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ON THE COVER:

The City of Long Beach, New York was awarded a federal grant to rebuild the iconic boardwalk and other facilities that were damaged during Hurricane Sandy.

1. Purpose

The purpose of this Hazard Mitigation Assistance (HMA) field guide is to provide all Federal Emergency Management Agency (FEMA) Regional HMA staff with a consistent process for the closeout of HMA mitigation activities. The HMA field guide is designed as a reference tool on the roles and processes needed to implement grant closeout activities for non-disaster and post-disaster HMA grants. 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)
- Pre-Disaster Mitigation (PDM) Program
- Hazard Mitigation Grant Program (HMGP)
- HMGP Post Fire

2. Background

FEMA performs financial and program monitoring of all grant programs in accordance with federal regulations, Title 2 of the Code of Federal Regulations (CFR Part 200, the Grants Management Manual (FEMA Manual 205-0-1, and the Grant Programs Directorate (GPD Enhanced Monitoring Plan. 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. All HMA financial procedures must be followed in accordance with those appropriate program regulations, authorities, and requirements.

3. Document Organization

This field guide contains descriptions of process steps and supporting reference material for successful execution of closeout activities. The document begins with a high-level description of roles and responsibilities, which is followed by a discussion of the required closeout activities. The appendices contain detailed reference information, including <u>acronyms and abbreviations</u>, <u>program descriptions</u>, <u>authorities</u>, checklists, and more.

4. Responsibilities

This section describes the HMA closeout roles and responsibilities for Regional FEMA personnel (i.e., HMA program staff and Grants Management Division). Because successful initiation and execution of closeout activities often depends on the recipients, the responsibilities of the subrecipient and recipient are also provided in <u>Appendix D: Responsibilities of Subrecipients and Grant Recipients</u>.

4.1. FEMA Regional Personnel

FEMA Regional staff close subawards and awards. The following responsibilities outline the duties of FEMA Regional staff:

- Receive and review closeout request submitted by the recipient and work with recipient to obtain missing documentation
- Verify that the scope has been met as approved, all required documentation has been provided per the project-specific closeout checklist, and the completed activity meets program regulations
- Complete financial reconciliation (including any de-obligation requests)
- Verify Environmental Planning and Historic Preservation (EHP) project conditions were met, if applicable
- Maintain closeout documents in the applicable system of record
- Update Property Information in system of record to reflect mitigated properties and applicable dates, following specific system requirements
- Update Mitigated Properties spreadsheet for acquisition or elevation projects (Regional listing of mitigated properties for monitoring purposes)
- Conduct final program review and coordinate with Headquarters if any clarifications are needed
- Send closeout letter to recipient confirming the subaward and award are officially closed and documenting final federal expenditures of the subaward and award
- Notify the recipient about the end date of the period of performance (POP) at least 90 days prior to the expiration of the POP and again at 30 days prior to the end date of the POP
- Notify the recipient, with a program copy for the record, within 30 days of notice from the program to close

5. Closeout Process

Closeout traditionally begins after the recipient completes all required work and has submitted all financial, performance, and other reports required under the terms and conditions of the award.

FEMA or the pass-through entity determines that all applicable administrative actions and all required work of the federal award have been completed. The recipient and subrecipient are required to close out the subaward or federal award in accordance with <u>Code of Federal Regulations</u> <u>Title 2 Section 200 Uniform Administrative Requirements, Cost Principles and Requirements for Federal Awards</u>.

Closeout Timelines

- 120 days for awards made <u>on or after</u> Nov. 12, 2020.
- 90 days for awards made prior to Nov. 12, 2020.

Remember to check for extensions that impact this timeline! An extension is requested by the non-federal entity and approved by the federal awarding office.

The subaward, award, and administrative closeout processes are outlined below.

5.1. Subaward Closeout Process

5.1.1. Overview

The subaward closeout is the process by which the recipient and FEMA verify that a subaward scope of work has been completed as approved and that all reimbursed costs were eligible.

The **recipient** has the primary responsibility for the closeout tasks associated with both the program and subrecipient requirements. The recipient must:

- Conduct final inspections for projects
- Reconcile subrecipient expenditures
- Resolve negative audit findings
- Obtain final reports from subrecipients
- Reconcile the closeout activities of subrecipients with all award requirements

These activities must all be done within the subaward's POP.

The subaward closeout process begins when the subaward POP has ended or when the project is complete, whichever occurs first. The recipient must report the subaward POP end date in its quarterly progress reports. Subrecipients are required to submit closeout materials to the recipient in accordance with regulations. Below are the steps in the subaward closeout process.

5.1.2. Process

Step 1: Recipient initiates the subaward closeout process. The recipient notifies FEMA HMA program staff that the subaward is ready for closeout and submits a closeout letter to FEMA signed by the Governor's Authorized Representative (GAR) or Tribal Authorized Representative (TAR). The closeout letter must have two components:

- 1. certification that all reported costs were incurred in the performance of eligible work, the approved scope of work was completed, and the mitigation measure complies with the provisions of the award agreement, and
- 2. verification that any program income has been accounted for in accordance with the terms and conditions of the grant award and 2 CFR Section 200; final project costs, including federal share, non-federal share, management costs (if applicable), and cost underruns and overruns; and specific project documentation as described in the project-specific closeout checklist.

Step 2: FEMA HMA program staff reviews the closeout request. Verify that the completed activities in the request comply with all applicable requirements associated with the subaward. If yes, go to Step 3. If no, go to Step 2a.

- Step 2a: If FEMA HMA program staff do not concur with the closeout request, FEMA HMA program staff advises the recipient of the reason(s) for nonconcurrence and request additional information and/or explain the corrective actions needed to resolve the noncompliance issues. If the requested information is not submitted, FEMA HMA program staff may disallow costs.
- Step 2b: FEMA HMA program staff returns to Step 2 to review the information submitted to address noncompliance and/or corrective actions. All requirements must be satisfied before moving to Step 3.

Step 3: FEMA HMA program staff closes the subaward. Go to the system of record (see Table 2 in Appendix B and close the subaward. This may require coordination with the Grants Management Division. HMA closes each HMGP subaward and the Grants Management Division closes each nondisaster subaward.

Step 4: FEMA HMA program staff (HMGP and the Grants Management Division (i.e., PDM, FMA, BRIC develops and sends a closeout letter to the recipient. The letter notifies the recipient that the subaward is officially closed and confirms the final federal expenditures for the subaward. A subaward is officially closed when FEMA approves the request and sends a closeout letter to the recipient.

Step 5: FEMA HMA program staff updates the project file. All correspondence (electronic or otherwise related to project closeout, including requests for additional information, should be maintained in the project file.

5.2. Award Closeout Process

5.2.1. Overview

The recipient has up to 120 days for awards made on or after Nov. 12, 2020, or 90 days for awards made prior to Nov. 12, 2020, following the end date of the POP to submit reports and liquidate funds. After the POP end date, all obligations incurred under the prime award must be liquidated and all financial, performance, and other reports required by FEMA must be submitted. All administrative actions must also be completed during the prime award POP, except the actual submission of the required reports. To close out the award, the **recipient** takes the following steps:

- Ensures all subawards have been closed out, including the recipient Management Costs subaward
- Reconciles/adjusts subaward costs, ensures that non-federal share costs are documented, and verifies that all costs submitted are eligible according to the FEMA-approved scope of work
- Receives and processes cost adjustments or returns unobligated funds to FEMA via the applicable financial system (SMARTLINK or PARS); final payment is made to the recipient
- Notifies FEMA that the award is ready for final closeout
- Submits a closeout letter, signed by the Governor's or Tribal Authorized Representative, to FEMA with supporting documentation, including:
 - A statement that the scope of work(s) has been completed as approved
 - Final SF-425 (for PARS, the final SF-425 is also submitted via PARS)
 - SF-270, Request for Advance or Reimbursement, if applicable, or request for de-obligation of unused funds, if applicable
 - o SF-428, Tangible Personal Property Report, if applicable
 - SF-429, Real Property Status Report, if applicable
 - $\circ~$ A statement that no inventions were made, or patents applied for in the implementation of the award

5.2.2. Process

Step 1: Recipient initiates the award closeout process by notifying FEMA HMA program staff that the award is ready for closeout and submits a closeout letter to FEMA signed by Governor's or Tribal Authorized Representative.

Step 2: FEMA HMA Program Staff verifies all subawards have been closed and fiscal reconciliations have been completed. This includes the recipient Management Costs subaward and verification of the match percentage.

Step 3: FEMA HMA Program Staff processes de-obligations (if applicable). HMA completes each HMGP de-obligation, and the Grants Management Division completes each non-disaster de-obligation.

Step 4: Ensure financial closeout.

Once FEMA agrees that the award closeout meets all applicable requirements, FEMA closes the award in the applicable system of record.

- Step 4a: HMA program staff reviews the award closeout request and confirms that the award is ready for closeout prior to submitting the award closeout to the Grants Management Division.
- Step 4b: The Grants Management Division sends concurrence to FEMA Finance to close the award.
- Step 4c: FEMA Finance responds back to the Grants Management Division with the date the SMARTLINK account is closed. For disaster awards, the Regional program team verifies in SMARTLINK that there have been no drawdowns beyond the closeout and liquidation period.

Step 5: FEMA HMA Program Staff closes the award. Once FEMA agrees that the award closeout meets all applicable requirements, FEMA closes the award in the applicable system of record. HMA closes each HMGP award, and the Grants Management Division closes each non-disaster award.

Step 6: FEMA HMA Program Staff sends a closeout letter. The letter to the recipient notifies the recipient that the award is officially closed and confirms the final federal expenditures for the award.

5.3. Administrative Closeout Process

5.3.1. Overview

<u>Per 2 CFR Section 200</u>, FEMA has the authority and responsibility to close a federal award when it determines that all applicable administrative actions and all required work of the federal award have been completed by the non-federal entity. FEMA may use administrative closeout when a recipient is not responsive to reasonable efforts FEMA makes to collect required reports (both financial and program) and/or closeout documentation needed to complete the standard process.

The Grants Management Division is the lead in the administrative closeout process per the Grants Management Manual. Therefore, HMA program staff must coordinate with the Grants Management Division and, if necessary, the Office of Chief Counsel to initiate and complete the administrative closeout process. Additional information about the administrative closeout process is found in the Grants Management Manual.

5.3.2. Process

The administrative closeout process requires three written notifications documenting the request made to the recipient for the required reports and/or any missing closeout documentation. If the recipient has not submitted the required reports and/or closeout documentation to close the award, FEMA will send a fourth and final written request for required reports and/or closeout documentation and must indicate FEMA's intent to administratively close the award if the recipient does not respond within 30 days.

If the recipient submits all required documents prior to the completion of the administrative closeout process, FEMA may use those documents to conduct a standard closeout. If the recipient does not submit the required documentation by the 30-day deadline, FEMA will administratively close the award using the available grant information in lieu of final reports and/or closeout documentation.

If a recipient is unable to meet the standard closeout requirements (e.g., unable to fulfill match requirements), it may request an administrative closeout by writing to the Grants Division Director. The letter should identify the reason for the recipient's request.

As a result of an administrative closeout, FEMA may be required to make cash or cost adjustments and ineligible cost determinations, which may result in identifying debt owed to FEMA. In addition, it may require additional enforcement actions, including enhanced oversight of other current awards to the same recipient.

6. 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, Notices of Funding Opportunity (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.

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award per 2 CFR Section 200; FEMA may place a hold on funds until the matter is corrected, or additional information is provided per 2 CFR Section 200, or it may do both. Similar remedies for noncompliance with certain federal civil rights laws are authorized pursuant to <u>Code of Federal</u> <u>Regulations Title 44 Parts 7 and 19.</u>

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 allowed under 2 CFR Section 200. These remedies include actions to disallow costs, recover funds, wholly or partly suspend, or terminate the award, initiate suspension and debarment proceedings, withhold further federal awards, or take other remedies that may be legally available.

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. 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.

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 why 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.

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 Environmental Planning and Historic Preservation requirements
- Failure to comply with the POP deadline

7. Records Retention

7.1. 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 in accordance with 2 CFR Section 200. There are some exceptions for which the retention period may be longer than three years as noted in 2 CFR Section 200 and as required by the recipient. The following examples are the most common instances:

- Records must be retained for longer than three years 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.
- 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.

7.2. 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
CFR	Code of Federal Regulations
CLP	Closeout and Liquidation Period
DRRA	Disaster Recovery Reform Act
EHP	Environmental Planning and Historic Preservation
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
OMB	Office of Management and Budget
PDM	Pre-Disaster Mitigation
POP	Period of Performance
RFC	Repetitive Flood Claims
SFHA	Special Flood Hazard Area

- SRL Severe Repetitive Loss
- TAR Tribal Authorized Representative
- U.S.C. United States Code

Appendix B: Program Descriptions

FEMA administers five hazard mitigation grant programs, which it collectively refers to as Hazard 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 <u>Disaster Recovery Reform Act of 2018</u>.

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 <u>Biggert-Waters Flood</u> Insurance Reform Act of 2012.

PDM is authorized by the Robert T. Stafford Disaster Relief and Emergency Assistance Act (<u>Stafford</u> 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 <u>Disaster Recovery Reform Act of</u> 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.

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

Table 1: Hazard Mitigation Assistance Program Eligible Activities Matrix

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

System of Record	HMGP	PDM	FMA ⁽¹⁾	BRIC	HMGP Post Fire
NEMIS	Х				Х
eGrants		Х	Х		
FEMA GO			Х	Х	
HMGP = Hazard Mitigation Grant ProgramBRIC = Building Resilient Infrastructure and CommunitiesPDM = Pre-Disaster MitigationNEMIS = National Emergency Management Information SystemFMA = Flood Mitigation AssistanceFEMA GO = FEMA Grants Outcomes					

Table 2: System of Record by Hazard Mitigation Assistance Program

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

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

Appendix C: 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 D: Responsibilities of Subrecipients and Grant Recipients

Subrecipient

The subrecipient is responsible for managing and completing all work approved in the project in compliance with program requirements and federal, state, and local laws and regulations. Conformance with procurement and program income should be aligned with Grant Programs Directorate (GPD) requirements.

At closeout, subrecipients must:

- Confirm all allowable expenditures were incurred during the period of performance (POP)
- Document non-federal cost share
- Submit final request for reimbursements and supporting documentation (if applicable) to the recipient
- Notify the recipient of any underruns or overruns from the approved budget (if applicable)
- Confirm and document Environmental Planning and Historic Preservation (EHP) requirements were met
- Document that required certifications from engineers, architects, local officials, or others were obtained (if applicable)
- Conduct final inspection
- Submit final performance report (quarterly report) and final Federal Financial Report (FFR) to the recipient
- Notify the recipient that the project is ready for closeout
- Submit final closeout documentation to the recipient to verify that all work was completed
- Provide additional documentation to the recipient (if requested)
- Confirm all project documentation is saved electronically and/or in a physical file
- Retain project records as specified in Title 2 of the Code of Federal Regulations (CFR) Section 200; for additional information, refer to <u>Section 7, Records Retention</u>

Recipient

The recipient is responsible for the closeout tasks associated with both the program and subrecipient requirements, including:

- Conduct on-site final inspections for construction-related mitigation activities
- Reconcile subrecipient expenditures
- Resolve negative audit findings
- Obtain final reports from subrecipients
- Reconcile the closeout activities of subrecipients
- Review all closeout documentation for compliance, and if necessary, send the subrecipient a request for additional supporting documentation
- Submit de-obligation requests to FEMA as cost underruns are identified
- Close out subawards as activities are completed

Upon completion of an award or subaward activity, the recipient and subrecipient are required to close out the award or subaward in accordance with Code of Federal Regulations Title 44 Part 13 or Code of Federal Regulations Title 2 Part 200, as appropriate. A project file must document that:

- The approved scope of work was fully implemented
- Obligated funds were liquidated in a manner consistent with the approved scope of work
- EHP and floodplain management compliance-related measures or mitigation were implemented
- Management costs and federal-share disbursements were reconciled
- POP modifications or extension agreements were documented (if applicable)
- Quarterly FFR, performance report, and property inventory (including properties acquired with federal funds and/or properties where FEMA post closeout monitoring is required) are included

Appendix E: Definitions

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

Administrative Closeout: The administrative closeout process permits FEMA to close an award using available grant information in lieu of final reports. It is initiated by the awarding office when a recipient is not responsive to reasonable efforts FEMA makes to collect required reports needed to complete the standard process.

An administrative closeout is initiated through the issuance of formal correspondence that provides notice of how FEMA intends to proceed. It is the last resort to closing an award when a recipient has failed to meet its final award reporting requirements and to meet the terms and conditions of the award. Per Title 2 of the Code of Federal Regulations (CFR) Part 200, FEMA must proceed to close out a federal award with information available within one year of the period of performance (POP) end date.

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

Closeout: The process by which FEMA or the recipient determines that all applicable administrative actions (including compliance with terms and conditions of an award) and all required work (project or program objectives) of the award have been completed by the recipient or subrecipient.

Closeout and Liquidation Period: The time after the grant performance period ends when a non-federal entity must submit final reports, closeout documents, and liquidate all obligations incurred during the performance period (120 days for awards made on or after Nov. 12, 2020; 90 days for awards made prior to Nov. 12, 2020; unless an extension is requested by the non-federal entity and approved by the federal awarding office).

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

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

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.

Extension: A time period added to the specified POP or closeout and 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 and liquidation period (CLP) 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 Office of Management and Budget (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 the 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.

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 "measure" 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 previous guidance).

Notice of Funding Opportunity (NOFO): A published document that summarizes all the information a potential applicant needs to apply for federal assistance and must include all items prescribed by 2 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 the start and end dates of the POP in the federal award.

Program Closeout: When FEMA ensures all programmatic requirements for an award are complete prior to financial reconciliation.

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.

Standard Closeout: The standard closeout process is used in one of two circumstances: when a grant award reaches the end of the POP and FEMA receives all final reports from the recipient by the established due date, or when, in advance of the POP end date, the recipient has expended all eligible costs and has completed all requirements and conditions as determined by FEMA to facilitate closing the grant award earlier than projected based on the established POP (also known as early closeout).

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.

Subaward Closeout: The process by which the recipient determines that the subrecipient completed all applicable administrative work and all required work under the subaward to the FEMA grant.

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 non-profits (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 (2 CFR 200):

- 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 where 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: Closeout Checklists and References

This section provides multiple Hazard Mitigation Assistance (HMA) mitigation activity closeout checklists. These checklists outline instructions and details the reviewer is expected to use when reviewing closeout documents from the recipient. When applicable, additional checklists may supplement the activity type - Environmental Planning and Historic Preservation (EHP), Operations and Maintenance Plan, etc.

- Acquisition/Demolition/Relocation
- Community/Residential Saferoom
- Elevation in the Special Flood Hazard Area (SFHA)
- Flood Risk Reduction
- Generators
- Mitigation Reconstruction
- Mitigation Planning
- Non-residential Floodproofing
- Tsunami Vertical Evacuation
- Warning Systems
- Wildfire Mitigation
- Wind Retrofit

Mitigation Activities	HMGP	PDM	FMA	BRIC	HMGP Post Fire
Acquisition/Demolition/Relocation	Х	Х	Х	Х	Х
Community/Residential Safe Room	Х	Х		Х	Х
Elevation in the SFHA	Х	Х	Х	Х	Х
Flood Risk Reduction	Х	Х	Х	Х	Х
Generators	Х	Х		Х	Х
Mitigation Planning	Х	Х	Х	Х	X
Mitigation Reconstruction	Х	Х	Х	Х	X
Non-residential Floodproofing	Х	Х	Х	Х	X
Tsunami Vertical Evacuation	Х			Х	
Warning Systems ⁽¹⁾	Х	Х		Х	Х
Wildfire Mitigation	Х	Х		Х	Х
Wind Retrofit	Х	Х		Х	Х

Table 3: Mitigation Activity Closeout by HMA Program

HMGP = Hazard Mitigation Grant Program

PDM = Pre-Disaster Mitigation

FMA = Flood Mitigation Assistance

BRIC = Building Resilient Infrastructure and Communities

 $^{(1)}\mbox{The only Warning System project type eligible under BRIC is an early earthquake warning system.}$