

Hazard Mitigation Assistance Program and Policy Guide: 2023 Updates to Period of Performance Guidance

The 2023 Hazard Mitigation Assistance Program and Policy Guide (HMA Guide) reflects updates to several requirements regarding the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire period of performance.

These fact sheets summarize specific policy changes in the 2023 HMA Guide. For complete policy details, read all relevant sections of the 2023 [HMA Guide](#).

HMGP Period of Performance Updates

The period of performance is the time period during which the recipient and subrecipient may incur new obligations and costs to carry out award activities. Recipients and subrecipients are expected to complete the federal award activities, including administrative actions, and to incur costs within the period of performance. Equipment, services and other activities funded by a subaward must be performed, delivered and completed within the subaward period of performance.

In the 2023 HMA Guide update, FEMA released several changes to the period of performance for the Hazard Mitigation Grant Program and Hazard Mitigation Grant Program Post Fire and incorporated regulatory changes made during the updates to [Title 2 Code of Federal Regulations Part 200](#) in 2020. The current period of performance requirements, including policy updates and regulatory changes, are summarized below.

FEMA also simplified information regarding when a subrecipient or recipient can claim management costs to align with the revisions to Title 2 Code of Federal Regulations Part 200. There is no longer an eight-year period of availability in which management costs must be claimed. Instead, Part 13 of the HMA Guide



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clarifies that management costs must be incurred within the subaward or award period of performance. For additional information on updates to management cost guidance in the 2023 HMA Guide, see the [HMA Program and Policy Guide Management Cost FEMA fact sheet](#).

Award Period of Performance

FEMA has extended the award period of performance from 36 to 48 months to allow more time for activity completion and closeout activities. [The periods of performance for these two hazard mitigation programs begin with the opening of the application period and end no later than 48 months from the close of the application period.](#)

FEMA updated the HMA Guide to indicate that the recipient has 120 days to submit final reports. This revision reflects the 2020 revisions to Title 2 Code of Federal Regulations Part 200 that updated the final reporting and liquidation deadline from 90 days to 120 days after the period of performance. FEMA only reimburses costs that occurred during the award period of performance. If the recipient or subrecipient conducts closeout or liquidates financial obligations after the award period of performance ends, these costs are not eligible.

Subaward Period of Performance

The 2023 HMA Guide maintains that FEMA does not establish activity completion timelines for individual subawards. A state, tribe or territory as the recipient, continue to be responsible for establishing the subaward period of performance start and end dates and providing this information to a subapplicant.

Recipients must include a period of performance in all subaward agreements. They are also responsible for ensuring that all approved activities, including management costs, are completed and all costs are incurred by the end of the subaward period of performance. In the 2023 HMA Guide, FEMA included that the subrecipient has 90 calendar days after the subaward period of performance to submit final reports to the recipient. This update aligns with the 2020 revision to Title 2 Code of Federal Regulations Part 200.

If the subaward period of performance ends on the same date as the award period of performance, the subrecipient has 90 calendar days from the end date of the



subaward period of performance to submit final reports to the recipient. The recipient then has an additional 30 calendar days to submit final reports to FEMA for the entire award, including all subawards. All reports are due to FEMA 120 calendar days after the end of the award period of performance.

Changes to Award Period of Performance Extension Requests

In the 2023 HMA Guide update, FEMA expanded the authority of the ten regional administrators to grant up to two 12-month extensions to the award period of performance. All requests to extend the award period of performance beyond **24 months** from the original award period of performance end date must be approved by FEMA headquarters.

The deadline for the recipient to request an extension of the award period of performance was updated from **60 to 90 calendar days** before the award period of performance expires. If the extension request is received less than 90 calendar days prior to the award period of performance's expiration, FEMA may deny the request.

The recipient's extension request must contain justification for why the extension is required. The updated HMA Guide has expanded the required justification to include the following items indicated in **bold**:

- **Program name, fiscal year, and award number.**
- Verification that progress has been made as described in Quarterly Progress Reports, **including dates of previous extensions.**
- Reason(s) for delay, **including details of the legal, policy or operational challenges that prevent the final outlay of awarded assistance by the applicable deadline.**
- Status of the activity/activities.
- Period of performance end date and new completion date.
- **Amount of assistance drawn down to date.**
- Remaining available assistance, both federal and non-federal.
- Budget outlining how remaining federal and non-federal assistance will be **expended.**
- Plan for completion, including milestones and time frames for achieving each milestone **and the position/person responsible for implementing the plan for completion.**



- **Certification that the activity/activities will be completed within the extended period of performance without any modification to the original scope of work approved by FEMA.**

