

The logo is circular with a red outer ring containing the text "WISCONSIN" at the top and "EMERGENCY MANAGEMENT" at the bottom. Inside the ring is a blue map of Wisconsin with the letters "W", "E", and "M" overlaid in red. Two blue stars are positioned on either side of the top of the map. Two horizontal black lines are drawn across the logo, one above and one below the main title text.

PUBLIC ASSISTANCE GRANT PROGRAM

Grant Management Guidance

June 2019

Table of Contents

Key Terms	2
Public Assistance Staff Point of Contact	2
Request for Public Assistance (RPA)	3
Assurances	4
Obligations	4
Procurement	5
Time Extensions	7
Scope of Work Changes	8
Project Worksheet Modification	8
Substantial Budget Modification	8
Hidden Damages	9
Alternate Project Requests	9
Improved Project Requests	10
Closeout	11
Small Projects 100% Complete at time of FEMA Inspection:	11
Small Projects Not 100% Complete at time of FEMA Inspection	11
Category Z Management Costs	12
Large Projects 100% Complete at time of FEMA Inspection	13
Large Projects Not 100% Complete at time of FEMA Inspection	13
Small Project Net Overrun Appeal and Closeout	15
Appeals	15
Audits	16

Introduction

This Grant Guidance addresses the most common administrative procedures that a Subrecipient might have to perform while managing their grant once one has been obligated through the Public Assistance (PA) Program subsequent to a Presidential Disaster Declaration. This Grant Guidance to the PA Program is a supporting document to the Wisconsin PA Administrative Plan. The WI PA Admin Plan establishes the organization, staffing, and administrative procedures for administering the Public Assistance (PA) Program.

Federal disaster assistance is made available through the Federal Emergency Management Agency (FEMA) to state governmental agencies, local governments, and certain eligible private non-profit organizations. FEMA provides a grant to the State and authorizes the State to pass funding through to eligible Subrecipients.

Key Terms

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; previously referred to as a Grantee (State, Tribe)

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.

Applicant - A non-Federal entity submitting an application for assistance under the Recipient's Federal award; 44 CFR and PAAPG often use this term in lieu of Subrecipient.

Public Assistance Staff Point of Contact

Email: DMAWEMPublicAssistance@wisconsin.gov

Fax: (608) 223-6526

Mail Forms To:

DEPARTMENT OF MILITARY AFFAIRS

Wisconsin Emergency Management

ATTN: State Public Assistance Officer

PO Box 7865

Madison, WI 53707-7865

Request for Public Assistance (RPA)

If a State, Territorial, Tribal, or local government entity or Private non-Profit (PNP) wishes to seek PA funding, it must first submit a Request for Public Assistance (RPA) into the FEMA Grants Portal, within 30 days of the respective area being designated in the declaration. Given the necessity to collaborate with Applicants early in the PA Program implementation process, FEMA’s expectation is that the Recipient has the Applicants submit an RPA into Grants Portal as soon as possible after the respective area is designated in the declaration or at the conclusion of the Applicant Briefing. FEMA may extend the deadline for submitting an RPA if the Recipient submits a request in writing with justification based on extenuating circumstances beyond the Applicant’s or Recipient’s control.

Using Grants Portal, the Applicant provides general information about its organization, including physical location and point of contact. The RPA must indicate the Applicant’s active Dun and Bradstreet (DUNS) number. If the Applicant does not have an active DUNS number, it may request one at: www.dnb.com/get-a-duns-number.html.

PNP RPA Documentation Requirements	
All PNP Applicants	<ul style="list-style-type: none">• PNP Facility Questionnaire (FEMA Form 90-121) available at www.fema.gov/media-library/assets/documents/10579.• A current ruling letter from the Internal Revenue Service granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954; OR<ul style="list-style-type: none">○ documentation from the State substantiating it is a non-revenue producing, nonprofit entity organized or doing business under State law.• If the Applicant owns the facility, proof of ownership. If the Applicant leases the facility, proof of legal responsibility to repair the incident-related damage.• List of services provided in the facility and when and to whom.
Membership Organization	<ul style="list-style-type: none">• Who is allowed membership• What fees are charged• Policy regarding waiving memberships
Education/School	<ul style="list-style-type: none">• Proof that the school is accredited or recognized by the State Department of Education
Child Care Facility	<ul style="list-style-type: none">• Proof that the State Department of Children and Family Services, Department of Human Services, or similar agency, recognizes it as a licensed child care facility
Mixed-Use Facility	Proof of the established purpose of the facility with documentation such as: <ul style="list-style-type: none">• Pre-disaster charter, bylaws, and amendments• Calendar of activities

SAM.gov

The System for Award Management (SAM) (<https://www.sam.gov>) is a government run site that serves as a central registration point for government contractors.

While federal contract opportunities have varying requirements, there is a core set of data that is required across the board. Instead of repeatedly submitting the same company information with each bid, the government created procurement systems for companies to submit required information through one source. Any company or entity that would like to do business with the federal government must register on the SAM. Registration on SAM.gov is a requirement to receive funding under the FEMA public assistance grant program.

A SAM registration is valid for one year and must be updated on an annual basis. There are third-party companies that assist with the SAM registration process for a fee. However, it is important to note, a company can register on SAM.gov without outside assistance and for no cost.

Assurances

The assurances outline the federal construction programs, federal audit requirements, and state assurances of disaster application for Subrecipients. The document outlines that the Subrecipient will complete or has completed all eligible work in accordance to applicable laws and regulations, as detailed in the document.

Within 30 days after the RPA due date, the assurance packet will be sent to the point of contact submitted into Grants Portal for the Subrecipient. A Subrecipient must have a signed assurance on file with WEM before any obligations or funding will be sent to the Subrecipient.

Obligations

Upon award from FEMA, WEM creates an obligation packet for each approved project worksheet. An obligation packet reflects the dollar amounts, requirements, and description of the work completed, as approved by FEMA and WEM. This obligation packet may not include all projects that have been approved and obligated for a specific Subrecipient.

An obligation packet will include the following:

- Verification of the Point of Contact information
- 90-91 Form, Mitigation Form, and Special Conditions List
- Eligibility Report
- DMA Form 1017
- Project Completion Certification Form (P.4 form)

When a Subrecipient receives an obligation packet, they should review the information provided.

DMA Form 1017

Signature on this form communicates that after reviewing the obligation packet that to the best of the Subrecipient's knowledge and belief, data in the application is true and correct, the documentation has been duly authorized by the governing body of the Subrecipient, and the Subrecipient will comply with the previously signed "Attachment G – Assurances for Federal Construction Programs, Federal Audit Requirements, and State Assurances of Disaster Application Subrecipients".

Project Completion Certification Form (P.4 form)

Once WEM receives this form, it signals that the project is ready for closeout and request payment. The following lines must be completed before the document can be accepted:

- Final amount expended to complete the project: This should reflect the actual dollar amount expended to complete the project. For small projects you are guaranteed reimbursement for the amount listed on the 1017 and P.4 forms, regardless if you experienced an overrun or underrun.
- Date that all physical work was completed: This is needed to ensure you properly incurred costs within the period of performance.

Procurement

Subrecipients must comply with Federal procurement standards as a condition of receiving PA funding for contract costs for eligible work. Federal procurement standards for State and Territorial governments are different than those for Tribal and local governments and PNPs.

State and Territorial government Applicants must follow the same policies and procedures they would use for procurements with non-Federal funds; comply with 2 CFR § 200.322, Procurement of recovered materials; and ensure that every purchase order or other contract includes any clauses required by 2 CFR § 200.326, Contract provisions.

Non-State Applicants (Tribal and local governments and PNPs) must use their own documented procurement procedures that reflect applicable State, Territorial, Tribal, and local government laws and regulations, provided that the procurements conform to applicable Federal law and standards.

Tribal and local governments and PNPs must conduct procurement transactions in a manner that complies with the following Federal standards:

- Provide full and open competition;
- Conduct all necessary affirmative steps to ensure the use of minority businesses, women's business enterprises, and labor surplus area firms when possible;
- Exclude contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals from competing for such procurements to ensure objective contractor performance and eliminate unfair competitive advantage;
- Maintain written standards of conduct covering conflicts of interest and governing the performance of employees who engage in the selection, award, and administration of contracts; and
- Maintain records sufficient to detail the history of the procurement. These records will include, but are not limited to:
 - Rationale for the method of procurement
 - Selection of contract type
 - Contractor selection or rejection
 - The basis for the contract price

Tribal and local governments and PNPs must use one of the following procurement methods:

- Micro-purchase
- Small purchase procedure
- Sealed bid (formal advertising)
- Competitive proposal

FEMA may reimburse costs incurred under a contract procured through a noncompetitive proposal only when one or more of the following apply:

- The item is only available from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- FEMA or the Recipient expressly authorizes a noncompetitive proposal in response to a written request from the Applicant; or
- After solicitation of a number of sources, competition is determined inadequate.

Tribal or local governments and PNPs must perform a cost or price analysis in connection with every procurement action in excess of the simplified acquisition threshold, including contract modifications. The method and degree of analysis depends on the facts surrounding the particular procurement situation. As a starting point, the Applicant must make independent estimates before receiving bids or proposals. Additionally, the Applicant must negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where a cost analysis is performed.

FEMA PA staff coordinate with FEMA’s Office of Chief Counsel when evaluating whether the Applicant complied with Federal procurement requirements. In the case of non-compliance with Federal procurement requirements, FEMA determines a reasonable cost for the eligible work completed based on all available information and documentation.

Quarterly Reports

Quarterly Progress Report (QPR), submitted by the Subrecipient to WEM is a useful tool to assist WEM with monitoring the progress of open projects. To comply with the requirements of 44 CFR §§206.204, **Project performance**, and 2 CFR 200.328(b)(1), **Monitoring and reporting program performance**, Subrecipients must submit quarterly progress reports on all projects for which the final state share payment has not yet been released and the project not closed.

The Subrecipient must submit to the Recipient the following information for each open project on a quarterly basis:

- Total expenditures to date for each project;
- Status of the project;
- % of the project that is completed;
- Projected completion date;
- Any scope of work changes or budget modifications; and
- Any circumstances that could delay the project.

Subrecipients report status of project worksheets on the Public Assistance – Project Worksheet Quarterly Progress Report form via e-mail every quarter. The report must be submitted no later than 30 days after the end of each quarter as indicated by the deadlines listed below:

Fiscal Year Quarter	Dates	Submit Progress Report By:
1 st Quarter	October 1 – December 31	January 30
2 nd Quarter	January 1 – March 31	April 30
3 rd Quarter	April 1 – June 30	July 30
4 th Quarter	July 1 – September 30	October 30

Time Extensions

When work cannot be completed within the specified period of performance, the Subrecipient must request a time extension for each separate project. The Subrecipient may request a time extension by completing a Public Assistance – Project Worksheet Time Extension Request form and submitting it to the State Public Assistance Officer (PAO) for evaluation. Request should be submitted prior to current approved deadline, be specific to one project, and include all pertinent supporting documentation.

As excerpted from 44 CFR 206.204(c), “the project completion deadlines shown below are set from the date that a major disaster or emergency is declared and apply to all projects approved under State disaster assistance grants.”

Debris Clearance	6 months
Emergency Work	6 Months
Permanent Work	18 Months

The State PAO will review the time extension request, carefully considering the reasons given for the extension and the proposed completion date of the project.

Submission Deadline

As a general rule, time extension requests must be submitted to WEM 30 days prior to the expiration of the prescribed completion deadlines to ensure that there is no gap in eligible performance period.

If the request is approved, the State PAO may grant time extensions within WEM’s authority for maximum limits:

- Emergency Work (Categories A and B): Time extensions for up to twelve (12) months of the original approval date may be granted by the State PAO without FEMA approval.
- Permanent Work (Categories C-G): Time extensions for up to forty-eight (48) months of the original approval date may be granted by the State PAO without FEMA approval.
- WEM provides each Subrecipient notification in writing regarding the status of time extension approval or denial. The State PAO notifies FEMA of all approved time extensions.

Typical examples of delays outside of a subrecipient’s control include:

- Permitting delays caused by other agencies
- Inclement weather
- Environmental concerns requiring alternate methods of repair or additional assessments/surveys
- Disaster related impacts to the availability of resources

Requests for time extensions beyond WEM’s authority (exceeding the maximum time limits listed above) shall be submitted to FEMA Region V for action. The request includes dates and provisions of all previous time extensions, a detailed justification for the delay, and a projected completion date. FEMA Region V notifies the State PAO in writing of the Region’s determination, advising of the new completion date and any other requirements determined necessary to meet the new completion date. The State PAO notifies the Subrecipient of the determination.

Scope of Work Changes

Project Worksheet Modification

On initiation of a project, the Subrecipient may determine that the scope of work is not sufficient to restore the damaged facility to its pre-disaster condition or function, necessitating a request for modification to the approved project worksheet (PW). Reasons for requesting modifications may include the following:

- Original design described in the project worksheet scope of work is not feasible
- Professional recommendations for construction methods differ from those initially proposed
- Project worksheet contains errors or omissions
- The Subrecipient discovers hidden damage during the course of completing previously approved work
- The Subrecipient wishes to pursue an Improved or Alternate Project
- Environmental limitations become evident

Submission Deadline

Prior to initiating the work related to the project worksheet modification element(s), in order for the Recipient (WEM) to determine program eligibility and ensure that all applicable special consideration reviews (floodplain management, environmental, historic, hazard mitigation, and/or insurance) are conducted.

Funding

Substantial projected increases or decreases (+/-15%) in the project funding will be addressed in a version of the project worksheet. (Additional information can be found in the section “Substantial Budget Modification”).

Prior to submitting for FEMA consideration, WEM will review the Subrecipient request to verify that the following information has been addressed and provided in the request:

- **SOW CHANGE?** Description of the proposed scope of work modification and why it is necessary.
- **VALIDATION?** Validation that the requested modification is necessary to restore the facility to pre-disaster design and condition. If the facility cannot be restored to its pre-disaster design, a statement by a qualified technical expert should be provided with explanation and justification for the modification.
- **COSTS?** Identification and costs for improvements and/or hazard mitigation proposals.
- **TIMELINE?** Identification of the proposed schedule of the construction work and possible time extensions.
- **PHOTOS?** Color photos documenting additional damage and how it was caused by the disaster.
- **SUPPORTING DOCUMENTS?** Documentation to support request for additional funding (i.e. bid documents, contracts, invoices, receipts, force account records, or an updated cost estimate and basis for the adjustment).
- **DESIGN SPECS?** Engineering and design reports, if applicable.
- **SPECIAL CONSIDERATIONS?** Identification of potential floodplain management, environmental, historical, hazard mitigation, and/or insurance issues.

Substantial Budget Modification

In the performance of the approved scope of work, it may become evident that a substantial cost overrun/underrun will be incurred. As a general rule, if it appears that a project budget will run over/under budget by 15%, the Recipient (WEM) should be notified in writing. Some of the common causes of increased/decreased funding needs are listed below:

- Bid prices come in significantly higher than original PW estimates
- Lengthy project delays result in increased costs

- Unit price variances (i.e. local unit prices vs. FEMA cost codes)
- Necessity of unique services (noncompetitive bid proposals) or extraordinary level of effort
- The Subrecipient determines that one or more elements of a project will not be completed.
- Insurance adjustments

For large projects, Subrecipients must report significant actual or anticipated overruns to the Recipient (WEM) immediately and prior to work completion.

Cost overruns on small projects are not handled on a project-by-project basis; rather, the Subrecipient may request supplemental funding for a net cost overrun on all small projects by submitting an appeal.

While proceeding with the project, the Subrecipient must ensure that it uses PA funding only for eligible work. If there are changes to the project and the Subrecipient begins or continues the work before the Recipient or FEMA reviews and approves those changes, it will **jeopardize PA funding**.

The Subrecipient may request a change in the scope of work by completing a Public Assistance – Project Worksheet SOW Change Request form and submitting it to the State PAO for evaluation. Subrecipients should submit supporting documentation that outlines:

- Affected PW number and title
- Request of a formal scope of work change
- Justification for a scope of work change
- Why this scope of work change is eligible in the PA program
- Changes in budget associated with the request
- Changes to the completion timeline with the request
- Any citations of PA Program Guidance or Regulations

The State PAO evaluates the request and when justified, submits a request and a recommendation to FEMA Region V. The Regional Administrator (RA) provides written notice to the State PAO after a determination has been made. The State PAO forwards the RA’s determination to the Subrecipient.

Hidden Damages

Additional damage that is identified during the performance of repairs authorized in the original PW scope of work of an approved facility. Prior to initiating the repair work related to the hidden damage elements, the Subrecipient shall notify the Recipient in order for the Recipient and/or FEMA to verify the damage and ensure that all special considerations concerns are reviewed and addressed. The Subrecipient should complete a Public Assistance – Project Worksheet SOW Change Request form and submit it to the State PAO for evaluation. Subrecipients should also submit any pertinent supporting documentation.

Alternate Project Requests

A Subrecipient requests an Alternate Project when they determine that the public welfare would not be best served by restoring a damaged public facility or the function of that facility. The Subrecipient may request an Alternate Project by completing a Public Assistance – Project Worksheet SOW Change Request form and submitting it to the State PAO for evaluation. Subrecipients should also submit any pertinent supporting documentation. The Alternate Project option may be exercised only on permanent restorative work. Funds contributed for Alternate Projects may be used to repair or expand other selected public facilities, to construct new facilities, or to fund hazard mitigation measures. These funds may not be used to pay the non-Federal share of any project, nor for any operating expense. Prior to the start of construction of any Alternate Project, the State PAO shall submit the following for approval by the RA:

- Written description of the proposed scope of work
- Updated schedule of work
- Outline of estimated costs
- Documentation supporting scope of work, schedule, and estimated costs
- Documentation of compliance with any special requirements, including but not limited to
 - Floodplain management
 - Environmental assessment
 - Hazard mitigation
 - Protection of wetlands
 - Clean Water Act
 - Environmental justice
 - Insurance

Prior to submitting for FEMA consideration, WEM shall review the Subrecipient request to verify that the following information has been addressed and provided in the request. As stated in *44 CFR 206.204(d)(2)(v)* “Prior to the start of construction, the Subrecipient shall submit for approval by FEMA the following:

- Description of the proposed alternate project;
- Schedule of work; and
- The projected cost of the alternate project(s)
- **SPECS?** Color photos, site map, and design specifications (when applicable)
- **SPECIAL CONSIDERATIONS?** Identification of potential floodplain management, environmental, historical, hazard mitigation, and/or insurance issues.

Improved Project Requests

A Subrecipient requests an Improved Project if they desire to make improvements to a facility that go above and beyond the pre-disaster function of a damaged facility. The Subrecipient may request an Improved Project by completing a Public Assistance – Project Worksheet SOW Change Request form and submitting it to the State PAO for evaluation. Subrecipients should also submit any pertinent supporting documentation. Prior to the start of construction of any Improved Project, the State PAO shall submit the following for approval by the RA:

- Written description of the proposed scope of work
- Updated schedule of work
- Outline of estimated costs
- Documentation supporting scope of work, schedule, and estimated costs
- Documentation of compliance with any special requirements, including but not limited to:
 - Floodplain management
 - Environmental assessment
 - Hazard mitigation
 - Protection of wetlands
 - Clean Water Act
 - Environmental justice
 - Insurance
- If approved, Federal funding for improved projects will be limited to the original Federal share of the approved estimate of eligible costs.

Prior to submitting for FEMA consideration, WEM shall review the Subrecipient request to verify that the following information has been addressed and provided in the request:

- **PROPOSED CHANGES?** Clear identification of the improved elements or any changes to the original scope of work.
- **COST?** Revised cost estimate with the improvements and related costs identified separately, when possible.
- **SPECS?** Design specifications, project location with site map, and a projected completion timeline.
- **SPECIAL CONSIDERATIONS?** Identification of potential floodplain management, environmental, historical, hazard mitigation, and/or insurance issues.

Closeout

Reimbursement on projects will not happen until Project Worksheets have been approved by both FEMA and the State, the State has mailed out Obligation paperwork, and the proper forms have been signed and returned by the Subrecipient.

Project worksheets will be obligated in one out of four categories depending on the size of the project (small or large) and the percentage complete at the time of FEMA inspection. Each project will be mailed a separate obligation packet. An obligation packet will be mailed once FEMA and the State have approved the project and have been able to complete the internal obligation process. An obligation packet includes a cover letter describing the type of project (one of the four categories) and a checklist for how to proceed for that particular type of obligation. Depending on the category of work a project falls into will also determine the closeout process and documentation required for closeout. Please see below for detailed obligation and closeout information on all four categories:

- Small projects 100% complete at time of FEMA inspection
- Small projects not 100% complete at time of FEMA inspection (Work to be Completed)
- Large projects 100% complete at time of FEMA inspection
- Large projects not 100% complete at time of FEMA inspection (Work to be Completed)

Small Projects 100% Complete at time of FEMA Inspection:

An obligation packet reflects the dollar amounts, requirements, and description of the work completed, as approved by FEMA and WEM. This obligation packet may not include all projects that have been approved and obligated for your jurisdiction.

Once a Subrecipient signs and returns a P.4 form, WEM can reimburse the state share on the project worksheet. After the federal and state share have been reimbursed on a project worksheet, the project worksheet is then closed by the state for that disaster.

Small Projects Not 100% Complete at time of FEMA Inspection

An obligation packet reflects the dollar amounts, requirements, and description of the work completed, as approved by FEMA and WEM. This obligation packet may not include all projects that have been approved and obligated for your jurisdiction.

Once a Subrecipient signs and returns a 1017 form, WEM can reimburse the federal share on the project worksheet.

Submit site photographs and all supporting documentation

For the state to complete its review and close this project, we need documentation for all work completed written as “Work to Be Completed” in the 90-91 form.

We do not need photographs or documentation for “Work Completed” in the 90-91 form, as FEMA had collected documentation and verified costs at the time the project was awarded.

Once a Subrecipient signs and returns a P.4 form, submits site photographs, and summary of expenses of work to be completed, WEM can reimburse the state share on the project worksheet.

After the federal and state share have been reimbursed on a project worksheet, the project worksheet is then closed by the state for that disaster.

Category Z Management Costs

If and when a Subrecipient requests a Category Z PW for management costs, the FEMA Program Delivery Manager (PDMG) will formulate a Category Z PW for 5 percent of the Total Award Amount obligated for a Subrecipient at the time of its request. FEMA may process amendments up to once a quarter for 5 percent of the Total Award Amount obligated for the Subrecipient at the time of its amendment request. If all final actual management costs are known at the time the Subrecipient requests a Category Z PW, the Subrecipient should submit its claim for all eligible costs incurred and FEMA will obligate the Category Z PW based on the actual eligible costs up to the 5 percent maximum. If additional project costs are obligated or deobligated, FEMA will adjust the 5 percent maximum and the actual eligible costs as appropriate.

Documentation and Requirements

The following documentation will be needed at closeout to substantiate the eligibility of management activities and associated costs. Additionally, costs claimed must be reasonable.

- An explanation of work performed with a representative sample of daily logs/activity reports. The activity must be related to eligible projects. Therefore, management costs associated with an appeal that is ultimately denied are not eligible. If an eligibility determination is appealed and the appeal is ultimately granted, that project is eligible for inclusion in the calculation of the Category Z PW and management activities associated with the eligible project costs are eligible for reimbursement.
- Documentation to substantiate the necessity of any claimed office supplies, equipment, or space.
- For meetings or site inspections, the activity description needs to include the number and purpose of the meetings or site inspections.
- Travel costs need to include the purpose of travel and a copy of the travel policy.
- Training needs to include the locations, date(s), and title of the course. The training must be related to PA and occur within the period of performance of the Category Z PW.
- Certify that the management activities and associated costs claimed are eligible, consistent with PA guidance, and not related to ineligible projects.

Closeout and Final Reconciliation

All Category Z PWs will be reconciled and reimbursed based on actual costs not to exceed the maximum percentage allowed (7 percent for Recipients and 5 percent for Subrecipients). This includes Category Z PWs that are below the large project threshold.

The period of performance for all Category Z PWs for management costs under the Interim Policy is tied to the timelines provided in Sections C.4 and C.5 of the Interim Policy. The Recipient must submit its certification of the

Subrecipient's Category Z PW with the final payment of claim and supporting documentation to FEMA within 180 days of the end of the period of performance.

Large Projects 100% Complete at time of FEMA Inspection

An obligation packet reflects the dollar amounts, requirements, and description of the work completed, as approved by FEMA and WEM. This obligation packet may not include all projects that have been approved and obligated for your jurisdiction.

Once a Subrecipient signs and returns a 1017 form, WEM can reimburse the federal share on the project worksheet.

Once a Subrecipient signs and returns a P.4 form, WEM can reimburse the state share on the project worksheet.

After the federal and state share have been reimbursed on a project worksheet, the project worksheet is then closed by the state for that disaster.

Large Projects Not 100% Complete at time of FEMA Inspection

An obligation packet reflects the dollar amounts, requirements, and description of the work completed, as approved by FEMA and WEM. This obligation packet may not include all projects that have been approved and obligated for your jurisdiction.

It also lists the percentage of work complete, which is less than 100%. This means not all physical work required was complete at the time the project was awarded by FEMA.

Please note that large projects only reimburse actual eligible costs incurred. DMA Form 1017 lists the estimated cost based on estimates provided to your FEMA program delivery manager (PDMG. These amounts may and likely will change after FEMA reviews and approves the project's closeout package.

Upon receipt of the signed P.4, the state will reach out to the Subrecipient point of contact to schedule an on-site visit. At this visit, the state representative will take photos of the work that was completed as well as work with the Subrecipient on what is needed to be submitted for review.

Submit all supporting documentation

For the state to complete its review and close this project, all supporting documentation for all work completed written as "Work to Be Completed" in the 90-91 form, must be submitted. We do not need photographs or documentation for "Work Completed" in the 90-91 form, as FEMA had collected documentation and verified costs at the time the project was awarded.

Types of documented needed for a successful closeout:

Cover sheet or letter – the cover sheet or letter goes into detail what the Subrecipient is requesting during closeout (i.e. cost overrun or cost underrun).

Summary of Expenditures – the summary should total all costs related to completing the project worksheet scope of work. The summary should be organized by site as it is on the project worksheet. When the state reviews the costs and documentation, it does so against what it written in the project worksheet scope of work and work to be completed.

Supporting Documentation – the following must be submitted along with the cover sheet and summary of expenditures. Not all documentation types may be applicable for the work that was completed:

- Force Account Labor
 - Labor Costs and Records
 - Fringe Benefits
 - Personnel Pay Policies
- Force Account Equipment/Supplies
 - Salvage Value
 - Equipment Rates
- Force Account Materials
- Contracts
 - Procurement Procedures
 - Invoices/Canceled Checks
 - Price Analysis to determine reasonableness of cost
 - Scope of Work
 - Type of Contract
 - Related Correspondence
 - Bid Documents – Engineering/Architectural and Construction Work must be bid out
 - Contracts – Copy of any Signed Contract
 - Change Orders
- Applicable Codes and Standards
- Documentation of Any Required Environmental Compliance
- Other Backup Documentation as needed
- General Items
 - Invoices, Time Sheets, Work Orders – proof of payment for each
 - Photos
 - Issues Identified in the Comment Field of the DSR/PW
 - Documentation Requirements
 - Insurance Requirements
 - Special Considerations
 - Environmental Concerns
 - Insurance Issues
 - Compliance with Historic Preservation Requirements
 - Time Extensions – include any time extensions you requested from the State or FEMA, if you do not have one submit a request at this time. Your request should state why the project was completed after the default completion date indicated on your project worksheet.
 - Work Completion Date – Document the day the work was completed

The state will review the cover sheet, summary of expenditures, and any supporting documentation for completeness. If there are any questions, concerns, or clarifications, the state will follow up with the Subrecipient as needed.

After the state has completed their review, they will send a recommendation letter and all supporting documentation to FEMA requesting that FEMA reviews and closes the project. During their review, FEMA will follow up with the state with any questions or clarifications. Upon completion of their review, FEMA will award a new version of the project worksheet to the state and close the project worksheet for the Subrecipient and the disaster. The state will then obligate the updated project worksheet to the Subrecipient (see Obligations) for

final 1017 and P.4 signatures. After receiving the signed 1017 and P.4, the state will request final reimbursement.

After the federal and state share have been reimbursed on a project worksheet, the project worksheet is then closed by the state for that disaster.

[Small Project Net Overrun Appeal and Closeout](#)

If the total approved amount on a Project Worksheet is less than the annually adjusted large project threshold published in the Federal Register, it is considered a small project.

“FEMA will not normally review an overrun for an individual small project. The normal procedure for small projects will be that when a [Subrecipient] discovers a significant overrun related to the total final cost for all small projects, the [Subrecipient] may submit an appeal for additional funding.” 44 CFR 206.204(e)(2)

FEMA only adjusts the approved amount on individual small projects if:

- The Subrecipient did not complete the approved SOW;
- The Subrecipient requests additional funds related to an eligible change in a SOW;
- The PW contains inadvertent errors or omissions; or
- Actual insurance proceeds differ from the amount deducted in the PW

Submission Deadline

Small Project Net Overrun Appeal: Within 60 days following the completion of all small projects.

WEM must submit the certification of completion of all small projects to FEMA within 180 days from the date that the Subrecipient completes its last small project.

Prior to submitting for FEMA consideration, the Recipient shall review the Subrecipient request to verify that the following information has been addressed and provided in the request:

- **TIMELY SUBMISSION?** Written verification that the appeal was submitted within 60 days of the completion of the FINAL small project.
- **CERTIFICATION?** Subrecipient certification, signed by applicant’s authorized agent, with supporting documentation substantiating claimed final costs for each small project (P.4).
- **VALIDATION?** Comparison between each approved SOW and the actual work completed; variances should be clearly identified.
- **HAZARD MITIGATION?** Documentation and separate accounting of the completion of approved Hazard Mitigation measures in accordance with the SOW.
- **SPECIAL CONDITIONS?** Verify and provide adequate documentation that all special considerations conditions of the grant have been met (obtain and maintain insurance, environmental compliance conditions, special permits, etc.).

[Appeals](#)

The Subrecipient may appeal any FEMA determination related to an application for, or the provision of, assistance under the PA program. For Alternative Procedures Projects, the Subrecipient may submit an appeal only for insurance or corrective actions resulting from reviews such as an audit.

FEMA provides the Subrecipient with two opportunities to request FEMA reconsider a determination. The first appeal is to the FEMA Regional Administrator. If the Subrecipient disagrees with the first appeal determination,

it may submit a second appeal to the Assistant Administrator of the Recovery Directorate at FEMA Headquarters.

The Subrecipient must submit a written appeal to WEM within 60 days of receiving written notification of FEMA's determination. WEM will forward the appeal with its written recommendation to FEMA within 60 days of its receipt of the appeal.

FEMA reviews the appeal and, within 90 days of receiving it, takes one of two actions:

- Provides its final written decision to WEM; or
- Requests additional information specifying the date FEMA must receive the information, usually 30 days.

The Subrecipient is then notified of the action taken by FEMA.

Audits

Recipients and Subrecipients are subject to Federal and non-Federal audits. A Recipient or Subrecipient that expends \$750,000 or more in Federal funds during its fiscal year must perform a single or program-specific audit.