subaward, or award is closed.

Work schedule delays, the need for extensions, subaward closeouts, and program closeout timelines can be identified and managed proactively by reviewing the management costs quarterly, projecting costs in the future, and comparing them to the quarterly progress reports, the subaward work schedule, and notes from status meetings.

4.2.4. Scope of Work and Work Schedule Monitoring

Using the scope of work and work schedule to monitor the progress of the subaward can be a helpful monitoring tool. By calculating the completion timeframe from the award date, or similar date, using the scope of work and work schedule, the progress, or lack thereof, for a subaward can be determined. This determination informs discussions of each subaward during status calls with the recipient and assists in the proactive correction of potential issues, such as Environmental Planning and Historic Preservation considerations, or potential needs, such as POP extensions.

The use of monitoring tools can help to avoid jeopardizing federal funding, spending time issuing adverse determinations, and responding to appeal requests. The tools are not a substitute for regular communication with recipients to discuss the implementation and closeout timeline of the award and subaward by utilizing Go/No-Go milestones.

4.3. Monitoring Awards

Award monitoring is typically the responsibility of grants management staff in the Grants Management Division. The Regional Administrator, through delegated authorities, may designate financial monitoring to be performed by other staff. However, both program and grants management staff should be in regular communication about issues that might affect the timely closeout of the award and the progress toward timely award closeout. Similar communication should also occur between FEMA Regional staff and recipient staff.

4.3.1. Financial Reporting and Monitoring

Financial reporting and monitoring refer to the standard requirements for financial status reports and monitoring that must be carried out for all FEMA awards. This process focuses on the financial aspects and data that provide reasonable assurance of a recipient's compliance with the terms and conditions of the award. This monitoring is performed by FEMA Regional grants management staff

and requires coordination with Hazard Mitigation Assistance program staff. All financial monitoring must follow processes and procedures that have been established.⁴

In accordance with Department of Homeland Security (DHS) Financial Assistance and Policy Oversight (FAPO), FEMA's reporting requirements must be consistent with Office of Management and Budget (OMB) requirements. Designated FEMA staff:

- Should monitor and document recipient financial report due dates and submissions
- Must inform recipients about applicable reporting requirements by type of report, the form or format, frequency of submission, number of copies, due date (either by actual date or by number of days after an event or period of time), and the means of submission (hard copy or electronic)

FEMA provides the reporting requirements in the Notice of Funding Opportunity (NOFO) announcements, program guidance, award terms and conditions in FEMA-State/Tribe Agreements, and by other means as appropriate. These requirements can be used as a partial checklist of what to monitor.⁵

4.3.2. Actions to Address Noncompliance

When appropriate, designated FEMA staff provide the recipient with several opportunities to address grant requirement noncompliance before initiating the formal process outlined in this section. This process applies regardless of how the noncompliance is identified, including if it is identified by FEMA through a program or financial review during the grant lifecycle, at closeout, or through a DHS Office of Inspector General or single audit finding. The remedies for noncompliance depend on whether the violation can be brought into compliance. Those remedies could be a corrective action plan, partial termination of the award or subaward, or full termination of the award or subaward.

5. Fund Recoupment

Non-federal entities receiving financial assistance funding from FEMA are required to comply with requirements in the terms and conditions of their awards or subawards, including the terms set forth in applicable federal statutes, regulations, NOFOs, and policies. Throughout the award lifecycle, or even after an award has been closed, FEMA or the pass-through entity may discover potential or actual noncompliance on the part of a recipient or subrecipient. This potential or actual noncompliance may be discovered through routine monitoring, audits, closeout, or reporting from various sources.

⁴ Reference the Review and Analysis of Federal Financial Reports SOP for guidance on cash analysis processes.

⁵ Financial Management Systems (2 CFR Section 200.302), FFR (2 CFR Section 200.327), Site Visits and Technical Assistance (2 CFR Section 200.328), and Financial Reporting and Data Analysis.

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award;⁶ alternatively, FEMA may place a hold on funds until the matter is corrected, or additional information is provided,⁷ or it may do both. Similar remedies for noncompliance with certain federal civil rights laws are also authorized.⁸

In the event the noncompliance is not able to be corrected by imposing additional conditions or the recipient or subrecipient refuses to correct the matter, FEMA may take other remedies to include actions to disallow costs, recover funds, wholly or partly suspend, or terminate the award, initiate suspension and debarment proceedings, and withhold further federal awards, or take other remedies that may be legally available.⁹

FEMA may discover and take action on noncompliance even after an award has been closed. The closeout of an award does not affect FEMA's right to disallow costs and recover funds as long the action to disallow costs takes place during the record retention period.¹⁰ The types of funds FEMA may attempt to recover include, but are not limited to:

- Improper payments
- Cost-share reimbursements
- Program income
- Interest earned on advance payments
- Equipment disposition amounts

FEMA may seek to recover disallowed costs through a Notice of Potential Debt letter, a Remedy Notification, or other letter. The document describes the potential amount owed, the reason FEMA is recovering the funds, the recipient's appeal rights, how the amount can be paid, and the consequences for not appealing or paying the amount by the deadline.

If the recipient neither appeals nor pays the amount by the deadline, the amount owed becomes final. Potential consequences if the debt is not paid in full or otherwise resolved by the deadline include the assessment of interest, administrative fees, and penalty charges; administratively offsetting the debt against other payable federal funds; and transferring the debt to the U.S. Department of the Treasury for collection.

⁶ 2 CFR Sections 200.208 and 200.339

⁷ 2 CFR Section 200.339

⁸ 44 CFR Parts 7 and 19

⁹ 2 CFR Section 200.339 and *FEMA Grants Manual*

¹⁰ See 2 CFR Sections 200.334 and 200.345(a). Closeout also does not affect the obligation of the non-federal entity to return any funds due as a result of later refunds, corrections, or other transactions (2 CFR Section 200.345(a)(2)).

FEMA notes the following common areas of noncompliance for FEMA's grant programs:

- Insufficient documentation and lack of record retention
- Failure to follow the procurement under grants requirements
- Failure to submit closeout documents in a timely manner
- Failure to follow EHP requirements
- Failure to comply with the POP deadline

6. Records Retention

6.1. FEMA

Subrecipient financial records, supporting documents, statistical records, and all other subrecipient records pertinent to a federal award must be retained by FEMA for a period of three years from the date of submission of the final expenditure report.¹¹ There are some exceptions for which the retention period may be longer than three years. The most common instances are when the non-federal entity is otherwise notified in writing by FEMA and for real property.¹²

¹¹ In accordance with 2 CFR Sections 200.333 through 200.337. There are some exceptions for which the retention period may be longer than three years as noted in 2 CFR Sections 200.333 through 200.337 and as required by the recipient.

¹² A) When the non-federal entity is notified in writing by FEMA; non-federal entities must keep records for the time period indicated in the notification or per the recipient/subrecipient internal requirements, which may be more stringent. FEMA must maintain closeout documents in the applicable system of record or archive paper files. B) Records for real property and equipment acquired with federal funds must generally be retained for three years after disposition. Records for project types where property may be acquired include safe rooms, flood risk reduction measures, and property acquisition and structural demolition/structure relocation. These activities require maintaining records in perpetuity.

Table 1: System of Record by Hazard Mitigation Assistance Program

System of Record	HMGP	PDM	FMA ⁽¹⁾	BRIC	HMGP Post Fire
NEMIS	X				X
eGrants		X	X		
FEMA GO			X	X	

HMGP = Hazard Mitigation Grant Program

PDM = Pre-Disaster Mitigation

FMA = Flood Mitigation Assistance,

BRIC = Building Resilient Infrastructure and Communities

NEMIS = National Emergency Management Information System

FEMA GO = FEMA Grants Outcomes

⁽¹⁾ FMA fiscal year 2019 (FY19) and older awards reside in the eGrants system. All future awards (after FY19) reside in the FEMA Grants Outcomes (FEMA GO) system.

In rare cases, when a system of record malfunctions, a manual official grant file may be utilized.

6.2. Recipient

The recipient must maintain the complete federal award closeout records file for at least three years from the submission date of its final expenditure report in accordance with 2 CFR Section 200. FEMA recommends that recipients remind subrecipients of the three-year records retention requirement and communicate the submission date of the final expenditure reports to FEMA. FEMA retains the right to disallow costs and recover funds based on a later audit or other review after closeout. FEMA must make any cost disallowance determination and notify the pass-through entity within the record retention period.

Appendix A: Acronyms and Abbreviations List

BRIC	Building Resilient Infrastructure and Communities
CAP	Corrective Action Plan
CFR	Code of Federal Regulations
CLP	Closeout and Liquidation Period
DHS	Department of Homeland Security
DRRA	Disaster Recovery Reform Act
EHP	Environmental Planning and Historic Preservation
FAPO	Financial Assistance and Policy Oversight
FEMA	Federal Emergency Management Agency
FEMA GO	FEMA Grants Outcomes
FFR	Federal Financial Report
FMA	Flood Mitigation Assistance
FMAG	Fire Management Assistance Grant
FY	Fiscal Year
GAR	Governor's Authorized Representative
GPD	Grant Programs Directorate
HMA	Hazard Mitigation Assistance
HMGP	Hazard Mitigation Grant Program
NEMIS	National Emergency Management Information System
NFIP	National Flood Insurance Program
NOFO	Notice of Funding Opportunity
OCFO	Office of the Chief Financial Officer
OMB	Office of Management and Budget

PDM	Pre-Disaster Mitigation
POP	Period of Performance
RFC	Repetitive Flood Claims
RFI	Request for Information
SOP	Standard Operating Procedure
SOW	Scope of Work
SRL	Severe Repetitive Loss
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
TAR	Tribal Authorized Representative
U.S.C.	United States Code
VAYGo	Validate as You Go

Appendix B: Recipient and Subrecipient Responsibilities

Recipient

The recipient is responsible for responding to any requests from the FEMA Region concerning monitoring activities, including the following:

- Support subrecipients and provide technical assistance as needed
- Gather and review quarterly progress and financial reports from subrecipients and follow up on any issues raised
- Submit quarterly progress reports to FEMA in a timely manner
- Attend and provide information to FEMA Regional staff conducting on-site or desk monitoring visits
- Maintain financial and program records as required and as specified in Title 2 of the Code of Federal Regulations (CFR) Section 200; for additional information, refer to [Section 6, Records Retention](#)

Subrecipient

The subrecipient is responsible for responding to any requests from the recipient concerning monitoring activities and for the following:

- Carry out approved scope of work and coordinate with the recipient if there are scope or budget changes (such as an overrun), problems, or delays
- Complete quarterly progress and financial reports in a timely fashion
- Attend and provide information to recipients conducting on-site or desk monitoring visits
- Maintain financial and program records as required; for additional information, refer to [Section 6, Records Retention](#)

Appendix C: Program Descriptions

FEMA administers five hazard mitigation grant programs, which it collectively refers to as HMA:

- BRIC - Building Resilient Infrastructure and Communities
- FMA - Flood Mitigation Assistance Program
 - Flood Mitigation Assistance
 - Severe Repetitive Loss (SRL)
 - Repetitive Flood Claims (RFC)
- PDM - Pre-Disaster Mitigation Program
- HMGP - Hazard Mitigation Grant Program
- HMGP Post Fire
- The **BRIC** program provides an annual cycle of mitigation funding for states, local communities, federally recognized tribes, and territories. BRIC supports states, local communities, federally recognized tribes, and territories as they undertake hazard mitigation activities, reducing the risks they face from disasters and natural hazards. This program was created with the passage of the [Disaster Recovery Reform Act of 2018](#).
- **FMA** is funded through revenue collected by the National Flood Insurance Program (NFIP), with the goal of mitigating NFIP-insured flood-damaged properties to reduce or eliminate NFIP claims. FMA funding is only available to communities that participate in the NFIP. The Severe Repetitive Loss and Repetitive Flood Claims programs were discontinued with the passage of the [Biggert-Waters Flood Insurance Reform Act of 2012](#).
- **PDM** is authorized by the Robert T. Stafford Disaster Relief and Emergency Assistance Act ([Stafford Act](#)), 42 U.S.C. 5133. PDM is designed to assist states, territories, federally recognized tribes, and local communities to implement a sustained pre-disaster natural hazard mitigation program to reduce overall risk to the population and structures from future hazard events, while also reducing reliance on federal funding in future disasters. As a result of the [Disaster Recovery Reform Act of 2018 \(DRRA\)](#), PDM is being replaced with the BRIC program.
- **HMGP** assistance is triggered by a major disaster declaration from the President and is funded through the Disaster Relief Fund. The purpose of the HMGP is to ensure that the reconstruction process following a disaster addresses mitigation measures to reduce the loss of life and property from future disasters. HMGP funding is awarded as a formula grant to a state based on the estimated total federal assistance per major disaster declaration, subject to a sliding scale formula.

- HMGP Post Fire** assistance is available for areas that received a Fire Management Assistance Grant (FMAG) declaration, even if no major disaster declaration was made. Section 420 of the Stafford Act authorizes FEMA to provide assistance under its FMAG program for the mitigation, management, and control of any fire that threatens such destruction as would constitute a major disaster. Whether or not a major disaster is declared, the President may provide HMGP Post Fire assistance in accordance with Section 404 in any area affected by a fire for which assistance was provided under Section 420. This rule applies to FMAG declarations issued on or after Oct. 5, 2018.

Table 2: Hazard Mitigation Assistance Programs Eligible Activity Matrix

Eligible Activities	HMGP	PDM	FMA	BRIC	HMGP Post Fire
Capability and Capacity Building	X		X	X	X
New Plan Creation and Updates	X	X	X	X	X
Planning-Related Activities	X	X		X	X
Project Scoping/Advance Assistance	X	X	X	X	X
Financial Technical Assistance			X		
Direct Non-Financial Technical Assistance				X	
Partnerships				X	
Codes and Standards	X	X		X	X

HMGP = Hazard Mitigation Grant Program
 PDM = Pre-Disaster Mitigation
 FMA = Flood Mitigation Assistance
 BRIC = Building Resilient Infrastructure and Communities

Source: 2015 HMA Guidance, BRIC Notice of Funding Opportunity (NOFO), and HMGP Post Fire Policy

Appendix D: Authorities

- The Hazard Mitigation Grant Program is authorized by Section 404 of the Stafford Act, 42 United States Code 5170c, and its implementing regulations at Code of Federal Regulations Title 44 Part 206, Subpart N, Hazard Mitigation Grant Program.
- The Pre-Disaster Mitigation Program is authorized by Section 203 of the Stafford Act, U.S. Code Title 42 Section 5133.
- The Building Resilient Infrastructure and Communities program is authorized by Section 203 of the Stafford Act and Section 1234 of the Disaster Recovery Reform Act.
- The Flood Mitigation Assistance program is authorized by Section 1366 of the National Flood Insurance Act of 1968, as amended, U.S. Code Title 42 Section 4104c, and its implementing regulations at Code of Federal Regulations Title 44 Part 78 and 79, Flood Mitigation Assistance and Flood Mitigation Grants.
- HMGP Post Fire assistance is authorized by Section 420 of the Stafford Act, U.S. Code Title 42 Section 5187.
- Mitigation planning is authorized by Section 322 of the Stafford Act, U.S. Code Title 42 Section 5165 and its implementing regulations at Code of Federal Regulations Title 44 Part 201, Mitigation Planning.
- Code of Federal Regulations Title 44 Part 80, Property Acquisition and Relocation for Open Space.
- Code of Federal Regulations Title 44, Emergency Management and Assistance, which includes Part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments. Applicable for awards made and major declarations declared before Dec. 26, 2014.
- Code of Federal Regulations Title 2 Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Super Circular). Applicable for awards made from Dec. 26, 2014 through Nov.11, 2020.
- Code of Federal Regulations Title 2 Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Updated). Applicable for awards made after Nov. 11, 2020.

Appendix E: Definitions

For additional explanation, refer to the latest edition of FEMA Manual 205-0-1, Grants Management Manual.

Award: A grant of financial assistance for a specified purpose by the federal government to an eligible recipient.

Cost Overrun: An increase in implementation cost of the mitigation subaward.

Cost Underrun: A decrease in implementation cost of the mitigation subaward.

Designated Staff: The program or grants management staff designated by the head of the program administering the grant program to carry out specific functions described in this document.

eGrants System: An electronic system built in 1999 that required that all government agencies both streamline grant application processes and provide for the means to electronically create, submit, review, award, and close out a grant application via the internet.

Enhanced Monitoring: The mechanism used (desk review or site visit) to review FEMA recipient's compliance with FEMA guidance, Notices of Funding Opportunity (NOFOs), Office of Management and Budget (OMB) policy, and other federal regulations.

Extension: A time period added to the specified period of performance (POP) or closeout liquidation period by the grantor, typically at the request of the recipient, with or without additional funds, to complete the project or program objectives. The extension establishes a new POP or closeout liquidation period end date. An extension without additional funds is referred to as a no-cost extension.

Federal Award: The federal financial assistance that a non-federal entity receives directly from FEMA or indirectly from a pass-through entity or the instrument such as the FEMA-State Agreement, cooperative agreement, or any other agreement setting forth the terms and conditions of the financial assistance.

Federal Financial Report (FFR) (SF-425): A statement of expenditures for a grant or contract submitted to the grantor agency. The form is known as the SF-425, the standard OMB-approved financial reporting document, and is prepared and submitted by the recipient or subrecipient. The schedule for submitting required financial reports is generally specified in the award documents of a grant or contract. FFRs are usually due quarterly and at the end of the POP (within timeframes established in regulations at time of award/disaster declaration) and may be required at interim times as well.

FEMA Grants Outcomes (FEMA GO): The grants management system that supports FEMA's grant programs. The system allows users to apply, track, and manage all disaster and non-disaster grants.

FEMA-State Agreement: A formal legal document stating the understandings, commitments, and binding conditions under which FEMA provides financial assistance to a state as the result of a major disaster or emergency declared by the President. If an Indian tribal government or a territorial government is the recipient of FEMA funds as a result of a major disaster or emergency declared by the President, FEMA refers to this formal legal document as the FEMA-Tribe Agreement or FEMA-Territorial Agreement.

Go/No-Go Milestone: A major milestone in the project that if not completed on time may result in a cancellation of the subaward. Progress toward meeting the Go/No-Go milestones must be reported in the quarterly progress reports submitted to the recipient and FEMA. At these Go/No-Go milestones, FEMA evaluates project performance, schedule adherence, and contributions to FEMA's program goals and objectives.

Governor's Authorized Representative (GAR): The person designated by the Governor to execute all necessary documents for disaster assistance programs on behalf of the state and local grant recipients. The GAR is responsible for state compliance with the FEMA-State Agreement.

Management Costs: Any indirect costs, direct administrative costs, and any other administrative costs not directly associated with a specific project under a major disaster, emergency, or disaster preparedness or mitigation activity or measure.

Mitigation Activity: A mitigation measure, project, plan, or action proposed to reduce the risk of future damage, hardship, loss, or suffering from disasters. The term "mitigation activity" is used interchangeably with the term "project" in this field guide.

National Emergency Management Information System (NEMIS): A system of record for recipients to submit applications and for FEMA to review, approve, obligate, and close out funding.

Non-Federal Entity: A state, local government, federally recognized tribe, or private nonprofit organization that carries out a federal award as a recipient or subrecipient (or a grantee or subgrantee as referenced in the 2015 *Hazard Mitigation Assistance Guidance*).

Notice of Funding Opportunity: A published document that summarizes all of the information a potential applicant needs to apply for federal assistance and must include all items prescribed by Title 2 of the Code of Federal Regulations (CFR) Section 200.

Period of Performance (POP): The time during which the non-federal entity may incur new obligations to carry out the work authorized under a federal award. The federal awarding agency or pass-through entity must include start and end dates of the POP in the federal award.

Program Monitoring: Activities that involve the review, evaluation, and validation of the recipient's program to measure program compliance and award progress and performance. Types of monitoring activities include quarterly progress report reviews, desk reviews, and site visits.

Recipient: A non-federal entity that receives a federal award directly from a federal awarding agency to carry out an activity under a federal program. The term “recipient” does not include subrecipients. Examples include states, territories, and federally recognized tribes.

Subaward: An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient: A non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program. It does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency. Examples include federally recognized tribes, private nonprofits (HMGP only), state agencies, and local governments.

Termination: The federal award may be terminated, in whole or in part, by the federal awarding agency or pass-through entity, if a non-federal entity fails to comply with the terms and conditions of the award:

- For cause.
- With the consent of the non-federal entity, in which case the two parties must agree to the terms and conditions.
- By the non-federal entity, upon sending to the federal awarding agency or pass-through entity written notification setting forth the reasons for termination, the effective date, and the portion to be terminated in the case of partial termination. The award may be wholly terminated when the federal awarding agency or pass-through entity determines an award modified by a partial termination will not accomplish the purposes for which it was made.

Tribal Authorized Representative (TAR): The person designated to execute all necessary documents for disaster assistance programs on behalf of the tribal grant recipients.

Appendix F: Hazard Mitigation Assistance - Recipient Quarterly Progress Report Meeting Template

Instructions

This template is provided to help Regions develop an agenda for their quarterly monitoring meetings. The template provides suggestions for topics to be discussed, including progress and challenges. The meeting objective is to discuss the overall project management of the recipient's Hazard Mitigation Assistance (HMA) portfolio and to establish performance metrics (such as obligation, reducing requests for more information, training, and closeout). The meetings are intended to provide ongoing technical support to help states maintain their HMA programs.

In addition to the Hazard Mitigation Officer, include the names of other FEMA and recipient officials/staff who attend the meeting.

The meeting agenda should be prepared and distributed prior to each meeting whenever possible. The agenda can be adjusted based on the subaward of the past quarter.

Use the space provided and, if needed, additional pages to capture notes.

Please ensure that meeting decisions are documented using the "Summary of Findings" template. If applicable, use the Request for Information (RFI) process and procedures detailed in the HMA Guidance to address specific issues. To streamline this process, the "Summary of Findings" template is formatted to meet RFI notification requirements. Listed below are general tasks used when preparing for and conducting quarterly reviews. Not all tasks will apply during a specific quarter.

Agenda for Hazard Mitigation Assistance – Recipient Quarterly Meeting Template

[insert date of meeting] **Fiscal Year Quarter** *[insert year, quarter number]* **Attendees** *[insert names]*

Portfolio Summary

- Hazard Mitigation Grant Program awards (*disaster number and number of subawards open*)
- Flood Mitigation Assistance awards (*year and number of subawards open*)
- Pre-Disaster Mitigation assistance awards (*year and number of subawards open*)
- Building Resilient Infrastructure and Communities program awards (*year and number of subawards open*)
- Hazard Mitigation Grant Program Post Fire assistance awards (*disaster number and number of subawards open*)

General Tasks Checklist

- Set performance measures and actions to be taken during the next quarter.
- If applicable, receive and analyze quarterly progress report, identify any issues, and address issues. (*List the issues*)
- Check status of current or outstanding issues.
- Verify resolved issues from previous quarters.
- Verify program-specific requirements are being met during the POP (e.g., active NFIP insurance, EHP project conditions, permits).

Subaward Tasks Checklist

- Is the work schedule for the individual subaward(s) on schedule (e.g., Go/No-Go milestones)? If not, why, and what technical assistance and/or corrective actions are needed to bring the subaward(s) on schedule? Review each subaward and list subawards that are ready or being closed out.
- Which subawards are due to close in the upcoming quarter? (*List the subawards. Are there any unresolved issues that will prevent closing the subaward?*)
- Review or complete final reconciliations as requested by recipient and for all subawards that are 100% complete.

- Monitor quarterly progress reports to identify subawards that subrecipients have completed and coordinate final reconciliations with recipient.
- Which subawards are in the process of being reviewed and/or awarded?
- Which subawards are in the process of being appealed?
- What is the status of subaward recoupments?

Extensions to End Date Tasks Checklist

- Will extensions be needed or are they anticipated based on the progress report review? *(If yes, provide details)*
- Prime Award: Are any extension requests anticipated based on review of the progress report and subawards?
- Review requests to extend the POP as identified in the Application for Federal Assistance (SF-424), as appropriate.
- Management Costs POP (formally Period of Availability) Extension – needs to be approved by Office of Chief Financial Officer (OCFO).
- Closeout and Liquidation Period (CLP): Do funds still need to be drawn down or liquidated? Are any outstanding documents needed for closeout?

Prime Award Tasks Checklist

- Is the award on track to close as scheduled?
- What issues will prevent timely closing of the award? *(Provide details)*
- Can the award be closed sooner? *(Provide details)*
- Ensure there are no unresolved issues, such as appeals, litigation, or audits.

Summary of Findings Template

Portfolio Summary

- List of Hazard Mitigation Grant Program awards (disaster number and number of subawards open)
- List of Flood Mitigation Assistance awards (year and number of subawards open)
- List of Pre-Disaster Mitigation assistance awards (year and number of subawards open)
- List of Building Resilient Infrastructure and Communities program awards (*year and number of subawards open*)
- List of Hazard Mitigation Grant Program Post Fire assistance awards (*disaster number and number of subawards open*)

Accomplishments from Previous Quarter

- Subapplications awarded
- Subawards closed out
- Awards closed out
- FEMA trainings

Table 3: Hazard Mitigation Assistance Closeout Priorities

Program	Agreement Number or Disaster Number (HMGP only)	POP End Date	Closeout Status	Number of Months Past POP End Date	Additional Information
			Open, pending, closed	6 months over, 1 year over, 18 months over	GONE Act, HMA Closeout Performance Measure, GPRA, Disaster Closeout Initiative

HMGP = Hazard Mitigation Grant Program
 POP = Period of Performance

Table 4: List of Current Outstanding Issues

Program	Subaward Number	Issue	RFI (Y/N)	Date RFI	Due Date RFI	Days Past RFI	RFI Description

RFI = Request for Information

Table 5: Corrective Action Plan Quarterly Review Tracking

Program	Award	Origin of CAP ⁽¹⁾	CAP Status (open, closed)	If closed, Corrective Action Taken (Y/N)	Reason(s) for Noncompliance	Additional Information
						Reference impacted subawards

CAP = Corrective Action Plan

⁽¹⁾ Origin may include findings from Office of Inspector General, FEMA, Region, or audit of Recipient, etc.

Table 6: Subawards Nearing Closeout ⁽¹⁾

Subaward Number	Subaward POP End Date	SOW Completion Date ⁽²⁾ (if different from POP date)	Additional Information
(if different from POP date)			

POP = Period of Performance; SOW = Scope of Work; EHP = Environmental Planning and Historic Preservation

⁽¹⁾ Less than three months to POP end date or SOW completion

⁽²⁾ Quarterly Progress Report definition of Percentage Work Complete: “100 percent work completion is, based on subrecipient’s report to the recipient, the date on which **all work associated with the approved Scope of Work is complete**, including meeting all compliance requirements (e.g., EHP, code and permit certifications, obtaining insurance) and Section 406 mitigation, if applicable.”

Table 7: Closeout and Liquidation Period and CLP Extensions (if applicable)

Subaward Number	Subaward POP End Date	Approved CLP End Date	CLP Extension Request Received (Y/N)	Date of the Approved	New Approved CLP End Date

POP = Period of Performance
 CLP = Closeout and Liquidation Period