



2020
STATE OF ALASKA
ADMINISTRATIVE PLAN
FOR
FEDERAL DISASTER PUBLIC
ASSISTANCE

For Federal Disasters Declared in Calendar 2020

Department of Military and Veterans Affairs
Division of Homeland Security and Emergency Management

**STATE OF ALASKA ADMINISTRATIVE PLAN
FOR
PUBLIC ASSISTANCE
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**STATE of ALASKA ADMINISTRATIVE PLAN
for FEDERAL DISASTER PUBLIC ASSISTANCE**

I. PURPOSE

The purpose of this plan is to identify the State of Alaska's (hereinafter referred to as the recipient) roles, responsibilities, processes, and procedures for administering the Federal Emergency Management Agency (FEMA) Public Assistance Program. Public Assistance (PA) is supplemental disaster aid to states, tribal and local governments, as well as certain Private Nonprofits for debris removal, emergency protective measures, and permanent restoration of infrastructure. This plan is integrated into and supportive of the State emergency plan.

The State assures FEMA that it shall comply with all applicable federal statutes and regulations in effect during the periods for which it receives grant funding, including those listed under Section II below. The State acknowledges that funding under the FEMA PA Program is conditional upon the State's compliance with all the terms and conditions of this plan.

II. AUTHORITY

A. State

- A.** Alaska Statute Title 26: Chapter 20, Homeland Security and Civil Defense
- B.** Alaska Statute Title 26: Chapter 23, Disasters
- C.** Alaska Statute Title 29: Municipal Government, to include Chapters 4, 20, and 35
- D.** Alaska Administrative Manual
- E.** Accounting Procedures Manual
- F.** Executive Orders of the Governor
- G.** State Emergency Operations Plan
- H.** FEMA State Agreement

B. Federal

- A.** 42 U.S.C. § 5121-5207, Robert T. Stafford Act
- B.** FEMA Regulation, 2 Code of Federal Regulations (CFR) Part 200 through 79 FR 75871
- C.** FEMA Regulation, 44 Code of Federal Regulations (CFR) Part 206
- D.** FEMA Regulation, 44 CFR Part 9
- E.** FEMA Regulation, 44 CFR Part 201 Mitigation Planning
- F.** Executive Order 12699 Seismic Design
- G.** Executive Order 12898, Environmental Justice
- H.** Executive Order 11988, Floodplain Management
- I.** Executive Order 11990, Protection of Wetlands
- J.** Executive Order 12898, Environmental Justice
- K.** Executive Order 13688, Federal Support for Local Law Enforcement Equipment Acquisition
- L.** 16 U.S.C. § 3501, Coastal Barrier Resources Act
- M.** 16 U.S.C. § 470, National Historic Preservation Act
- N.** 16 U.S.C. § 1531, Endangered Species Act References
- O.** DHS Standard Terms and Conditions for grants (<http://www.dhs.gov/fy15-dhs-standard-terms-and-conditions>)

III. DEFINITIONS

- A. Alternate Project:** A subrecipient may determine that the public welfare would not be best served by restoring a damaged facility or its function to the pre-disaster design, although the facility was still in use at the time of the disaster. In this event, the subrecipient may apply to FEMA to use the Public Assistance grant for permanent restoration on that facility for other purposes. Projects other than the damaged facility on which the subrecipient spends eligible funds are referred to as alternate projects (44CFR206.203). See also Public Assistance Program and Policy Guide, Chap 2, VII (G) for further guidance.
- B. Applicant's (subrecipient) Agent:** An agent specified by the Applicant's (subrecipient) Principal Executive Officer or Administrator on the Designation of Applicant's Agent Form (DHS&EM Form 30-5) as the Applicant's primary point-of-contact for all matters pertaining to its request for assistance. If no agent is appointed, the Principal Executive Officer or Administrator will be designated as the Applicant's (subrecipient) agent. The Designation of Applicant's (subrecipient) Agent form must be kept current by the Applicant (subrecipient) and updated as needed with DHS&EM.
- C. Applicant's Briefing:** Meeting conducted by a representative of the State (recipient) for all potential applicants (subrecipients) interested in receiving PA grants. This briefing occurs after an emergency or major disaster declaration and addresses the application process, procedures, administrative requirements, and funding and program eligibility criteria. This is also typically when RPAs are submitted from the potential applicants (subrecipients) to the State (recipient). See Chap 3, 1. (B) of the Public Assistance Program and Policy Guide for further information.
- D. Capability Assessment and Recovery Tool:** A written document consisting of three parts: 1) High Risk review, 2) Preliminary Screening, and 3) Recovery Plan. This tool is deployed as soon as possible after potential PA program subrecipients are identified. The purpose of this tool is to assist in determining subrecipients' financial and recovery capabilities and to improve project worksheet development and recovery planning. Funding for permanent work may not be disbursed until a subrecipient's Recovery Plan is on file with DHS&EM.
- E. Closeout:** Process by which FEMA or the recipient determines all applicable administrative actions, documentation, and work of the award have been completed and subrecipient has complied with all actions described in 2 CFR 200.343.
- F. Consolidated Resource Center (CRC):** The CRC reviews packages for accuracy, program eligibility, appropriate supporting documentation, and other requirements per FEMA PA Program policy. The CRC also applies any applicable insurance, federal road, and other applicable reductions to the overall cost of the project and then submits the project back to the PDMG for signatures.
- G. Direct Administrative Costs:** Costs incurred by the recipient or subrecipient that can be identified separately and assigned to a specific project. In accordance with 2 CFR 200, treatment of direct costs must be consistent across all federal awards and other activities of the recipient or subrecipient. Such costs can include staff time to conduct initial inspections, prepare and submit a PW, and make interim and final inspections of the project.
- H. Disaster Assistance Program Manager (DAPM):** The Disaster Assistance Section Program Manager will provide overall program oversight and will manage resources appropriately to ensure Disaster Assistance program objectives are met.
- I. Division of Homeland Security and Emergency Management (DHS&EM):** Within the Department of Military and Veterans Affairs (DMVA), DHS&EM has the responsibility under the Alaska Disaster Act to prepare and maintain a state emergency plan which includes provisions for prompt and effective response to disasters, emergency relief, organization of

personnel, chains of command, and preventive and preparedness measures to eliminate or reduce disasters or their impact. DHS&EM is also the State agency responsible for coordinating recovery efforts.

- J. Emergency Management Mission Integrated Environment (EMMIE):** The platform on which many web-based FEMA E-Grants (awards) applications will reside, such as Public Assistance and Fire Management Assistance Grants. This FEMA based program will replace National Emergency Management Information System (NEMIS).
- K. Emergency Work:** Work performed to reduce or eliminate an immediate threat to life, protect public health and safety, and protect improved property threatened in a significant way as the result of the disaster. Under the Public Assistance Program, Category A (Debris Removal), and Category B (Emergency Protective Measures) are referred to as Emergency Work. See Chap 2, IV, V, and VI of the Public Assistance Program and Policy Guide for further information.
- L. Expedited Funding:** An advance of grant funds by FEMA, for emergency work to assist with payment of emergency work that must be performed immediately. This funding is not available for Accelerated Debris Removal Alternative Procedures. See Chap 3, pp.134 of the Public Assistance Program and Policy Guide for further information.
- M. Exploratory Call:** Contact to introduce applicant to Program Delivery Manager. Applicant presents an initial sense of the damage and needs. Also identifies who needs to participate in the Recovery Scoping Meeting.
- N. Federal Award:** The federal financial assistance that a non-federal entity receives directly from FEMA or through a recipient.
- O. Federal Emergency Management Agency (FEMA):** The federal agency responsible for coordinating disaster recovery efforts.
- P. FEMA-State Agreement:** A legal document between FEMA and the affected state outlining the understandings, commitments, terms, and conditions for assistance resulting from a federal disaster or emergency declared by the President. The FEMA Regional Administrator and the governor sign the document.
- Q. Governor's Authorized Representative (GAR):** The individual 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. The GAR may also be designated as the State Coordinating Officer (SCO).
- R. Grants Portal:** FEMA's Public Assistance Project Worksheet development tracking, communication and information storage system.
- S. Hazard Mitigation (Section 404):** In HMGP, mitigation measures are proposed which may involve facilities other than those damaged by a disaster, new facilities, or even non-structural measures such as development of floodplain management regulations. See Chap 2, of the Public Assistance Program and Policy Guide for further information.
- T. Hazard Mitigation (Section 406):** Mitigation measures that must be directly part of the reconstructed work on a facility or will protect or benefit the repaired portion of the facility. Section 406 Hazard Mitigation is included, when appropriate, as part of the PW scope of work. Section 406 Hazard Mitigation is different from mitigation measures that are considered for eligibility under the Hazard Mitigation Grant Program (HMGP) of Section 404 of the Stafford Act. See Chap 2, of the Public Assistance Program and Policy Guide for further information.

- U. Home Owners Associations (HOA)** A Home Owners Association (HOA) is an organization of homeowners of a particular subdivision, condominium or planned unit development. The purpose of a home owners association is to provide a common basis for preserving maintaining and enhancing their homes and property. HOA's are generally non-critical Private Non Profits or businesses and not eligible for Public Assistance.
- V. Improved Project:** A project in which a subrecipient makes improvements to the facility (beyond returning the facility to pre-disaster condition) while performing disaster restoration work. For the most part, these are projects for which funding for the improvements cannot be separated from the costs of the original repair work. The improved facility must have the same function and at least the equivalent capacity as that of the pre-disaster facility. Funding for such projects is limited to the original cost estimate associated with repairing or replacing the damaged facility to its pre-disaster design. The subrecipient must obtain approval for an improved project from the State prior to construction (44 CFR 206.203). See Chap 2, of the Public Assistance Program and Policy Guide for further information.
- W. Indirect Costs:** Costs a recipient or subrecipient incurs for a common or joint purpose benefitting more than one cost objective (Project Worksheet) that are not readily assignable to the cost objectives specifically benefitted. See Chap 3, of the PA Program and Policy Guide for further information.
- X. Initial Incentive Payment:** A payment made to subrecipients not considered high risk as described in 2 CFR 200.205, upon request, of up to the full amount of the federal cost share for each PW (equals 75% of the total value of the federal award).
- Y. Joint Field Office (JFO):** A temporary facility established in a Presidential declared disaster area to serve as the field headquarters for FEMA and other federal, state, voluntary and local recovery personnel. Also serves as the focal point for disaster operation, direction, coordination, and information. See Chap 1, of the Public Assistance Program and Policy Guide for further information.
- Z. Large Project:** Approved projects estimated to cost the same or more than the large project threshold amount, which is \$131,100 (2020). The large project threshold is adjusted annually to reflect changes in the Consumer Price Index for all Urban Consumers. The determination of the threshold is based on the declaration date of the disaster. The threshold amount applicable to any project is that amount in effect on the declaration date of the disaster, regardless of when project approval is made or when the work is performed. See Chap 3, of the Public Assistance Program and Policy Guide for further information.
- AA. Lock-In Amount:** The amount of management cost funds available to the state for a particular major disaster or emergency as FEMA determines at 30 days, 6 months, and 12 months.
- BB. National Emergency Management Information System (NEMIS):** A FEMA-wide system of hardware, software, telecommunications, and applications that provides a technology base for FEMA and the state to carry out the emergency management recovery mission. This system has been replaced by EMMIE in federal disasters declared after 2008.
- CC. Non-Federal Entity:** A state, local, or Indian tribal government, or non-profit organization that carries out a federal award as a recipient or subrecipient.
- DD. Pass-through Entity:** A state or Indian tribal government that provides a subaward to a subrecipient to carry out an activity under the PA Program.

- EE. Period of Performance:** The time during which the non-federal entity may incur obligations to carry out work authorized under the federal award.
- FF. Permanent Work:** Work required to restore a damaged facility through repairs or replacement to pre-disaster design, function, and capacity in accordance with applicable codes and standards. Under the PA Program, Category C (Roads and Bridges), Category D (Water Control Facilities), Category E (Buildings and Equipment), Category F (Utilities), and Category G (Parks, Recreational Facilities, and Other Items) are referred to as Permanent Work. See Chap 2, of the Public Assistance Program and Policy Guide for further information.
- GG. Personally Identifiable Information (PII):** Information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc." The Public Assistance Program as administered by the State of Alaska has no need to collect PII. If program staff come in contact with PII it is to be handled and controlled in accordance with Alaska Statute 45.48-Personal Information Protection Act.
- HH. Principal Executive Officer:** The Mayor (normally the Chief Elected Official), City Manager/Administrator, or, where there is no home rule or general law municipality, the recognized Traditional Village Council Chief or Administrator, or an eligible incorporated non-profit entity CEO or COO.
- II. Program Delivery Manager (PDMG):** Single point of contact assigned to provide customer service to Applicants throughout the Public Assistance process.
- JJ. Project Worksheet (FEMA Form 90-91):** The form used to document the scope of work and cost estimate for a project. See Chap 3, of the PA Program and Policy Guide for further information. This term is now referred to as a Sub-Grant Application for use in EMMIE.
- KK. Public Assistance:** Federal assistance provided through FEMA, under authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (44 USC 5121-5207) for infrastructure recovery. Under this program, FEMA awards grants to assist state, tribal, and local governments as well as certain private non-profit entities with response and recovery from disasters.
- LL. Quarterly Report:** A progress report submitted by the subrecipient to the State on a quarterly basis. It includes details on the subrecipient, the project, key dates and activities, funds expended, cost over-run potentials, changes to Scope of Work or other issues, and anticipated completion dates.
- MM. Recipient:** A state or Indian tribal government that receives a federal award directly from FEMA to carry out an activity under the PA Program. A pass-through entity can also be a recipient. A recipient cannot be a subrecipient.
- NN. Recovery Scoping Meeting:** A meeting conducted by FEMA, in coordination with the state, with each potential subrecipient individually in order for the potential subrecipient to identify damages, assess specific needs, discuss special considerations, and develop a plan of action.
- OO. Request for Public Assistance FEMA Form 90-49:** Form used by subrecipients as an official notification to FEMA of their intent to apply for Public Assistance. This term is now referred to a pre-application for use in EMMIE.

PP. Site Inspector: Specifically trained FEMA field personnel responsible for documenting the damages from the disaster site.

QQ. Small Project: Approved projects estimated to cost less than the large project threshold amount. See Large Project definition above.

RR. State: Any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

SS. State Coordinating Officer (SCO): The individual designated by the governor to coordinate state and local disaster assistance efforts with that of the federal government through the JFO and the Federal Coordinating Officer (FCO).

TT. State Emergency Operations Center (SEOC): The primary coordination center for all State and federal disasters in Alaska. The SEOC coordinates all intelligence, operations, and logistics matters for the response and initial recovery phases of a disaster.

UU. State Management Cost: Any indirect costs, administrative expenses, and any other expenses that a recipient or subrecipient reasonably incurs in administering and managing the PA grant that are not directly chargeable to a specific project. (*See* 2 CFR 200)

VV. State Public Assistance Branch Chief (PABC): The individual(s) designated to oversee the PA program and all related support staff. The SPABC will normally be a member of the State Emergency Management staff.

WW. State Public Assistance Officer (SPAO): A State representative who administers the PA Program at the state level. The SPAO will normally be a member of the State Emergency Management staff.

XX. 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. Under the PA Program, subrecipient PWs are subawards.

YY. Subrecipient: A non-federal entity that receives a subaward from a pass-through entity to carry out an activity authorized through a PW under the PA Program.

IV. ORGANIZATION AND RESPONSIBILITIES

A. State (recipient). The Governor of Alaska has designated DHS&EM, within DMVA, as the State office responsible for managing and administering the PA Program. These responsibilities include, but are not limited to:

1. Ensuring the FEMA-State Agreement is coordinated and executed (SCO).
2. Submitting the Application for Federal Assistance, SF-424 (Disaster Grants).
3. Complying with federal and State program and grant administrative requirements (SPAO).
4. Notifying potential subrecipients of the availability of assistance (PIO).
5. Assisting the local government in conducting preliminary damage assessments (Operations Section in SEOC).
6. Conducting Applicant's Briefings (SPAO).
7. Complete Recovery Assessment Tool (SPAO).

8. Requesting Expedited Payments on behalf of subrecipients as applicable in coordination with the PABC and DAPM (SPAO).
9. Attending Recovery Scoping Meetings (SPAO/Contractor).
10. Assigning a Public Assistance Liaison to work with the FEMA PDMG.
11. Assisting FEMA in determining work and subrecipient eligibility (SPAO/Contractor).
12. Reviewing and approving the PW(s) at the State level and making the necessary comments in Grants Portal and EMMIE (SPAO).
13. Processing requests for appeals, reviewing cost over-runs, approving time extensions, improved/alternate projects, advances and reimbursements (SPAO, PABC, DAPM).
14. Making recommendations to FEMA on appeals and improved/alternate project requests (SPAO, PABC, DAPM).
15. Securing insurance information from subrecipients when required (SPAO).
16. Ensuring subrecipients are informed/acknowledge responsibilities per CFR200.303. (SPAO)
17. Monitoring subrecipients adherence to the procurement and contract requirements outlined in 2 CFR 200.317 and this plan (SPAO/Disaster Grants).
18. Disclosing within 30 days of discovery any real or potential conflicts of interest to FEMA Regional office per 2 CFR 200.317-326. (SPAO/Disaster Grants)
19. Participating with FEMA in establishing hazard mitigation and insurance requirements (SPAO).
20. Monitoring subawards by conducting quarterly reviews, site inspections, and audits as required, ensuring program compliance (SPAO/Disaster Grants).
21. Reviewing and certifying project completion information (SPAO).
22. Determining budget and staffing requirements necessary for proper program management (PABC, DAPM).
23. Providing programmatic assistance upon subrecipient request or when deemed necessary by the (SPAO, PABC).
24. Requesting closeout of projects, subrecipients, and programs (SPAO).

B. Subrecipient. Responsibilities include, but are not limited to:

1. Preparing and participating in the Preliminary Damage Assessment (PDA).
2. Attending the Applicant's Briefing.
3. Submitting a Request for Public Assistance.
4. Participating in Exploratory Call and Recovery Scoping Meeting.
5. Identifying damages that are a direct result of the disaster, within 60 days of the FEMA Recovery Scoping Meeting.
6. Providing all required information for project worksheet formulation within assigned deadlines as outlined in this plan and assisting FEMA and the State (recipient) in PW formulation.
7. Completing, signing, and returning a Subrecipient Preliminary Information Package to the State prior to grant award.
8. Providing all documents as required from the Award Package within prescribed deadlines in an accurate, completed, and signed (as needed) condition.
9. Fully utilizing FEMA Grants Portal.
10. Assigning a Designated Applicant Agent to work with FEMA and the State throughout the PA process.
11. Reviewing the PW(s) to ensure the location of damages, damage description and dimensions, scope of work, and cost estimate are accurate and complete.
12. Tracking project costs separately for each project as costs are incurred and submitting cost documentation to support claimed expenditures in a timely manner or by the deadline assigned by the State (recipient).
13. Taking positive action to adhere to the procurement and contract requirements outlined in 2 CFR 200.317 and this plan.

14. Disclosing within 30 days of discovery any real or potential conflicts of interest to Recipient (SPA0) per 2 CFR 200.317-326
15. Ensuring contracted work is not awarded to state or federally-barred contractors.
16. Ensuring the work conforms to that outlined in the PW(s) (award). If alternative methods of repairs are used, additional work is performed, the scope of work is not completed in its entirety, or cost over-runs are identified, the subrecipient will notify the SPA0 before additional work or costs are incurred.
17. Monitoring projects by conducting quarterly reviews, site inspections, and audits as required, and ensuring program compliance.
18. Providing appropriate cost documentation for all incurred expenses necessary to complete the approved scope of work.
19. Requesting appeals, over-runs, time extensions, etc. in a timely manner.
20. Submitting all required forms and documentation required throughout the PA process in the method and timeframe requested or by the deadline assigned by FEMA and/or the State (recipient).
21. Certifying project completion.
22. Complying with the federal and State program and grant administrative requirements.
23. Meeting all deadlines established in this Administrative Plan or assigned by the State (recipient).
24. Developing a Disaster Recovery Plan, detailing how work will be completed, lines of authority, etc.

V. STAFFING AND FUNDING

- A. Following a federal declaration, the governor will designate State (recipient) certification officers to include a GAR, Alternate GAR (AGAR), an SCO, and an alternate SCO.
1. The GAR/AGAR is empowered to execute on behalf of the State all necessary documents for disaster assistance, including approval of subawards and certification of claims for PA. The GAR/AGAR maintains overall management and oversight of all aspects pertaining to the disposition of disaster assistance, hazard mitigation, donations management, programmatic compliance, and materials disposition under the federal disaster assistance program.
 2. The SCO will coordinate with the FCO to implement the federal assistance program through the Joint Field Office (JFO).
 3. The DAPM will provide overall program oversight and will manage resources appropriately to ensure Disaster Assistance program objectives are met.
 4. The SPAO may have additional assigned staff (as appropriate per event) for the initial work of subrecipient briefings, writing/reviewing PWs, and determination of eligibility. This may include utilization of contract services to support various PA functions.
 5. Ongoing management of the PA Program will require several staff from the Disaster Assistance Section, Information Management, Administrative Support, and Finance to augment the SPAO, SCO, and GAR.
 6. After the JFO closes, primary responsibility for coordination of federal assistance will shift from the SCO to the Disaster Assistance Program Manager with the assistance of the PABCs and the SPAO. The State (recipient) will incur the initial costs for administrative support personnel. The State (recipient) will submit a claim for reimbursement to FEMA in accordance with the management cost provisions of 2 CFR 200 and 44 CFR §206.228(a) (3) on a State (recipient) fiscal year basis.
- B. Disaster Grants Staff provides a final financial audit and quality review of payment requests to ensure they comply with State and federal financial guidance. They also provide coordination of payment requests to the Department of Administration for processing.
- C. Management and Program Staff: The State (recipient) is responsible for administering all funds provided under the PA Program as well as coordinating the program among FEMA, the State, and subrecipients.
- D. Administrative Support Staff: Since staffing requirements vary depending on the magnitude, type, and extent of the disaster, the following personnel may be used to assist the GAR, SCO, and DAPM in meeting program and grant administrative requirements:
1. PABC: Emergency Management Specialist III from the Disaster Assistance Section
 2. SPAO: The designees will be Emergency Management Specialists from the Disaster Assistance Section.
 3. Contractors: Disaster Assistance contractors may be used to augment State staff to conduct briefings, attend meetings, provide subrecipient follow-up, perform site inspections, and review PWs.
 4. Voluntary Agency Liaisons, Subrecipient Liaisons, Project Officers, Program Specialists, Accounting Specialists, Technical Specialists, Resource Coordinators, and other State Administrative Support Personnel as required, including Computer Specialist, Administrative Technician and Clerk/Typist: Qualified personnel from applicable State agencies who may assist the State Emergency Management staff.
- E. The Disaster Recovery Reform Act of 2018 (DRRA): amends Section 324 of the Stafford Act to define management costs to include “any indirect cost, any direct administrative cost, and any other administrative expense associated with a specific project under a major disaster, emergency, or disaster preparedness or mitigation activation or measure.”

All management costs will be obligated via Category Z PWs and funded at 100 percent Federal share. This includes management costs for all projects (e.g., small projects, large projects, and any projects completed under Stafford Act Section 428, Public Assistance Program Alternative Procedures).

For the Recipient:

1. FEMA provides contributions for management costs based on actual costs incurred up to 7 percent of the total award amount for the disaster or emergency, excluding Subrecipient management costs.
2. The 7 percent rate is inclusive of management costs expended by the Recipient for its own projects. The Recipient does not receive an additional 5 percent for management costs on its own projects.
3. If a Recipient requests management cost funding prior to Subrecipient project obligations, FEMA may make an initial Category Z obligation for 7 percent of the state minimum per capita indicator. Once project obligations exceed the minimum per capita indicator, FEMA may process additional versions to the Category Z PW for 7 percent of the total project amount obligated on a quarterly basis as needed. These obligations are subject to Strategic Funds Management. FEMA may require a plan describing how the Recipient plans to use the funds.
4. After FEMA has received the Recipient's certification of all projects for a declaration in accordance with 44 CFR § 206.205 and processed all final actual cost project claims, and upon receipt of the Recipient's final actual management cost claim, FEMA will process the final Category Z obligation or deobligation based on actual reasonable costs up to the maximum 7 percent.

For Subrecipients:

5. FEMA provides contributions for management costs based on actual costs incurred up to 5 percent of the Subrecipient's total award amount.
 6. Once a Subrecipient has project obligations, FEMA may provide a Category Z obligation for 5 percent of the total project amount obligated. FEMA may process additional versions to the Category Z PW for 5 percent of that Subrecipient's total project obligations on a quarterly basis as needed. These obligations are subject to Strategic Funds Management. FEMA may require a plan describing how the Subrecipient plans to use the funds.
- F. After FEMA has received and processed all of a Subrecipient's final actual cost project claims and upon receipt of the Subrecipient's final actual management cost claim, FEMA will process the final Category Z obligation or deobligation based on actual reasonable costs up to the maximum 5 percent.
1. Any cost being claimed by the recipient and subrecipient as a "Direct Administrative Cost" or an Indirect Administrative Cost" for a project will be considered a cost objective and must be accounted for on the appropriate summary forms outlined in this plan and must be supported by actual cost documentation.
- G. Cost Sharing: The basis for this determination is as follows. The State (recipient) will continue to provide the 25% cost share to match FEMA's 75% funding limit outlined in 44 CFR §206.65 and §206.203 (b) with the exception of Alaska Railroad Corporation (ARRC). Therefore, subrecipients may not be required to provide a cost share for any disaster assistance grants Based on the new FEMA Interim Policy the State of Alaska is not requested or required to pass through Management Costs to our subrecipients.

VI. POST DECLARATION ACTIVITIES

- A. DHS&EM will ensure negotiation, coordination, and execution of the FEMA-State Agreement.
- B. Notifying Potential Subrecipients: DHS&EM, the SPAO, the State Public Affairs Officer(s), City Mayor(s), Tribal Administrator(s), and local Emergency Management Coordinator(s) will

be used to notify potential subrecipients of the available assistance programs. Potential subrecipients will be notified via letter, DHS&EM web page, telephone calls, and/or relevant media available in the affected area or posted on community bulletin boards. This notification will include the time and date of the Applicants' Briefing to be held in their area. Notification will occur as early as possible. The SPAO will provide details on the roles and responsibilities of the State (recipient) and potential subrecipients, the appropriate staff to be in attendance, items the potential subrecipients should bring to the Applicants' Briefing, and brief overview on cost documentation requirements. The Public Information Officer for DHS&EM will also disperse information on the Applicants' Briefings through their normal communication channels.

- C. **Capability Assessment and Recovery Tool:** The SPAO (or other designated staff) will complete the High Risk review and Preliminary Screening sections of the Recovery Assessment Tool to assist in identifying any necessary special conditions or restrictions appropriate to ensure program success and recovery. The High Risk review will be used to determine if the subrecipient has proper financial resources prior to award of grant funds. This tool is also used to identify areas where additional State support/guidance may be needed to assist potential subrecipients with programmatic requirements. The SPAO will complete the High Risk review and route to the PA Branch Chief and DAPM for review and concurrence. Any potential subrecipients determined to be high risk by the SDAPM must be forwarded to the GAR for final concurrence prior to notification (certified mail). The notification letter will also provide appeal instructions. All associated and supporting documentation will be included in the subrecipient Folder. A copy should be made available to the FEMA Public Assistance Officer (PAO) to assist with project formulation.
- D. **Applicants' Briefing:** Once a designated area has been approved for PA, members of the Disaster Assistance Section will conduct an Applicants' Briefing. The number of potential subrecipients and the area involved in the disaster will determine the number of briefings held. The local government contact will arrange for the Applicants' Briefing location through coordination with the SPAO. Typically, the Applicants' Briefing is conducted by the SPAO or another Public Assistance staff member from DHS&EM. If FEMA chooses to participate in the briefing their roles and responsibilities will be pre-determined. At the Applicants' Briefing, a RPA (*FEMA Form 90-49*) will be collected from each public entity, tribe, and Private Nonprofit organization interested in pursuing assistance under the PA Program. The SPAO will provide each subrecipient with a Recovery Plan template/outline. The SPAO will brief applicants on the purpose and importance of the Recovery Plan. DHS&EM must have a Recovery Plan for each non-State agency subrecipient prior to disbursement of any project funds. Also of significant importance, the Recovery Plan generated by the subrecipient will be invaluable to the subrecipient, recipient, and FEMA during the Recovery Scoping Meeting and project formulation. The SPAO will be responsible for providing the subrecipients with the various policy manuals, policies, and guides that provide information on the procedures that will be used throughout the PA process.
- E. **Recovery Scoping Meeting:** A Recovery Scoping Meeting is conducted following the Exploratory Call to provide each individual potential subrecipient specific information needed to meet requirements of the PA Program and to allow the potential subrecipients to identify specific damages to their public infrastructure. The SPAO will ensure that a list of potential projects is left with each potential subrecipient's representative following the Recovery Scoping Meeting. This starts the 60 day period for potential subrecipients to identify and report disaster related damages to the State (recipient) and FEMA and provide documentation to support project formulation.
- F. **Damage Assessment:** Following the conclusion of the Recovery Scoping Meeting, the State (recipient) will participate in the damage assessments with FEMA and local personnel. The date

and time of damage surveys will normally occur immediately following the Recovery Scoping Meeting. However, final coordination shall occur between the SPAO, FEMA PDMG, and the local representative. The SPAO will make the local representative aware of what will be required during the damage assessments, to include the following:

1. List of all identified damages that were a direct result of the declared event
 2. Map or drawings to indicate location of damaged facilities
 3. Supporting documentation for work complete
 4. Estimates for work incomplete or not yet begun
 5. Copies of applicable insurance policies
 6. Copies of applicable codes and standards
 7. Photographs of sites before and after event
 8. Any known environmental or historic issues related to affected sites
- G. Subrecipient Eligibility: The State (recipient) will assist FEMA in screening all potential subrecipients for eligibility first by a review of the submitted RPAs. After the Applicants Briefings and site visits are complete, the joint State (recipient)/FEMA teams will conduct a preliminary eligibility determination based on information gathered during the site visits. This will include verification and support by both FEMA and the State (recipient) that the potential subrecipient is eligible for the PA program. If a difference of opinion arises between the team members, the issue will be brought to the FEMA PDMG and the State PA Branch Chief for review and determination. FEMA makes all final determinations regarding eligibility. Subrecipient eligibility determinations will not be made in the field during the site visits. The FEMA/State teams will visit and gather all of the necessary information for each damaged site shown by potential subrecipients that would normally be necessary to write a PW, regardless of eligibility. Per 44 CFR 206.222, eligible subrecipients under the PA Program are:
1. State agencies, local governments, and governmental entities. The Alaska Rail Road Corporation (ARRC) is a quasi-state agency with profit generating potential. As such, it is and has been an eligible PA subrecipient. The State does not cover ARRC's 25% cost share unless ARRC demonstrates a significant economic impact from the associated disaster.
 2. Federally recognized Indian tribes or authorized tribal organizations and Alaska Native Village organizations. This does not include Alaska Native Corporations, which are owned by private individuals.
 3. Private nonprofit organizations that have an IRS tax exemption certificate and organization charter or by-laws, as outlined in 44 CFR 206.221(f)(1-2). They must also provide an essential governmental-type service to the public. Special utility districts must provide a copy of the legislation that grants the district taxing authority. Eligible private nonprofit organizations must own or operate educational, utility, emergency, medical, custodial care, or other essential governmental service facilities. Other essential governmental service facilities are defined as museums, zoos, community centers, libraries, homeless shelters, senior citizen centers, rehabilitation facilities, shelter workshops, and other facilities which provide a health and safety service of a governmental nature. More information on private nonprofits can be found at 44 CFR 206.221(e) and FEMA's Public Assistance Program and Policy Guide, pp. 15-18.

VII. PUBLIC ASSISTANCE AWARD APPLICATION PROCESS

- A. Recipient Process: The State (recipient) will submit an "Application for Federal Assistance" (SF 424), "Assurances for Non-Construction Programs" (SF 424B), and "Assurances for Construction" Programs (SF 424D) to FEMA in order to receive federal funding. Approved PWs will be the basis for issuing sub-grants to eligible subrecipients in accordance with the cost sharing provisions established in the FEMA-State agreement.
1. Potential subrecipients application Process: In order to receive federal funding, the potential subrecipient will submit an RPA (FEMA Form 90-49) within 30 days of the

declaration date, preferably through the FEMA Grants Portal system. If the potential subrecipient is a private nonprofit (PNP) organization, they will be required to submit a completed PNP Questionnaire (FEMA Form 90-121) in addition to the RPA within 30 days of the declaration date. Potential subrecipients must also complete a Recovery Plan that includes details on the projected completion process for each project. Requests submitted after this 30 day period will be reviewed and, if warranted, forwarded to FEMA for consideration. The State (recipient) may ask FEMA for an extension to the filing deadline.

2. Subrecipient Preliminary Information Package: Once FEMA makes an eligibility determination, the State (recipient) will be responsible for forwarding the appropriate Subrecipient Preliminary Information Package Grant Agreement forms to the potential subrecipient for signature. All applicable forms must be completed and returned to the State (recipient) prior to delivery of the Award document. The Subrecipient Preliminary Information Package includes:
 - Award Information Cover letter
 - Designation of Applicant's Agent (DHS&EM Form 30-5)
 - Recovery Plan template
 - Contract/Procurement information
 - Procurement Method Report (PMR)
 - Non Competitive Single Source Procurement
 - RPA
 - PNP RPA Form
 - PNP Facility Questionnaire

B. PW Preparation

1. Depending on the size and nature of the disaster, the State (recipient) may choose to participate at various levels in the PA process. FEMA's PDMG will have primary responsibility for developing the PWs, but will be completed with State (recipient) and subrecipient assistance at all levels. This will include the SPAO and /or disaster assistance contractors working with the various subrecipients to advise and assist them in providing the information required to operate in the Grants Portal system to complete damage descriptions and satisfy all Essential Elements of information (EEI's). In addition, the SPAO and /or disaster assistance contractors and FEMA PDMG will identify hazard mitigation opportunities and requirements as provided by Section 406 of the Stafford Act. Eligibility determination for 406 Mitigation Projects will be based on the following sources: FEMA Appeals Database, Flood Hazard Mitigation Handbook for Public Facilities, and the PA Program and Policy Guide. The SPAO will take action to ensure 406 Mitigation opportunities are considered for all eligible PW's.
2. All project information required to complete the PWs, Damage Description and Dimensions, Scope of Work, Cost Estimate, insurance information, etc. must be submitted within 30 days of the Recovery Scoping Meeting. Any newly discovered damage not reported at the Recovery Scoping Meeting must be reported to the State (recipient)/FEMA within 60 days of the Recovery Scoping Meeting. If this timeframe cannot be met, the subrecipient should follow the procedures for requesting a time extension. If all project information required to complete the PWs cannot be obtained because of weather or other factors hindering the ability to view the damages and the Recovery Scoping Meeting has already occurred, the new deadline assigned will be 60 days from the date of the actual site visit, pending FEMA approval.
3. If damages are not fully documented within the 60 day deadline and an extension has not been requested by the subrecipient or has been denied, the PW will be written based on information provided from the subrecipient up to that point, or FEMA may utilize the FEMA cost codes/resources, as identified in 2 CFR 200 and 206.228 for estimating repair/replacement costs. Changes requested after this point will be coordinated through

the State (recipient) and forwarded to FEMA for action. If the subrecipient remains dissatisfied with the outcome of these less formal activities to incorporate changes, the subrecipient will be given a standard 60 day appeal option following FEMA's eligibility determination as outlined in the award document.

4. **PW Review:** If Grants Portal processing is not feasible for any particular subrecipient, the State and FEMA will process PW's by hard copy. FEMA will include an eligibility memorandum with any project worksheets containing ineligible damage, work, and/or costs.
5. If there are any areas of disagreement noted, the subrecipient will contact the State (recipient)/FEMA to discuss the specific areas of concern and concurrently make changes to the PW as required. If agreement cannot be reached, the PWs will be entered into EMMIE and the subrecipient will be granted appeal rights once the PW is officially obligated or denied by FEMA.
6. **Disputes/Conflict Resolution:** In order to expedite funding and minimize subrecipient appeals, the following conflict resolution process should be followed:
 - If a Subrecipient Liaison has been assigned, the subrecipient should notify this individual of the unresolved issue.
 - The Subrecipient Liaison should work to resolve the issue with the PA representative. If the issue remains unresolved, the Subrecipient Liaison should notify the SPAO.
 - The SPAO should work to resolve the issue with the PAO.
 - If these steps do not result in resolution, the subrecipient is referred to the appeal process.
7. **Award Package:** After PWs have been written, reviewed, and approved/obligated, the subrecipient will receive an award package that includes the grant awarding document, PW(s), appeal instructions, and the following documents:
 - Award Cover Letter
 - Obligating Award Document (contains required information for sub-recipients and pass-through entities per CFR 200.311)
 - *Grants Portal form Project Report*
 - *FEMA form 09-91 Project Worksheet(s)*
 - Disaster Public Assistance Assurances and Agreements form
 - Disaster Public Assistance General Requirements form
8. **Forms Package:** DHS&EM will also provide to each subrecipient all award processing forms. One set of blank forms will be provided and subrecipients are responsible to safely maintain them so copies can be generated as needed through the PA project process. The Forms Package includes the following documents:
 - DHS&EM Subrecipient Insurance Commitment Form
 - Waiver of Sovereign Immunity (DHS&EM Form 30-62)
 - Indemnity and Hold Harmless Agreement (DHS&EM Form 30-81)
 - DHS&EM Form 30-3 Request for Funds Form
 - Direct Vendor Payment Form (On Behalf Of)
 - DHS&EM Form 30-4 Statement of Documentation
 - DHS&EM Form 30-60 Project Quarterly Report
 - DHS&EM Form 30-80 Certificate of Compliance
 - DHS&EM Form 30-102 Project Final Narrative Form
 - FEMA Form 90-91 Project Worksheet
 - DHS&EM Form 30-72 Force Account Labor Summary Record
 - DHS&EM Form 30-73 Materials Summary Record
 - DHS&EM Form 30-74 Rented Equipment Summary Record
 - DHS&EM Form 30-75 Contract Work Summary Record
 - DHS&EM Form 30-76 Force Account Equipment Summary Record

- FEMA Form 90-128 Applicant's Benefits Calculation Worksheet
 - FEMA Form P.4 Project Completion and Certification Report
9. Eligible PW: The State (recipient) will notify the subrecipient when its project application is prepared and ready for signature.
 10. Ineligible PWs: written notification to the subrecipient of the ineligibility finding with FEMA's justification and the subrecipient's appeal rights.
 11. The varied levels of State (recipient) involvement may include:
 - Assign an SPAO, Specialist(s), and/or Contracted Service Staff to the Joint Field Office (JFO)
 - Assist FEMA and/or the subrecipient in developing scopes of work and cost estimates
 - Notify FEMA of any eligibility questions and/or technical assistance requirements needed to facilitate project approval
 - Provide State (recipient) support as needed, such as engineers for highly technical projects or mediators to resolve disputes
 - Assist FEMA and the subrecipient in identifying hazard mitigation opportunities as provided by Section 406 of the Stafford Act
 - Submit applications and make recommendations to FEMA on project approval
 - Participate in the project validation process
 - Request re-inspections or time extensions for additional significant damage not previously identified within 60 days of an initial subrecipient inspection
 - Facilitate informal resolution of disputes through management oversight by the DAPM
 12. The subrecipient will:
 - Identify all disaster related projects
 - Assist in the preparation of all PWs by effectively utilizing FEMA Grants Portal to engage in development of each PW to ensure damage descriptions, scopes of work, cost estimates, etc. are accurate and complete. Also must be proactive in identifying and correcting all errors and/or discrepancies to DHS&EM staff
 - Address pertinent environmental and historic preservation requirements, insurance coverage, floodplain management issues, and hazard mitigation opportunities
 - Report to State any damage that is not previously identified to the State (recipient) or PDMG within 60 days of the initial Recovery Scoping Meeting
 - Describe the pre-disaster facility, function, and location
 - Describe the repairs necessary to repair facility to its pre-disaster design, function, and capacity
 - Describe any change in the pre-disaster design of the facility that may be necessary
 - Provide a justifiable cost estimate to complete the repairs
 - Apply for and obtain all necessary permits
 - Ensure research is conducted (view and print a screen shot from the federal SAM site <https://www.sam.gov/portal/public/SAM/>) to verify material purchases and contracts are prevented from being awarded to any party that is barred or suspended or is otherwise excluded from participation in federal programs under Executive Order 12549, "Debarment and Suspension." This action must be taken prior to a contract being awarded or material purchase being made and documented on the procurement method report along with the SAM screen shot and provided to SPAO
 - Comply with all local, State (recipient), and federal insurance requirements

VIII. PROJECT FUNDING

- A. Applicants (subrecipients after grant obligation) are briefed of the requirements imposed on them by federal and State (recipient) statutes, such as Allowable Costs, Cash Management, and Reporting throughout the PA Process and acknowledge by signing the Assurances and Agreements form. The subrecipient also receives a copy of this Administrative Plan that outlines those requirements. The responsibility for the cost share requirements outlined in 2 CFR 200.306 shall be stated in the FEMA State Agreement. For the purpose of this plan, the State of Alaska will assume the responsibility for meeting the 25% cost share requirement and the funds will be generated from the State Disaster Relief Fund. The 25% cost share is tracked by disaster and project worksheet number through the state finance system Integrated Resource Information System (IRIS). The cost share for large projects shall be determined from final project costs and will be adjusted at closeout based on actual eligible costs. The exception to this provision concerns ARRC, a for-profit quasi state entity. DHS&EM will render a decision concerning cost share per disaster based on overall economic impact to ARRC, notify the subrecipient, and include a statement in the disaster specific Administrative Plan. Per 2 CFR 200 and 206.205, the State (recipient) contribution to the non-federal share will be paid as specified in the FEMA-State Agreement. The federal payment for small projects shall not be reduced if all of the approved funds are not spent to complete a project.
1. Applicable Cost Principles – For each kind of organization, there is a set of federal principles for determining allowable costs. Allowable costs will be determined in accordance with the cost principles applicable to the organization incurring the costs as follows:
 - State, Local, or Indian Tribal Governments – 2 CFR 200.416
 - Educational Institutions – 2 CFR 200.418.
 2. 2 CFR 200.331 – Requirements for pass-through entities:
 - The State of Alaska shall follow State law and procedures when administering subawards to subrecipients, whether on a cost reimbursement or fixed amount basis. The State will ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification:
 - Federal Award Identification
 - Subrecipient name
 - Subrecipient’s unique entity identifier
 - Federal Award Identification Number (FAIN)
 - Subaward Period of Performance start and end date
 - Amount of Federal Funds Obligated to the subrecipient
 - Total Amount of the Federal Award
 - Federal Award project description
 - Name of the Federal Awarding Agency
 - CFDA Number, name, and dollar amount available
- B. The State (recipient) will manage PA funding (75% fed/25% state) separately by specific disaster. The State (recipient) will allocate and account for funds based on approved and obligated PWs. As PWs are obligated, the State (recipient) will encumber the obligated amount within the state finance system, Integrated Resources Information System (IRIS) throughout the entire disaster. The Division of Administration provides a detailed “Expenditures by Program” report monthly to PA staff for review. The SPAO is responsible to review the report upon receipt checking for anomalies and on a quarterly basis, complete a thorough review, ensuring all programmatic funds are accurately accounted for. Funds are tracked daily within the PA Section by use of detailed disaster status sheets created for each specific disaster.

C. The State (recipient) will disburse funds to the subrecipient after the PWs are obligated, the subrecipient completes the grant agreement between the subrecipient and State (recipient), and they either request an Initial Incentive Payment, Advance, On-Behalf-Of (OBO) payment, Reimbursement or complete the project and submit all required back-up documentation Summary and Closeout forms. The State (recipient) will maintain records of all subrecipient issues across disasters. Subrecipients who are determined to be high risk as described in 2 CFR 200.205 will be monitored at a greater degree than non-high risk subrecipients (see VI section C. Project Performance, (k) Special Sub-grant conditions for high risk subrecipients” and (1) Required Close-Out Documents (iii) high risk subrecipients) and may have payment requests adjusted to limit risk to public funds. After accumulating 12 consecutive months of successful PA financial grant actions, high risk subrecipients may submit a written request to the Disaster Assistance Program Manager to be removed from high risk status. Payments will be made utilizing the following methods:

1. Small Projects – (\$3,300-\$131,099.99) FEMA will adjust this amount annually to reflect changes in the Consumer Price Index for all Urban Consumers and publish it in the Federal Register before October 1. The determination of the threshold that will be used to classify a project is based on the declaration date of the disaster. For 2020, the threshold is \$131,099.99 and is identified in any disaster specific PA Administrative plans required during 2020. Funding for small projects will be based on the PW cost estimate.

- Initial Incentive Payments – Subrecipients may request funds up to the full amount of the federal share for each grant award (75%) as an Initial Incentive Payment. Subrecipients make these payment requests using the standard Request for Funds form. The State (recipient) Public Assistance Officer will review the request and process as deemed reasonable. The subrecipient is responsible for retaining all cost documentation that will be required for any future audits. Subrecipients who are provided the full amount of the federal share for each grant award must complete their Small Projects by the original completion deadlines or they will be required to report on those Initial Incentive Payment funds, return any un-liquidated portions and request a time extension from the State (recipient). If the subrecipient provides inadequate justification for their request and the State (recipient) denies additional time to complete the project(s) the subrecipient will receive funding for eligible costs incurred up to the latest approved completion date. The project scope of work must still be completed in order for the subrecipient to keep any funds provided. Subrecipients who do not complete the project and do not submit the appropriate Summary and Closeout forms will be required to return all funding. Subrecipients who fail to do so will be denied disaster recovery funding in future events equal to the amount owed and will be classified as high risk.
- Final Payments - When the subrecipient has completed work associated with each Small Project, submitted the appropriate Close-Out forms and received a Final Inspection the State (recipient) will issue a final payment to the subrecipient. This payment will be for the remaining 25% of grant funding for the project. When the final payment is made the State (recipient) will consider each Small Project closed.
 - If the subrecipient spends less than the amount estimated on the project worksheet the total payment will not be reduced to match actual costs.
 - If the subrecipient incurs costs significantly greater (\$3300 or more) than the total amount approved for all Small Projects the subrecipient may appeal for additional funding. This opportunity applies only to a Net Cost Overrun when all Small Projects are complete and final costs are known and does not apply to individual projects. Subrecipients must provide a

per Project Worksheet breakdown of all costs for **all** Small projects regardless of whether they all had an overrun or not. This breakdown must include cost Summary forms and all back up to support the costs (invoices, timesheets, equipment logs etc.) and a complete explanation why the costs were necessary to complete the PW scope of work.

2. Large Projects- (\$131,100 and higher) Approved projects estimated to be equal to or greater than the large project threshold amount are considered Large Projects. For Non-High Risk subrecipients funding is based on actual documented costs. However, due to the complexity and nature of most large projects, work typically is not complete at the time FEMA writes the project worksheet. Because of this, many Large Projects initially are approved based on estimated costs. Funds generally are made available to the subrecipient on a progressive payment basis as work is completed (up to 75% of the total PW amount). When all work associated with the project is complete the State (recipient) performs an audit of actual costs and reconciles those costs and documentation against the PW scope of work. Reimbursement is based on actual eligible costs incurred to complete the approved PW scope of work not the PW approved amount. Funds are typically disbursed to subrecipients through several payment methods.

- Advance Payments - Upon submittal of a "Request for Funds" form (DHS&EM Form 30-3) the State (recipient) may advance a subrecipient *up to* 30 % of the total PW cost estimate that must be used within 30 days of receipt.
 - The amount allowed by the SPAO will be determined by the information provided on the "Request for Funds" form, specifically, the type of work that will be completed and the start and end dates identified. Any amount not expended within the 30 day period must be returned to the State (recipient) immediately. Failure to comply with this requirement may jeopardize the subrecipient's grant funds and will require them to report and return interest earned while these funds were on deposit in an interest bearing account.
 - The subrecipient must report on status of advance funds within 30 days of receipt and has up to 60 days to provide the appropriate Summary forms and supporting cost documentation i.e., invoices, timesheets, etc. If the Summary forms and supporting cost documentation is not received within the time limitations the State (recipient) will begin the de-obligation process for remaining funds, collection procedures on advance funds provided and closeout the subrecipient's project file.
 - A subrecipient may request additional advance payment of funds, not to exceed 30%, of the PW total estimate by completing an additional "Request for Funds" form and providing the appropriate Summary forms with all supporting back-up documentation to substantiate expenditures for the previous advance.
 - The total of all advances for any one PW will not exceed the federal share for the grant award (75% of the PW amount).
- Reimbursements - Subrecipients may receive payments for large projects after portions of the work have been completed on a reimbursement basis.
 - For these types of payments subrecipients will be required to submit the following:
 - (a) "Request for Funds" (DHS&EM Form 30-3).
 - (b) All appropriate Summary Forms.
 - (c) Cost back-up documentation to support all claimed costs. The total of all reimbursements prior to Closeout will not exceed 75% of the PW amount unless the GAR approves the waiver to the 75% requirement limitation.
 - Requests for reimbursements are reviewed and approved in five levels:

- (a) The SPAO completes a thorough review to ensure compliance with programmatic and eligibility requirements. All payments will be tracked by the SPAO in order to keep a running total of funds paid per project.
 - (b) The PABC completes a spot check audit to verify the determination.
 - (c) Disaster Grants staff completes a financial review to ensure compliance with OMB requirements.
 - (d) The DAPM then completes a spot check to verify the final determination.
 - (e) The GAR, or alternate, provides final approval prior to payment.
- On Behalf Of (OBO) Payments - Subrecipients may request that some costs incurred for eligible work performed be paid directly to the vendors who provided the goods or services.
 - Subrecipients who request OBO Payments must complete and sign the "Request for OBO Payment" form. The subrecipient must submit original invoice(s) or certified copies of invoice(s) signed by the vendor to support request and all appropriate Summary Forms.
 - Any costs included in the invoice(s) deemed ineligible under the project scope of work will remain the responsibility of the subrecipient for payment.
 - The subrecipient will be required to account for all OBO Payments in addition to other eligible costs they incurred on the appropriate summary forms before final payment is made.
- Expedited Funding – An advance of grant funds by FEMA, for emergency work to assist with payment of emergency work that must be performed immediately. This funding is not available for Accelerated Debris Removal Alternative Procedures. See Chap 3, pp.134 of the PA Program and Policy Guide for further information.
- Final Payments - When the work associated with each PW is completed and the appropriate Summary and Closeout forms are submitted (with supporting cost documentation) the State (recipient) will issue a Final payment. This payment is the remaining balance of grant funding for each project. Once final payment is made the State (recipient) will consider the Large Project financially closed and will submit for FEMA programmatic closure.
 - No Cost Overrun - If during audit, the SPAO determines the actual eligible reimbursement amount is less than the amount claimed by a subrecipient, an amended Statement of Documentation will be completed by the SPAO using the cost estimate found in the PW, the amount being claimed by the subrecipient on the original Statement of Documentation form, and the final eligible costs after the audit is conducted. The amended Statement of Documentation will then be submitted to the subrecipient with information regarding why the reductions were made. The subrecipient can then sign the amended form or submit additional supporting documentation for consideration.
 - Cost Overrun - If the subrecipient discovers a potential cost overrun, it must inform the State (recipient) as soon as that situation is identified. The subrecipient may only seek the additional funding by submitting a Cost Overrun Request. However, these costs must be clearly supported with accurate documentation that directly indicates they were necessary to complete the approved scope of work. Cost Over-runs will be requested and finalized as a separate process prior to project "Close-out"

and the SPAO will provide the subrecipient with updated FEMA Form P.4 Project Completion and Certification Report for signature in order to proceed with any final payment and project close-out.

3. If the subrecipient is a State Agency, funding is provided through a Reimbursable Service Agreement (RSA) contract.
 - Subrecipients covered under an RSA contract must still provide the appropriate Summary and Closeout forms with all backup cost documentation as is required for all “Small” and “Large” Project Worksheets outlined above.
 - The SPAO will review the documentation provided for programmatic eligibility and submit the “Request for Payment” through the levels of review outlined above.
 - Any documentation provided from the subrecipient State agency’s finance section to DHS&EM’s financial support will be reviewed by the SPAO
 - Payments will only be processed after RSA Executes have been entered into the Alaska State Accounting System (AKSAS).
 - If there is a discrepancy between the submitted back-up cost documentation provided by the Programmatic personnel of the State Agency and the financial documentation contained within AKSAS, DHS&EM will notify the programmatic personal of the discrepancy and return the mismatched documentation back to the originator until all errors have been reconciled. There will not be any transfer of funds until all discrepancies have been corrected.
 - If the State (recipient) determines that it is necessary to de-obligate PA grant funds appropriated for a particular subrecipient and project, due to non-compliance with programmatic requirements, it will be accomplished utilizing the De-obligation Checklist. This option will be activated at the discretion of the DHS&EM SDAPM.

IX. PROJECT PERFORMANCE

- A. The State (recipient) will utilize the following procedures when processing requests from subrecipients regarding Improved and Alternate Projects, Appeal Requests and Decisions, Time Extensions, and Cost Overruns.
- B. The State (recipient) through the SPAO will monitor program performance by sub-recipients in the completion of projects to ensure costs are limited to eligible grant performance activities and within grant performance periods. State program, grant and financial staff will monitor and adequately safeguard all assets to ensure they are used solely for authorized purposes.
- C. Improved Projects: When performing restoration work on a damaged facility, a subrecipient may decide to use the opportunity to make improvements to the facility.
 1. A subrecipient may request an improved project for either a small or a large project, but is limited to Category C-G projects only.
 2. All improved projects must be approved by DHS&EM utilizing the Improved Project Checklist prior to starting the improved portion of the proposed work.
 3. Requests for Improved Projects must be submitted to DHS&EM in writing and must contain the following:
 - A reason for requesting the improved project
 - A description of the proposed work
 - A schedule of work
 - A cost estimate
 - Information adequate to establish compliance with special requirements including, but not limited to, floodplain management, environmental assessment, protection of wetlands, endangered species, and insurance

4. The improved facility must have the same function and at least the same capacity as that of the pre-disaster facility.
 5. Exceptions to these requirements are improvements associated with required Codes and Standards as outlined in 44 CFR 206.226 (d).
 6. Once the request is submitted to DHS&EM, the SPAO will review the request to ensure that all required information is contained in the request. If it is determined there is a significant change from the pre-disaster configuration (different location, footprint or size) the State (recipient) will forward the request to FEMA with a recommendation for FEMA review prior to construction to ensure completion of the appropriate environmental and/or historical review. If the request is denied, the SPAO must submit a letter to the subrecipient informing them that their request is denied. This letter should contain information on why it was denied and the appropriate appeal procedures.
 7. Funding for Improved Projects is typically limited to the estimated amount outlined in the original PW (see PA Program and Policy Guide pp. 108).
 8. Requests for Improved Projects will be identified by the SPAO on the Monthly Status Report.
- D. Alternate Projects:** A subrecipient may determine that the public welfare is best served by not restoring a damaged facility or its function to the pre-disaster design. In this event, the subrecipient may use the PA grant for that facility for other capital improvement purposes. See PA Program and Policy Guide pp.109.
1. A subrecipient may request an Alternate Project for either a small or a large project, but is limited to Category C-G projects only.
 2. All alternate projects must be approved by DHS&EM utilizing the Alternate Project Checklist prior to construction.
 3. Requests for Alternate Projects should be submitted to DHS&EM in writing within 12 months following the Recovery-Scoping Meeting and must contain the following:
 - A reason for requesting an alternate project
 - A description of the proposed work
 - A schedule of work
 - A cost estimate
 - Necessary assurances to document compliance with special requirements including, but not limited to, floodplain management, environmental assessment, protection of wetlands, endangered species and insurance
 4. Alternate projects are eligible for 90 % of the approved PW amount (includes State's cost share) for eligible costs associated with repairing the damaged facility to its pre-disaster design, or the actual costs of completing the alternate project, whichever is less. The proposed alternate project may not be located in the regulatory floodway and will have to be insured if located in the 100-year floodplain. Funding may not be used for operating costs or to meet the State (recipient) or local share requirement on other PA projects or projects that utilize other federal grants. In general, they may be used for capital projects such as facilities or equipment. 406 Hazard Mitigation funds cannot be applied to an alternate project. An environmental review will be performed for all alternate projects.
 5. Alternate projects for PNP subrecipients must be for facilities that would be eligible for assistance as outlined in the State PA Plan. Private non-profit facilities are only eligible for 75 % of the approved federal share.
 6. Once the request is submitted to DHS&EM, the SPAO will review the request to ensure that all required information is contained in the request, make a recommendation on behalf of the State (recipient), and forward the request and the State's (recipient) recommendation to FEMA for a decision.
 7. If the request is denied, the SPAO must submit a letter to subrecipient informing them that their request is denied. This letter will contain information on why it was denied and the appropriate appeal procedures.

8. Requests for Alternate Project will be identified by the SPAO on the associated Disaster Status Report.
- E. On January 29, 2013, President Obama signed into law the Sandy Recovery Improvement Act of 2013 (SRIA) (P.L. 113-2). This law amends Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) (Stafford Act). Specifically, the law adds section 428, which authorizes alternative procedures for the PA Program under sections 403(a)(3)(A), 406, 407 and 502(a)(5) of the Stafford Act. It also authorizes FEMA to implement the alternative procedures through a pilot program. The program will remain in place until FEMA promulgates and adopts revised regulations that reflect the program changes the law authorizes.
1. The amended law:
 - Allows for making grants for permanent work projects on the basis of fixed estimates to provide financial incentives and disincentives for the timely or cost-effective completion of work if the State, tribal, or local government, or owner or operator of the private nonprofit facility agrees to be responsible for actual costs that exceed the estimate.
 - Provides an option for State, tribal, or local government, or owner or operator of the private nonprofit facility to receive an in-lieu contribution, without reduction, on the basis of estimates for repair, restoration, reconstruction, or replacement of a public facility and management expenses (i.e., eliminates the penalty for alternate projects under sections 406(c)&(2) of the Stafford Act).
 - Allows for consolidating, as determined by the Administrator, the facilities of a State, tribal, or local government, or owner or operator of the private nonprofit facility as a single project based upon estimates adopted under the procedures.
 - Allows for the Administrator to permit a Recipient or Subrecipient to use all or part of the excess grant funds for cost-effective activities that reduce the risk of future damage, hardship, or suffering from a major disaster and other activities to improve future Public Assistance operations or planning.
 - Requires the Administrator to make available an independent expert panel to validate the estimated eligible cost if requested by a Subrecipient, and where the Administrator or certified cost estimate prepared by the subrecipient's professionally licensed engineers has estimated an eligible federal share for a project of at least \$5 million.
 - Requires the Administrator, at a subrecipient's request, to consider properly conducted and certified cost estimates prepared by professional licensed engineers (mutually agreed upon by the Administrator and the subrecipient).
 2. In accordance with the law, State, Tribal, and local governments and the owners and operators of certain private nonprofit facilities (subrecipients) may participate in the alternative procedures. Participation in the pilot program and use of the alternative procedures for specific sub-grants (or projects) is voluntary. If subrecipients use any alternative procedures, they will sign an acknowledgement regarding these procedures, which FEMA will attach to the sub-grant Application (also known as a PW) for the sub-grants(s) in question.
- F. Requests for Reconsideration/Appeals and Decisions: An eligible subrecipient may appeal any determination made by DHS&EM/FEMA relating to an application for PA. The following conflict resolution process should be followed to expedite funding and minimize subrecipient appeals:
1. The subrecipient will notify the SPAO of the unresolved issues.
 2. The SPAO will attempt to resolve the issue with the subrecipient through an informal basis. If the issues cannot be resolved, a formal request for reconsideration from the

subrecipient should be submitted to the SPAO. This request will be reviewed by the PA Branch Chief and DAPM for potential resolution.

3. The subrecipient is encouraged, but not required, to follow steps 1 and 2 above before filing an appeal with the State (recipient) in accordance with 44 CFR 206.206. The appeal time limits apply even if the informal process is utilized.
4. If the subrecipient decides not to follow the steps above, the subrecipient will need to make a formal appeal in writing through the GAR to the Regional Administrator of FEMA. The GAR will review, evaluate, make additional investigations as necessary, and make a written recommendation on all appeals before submission to FEMA. The following applies:
 - Under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and applicable regulations, the subrecipient is entitled to appeal any eligibility determination. The subrecipient may appeal determinations to the FEMA Region X Regional Administrator pursuant to 44 CFR § 206.206. If the subrecipient elects to file an appeal, the appeal must: (1) contain documented justification supporting the subrecipient's position, (2) specify the monetary figure in dispute, and (3) cite the provisions in federal law, regulation, or policy with which the subrecipient believes the initial action was inconsistent. An appeal must be submitted to the State (recipient) by the subrecipient within 60 days of the subrecipient's receipt of rendered decisions. The Recipient's transmittal of that appeal, with a written recommendation, is required to be submitted to Region X within 60 days of receiving the subrecipient's letter.
 - In accordance with the FEMA Recovery Directorate manual – PA Program Appeal Procedures (Version 2, 9/30/13), Eligibility Determinations. FEMA staff will document all determinations regarding ineligible damage, work, and /or costs using the PA Determination Memorandum. This memorandum will be transmitted by letter to Recipients who in turn are required to transmit to subrecipients within 15 days of the date on FEMA's letter. The recipient is also required to provide proof of the subrecipients receipt of notification to FEMA.
 - Lastly, as FEMA will not accept additional information after issuance of the Regional Administrator's first appeal response, the subrecipient must submit all relevant supporting information with its first appeal.
5. The appeal shall contain documented justification supporting the subrecipient's position, specifying the issue in dispute and the provisions in federal law, regulation, or policy under which the subrecipient believes the initial action was unacceptable.
6. Once the appeal is received by DHS&EM, the SPAO will review the appeal and prepare correspondence for FEMA that includes analysis and a recommendation concerning the subrecipient's request and the basis for the action that resulted in the appeal. The SPAO will also make a recommendation to the GAR/FEMA for the request based on their analysis. The PA Branch Chief and Program Manager will review and provide analysis to the GAR as needed. The GAR will review all of the information provided and any additional information necessary to render a written recommendation to FEMA.
7. Complex appeals may require use of subject matter experts or technical assistance in order to complete a thorough investigation or analysis. DHS&EM will work with subrecipients to facilitate the additional assistance when required.
8. Time limits:
 - The subrecipient must submit their written appeal to DHS&EM within 60 days after receipt of a notice of action that is being appealed in accordance with 44 CFR 206.206.
 - The GAR will review and forward appeals from a subrecipient, with a written recommendation, to the Regional Administrator of FEMA within 60 days.
 - Within 90 days following the receipt of an appeal, the Regional Administrator of FEMA will notify the State (recipient) of the disposition of the appeal.

- If appeals involve highly technical issues, the Regional Administrator of FEMA may, at his or her discretion, submit the appeal to an independent scientific, technical or legal person or group having expertise in the subject matter of the appeal for advice or recommendation. The period for this technical review may not exceed 90 days and may be in addition to the 90-day time limit for the Administrator to render a decision.
- Requests by FEMA for additional information will be made formally with a 30 day response period.
- The disposition of the appeal, as determined by the Regional Administrator of FEMA, is considered the first Appeal. The subrecipient can submit a second appeal following the same procedures with the exception that it should be addressed to the Assistant Administrator of FEMA.
- If the appeal is denied, the SPAO must submit a letter to the subrecipient informing them that their appeal is denied and provide a copy of FEMA Region X's determination and findings. This letter should contain information on why it was denied and the appropriate second appeal procedures.
- If the subrecipient decides to appeal for a second time and that appeal is denied, it will constitute FEMA's final administrative decision in accordance with 44 CFR 206. The SPAO will submit a letter informing the subrecipient of the status of the second appeal, provide them with a copy of FEMA's final decision and notify the subrecipient that it is the final administrative decision.

G. Time Extensions: The State (recipient) may grant time extensions for the completion of approved work associated with all PWs. As the Grantee, the State's expectation is that all projects will be completed within the appropriate programmatic time limits. All time extension requests will be thoroughly reviewed to ensure justification meets established approval requirements.

1. For Debris Removal and Emergency Protective Measures PWs, the State (recipient) may, on a case by case basis, grant up to an additional six months for the completion of work described in the PW. SPAO will complete the Time Extension Checklist and include it with the transmittal.
2. For Permanent Work, the State (recipient) may, on a case by case basis, grant up to an additional 30 months for the completion of work described in the PW. SPAO will complete the Time Extension Checklist and include it with the transmittal.
3. All time extension requests must be submitted to DHS&EM prior to the expiration of any existing deadlines. Extensions will only be considered for extraordinary circumstances that are clearly beyond the control of the subrecipient.
4. Requests by subrecipients for time extensions must include the following:
 - The PW number the time extension is being requested for.
 - The dates and provisions of any previous extensions granted.
 - A detailed justification for the delay and need for more time.
 - A projected completion date.
5. In order for the State (recipient) to consider any time extension request, the subrecipient must be current with all quarterly reports and other project documentation.
6. The SPAO will inform FEMA Region X PA staff of any time extensions approved by the State (recipient).
7. If a subrecipient requests a time extension beyond the State's (recipient) authority, the SPAO may process the extension up to the State's (recipient) limit but must submit the request to FEMA for approval for the remaining time.
 - The Time Extension Request must be submitted by the SPAO to the Regional Administrator.
 - If the State (recipient) supports an extension that goes beyond an overall Disaster time limit, the disaster must be extended first. The SPAO must process a Disaster

Time Extension Request through the SDAPM and the GAR. This request must then be submitted along with an updated SF 424, SF 424 b and SF 424 d to the Regional Administrator.

8. If DHS&EM provides an Initial Incentive Payment to subrecipients for their small project(s), Time Extensions must be approved by the SDAPM.
 9. If a subrecipient is denied a time extension for any reason, the subrecipient may, upon completion of the project, be reimbursed for eligible project costs incurred only up to the latest approved completion date. If the project is not completed, no funding will be provided for the project and the State (recipient) will take appropriate actions to have any funds issued to the subrecipient refunded back to the State (recipient).
 10. If the request is denied, the SPAO must submit a letter to the subrecipient informing them that their request is denied. This letter will contain the reason(s) for denial and appeal procedures.
 11. All project and disaster Time Extensions will be annotated by the SPAO on a Disaster Status Report. The following will provide examples of circumstances that do and do not justify approval from the State (recipient) for requests for a Time Extension:
 - Approval Examples:
 - Delays caused by weather
 - Delays caused by limited construction season
 - Delays caused from limited barge service in a remote community
 - Other extraordinary circumstances clearly beyond the control of the subrecipient
 - Denial Examples:
 - Requests that are not supported by a detailed justification for any delays
 - Requests that are made and past Quarterly reports submitted by the subrecipient that do not show progress being made in a timely manner
 - Requests made that do not include the required information outlined in (d) (iii) above
 - Time Extensions may be denied solely on the basis of late submission
 12. Disaster Time extensions pertain to Period Of Performance (POP) and Liquidation Period extensions.
 - POP extensions are considered when approved work on one or more PW's cannot be completed within the current approved POP for the disaster. The POP includes work associated with recipient Direct Administrative Cost (DAC) PW's. The SPAO must request the extension from FEMA using the justification of the affected PW's. The POP must first be extended before the PW POP can be extended and are handled as separate requests.
 - Liquidation period begins when the POP ends and is for 90 days. This period of time is for the recipient to liquidate all obligations incurred during the POP. Liquidation period extensions may be approved by FEMA under extraordinary circumstances but should be avoided.
 - SPAO's will create disaster POP review reminders that occur at 36 months from disaster declaration or at the halfway point of any FEMA approved disaster extensions. This review is to identify and appropriately act on any issues that pertain to on-schedule project or disaster completion and close-out.
- H. Cost Overruns:** Since the majority of PWs are based on cost estimates, there may be occasions where the subrecipient incurs additional expenses that exceed the cost estimate assigned to the project.

1. Requests for cost overruns will be logged in the Disaster Status Report that will be completed by each SPAO.
2. Large Project Cost Overrun:
 - Subrecipients must monitor their projects and notify the State (recipient) as soon as possible if a cost overrun is anticipated. Unapproved costs may not be reimbursed.
 - Cost overrun requests must be in writing and contain detailed justification for the eligibility for any additional costs in order for the State (recipient) to make its recommendation to FEMA. If the increase is due to additional damage, it will be necessary for the subrecipient to show how that damage is disaster related.
 - The cost overrun request must be reviewed by the SPAO, utilizing the Large Project Cost Overrun checklist and then forwarded to FEMA with a written recommendation that includes copies of supporting documentation submitted by the subrecipient and a copy of the subrecipient's request for a cost overrun approval.
 - To determine eligibility, the SPAO will assist FEMA in working with the subrecipient to identify and request any additional information or documentation that may be required to render a decision.
 - SPAO will keep Disaster Grants Section informed of any major funding changes.
 - If the request is approved and funds are available, FEMA will write an amendment to the PW adjusting the cost estimate to reflect the change.
 - If the request is denied, the SPAO must submit a letter to subrecipient informing them that their request is denied. This letter will contain information on the denial, the amended PW, and the appropriate appeal procedures.
3. Small Project Cost Overrun:
 - Cost overruns for Small Projects are handled differently. The subrecipient may request supplemental funding for a net cost overrun on all small projects by submitting an appeal through the State (recipient) to FEMA.
 - A Cost Overrun Appeal for Small Projects may only be submitted when the total cost of all small projects significantly exceeds (at least \$3000) the total cost approved for all small projects.
 - The appeal must be submitted within 60 days of the completion of the last small project.
 - The appeal must include copies of actual cost documentation for all small projects.
 - The cost overrun appeal must be reviewed by the SPAO, utilizing the Net Small Project Cost Overrun Checklist, and then forwarded to FEMA with a written recommendation. Items that will be included with DHS&EM's written recommendation include copies of cost documentation for all Small Projects, not just the projects with an overrun. Copies of close out forms submitted to date from the subrecipient and a copy of the subrecipient's request for a cost overrun approval.
 - If DHS&EM supports the appeal, the recommendation will include a request for a Net Small Project Cost Overrun PW to be written covering any significant cost overrun amounts.
 - To determine eligibility, the SPAO will assist FEMA in working with the subrecipient to identify and request any additional information or documentation that may be required to render a decision.
 - If the appeal is denied, the SPAO must submit a letter to subrecipient informing them that their request is denied. This letter will contain the reason(s) for denial and appeal procedures.
4. Appeals for Small Project cost over-runs will be logged on the Disaster Status Report by the SPAO.

- I. **Project Tracking:** The SPAO will develop a tracking system to monitor each PW for the disaster. Grant monitoring visits will be conducted at least once annually for all subrecipients with open "Large" projects or when needed to verify performance. At a minimum a Project Status report will be completed by the SPAO and utilized to capture details on the progress of each project, the status of advances, level of completeness and category of work etc. A Quarterly Review will be conducted on each open subrecipient/project to ensure any issues are identified and reported to FEMA. The SPAO will complete on-site inspections for any projects as deemed necessary. The SPAO will also track insurance requirements, de-obligations and any other issues jeopardizing PW funding or completion on the Disaster Status Report. This information will be utilized to assist DHS&EM in the grant project monitoring process.

X. PROJECT REQUIREMENTS

- A. The State (recipient) will utilize the following procedures in regards to: Insurance, Project Tracking, Disposition of High Cost items, High Risk grant conditions, Scope of Work changes, Contract Requirements, Force Account expenses, and Time Limitations.
- B. The State (recipient) shall participate with FEMA during the review of subrecipient insurance coverage. 44 CFR, 206 Subpart I establishes requirements which apply to disaster assistance provided by FEMA prior to approval of a FEMA grant for the repair, restoration, or replacement of an insurable facility or its contents damaged by a major disaster.
 1. Eligible costs shall be reduced by the amount of any insurance recovery actually received or anticipated relating to eligible costs. FEMA will base its determination of eligible costs on whether the insurance settlement is reasonable and proper.
 2. The full coverage available under the standard flood insurance policy from the National Flood Insurance Program (NFIP) will be subtracted from otherwise eligible costs for an insurable facility and its contents within the special flood hazard area. The deductible amount or damages in excess of the NFIP limits or for flood damaged items not covered by standard NFIP policy will be eligible.
 3. If eligible damages are greater than \$5,000, a subrecipient must obtain and maintain insurance to cover the facility for the hazard that caused the loss in the amount of the eligible damage to the facility.
 - If a facility meets the requirements of paragraph 3, DHS&EM will send a letter to the subrecipient through certified mail informing them of the requirement to obtain and maintain insurance on their facility in order to receive grant funding. Enclosed with the letter will be a copy of the Insurance Commitment Certification form.
 - No funds will be made available to the subrecipient on current or future disasters until actual documentation is received which provides information sufficient in detail that insurance has actually been provided for the damaged facility, or extraordinary circumstances prohibit obtaining insurance and appropriate documentation to support this is provided to DHS&EM.
 - A subrecipient is exempt from the insurance purchase requirements for projects where the eligible damage (before any reductions) is less than \$5,000.00 or for facilities that, in the determination of the State Insurance Commissioner, the type and/or extent of insurance being required by FEMA are not reasonable (does not apply to facilities insurable under the NFIP).
 - The subrecipient and facility information will then be entered into the disaster status spreadsheet for future reference.
 - See 44 CFR 206.250-253 or pp. 86 of the Public Assistance Program and Policy Guide for further information and exceptions.

4. Assistance will not be provided under Section 406 of the Stafford Act for any facility for which assistance was provided because of a previous major disaster unless all insurance required by FEMA as a condition of previous assistance has been obtained and maintained.
 5. The State (recipient) will make every reasonable attempt to identify facilities with a current insurance policy in effect at the time of the disaster. This process will be initiated once a facility is identified as being damaged and covered under a disaster declaration. Subrecipients will be required to provide all available insurance information upon request. The State (recipient) will make an initial review of the insurance documents and information gathered and render a preliminary recommendation to FEMA. The State (recipient) will rely on a FEMA Insurance Specialist to make any final determinations on how the insurance may impact project funding. Subrecipients will be required to provide the following items to the State (recipient) as soon as possible:
 - Pertinent insurance information
 - Copy of insurance policy
 - Statement of Loss
 - Information on anticipated insurance proceeds
 - Details on any insurance settlements
 6. Recoupment of Federal Funds: The subrecipient will be notified as soon as possible if an approved PW is totally or partially de-obligated. Reimbursement by the subrecipient to the State (recipient) will be requested once an amended PW de-obligating the approved funding is processed. If the discovery of the overpayment occurs when the disaster is still open and the funds are already drawn down from the federal Payment Management System, DHS&EM would reduce the next drawdown from the federal Payment Management System by the amount overpaid to the subrecipient. If the disaster is closed and DHS&EM discovers an overpayment, the funds will be returned to FEMA via a warrant within 30 days of the discovery.
 7. The State (recipient) will conduct periodic systems reconciliations between programs and finances in the State (recipient) by comparing records found in NEMIS or EMMIE with accounting records of the State (recipient) quarterly.
- C.** Disposition of Equipment, Supplies, and Salvaged Materials: The State (recipient) will track and document any projects that require the purchase of equipment with a value of \$5,000.00 or more. The SPAO will ensure the requirement to purchase the equipment is noted in the PW with language that discusses the various methods such equipment can be accounted for when no longer required for the project. When the project is reported as complete by the subrecipient, the SPAO will request details on the disposition of the equipment and forward it to FEMA to ensure the method is adequately noted and adjustments to funding are made. Subrecipients are responsible to review 2 CFR 200.313 (Equipment) to ensure purchase, use, records, maintenance, and disposition are in accordance with federal requirements.
- D.** A subrecipient may be considered high risk if DHS&EM determines that the subrecipient has a history of unsatisfactory performance, is not financially stable, has not conformed to terms and conditions of previous awards, is non-compliant with single audit requirements, is subject to a federal or State tax lien, or is otherwise not responsible.
1. If DHS&EM determines an award will be made, special conditions and/or restrictions shall correspond to the high-risk condition and shall be included in the award. Special conditions or restrictions may include but are not limited to:
 - Payment on a reimbursement basis only
 - OBO payments only
 - Withholding project funds pending evidence of acceptable project performance
 - Additional project monitoring

- Submission of monthly rather than quarterly reports
 - Requiring the subrecipient to obtain technical or management assistance
 - Periodic on-site project inspections/audits
2. If DHS&EM decides to impose such conditions, written notification to the subrecipient will occur as early as possible with information regarding the nature of the special conditions/restrictions, the reason(s) for imposing them, corrective actions required for removal of restrictions, and the method of requesting reconsideration of the conditions/restrictions imposed.
 3. Failure to accept special conditions may result in project closure and de-obligation of funding.
 4. Decisions to place special conditions on subrecipients can be appealed following the appropriate procedures outlined in this plan.
- E. Change in Scope of Work: During the performance of work on a project, a subrecipient may discover hidden damage or additional work that is necessary to properly complete the project.
1. Changes in the Scope of Work may result in additional environmental/historic preservation compliance reviews and/or new permits.
 2. When the need for a change in scope is discovered, the subrecipient must notify the State (recipient) as soon as possible. Any additional work that is being requested in addition to the original Scope of Work cannot be started until approval is granted by FEMA and included in a revised PW or the subrecipient risks having all associated costs deemed ineligible for reimbursement.
 3. Requests for changes in scope must include a detailed justification for the eligibility of the additional work.
 4. If additional damage to the facility is involved, it will be necessary to show how that damage is disaster related.
 5. The State (recipient) will review the request, utilizing the Change in Scope of Work checklist, and forward the request to FEMA with written recommendation. A copy of the subrecipient's letter requesting the change will be included with DHS&EM's written recommendation/analysis.
- F. Contract Requirements: The State (recipient) will utilize the following procedures with regards to subrecipients who are currently utilizing or planning on utilizing contractors to complete any portions of work outlined in PWs.
1. The SPAO will review the subrecipient's Recovery Plan to verify method of project completion and schedule.
 2. If a subrecipient has already awarded a contract (or intends to) in order to accomplish work outlined in the PW, DHS&EM will require completion of the PMR, a copy of the RFP, contract and bid documents that outline the Scope of Work the contractor is to complete, and a copy of the subrecipient's procurement policy. This is to ensure proper procurement methods were utilized, as outlined in 2 CFR 200.317-326.
 3. If the subrecipient intends to utilize Non-Competitive Proposals as the procurement method, the subrecipient must complete and return to DHS&EM the Sole Source Checklist for approval prior to awarding a contract.
 4. See pp. 30-36 of the PA Program and Policy Guide for information on allowable procurement methods and contract types.
 5. Payment requests will not be processed until the procurement/contract information is received.
- G. Force Account Requirements: The State (recipient) will utilize the following procedures with regards to subrecipients who will complete the scope of work outlined in the PW utilizing Force Account Labor, Equipment, Materials, and/or Rented Equipment.

1. SPAO will review the subrecipient's Recovery Plan to verify method of project completion and schedule.
 2. Subrecipients will be required to report to the State (recipient) project progress on a quarterly basis using the Quarterly Report form and including information on costs, work start and end dates, percentage of work complete, and any known cost under/overruns.
 3. Payment requests will not be processed until the projected construction schedule information is received.
- H. Time Limitations:** Subrecipients must complete approved work within specified time frames from the date a major disaster or emergency is declared in order to remain eligible. Emergency Work must be completed in 6 months and Permanent Work in 18 months.
1. Further Time Limitations: DHS&EM has established various time limits the subrecipient must adhere to during the PA process. These include the following:
 - Request for PA. The subrecipient must file a Request for Public Assistance with the State (recipient) within 30 days from the date of the federal declaration.
 - Identifying Additional Damages. The subrecipient has 60 days from the date of the Recovery Scoping Meeting to notify the State (recipient) of any damages not yet reported.
 - Alternate Projects. All requests for alternate projects should be made within 12 months of the Applicant Briefing and approved by DHS&EM prior to construction.
 - Projects Identified as 100 % Complete. When a PW is identified as 100 % complete, (through subrecipient conversations, Quarterly reports, etc.) the subrecipient has 90 days to submit all appropriate Close-Out documents and cost documents as appropriate for Large and Small Projects. If a PW was 100 % complete prior to the PW being written, the subrecipient has 90 days to submit documentation from the date the Grant Award letter is received. Additionally, the subrecipient must submit a Project Final Narrative (DHS&EM 30-102), a Statement of Documentation (DHS&EM Form 30-4), and a Project Completion and Certification Report (FEMA P.4) certifying that all work has been completed in accordance with funding approvals.
 - Appeals. The subrecipient must file an appeal with DHS&EM within 60 days of receipt of the notice of the action or decision being appealed.
 - Quarterly Reports. Quarterly reports are due 15 days after the quarter ends. Failure to provide quarterly reports may result in funding being withheld or withdrawn.
 - Submission of State (recipient) forms package (subrecipient preliminary information package). The subrecipient must submit all required State (recipient) forms within 30 days of receiving the subrecipient preliminary information package.
 - Time Extensions. If extenuating circumstances or unusual project conditions exist, a time extension may be requested through DHS&EM. DHS&EM has the authority to extend the time frames for completion of debris removal and emergency protective measures by six months and permanent work by 30 months. Requests for time extensions must be submitted to DHS&EM prior to the assigned deadline. Any time extension requests that exceed these amounts will require FEMA approval.
 - Information for PW Formulation. Subrecipients will have 60 days from the Recovery Scoping Meeting to submit all of the necessary information/documentation necessary to complete the PW formulation process.
- I. Project Completion:** DHS&EM will follow the project Close-Out described below:

1. Large Projects. Upon being notified by the subrecipient that a large project is complete, the SPAO will schedule a Final Inspection, if required. Prior to performing the Final Inspection, the SPAO must have all of the following:
 - Statement of Documentation
 - All applicable Summary Forms and back-up cost documentation, including but not limited to:
 - Labor costs and records
 - Fringe Benefits
 - Personnel policies
 - Equipment Salvage values
 - Applicable Equipment Rates
 - Procurement Method Report/Procedures
 - Invoices/Receipts (must include vendor screen shot from the federal SAM site (<https://www.sam.gov/portal/public/SAM/>) to verify vendor is not barred)
 - Copy of RFP(s)
 - Copy of contract(s)
 - Insurance policies and settlements
 - Final Project Narrative
 - Certificate of Compliance
 - Project Completion and Certification (P. 4).
 - The SPAO will audit all cost documentation and complete a Final Inspection Report (DHS&EM 30-7). The SPAO will inspect all aspects of the Scope of Work outlined in the PW and will photograph and verify work completion. If a portion of the Scope of Work has not been completed, the subrecipient must either complete the work or make a request through the State (recipient) to FEMA to have it removed from the PW. This request must include a detailed justification of why the work was not completed.
 - If all work was verified as complete, the SPAO will fill out the Final Inspection Report, process any final payments of eligible costs, and request Project Closeout through FEMA. All payments will be accompanied by payment processing checklist and reviewed by the programmatic Branch Chief and Program Manager. Further review will be conducted by grants administration staff prior to financial processing and payment. This is documented on a “transmittal” form which is dated and initialed by the reviewers.
 - If a large project was 100% complete at the time the PW was prepared, the eligible cost was based on actual cost information, and the subrecipient is not claiming additional funding, an on-site final inspection will not be conducted; however a final inspection report will still be generated noting this information. Subsequently the State (recipient) will complete a Closeout package and submit it to FEMA.
2. Small Projects (Reimbursement Process): Documentation and closeout for these projects may be accomplished by one of several methods.
 - No Cost Overrun: For any/all small project(s) reported complete by subrecipients with no cost overrun being requested, subrecipient will submit close-out forms, payment request and evidence of project completion such as photos that clearly depict the work completed or invoices and certified statements for material only projects. The SPAO will complete a Final Inspection Report or Net Small Project Final Inspection, process any final payments, and close out the PW. If the evidence provided by the subrecipient is insufficient to demonstrate project

completion, the SPAO will conduct an on-site inspection before proceeding with payment or closeout. Documents required for final payment and close out:

- Statement of Documentation
- Payment Request (only if needed)
- Final Project Narrative
- Certificate of Compliance
- Project Completion and Certification (P. 4)
- Evidence of project completion
- Final Inspection Report
- Cost Overrun: In order to request a Cost Overrun for a Small Project(s), a subrecipient must:
 - Complete all their Small Projects
 - Have total actual costs to complete all Small Projects combined that exceed the total approved dollar amount for all the Small Projects by at least \$3,200
 - Submit all cost documentation and appropriate summary forms to support claimed costs
 - Provide a written request for the overrun with analysis supporting how costs were necessary to complete approved PW scope of work
 - Required Close-Out Documents (Cost Overrun):
 - (a) Statement of Documentation
 - (b) Final Project Narrative
 - (c) Certificate of Compliance
 - (d) Project Completion and Certification (P. 4)
 - (e) Evidence of project completion
 - (f) All applicable Summary Forms and back-up cost documentation, including but not limited to:
 - Labor costs and records
 - Fringe Benefits
 - Personnel policies
 - Invoices/Receipts (must include vendor screen shot from the federal SAM site <https://www.sam.gov/portal/public/SAM/> to verify vendor is not debarred)
 - Equipment Salvage values
 - Applicable Equipment Rates
 - Procurement Method Report/Procedures
 - Copy of contract(s)
 - Insurance policies and settlements
- Subrecipient (High Risk): Any subrecipient identified as high risk must follow the Large Project procedures for their Small Projects. Generally, all costs claimed must be accompanied by supporting cost documents, summary forms, payment request forms and closeout documents. Payments will be limited to reimbursements and OBO payments (No Advances or Initial Incentive Payments). These payments will be capped at the federal share (75%) of the approved PW amount until final inspection and closeout. If a portion of the scope of work is not completed, the subrecipient must either complete the work or make a written request through the State (recipient), to FEMA to have it removed from the PW. This request must also include a detailed justification of why the work was not completed. The SPAO will coordinate with subrecipient to schedule a Net Small Project Final Inspection when all small projects are completed.

- The SPAO Final Inspection may be completed by document review and photos if sufficient to demonstrate completion of the scope of work. It may also be completed by site visit if necessary to verify work completion. If a site visit is required, the SPAO should evaluate the option of a “Net” Small Project Inspection when all “Small” projects are complete to conserve travel costs.
 - When all work is verified complete, the SPAO will fill out the Final Inspection Report, process any final payments of eligible costs, and request Project Closeout through FEMA.
3. Recipient:
- Upon completion of both small and large projects, the State (recipient) will send a written “Project Completion and Certification Report, P. 4” to the FEMA Public Assistance Officer. Small Project certifications require that all projects are completed in accordance with FEMA approvals and the State (recipient) and/or subrecipient’s contribution to the non-Federal share, as specified in the FEMA-State Agreement, has been executed. Note: The small project certification is not required to specify the amount spent on projects by subrecipients.
 - Large project certifications require that all reported costs were incurred in the performance of eligible work and that all approved project work was completed in compliance with the provisions of the FEMA State Agreement.
 - Payments for the project were made in accordance with 2 CFR 200.305. Note: An accounting of actual eligible costs for each large project is required at project completion. An accounting of eligible cost means the total amount of actual eligible costs. If actual costs exceed the approved project grant, additional information supporting and explaining the additional claimed costs is required (see cost overruns above).

XI. RECORDS AND REPORTS

- A. SPAOs are responsible for grant and project management of all subrecipients. SPAOs ensure projects are being completed as outlined in the PW’s scope of work, narrative and fiscal reports are timely, and documentation is received for all expenditures. Subrecipients are required to submit quarterly reports to DHS&EM 15 days after the quarter ends. Failure to provide quarterly reports will result in funds being withheld or withdrawn. Large projects are monitored (on-site) and Final Inspections are performed and Final Inspection Reports completed by SPAOs. Subrecipients are responsible to retain all records for three years from the closeout of their last PW. State (recipient) financial status reports are prepared by the finance section and narrative reports are prepared by the SPAO for each open disaster. These reports are submitted to FEMA based on established deadlines.
1. FEMA Quarterly Progress Reports – FEMA will request on a quarterly basis the status of all large projects they have not closed. Reporting should typically begin three months from the date the JFO opened or on a quarterly schedule mutually agreed upon between FEMA and the State (recipient). FEMA Region X Infrastructure will forward the report template to DHS&EM Program Support who will suspense and distribute it to affected sections to meet the reporting deadlines established by FEMA. The DAPM through the SPABC(s) is responsible to ensure assigned data fields are completed accurately and returned to Program Support in order to meet the reporting deadline. The data field “Actual Completion Date” will only be completed when a FEMA Form P.4 Project Completion and Certification Report signed by the subrecipient has been received and verified by the assigned SPAO. The rationale for this procedure is that subrecipients often misunderstand the meaning of the date and report incorrect dates on other subrecipient documents i.e., Quarterly and Project Final narrative reports. The SPAO reviews this information and verifies the proper “Actual Project Completion” date

during the close-out process. The P.4 will be the State's (recipient) validation/certification of the correct date. Columns will also be included on this report titled Alternate and Improved in order to identify projects which fall into these categories. Also, to improve consistency of reporting, the date of the letter to FEMA requesting closure of a project worksheet or subrecipient will be entered on this report as the "State Closed" date.

2. *Quarterly Progress Reports (DHS&EM Form 30-60) will be required for each Project Worksheet, (Large and Small) for each quarter beginning in the quarter an Obligating Award Document (OAD) is provided to the subrecipient. Quarterly reports are due 15 days after the quarter ends on April 15, July 15, October 15 and January 15. Once the quarterly report is received, the SPAO will review it to ensure it is correctly and completely filled out. If any information is missing, the SPAO will contact the subrecipient for revisions. Subrecipients will submit quarterly reports until their project is 100% complete and they submit a closeout package including the Project Final Narrative (DHS&EM Form 30-102). Failure to provide quarterly reports may result in funding being withheld or withdrawn. Requests for advances, payments, time extensions, etc. will not be processed unless all quarterly reports have been submitted. The SPAO will inform all subrecipients that did not submit a quarterly report of the possible effects this may have on their grant and make an additional request for them to submit a report. If the subrecipient continues to not submit a quarterly report, the SPAO will follow the de-obligation procedures.*
3. **Federal Financial Report (FFR) (SF 425) – FFRs are prepared within 30 days after the close of a quarter. The final FFR is due within 90 days after the end of the performance period. When it is anticipated additional time will be required, DHS&EM will make every effort to submit a time extension request 120 days prior to the close of the Period of Performance. The reconciled AFRS reports used to make the federal Payment Management System draws are used in the preparation of the reports. The accountant responsible for that grant prepares the FFR and the report is approved by the GAR/AGAR. The federal portion and any State (recipient) portion of any required match is derived from an AFRS report. The local match, if any, is provided by PWs. If required, an extension is attained via e-mail from the appropriate budget staff person at DHS/FEMA Region X. The State (recipient) shall submit the financial reports to the FEMA regional office 30 days after the end of the first federal quarter following the initial grant award. The State (recipient) will submit financial reports to FEMA at least quarterly. Thereafter, reports are due January 30, April 30, July 30 and October 30. FFRs must permit the tracking of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes. All federally required financial reports are prepared by the Accounts Receivable Staff. The reports are prepared by a Financial Analyst (FA) II or III, and overseen by the FA V who is responsible for that section. The Accounting Manager reviews the reports prior to being signed by the appropriate program staff.**
4. **Federal Cash Transaction Report – The State (recipient) shall submit the Federal Cash Transaction Report (PSC 272) within 30 days following the end of each quarter. A certified copy of the PSC 272 will be faxed to the Division of Payment Management and the FEMA Grant Programs Division**
5. **Subrecipient Closeout – The State (recipient) will close each subrecipient once its Small and Large projects are closed. Small projects will be closed out individually or as a "Net" Small Project Close-Out, in accordance with 44 CFR § 206.205 (a) after the State (recipient) has determined that all work has been completed, all necessary documents have been received, and any appeal for small project overruns has been reconciled. Large projects will be closed out individually in accordance with 44 CFR § 206.205 (b), after the State (recipient) has determined that all work has been completed, all necessary documents have been received, the costs for each individual large project have been reconciled, all project payments have been made, and no further action is pending or**

anticipated (including litigation or lawsuits). The State (recipient) will notify FEMA when all eligible funds have been paid to a subrecipient and request subrecipient closeout.

6. Grant Closeout – After all subrecipients have been closed-out and all eligible Recipient funding has been reconciled (including statutory administrative costs and/or State management costs), the State (recipient) will request that FEMA closeout the PA Program Grant for the disaster.
 - All closeout activities must occur within the approved Grant Performance period as specified on SF424 by the State (recipient) and approved by FEMA.
 - The state will budget sufficient funds for grant close out as needed and be responsible for any costs in excess of the State Management Cost approved amount.
 - Grant Performance periods may be extended upon a written request by the State (recipient) if required and approved by FEMA.
 - Subrecipients must submit all financial and back-up documentation for closeout no later than 90 days prior to the end of the performance period. Any documentation submitted after this period may result in forfeiture of all or part of the specific sub-grant(s).
 - The State (recipient) must submit all Final Financial Reports, records and closeout documentation to FEMA within the Liquidation Period (90 days after the performance period deadline).
7. The closeout of a grant does not affect:
 - The federal agency's right to disallow costs and recover funds on the basis of a later audit or other review
 - The recipient's obligation to return any funds due as a result of later refunds, corrections, or other transactions
 - Records retention as required by 2 CFR 200.333-337
 - Property management requirements in 2 CFR 200.310-316
 - Audit requirements in 2 CFR 200 Subpart F
8. Record Retention – The subrecipient will be required to keep complete records of all work (i.e. receipts, checks, job orders, contracts, equipment usage documentation and payroll information) funded under the PA Program for a minimum of three years. The start date is determined by the date FEMA acknowledges closing the subrecipient for the disaster. During this three-year period, all approved PWs are subject to federal and State (recipient) reviews or audits. DHS&EM will confirm the start date for record retention period to begin by letter to subrecipients. As the recipient, DHS&EM will retain all records obtained during the Grant Management process for three years. Information may be kept in both hard copy and electronic files for each subrecipient. The 3 year retention period begins the date final SF-425 is submitted to FEMA.
9. Real Property and Equipment Reporting – In order to comply with 2 CFR 200.310-316 (Property Standards), DHS&EM will submit SF-429 and SF-428 respectively when required after notification by FEMA Region X's Grants Division. Through PW progress monitoring the state will ensure equipment valued at \$5000 or more is used by the non-Federal entity in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the Federal award, and the non-Federal entity must not encumber the property without prior approval of the Federal awarding agency. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency. When original or replacement equipment acquired under a federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes,

regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows in accordance with Federal awarding agency disposition instructions.

10. Federal Funding Accountability and Transparency Act (FFATA) – This act requires direct recipients of federal non-disaster and disaster grants to report award information about first-tier sub-awards in the amount of \$25,000 or greater made after October 1, 2010. These reports are due by the end of the month following the month in which the sub-award obligation is made. See State of Alaska Standard Operating Procedure same subject effective May 18, 2015.

XII. AUDITS

Audit requirements will be in accordance with 2 CFR 200.501. Recipients and subrecipients that expended \$750,000 or more of federal funds, including State Management Costs (SMC) in a recipient and subrecipient fiscal year are required to have a single audit done for that year. Single audit reports are submitted to the State's single audit coordinator (907-465-4666). The State's single audit coordinator will distribute a copy of the single audit report to each department. The department's single audit representative will notify the division's program managers when subrecipient audits contain adverse findings and reportable conditions. Corrective actions will be required of subrecipients within a six month time frame, or further actions will be taken.

- A. Single audit requirement information is included in the subrecipient grant application and in the Assurance and Agreement document. All subrecipients sign acceptance of these requirements prior to receipt of approved PWs.
- B. Subrecipient grant management deficiencies identified through ongoing DHS&EM subrecipient monitoring will be reported to the subrecipient's signatory official for corrective actions. If deficiencies are not corrected, the GAR will provide formal notification to subrecipient of withdrawal of funding for the project and notification to the State's Single Audit Coordinator for potential further action.
- C. Audit findings issued to the State through a State Legislative Audit or Federal Office of Inspector General Audit will be addressed within six months. The GAR is responsible for ensuring resolution of audit findings and corrective actions to prevent future audit deficiencies.
- D. Financial Management:
 1. The State verifies through www.sam.gov that applicants are not debarred, suspended or otherwise excluded for participation in Federal assistance programs. A screenshot of their Exclusion Summary will be maintained for each Applicant.
 2. State and Federal expenditures and revenues are tracked within the state financial system Integrated Resources Information System (IRIS) using numerous structures. These structures include appropriations, collocation codes, ledger codes and program codes. An appropriation number will be assigned for each disaster for each federal and State program. Each appropriation will receive an authorization for revenue based on the State's finance plan for the disaster. A collocation code is assigned to each type of federal program in each disaster. Each project will be assigned a program code. Program codes for projects will have an encumbrance placed based on the estimated costs of the PW. The encumbrance commits funding from the overall authorization located at the appropriation level. DHS&EM will submit request for payment for each project to the finance section. The finance section will assign the collocation code and program code. After the payment is processed from the encumbrance, a copy of a financial transaction

report will be provided to DHS&EM to ensure payments are made from appropriate program codes and encumbrances. The financial transaction reports are filed within each PW file. Finance section will process and submit drawdown requests to the Division of Treasury after payments are made.

3. Disbursement of funds will be as expeditious as possible to minimize the time between the grant award and actual disbursement. The State prefers to use Electronic Funds Transfers (EFT) whenever feasible to the Sub-recipient. Payments will be made by "Warrant" (check) only upon request by the Sub-recipient.
4. The requirements for the State (recipient) to describe procedures for addressing excess cash not needed for immediate cash disbursement and for immediately returning any federal funds that are in excess to the program needs are not applicable. The State (recipient) only draws down funding when expenditures are incurred. Therefore, there will not be instances where excess cash will be available.
5. The State (recipient) will return any additional federal funds identified after closeout by issuing a warrant from the State (recipient) payable to FEMA as soon as practicable after discovery. The warrant will be supported with a letter explaining the details and reasons for the return of funding.
6. SPAOs are responsible for grant management of all PWs. They ensure projects are being completed as outlined in the scope of work, reports are timely, and documentation is received for all expenditures. Request for reimbursements from subrecipients on a PW are reviewed and approved by three levels: the SPAO, the SPABC, and the SDAPM. The request with full documentation is then audited by the Disaster Accountant in Finance to ensure compliance and then final approval is given by the GAR prior to payment.
7. The State of Alaska will seek reimbursement from FEMA after the payment to the subrecipient is processed. No interest will be remitted to FEMA since the State of Alaska does not request federal funds in advance.
8. Per 2 CFR 200.313 - The real and personal property acquired with the federal grant funds will be maintained on inventory following State or local procurement guidelines to include serial number, property identification tag, location, cost, date and other tracking data. A physical inventory will be conducted annually and reconciled with property records every two years to include after closing of a grant.
9. State or local procurement regulations will be followed when purchasing property, equipment, goods, and services. A purchase order and/or delivery order is issued and must be approved by authorized personnel. For small purchase orders (\$100,000 or less), price quotations will be obtained from an adequate number of qualified sources. Purchases above \$100,000 will be bid competitively.

XIII. PLAN DEVELOPMENT AND MAINTENANCE INSTRUCTIONS

- A. The State (recipient) will annually submit a plan and amendments for each disaster for which PA is included. Revisions will be forwarded to the Regional Administrator of FEMA for approval.
- B. The State (recipient) will amend this plan whenever necessary to reflect current policy guidelines and any new or revised federal statutes or regulations or a material change in any State law, organization, policy, or State agency operation that is relevant to the State's administration of the PA program. The State (recipient) will obtain FEMA approval of the amended plan and its effective date.