

# **STATE OF ALASKA**

## **ADMINISTRATIVE PLAN**

**for**

## **HAZARD MITIGATION GRANT PROGRAM FUNDING**

**(PUBLIC LAW 93-288, SECTION 404)**



**STATE OF ALASKA DEPARTMENT OF MILITARY AND VETERANS AFFAIRS**

**DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT**

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## Table of Contents

1.	PURPOSE .....	3
2.	INTRODUCTION .....	3
3.	AUTHORITY .....	3
3.1.	State .....	3
3.2.	Federal .....	4
4.	DEFINITIONS .....	4
5.	ORGANIZATION AND STAFFING .....	6
6.	RESPONSIBILITIES .....	6
6.1.	State .....	6
6.2.	Local .....	7
7.	DIRECTION AND CONTROL .....	7
7.1.	Notifying Potential Applicants .....	7
7.2.	Applicant’s Agent .....	7
7.3.	Applicant Eligibility .....	8
7.4.	Project Eligibility .....	8
7.5.	Environmental Review .....	9
7.6.	Project Identification .....	9
7.7.	Application Procedures .....	9
7.8.	Project Selection .....	11
7.9.	Project Compliance .....	11
7.10.	Project Management .....	11
7.11.	Technical Assistance .....	13
7.12.	Financial Management (Funding) .....	13
7.13.	Administrative Allowance .....	15
7.14.	Appeals .....	15
7.15.	Records and Reports .....	16
7.16.	Equipment Management .....	18
7.17.	Facilities and Real Property .....	18
7.18.	Close-out Procedures .....	18
7.19.	Audits .....	19
8.	DEVELOPMENT AND MAINTENANCE .....	19
9.	APPENDICES .....	19

## **1. PURPOSE**

- 1.1. The purpose of this plan is to outline the management, fiscal, and administrative procedures the Division of Homeland Security and Emergency Management will follow to implement the provisions of the Robert T. Stafford Act, as amended 42 U.S.C 5121 et seq, September 1998 (Stafford Act) PL 93-288, §404, Hazard Mitigation activities.
- 1.2. This Administrative Plan for Hazard Mitigation Grant Funding will be incorporated into the State's new Emergency Response Plan as a separate annex in accordance with (IAW) 44 CFR § 206.437(c).

## **2. INTRODUCTION**

- 2.1. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended 42 U.S.C 5121 et seq, September 1998 (Stafford Act) established the Hazard Mitigation Grant Program (HMGP). This plan further fulfills the Stafford Act §404, the Disaster Mitigation Act of 2000 (DMA 2000), §201 and §322 (a-d) plan requirements. HMGP identifies pre- and post-disaster hazard mitigation strategies for activities that can be funded under both Pre-Disaster Mitigation (PDM) and Hazard Mitigation Grant Program guidelines. For a project to be eligible, the applicant must demonstrate that the project is cost effective and substantially reduces the risk of future damage, hardship, loss, or suffering resulting from a major disaster.
- 2.2. The Post-Katrina Emergency Management Reform Act of 2006-10-03 Title VI—National Emergency Management Attached to the Department of Homeland Security FY 2007 Appropriations Bill H.R. 5441 reestablished the maximum amount of HMGP funds typically available after a disaster as being 15% of federal disaster recovery costs, for disasters with costs under \$2 billion. Up to 75 percent of the cost of the approved HMGP project shall be covered by federal contributions. The remaining 25 percent of the project's costs shall be covered by state or local matching funds, or contributions from other funding sources IAW the Federal Emergency Management Agency (FEMA) - State Agreement. HMGP funds cannot be used to match other federally funded grants; however specific federal grants, such as Community Development Block Grants (CDBG), may be used as matching funds for HMGP, assuming that the proposed project meets CDBG program eligibility requirements.
- 2.3. FEMA HMGP guidance allows the State to use up to 5% of HMGP to complete discretionary State mitigation activities that may be difficult to evaluate against traditional FEMA program cost-effectiveness criteria. Some examples are warning systems, hazard mapping, Geographic Information System hardware and software, public awareness campaigns, unproved mitigation technologies or products, etc. FEMA Policy Guidance Letter EL-7, 9/19/96.
- 2.4. FEMA HMGP guidance also allows 7% of HMGP funds for developing hazard mitigation plans at the State, local, and tribal levels. 44 CFR § 206.434(d)(1).
- 2.5. Section 404 mitigation funding cannot be used to fund any type of mitigation measure that is eligible under FEMA's Public Assistance (PA) program, Stafford Act §406 mitigation projects, or other Federal programs, though it may be used to complement or enhance other hazard mitigation projects including §406 projects. Section 404 mitigation funds may be combined with other Federal, State, or local private funding sources when appropriate to develop a comprehensive mitigation solution.

## **3. AUTHORITY**

### **3.1. State**

- 3.1.1. Alaska Disaster Act A.S. 26.23.010 – A.S. 26.23.220, A.S. 26.23.300
- 3.1.2. Any Executive Order of the Governor
- 3.1.3. Administrative Order 175
- 3.1.4. State of Alaska Hazard Mitigation Plan
- 3.1.5. FEMA/State Agreement

### 3.1.6. State Emergency Operations Plan

## 3.2. Federal

- 3.2.1. Robert T. Stafford Disaster Relief and Emergency Assistance Act §404 (Public Law 93-288, as amended) and the Disaster Mitigation Act of 2000; §322
- 3.2.2. Disaster Assistance; Hazard Mitigation & Relocation Assistance Act (Public Law 103-181)
- 3.2.3. Public Law 93-234, Flood Disaster Protection Act
- 3.2.4. Executive Order 12612, Federalism
- 3.2.5. Executive Order 11988, Floodplain Management.
- 3.2.6. Executive Order 11990, Protection of Wetlands
- 3.2.7. FEMA Regulations, 44 CFR § 206, Subparts M and N
- 3.2.8. Executive Order 12699, Seismic Safety
- 3.2.9. Executive Order 12898, Environmental Justice
- 3.2.10. National Environmental Policy Act (NEPA)
- 3.2.11. National Historic Preservation Act (NHPA)
- 3.2.12. OMB Circulars, A-21, A-87, A-94, A-102, A-110, A-122 and A-133
- 3.2.13. FEMA/State Agreement
- 3.2.14. FEMA document “Hazard Mitigation Grant Program Guidelines for Acquisition and Relocation Projects”
- 3.2.15. Interagency Hazard Mitigation Team Agreements
- 3.2.16. FEMA Regulation, 44 CFR § 13, Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments

## 4. DEFINITIONS

- 4.1. AKSAS: Alaska State Accounting System.
- 4.2. Alternate GAR: Alternate Governor’s Authorized Representatives (AGARs): Performs as the Alternate Governor’s Authorized Representative (GAR) to represent the Governor in all activities related to implementing Public Law 93-288 as amended and serves as the alternate grant administrator for all funds provided under the Hazard Mitigation Grant Program when the GAR is not available. The AGARs performs all duties and assumes all responsibilities of the GAR when the GAR is not available. These duties include providing technical advice and assistance to eligible subgrantees, ensuring that all potential applicants are aware of assistance available, and submitting those documents necessary for grant award.
- 4.3. Applicant: Any State agency, local government, eligible tribal or native government/organization, or eligible non-profit organization submitting an application for assistance under the Hazard Mitigation Grant Program. An applicant is also referred to as a subgrantee.
- 4.4. Application: The initial request for HMGP funding, as outlined in §206.436 of 44 CFR.
- 4.5. Disaster Policy Cabinet (DPC): The DPC is chaired by the DMVA Commissioner or his designated representative and comprises commissioners of select agencies to provide recommendations to the Governor concerning disaster related matters. The role of the DPC includes approving requests for mitigation project funding and State-funded long-term recovery projects as well as supporting the State’s commitment to disaster relief fund efforts.
- 4.6. Division of Homeland Security and Emergency Management (DHS&EM): The agency responsible for implementing the Hazard Mitigation Grant Program for the Governor.

- 4.7. Federal Hazard Mitigation Officer (FHMO): The FEMA employee responsible for coordinating post disaster hazard mitigation activities with other government agencies at all levels.
- 4.8. FEMA/State Agreement: A formal legal document stating the understandings, commitments, and binding conditions for assistance applicable as a result of a disaster declared by the President.
- 4.9. Grant: An award of financial assistance. The Federal share of HMGP equals 15% of the total cost of disaster assistance outlays for disasters with costs under \$2 billion.
- 4.10. Grantee: The entity to whom a grant is awarded and which is accountable for expending the funds provided. The Grantee is the entire legal entity, even if only a particular component of the entity is designated in the grant award document. For the purposes of this plan, except as noted in §206.435 of 44 CFR, the State is the grantee.
- 4.11. Governor's Authorized Representative (GAR): Represents the Governor in all activities related to implementing Public Law 93-288 as amended and serves as the grant administrator for all funds provided under the Hazard Mitigation Grant Program. The GAR's responsibilities include providing technical advice and assistance to eligible subgrantees, ensuring that all potential applicants are aware of assistance available, and submitting those documents necessary for grant award.
- 4.12. Hazard Mitigation: Any cost-effective measure that will reduce the potential for damage from a natural disaster event, or any action taken to reduce or eliminate the risk to life and property from a disaster.
- 4.13. Hazard Mitigation Plan: Section 322 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act as amended by §104 of the Disaster Mitigation Act of 2000 requires a State Hazard Mitigation Plan as a condition of receiving disaster assistance funds, excluding assistance provided pursuant to emergency provisions. To obtain Federal assistance each State, local, and tribal government must prepare a hazard mitigation plan with sections that include: a description of the planning process; an assessment of natural hazard risks; a description and analysis of hazard management policies, programs, and capabilities; a list of mitigation goals, objectives, and strategies to reduce or eliminate vulnerability; and a method to implement, monitor, evaluate, maintain, and update the mitigation plan.
- 4.14. Hazard Mitigation Grant Program (HMGP): The program authorized under §404 of the Stafford Act, which provides funding for certain mitigation measures identified through the evaluation of hazards conducted under §409 (Section 322 of the Disaster Mitigation Act of 2000 when guidelines are adopted).
- 4.15. In Accordance With (IAW): An acronym used throughout the document to show compliance to a referenced authority.
- 4.16. Local/Tribal Mitigation Plan: The plan required from local and tribal governments as a condition of receiving a project grant under the Hazard Mitigation Grant Program.
- 4.17. Preliminary Damage Assessment (PDA): A survey to determine the magnitude and impact of damage caused by a disaster. The PDA is the basis for estimating total disaster related damage and evaluating the need to request a Presidential disaster declaration. The PDA is generally conducted jointly with FEMA, DHS&EM, and technical representatives from appropriate State agencies. The team also identifies immediate mitigation opportunities and issues to be addressed.
- 4.18. Project: Any mitigation measure, project, or action proposed to reduce risk of future damage, hardship, loss, or suffering from disasters. The term "project" is used interchangeably with the term "measure."
- 4.19. Private Non Profit Organizations (PnP): Any non government agency or entity that currently has: 1) an effective ruling from the Internal Revenue Service granting tax exemptions under section 501 (c), (d), or (e) or the Internal Revenue Code of 1954; and 2) Articles of Incorporation and by-laws filed with the State of Alaska.

- 4.20. National Flood Insurance Reform Act and Disaster Assistance (NFIRDA): Requires recipients for Federal Disaster Assistance for flood damage to real and or personal property to purchase and maintain flood insurance coverage if they want to remain eligible for federal flood disaster assistance.
- 4.21. Regional Director (RD): The representative from FEMA Region X who is responsible for approving the State Hazard Mitigation Plan and the State's Administrative Plan for implementing the HMGP.
- 4.22. Standard State Hazard Mitigation Plan (SHMP): Must be approved by FEMA in order for States to be eligible to receive Stafford Act assistance, excluding emergency assistance. HMGP funding is based on fifteen percent (15%) of the total estimated eligible Federal disaster assistance, for disasters with recovery costs under \$2 billion. This plan demonstrates the State's goals, priorities, and commitment to reduce risks from natural hazards and serves as a guide for State and local decision makers as they commit resources to reducing the devastating effects of natural hazards.
- 4.23. State Hazard Mitigation Officer (SHMO): The representative of State government who is the primary point of contact in planning and implementing pre- and post-disaster mitigation programs and activities required under the Stafford Act.
- 4.24. State Hazard Mitigation Advisory Committee (SHMAC): A team of personnel comprised of appropriate DHS&EM staff and technical experts from other State, local, tribal, and federal agencies, all with decision making authority or contact with their agency decision makers. The SHMAC is chaired by the SHMO. The purpose of the SHMAC is to review, prioritize, and recommend selection of HMGP projects submitted by eligible applicants. Committee members will also assist with developing and reviewing the State Hazard Mitigation Plan and provide consultation on State level mitigation activities.
- 4.25. Subgrant: An award of financial assistance under a grant by the grantee to an eligible subgrantee.
- 4.26. Subgrantee: The government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided. Subgrantees can be a State agency, local government, private non-profit organization, Alaska Native village, or organization (not Alaska Native corporations with ownership vested in private individuals) as outlined in § 206.434 of 44 CFR.
- 4.27. Supplement: An amendment to the hazard mitigation application to add or modify one or more mitigation measures.

## **5. ORGANIZATION AND STAFFING**

- 5.1. The organizational structure for administrating the HMGP will be flexible and capable of expansion and contraction as the need dictates depending on the severity of the disaster.
- 5.2. The SHMO shall submit a staffing plan for the JFO within five (5) days of the opening of the office (IAW 44 CFR, § 206.437). If no initial staffing plan is submitted within the first 5 days, it is assumed that the initial staffing plan consists of the GAR and the SHMO. The staffing plan for this disaster is included as [\(Appendix 9.1\)](#).

## **6. RESPONSIBILITIES**

### **6.1. State**

- 6.1.1. The Division of Homeland Security and Emergency Management (DHS&EM) is the State agency responsible for administering §404 HMGP and §406 PA mitigation as defined in this plan. All applications for §404 funding will be processed through DHS&EM.
- 6.1.2. The State Hazard Mitigation Officer (SHMO), a member of the DHS&EM Staff, is defined in this plan as the person responsible for all emergency management mitigation activities for the State and pursues compliance with Stafford Act §322 as amended by §104 DMA 2000 planning requirements.

- 6.1.3. For each Presidential Disaster Declaration where Alaska has an existing applicable Hazard Mitigation Plan, the plan will be reviewed and revised as a means of validating earlier concerns and priorities, or to update the existing plans to reflect changes that have resulted from the current disaster or in mitigation technologies, strategies, or policies.
- 6.1.4. DHS&EM Hazard Mitigation Section personnel will work with PDA teams on tasks requiring special expertise or knowledge concerning §322, §404 and/or §406 activities as well as other State hazard mitigation programs. The SHMO may request personnel from other State agencies, per Alaska Statute 26.23.010, to augment the PDA teams.
- 6.1.5. DHS&EM will submit the State's HMGP application IAW 44CFR § 206.436 as well as all local HMGP applications and funding requests for the purpose of identifying new projects to the FEMA Region X Director within 12 months of the date of disaster declaration.

## **6.2. Local**

- 6.2.1. The Chief Executive Officer or Senior Elected Official of an organization or governmental entity who qualifies for public assistance and possible mitigation grants will approve an individual to represent that entity in all §404 and §322 matters.
- 6.2.2. Applicants are responsible to ensure a signed grant award is established prior to the start of any work or expenditure of funds unless specified in the application and obligating award document. Work started or funds expended outside the signed grant award performance period may be determined ineligible and the responsibility of the Applicant.

## **7. DIRECTION AND CONTROL**

### **7.1. Notifying Potential Applicants:**

- 7.1.1. The SHMO, in cooperation with the State Public Assistance Officer (SPA), Federal Public Assistance Officers (FPAO), and the FHMO will issue a statement on the availability of HMGP funding and will establish a State mitigation program point of contact during the Public Assistance (PA) Applicant's Briefing.
- 7.1.2. Potential applicants will be identified through a joint PDA and applicant briefings conducted with the PA and/or IA programs, through media and public information channels, or other methods determined appropriate by the State. Applicant eligibility, as described below, may be determined during these briefings.
- 7.1.3. At the discretion of the SHMO and FHMO, the Federal Public Information Officer (FPIO) will distribute a joint State/FEMA media release describing the program. The media release will include Federal and State points of contact and information regarding any scheduled HMGP briefings.
- 7.1.4. The SHMO, FHMO, SPA, and FPAO, or their representatives, will announce, advertise, and conduct HMGP applicant briefings as needed in areas convenient to potential applicants. The briefings will include: a description of the program, the mitigation priorities for the current disaster, application information and forms, an explanation of the submittal-review-award process and schedule, and a point-of-contact for additional information and assistance.
- 7.1.5. Potential applicants not previously notified during Preliminary Damage Assessment Briefings or Applicant Briefings will be advised of application prospects and procedures using the internet, email messages, or by letter.
- 7.1.6. Applicants will be notified of any eligibility or non-eligibility determinations made by FEMA or DHS&EM in writing.

### **7.2. Applicant's Agent:**

7.2.1. An applicant's Chief Elected Official is required to designate an agent who will be the applicant's point of contact for all matters pertaining to its application for Federal assistance (DHS&EM Form 30-5). If no agent is appointed, the Chief Elected Official of the eligible organization will be designated as the applicant's agent.

7.3. Applicant Eligibility:

7.3.1. The following are eligible to apply for §404 Hazard Mitigation Grant Program funds:

7.3.1.1. State and local governments.

7.3.1.2. Private non-profit (PNP) organizations or institutions that own or operate a non-profit facility as defined in 44 CFR § 206.221 (e).

7.3.1.3. Alaska Native Villages or organizations, but not Alaska Native Corporations with ownership vested in private individuals.

7.3.2. DHS&EM does not differentiate on the ground of race, color, or national origin.

7.4. Project Eligibility:

7.4.1. Project eligibility criteria are addressed in the Division of Homeland Security and Emergency Management's Hazard Mitigation Grant Program applications ([Appendix 9.2 and 9.3](#)). Eligible activities include:

7.4.1.1. Local All-Hazard Mitigation Plan Development.

7.4.1.2. State Management Costs are eligible under 44 CFR, § 206.439(b)(2), 72 FR 57869 . Costs of State personnel (regular time only) assigned to administer HMGP in the Joint Field Office (JFO) may be eligible when approved by the FEMA Regional Director (RD). The request for funding State Management Costs will be included in the FEMA / State Agreement. The State shall submit a staffing plan for the JFO within five (5) days of the opening of the office IAW 44 CFR, § 206.437 and 206.439(b)(2) Management Costs are subtracted from the HMGP aggregate total.

7.4.1.3. After the close of the JFO, costs of State personnel (regular time salaries only) for continuing management of the HM grants may be eligible when approved in advance by the RD.

7.4.1.4. Those projects that conform to the State Hazard Mitigation Plan and the applicant's Local All-Hazard Mitigation Plan if applicable.

7.4.1.5. Those that have a direct beneficial impact upon the designated disaster area, whether or not the project is located in the designated area, IAW 44 CFR § 206.434 (b)(2).

7.4.1.6. Projects that conform to 44 CFR § 9, Flood Plain Management and Protection of Wetlands; and 44 CFR § 10, Environmental Considerations. FEMA and State floodplain and environmental program managers will review these projects as applicable.

7.4.1.7. Projects that solve a problem independently or constitute a functional portion of a solution if there is assurance that the project as a whole will be completed.

7.4.1.8. Projects that are cost effective and substantially reduce the risk of future damage, i.e.:

7.4.1.8.1. they address a problem that has been repetitive or that pose a significant risk if left unsolved;

7.4.1.8.2. the value of future damage reduction exceeds the cost of the project;

7.4.1.8.3. assurance that the entire project will be completed.

7.4.1.9. Projects that provide the most practical, effective, and environmentally sound solution after considering a range of options for mitigation.

7.4.1.10. Projects that contribute to a long-term solution that integrates hazard mitigation principles with existing programs and overall community planning.

7.4.1.11. Projects that consider the long-term effects of the areas and entities they protect and also feature manageable future maintenance and modification requirements.

7.4.2. Projects involving any facility for which assistance was provided as a result of a previous major disaster will only be eligible if all insurance required by FEMA as a condition of previous assistance has been obtained and maintained. 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.

#### 7.5. Environmental Review:

7.5.1. Applicants must indicate any potential environmental issues needing consideration on their Project Applications.

7.5.2. DHS&EM does not have the capability to perform National Environmental Policy Agency (NEPA) level reviews. FEMA Region X will conduct the required Federal environmental reviews. Therefore, no project shall commence prior to this review and appropriate approval(s). All projects considered for funding under the HMGP must meet minimum NEPA requirements, which are included in the HMGP Project Application. The applicant is encouraged to work with the SHMO and the FEMA Regional Environmental Officer to obtain and provide a reasonable level of environmental detail that is dependent on the type and location of the proposed mitigation project.

7.5.3. FEMA is responsible for making the final NEPA determination and approval recommendation for all projects, IAW Federal Guidelines. Projects may receive conditional approval. DHS&EM is responsible for ensuring that these conditions, if applicable, are met. Documentation to prove these conditions were met may be required before the project will be closed.

7.5.4. FEMA will determine reasonable timeframes for conducting NEPA reviews. Turn-around time for a NEPA review is based on project complexity, project scope, existing workloads, local capacity, or other priorities. FEMA will ensure that reviews are conducted in the shortest time possible. This will likely be done on a project-by-project basis.

#### 7.6. Project Identification:

7.6.1. Preliminary Damage Assessment (PDA) Teams will include the SHMO when possible, or be briefed by the SHMO to identify potential mitigation projects prior to an official Presidential Disaster Declaration. The SHMO will review PDA Team reports to closely scrutinize them for possible §404 and §406 mitigation opportunities.

7.6.2. The SHMO will review the State Hazard Mitigation Plan (SHMP) to identify potential projects that may qualify for mitigation grant funds.

7.6.3. The Public Assistance Damage Assessment Teams (PADAT) will be briefed to consider potential mitigation projects and include them in their Project Worksheets as §406 mitigation projects. The worksheets will be reviewed by the SHMO for additional §404 and §406 potential.

7.6.4. The SHMO will review the PADAT reports and recommend identifying potential mitigation grant projects to include FMA, PDM, or Forestry mitigation grants.

#### 7.7. Application Procedures:

- 7.7.1. A “Statement of Intent” to participate in HMGP will be forwarded to FEMA by the GAR within 60 days of the disaster declaration date. If an extension is needed, it will be coordinated with FEMA Region X prior to the 60-day deadline. The request for an extension will include a new timeline.
- 7.7.2. The SHMO is responsible for ensuring that all Hazard Mitigation Grant Program applications are submitted prior to DPC review and that the Hazard Mitigation Grant Program applications are finalized prior to submission to FEMA. The SHMO will assist applicants with developing projects and completing comprehensive applications during community visits and hazard area inspections as needed. The SHMO, SCO, or GAR may request FEMA provide a Mitigation Technical Assistance Team to assist with soliciting and preparing HMGP applications and completing Benefit Cost Analyses (BCA) of the projects.
- 7.7.3. Comprehensive “PROJECT” and “PLANNING” applications are included as [\(Appendix 9.2 and 9.3\)](#) of this Administrative Plan. The appropriate application must be completed for each proposed activity prior to the SHMO submitting them to the DPC. The DPC will validate and finalize the priority of activities for the Governor’s approval. The completed applications will be submitted to FEMA for funding upon approval by the Governor. The applications include, but are not limited to:
- 7.7.3.1. Eligibility Criteria: Does the project meet the criteria for funding by the HMGP?
  - 7.7.3.2. State Mitigation Goals: Does the project meet the goals outlined in the State Hazard Mitigation Plan?
  - 7.7.3.3. Signature of Authorized Agent: Subgrantee (1) agrees to commit its jurisdiction to completing the project and (2) verifies they have their cost - share of funds required (if applicable).
  - 7.7.3.4. Applicant Data:
  - 7.7.3.5. Historical Damage Information:
  - 7.7.3.6. Cost Estimates:
  - 7.7.3.7. Primary Project Scope of Work:
  - 7.7.3.8. Alternative Project Descriptions:
  - 7.7.3.9. Project Eligibility Issues:
  - 7.7.3.10. Environmental Information: This section includes information consistent with 44 CFR § 9, Floodplain Management and Protection of Wetlands, and 44 CFR § 10, Environmental Considerations.
  - 7.7.3.11. Required Information for the Project: i.e. Maps, sketches, detailed drawings, descriptions etc.
  - 7.7.3.12. Checklist of Attachments: The attachments are used to further explain complex issues and concerns. The SHMO or FEMA Regional Technical Assistance Team will evaluate each application and determine additional attachments that are required.
  - 7.7.3.13. Maintenance Agreement:
  - 7.7.3.14. Work Schedules and Timelines:
- 7.7.4. The SHMO will convene and chair the SHMAC when DHS&EM receives the 180-day lock-in for the disaster. The committee is comprised of appropriate DHS&EM staff and technical experts from

other State or Federal agencies. They will review all HMGP activity submittals for eligibility and completeness. Based on the committee's prioritized recommendations, the SHMO will make any final adjustments before presenting them to the Governor's DPC for approval, refining priority, or further guidance.

7.7.5. The SHMO will identify potential Fast Track projects and present them to the DPC for consideration. The DPC determines each project's priority and has final approval authority. The DPC may circumvent the normal project selection process by choosing to "fast track" projects when determined to be in the State's best interest.

7.7.6. Applicants are required to have a FEMA approved, locally adopted Local All-Hazard Mitigation Plan to comply with Disaster Mitigation Act of 2000 § 322 and 44 CFR §201.6(a) criteria as a condition of applying for mitigation grant assistance. Local communities without a FEMA approved and locally adopted plan may only apply for planning project assistance. Each local plan must complement the State Hazard Mitigation Plan, include Hazard Vulnerability Analyses and Risk Assessments, document community involvement, be adopted by the community or tribal government, and be approved by FEMA. Eligible private non-profits (PNPs) must participate with the State to identify potential hazards, to analyze the vulnerability, to assess the risk threatening their population and infrastructure, and to develop mitigation measures and strategies to reduce the threat from these hazards. This can be accomplished within the local government's mitigation plan where the PNP is located, or if more appropriate, through creating an annex to the State Mitigation Plan. PNPs must coordinate with the local jurisdictions in which PNP infrastructure is located, regardless of the jurisdiction having a FEMA approved all-hazard local mitigation plan. DHS&EM Mitigation Section Staff will provide technical assistance as needed.

#### 7.8. Project Selection:

7.8.1. The SHMO will convene a board of SHMAC members to evaluate and prioritize all eligible HMGP project submittals because funding is typically insufficient to select all valid HMGP projects. Regardless of funding availability, projects will be ranked according to the criteria set forth in 44 CFR § 206.425 (b) as follows:

7.8.2. Measures that, if not taken, will have a detrimental impact on the applicant, such as potential loss of life, loss of essential services, damage to critical facilities, or economic hardships on the community;

7.8.3. Projects for developing local all-hazard mitigation plans to comply with DMA 2000 initiatives. If a community does not have a community adopted FEMA approved plan, they will not be eligible for HMGP funding;

7.8.4. Measures that best fit the State Hazard Mitigation Plan and an overall plan for development and / or hazard mitigation in the community, disaster area, or State;

7.8.5. Measures that have the greatest potential impact on reducing future disaster losses;

7.8.6. Measures that are designed to accomplish multiple objectives, including damage reduction, environmental enhancement, and economic recovery.

#### 7.9. Project Compliance:

7.9.1. The SHMO will also consider the level of interest and demonstrated degree of commitment on the part of each applicant. Applicants with a poor history of compliance or success will be closely monitored during the construction phase of the project. The SHMAC will also review, prioritize, and recommend selection of HMGP projects submitted by eligible applicants. Additionally, a project manager or contractor may be a requirement as a condition of the HMGP Grant Award.

#### 7.10. Project Management:

- 7.10.1. DHS&EM has primary responsibility for project management and accountability of funds as prescribed in 44 CFR § 13 and in the funding section below. The GAR is responsible for ensuring that the subgrantees meet all program and administrative requirements.
- 7.10.2. DHS&EM may place special conditions or restrictions on grants to “high risk” subgrantees, as defined in 44 CFR § 13.12. DHS&EM will notify the subgrantee subject to these conditions in writing of the nature of the conditions, the reason(s) for imposing them, what action must be taken before the conditions will be removed, and the time period in which this must be accomplished, and the method of requesting reconsideration of the conditions.
- 7.10.3. The SHMO reviews and approves all requests for reimbursement and advances from applicants before forwarding them to the Division of Administrative Services (DAS) financial management staff for audit to prevent duplication of payment and to ensure payment eligibility. Any questions regarding eligibility or duplication of payment are returned to the SHMO for clarification. Final approval for payment is made by the GAR. DAS financial management staff then processes payment, disburses funding, and returns the request for payment and financial transaction reports (showing payment processed) to the SHMO. The DAS financial management staff conducts a periodic reconciliation of AKSAS with FEMA’s disaster management system, NEMIS.
- 7.10.4. The subgrantee shall submit a Project Quarterly Report (DHS&EM Form 30-60) ([Subgrantee’s Handbook, Attachment 2](#)) to the GAR indicating the status and projected completion date for the project. Any problems affecting the completion date, scope of work, or project cost which could result in noncompliance with the approved grant conditions will also be included in the report.
- 7.10.5. The SHMO shall submit a quarterly progress report to FEMA indicating the status and projected completion date for each measure funded. Any problems affecting the completion date, scope of work, or project costs which could result in noncompliance with the approved grant conditions will also be included in the report.
- 7.10.6. Subgrantees normally have up to twenty-four (24) months from the activity approval and funding date to complete the project, or twelve (12) months for a plan. DHS&EM and FEMA Region X must approve any deviation from this schedule.
- 7.10.7. The subgrantee will submit project cost overruns, with complete justification, to the GAR for approval. Cost overruns which can be met without additional federal funds, or which can be met by offsetting cost underruns on other projects, need not be submitted to the FEMA Regional Director for approval, so long as the full scope of work on all affected projects can still be met. For cost overruns which exceed federal obligated funds and which require additional federal funds, the GAR shall evaluate each cost overrun and shall submit a request with a recommendation to the Regional Director for a determination. The applicant’s justification for additional funding and other pertinent material shall accompany the request. The Regional Director shall notify the GAR in writing of the determination and process a supplement, if necessary. In no case will the federal cost for HMGP exceed either the 75% federal share or fifteen percent (15%) of the estimated aggregate amount of grants identified in the Stafford Act and section 2.2.2 of this document.
- 7.10.8. Payment to the State for claims under § 404 will be as provided in 44 CFR § 206.438(d).
- 7.10.9. If any provision under this Grant Agreement or its application to any person or circumstances is held invalid by any court of rightful jurisdiction, this invalidity does not affect other provisions of the Grant Agreement which can be given effect without the invalid provision.
- 7.10.10. While DHS&EM undertakes to assist the applicant with the project by providing grant funds pursuant to this Grant Agreement, the project itself remains the sole responsibility of the applicant. DHS&EM undertakes no responsibility to the applicant, or to any third party, other than as is expressly set out in this Grant Agreement. The responsibility for the design, development, construction, implementation, operation and maintenance of the project, as those phases are

applicable to this project, is solely that of the applicant, as is responsibility for any claim or suit of any nature by any third party related in any way to the project.

7.10.11. The applicant shall defend at its own cost any and all claims or suits at law or in equity which may be brought against the applicant in connection with the project. The applicant shall not look to DHS&EM, or state or federal agency, or to any of their employees or agents, for any performance, assistance, or any payment or indemnity, including but not limited to cost of defense and/or attorney's fees, in connection with any claim or lawsuit brought by any third party related in any design, development, construction, implementation, operation and/or maintenance.

#### 7.11. Technical Assistance:

7.11.1. Technical assistance may be given by FEMA and/or DHS&EM to assist either the grantee and/or subgrantee. Technical assistance may include assistance with data collection, project development and management, engineering and/or floodplain management assistance, and benefit/cost determinations. Requests for technical assistance should be forwarded to the respective agency (FEMA or DHS&EM, as appropriate). Requests should be in writing, but alternative methods may be acceptable, as appropriate.

#### 7.12. Financial Management (Funding):

7.12.1. Total approved project costs are split with a 75% Federal share and a 25% State share. Any additional program costs are not eligible, and are the responsibility of the subgrantee. However, in some instances cost overruns may be funded on a case-by-case basis, using the procedures described above in Section 7.10.7.

7.12.2. Hazard Mitigation Grant Program funds obligated by FEMA will be identified and dispersed to DHS&EM in a manner similar to Public Assistance funds. A copy of the Public Assistance Administrative Plan can be found at DHS&EM.

7.12.3. Applicants must set-up separate accounts to facilitate tracking HMGP funds generated by different disasters.

7.12.4. All payments to a subgrantee go through a review and approval process within DHS&EM. The SHMO will review the request and the applicant file to determine payment amounts. The request will be reviewed and approved for payment by the SHMO, then routed through the DAS financial management staff for audit, the Plans and Preparedness Program Manager for review, and to the GAR for final payment approval.

7.12.5. Applicants will use local standard operating procedures when procuring services or goods. Qualified State agencies will follow State Procurement Guidelines.

7.12.6. Obligating Federal funds for specific mitigation projects will be accomplished as those projects are approved by FEMA.

7.12.7. An applicant (subgrantee) may request an advance or reimbursement of funds by completing DHS&EM Form 30-03, "Request for Funds" form ([Subgrantee's Handbook, Attachment 1](#)). The completed form must be typewritten and submitted to the State for approval and processing. DHS&EM will not accept handwritten requests. Faxed documents must be followed-up with a mailed original. Advance funds must be expended towards the approved scope of the project within 30 days of receipt, or they must be refunded to the state. The applicant must provide supporting documentation for all project expenditures for which advance funds are used prior to receiving subsequent funding. Accruing interest on advance funds is not authorized, and any accrued interest must be returned to the State and subsequently to FEMA.

7.12.8. Advances are limited to increments of 30% of the estimated total "Approved" project cost. Additional funding may be advanced as the applicant provides documentation to substantiate

expenditures. Each subsequent request may not exceed 30% of the estimated total project cost. Total advances may not exceed 75% of the estimated project cost. Final payments will not be paid until the project is complete and all receipts and documentation are received by DHS&EM.

- 7.12.9. Reimbursement of funds: An applicant (subgrantee) may request a reimbursement of funds by completing the DHS&EM Form 30-03, "Request for Funds" form. The applicant must provide documentation that shows actual expenditures made supporting grant project activities and/or supporting functions described in the approved scope of work for the project. The request will be processed for payment once it is validated for authorized expenditures.
- 7.12.10. If the request is denied, the GAR will inform the subgrantee in writing within thirty (30) days of the date of the request with an explanation for the denial. If approved, the request will be transmitted to the DAS financial management staff for processing per established accounting procedures.
- 7.12.11. 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 applicant. Payments will be made by "Warrant" (check) only upon request by the applicant.
- 7.12.12. DAS financial management staff will draw the funds through Smartlink. The funds will only be drawn from Smartlink as DHS&EM incurs expenditures on the approved project. DHS&EM will request that FEMA de-obligate unexpended funds at the closeout of each project, once all project expenditures are paid.
- 7.12.13. State "Warrants" are good for six months from date of issue. Under normal circumstances, the State would keep warrants that have reached the Statute of Limitations (SOL) on the books for 18 months and then send them to "Unclaimed Properties" at:

Department of Revenue		Department of Revenue
Division of Treasury		Division of Treasury
Unclaimed Property Section	or	Unclaimed Property Section
P.O. Box 110405		Willoughby Ave., 11 <sup>th</sup> Floor
Juneau, AK 99811-0405		Juneau AK 99811-0405

If the warrant expires before the expiration of the performance period of the disaster and the applicant submits an affidavit that the:

- Warrant was lost;
- Warrant was stolen;
- Warrant was fraudulently cashed; or
- Applicant was unable to cash the warrant because they were:
  - Medically incapable of cashing the check and there is no one with a power of attorney that can act in the applicants behalf.
  - Outside the U.S.A. during the entire time the warrant was valid and could not find an institution willing to cash it.
  - The applicant can then request that the warrant be reissued. State warrants can be reissued indefinitely by contacting the Unclaimed Properties Section at the addresses above.

- 7.12.14. In the event the applicant fails to expend funds in accordance with state law and or the provisions of the agreement, DHS&EM reserves the right to recapture funds in an amount equivalent to the extent of noncompliance. Such right of recapture shall exist for a period not to exceed three years following agreement termination. Repayment by the applicant of funds under this recapture provision shall occur within 30 days of demand. In the event DHS&EM is required to institute legal proceeding to enforce the recapture provision, DHS&EM shall be entitled to its costs thereof, including reasonable attorney's fees.

- 7.12.15. Subgrantees are permitted to rebudget within the approved direct cost budget to meet unanticipated requirements and may make limited program changes to the approved project, per 44 CFR § 13.03. However, all changes of the budget, Scope of Work, and program activities must be coordinated with DHS&EM.
- 7.12.16. Final payments will not be paid until the project is complete and all receipts and documentation are received by DHS&EM. The applicant's claim and reimbursement documents for reimbursement must be submitted within 60 working days of the completion of the work. Upon justification from the applicant, the SHMO can grant an extension of 30 days. All payments to a subgrantee go through a review and approval process within DHS&EM. Prior to project closeout, applicants must reconcile their programmatic expenditures with actual financial activity. If funds remain after project completion, the remaining funds, and any interest accrued in excess of \$100 annually must be returned to the State and ultimately to FEMA before the project can be closed.
- 7.12.17. Applicants for Acquisition/Relocation Projects must provide copies of all documentation obtained from financing the home including contracts between applicants and home owners, vendors, and suppliers. Applicants must provide a written report explaining what happened with each home, funds expended, and any information concerning project progress.
- 7.12.18. Expenditures made or obligations incurred following the grants performance period ending date or the closeout of the disaster shall not be eligible.

#### 7.13. Administrative Allowance:

- 7.13.1. Grantee Administrative Allowance: The State, as the Grantee, will be reimbursed a combined total Grantee Administrative Allowance, Sub-grantee Admin Fee and State Management Cost rolled into one single State Management Cost (SMC) as a flat rate capped at 4.89% for HMGP and paid at the project close-out IAW 44 CFR § 206.228 (a)(2) -§ 206.228 (a)(3)(iii) and § 206.228 (b),.
- 7.13.1.1. Sub-grantee Administrative Allowance Costs are not reimbursed through the Hazard Mitigation Grant Program. The State will not pass through to Sub-Grantees any percentage or amount of the Management Costs made available under 44 CFR § 206 or 207 . The basis for this determination is the State of Alaska will continue to provide the 25 percent cost share to match FEMA's 75 percent funding limit as outlined in 44 CFR § 206.228 (a)(2) -§ 206.228 (a)(3)(iii) and § 206.228 (b). Therefore Sub-Grantees will not be required to provide a cost share for any HMGP grants.
- 7.13.1.2. Sub-grantee Indirect Costs such as: travel, overtime, per-diem, requesting, obtaining and administering assistance are not eligible for reimbursement through the HMGP.

**7.13.2.** State Management Costs (SMC): Costs of State personnel assigned to administer the Hazard Mitigation Grant Program in the Joint Field Office (JFO) may be eligible when approved by FEMA's Regional Director (RD) within 5 days of the opening of the office. Post JFO costs are also eligible if approved in advance. (44 CFR § 206.439(b)(2)(i)). Additionally, contract costs, equipment and office supplies and communication costs used in the JFO for the HMGP program may be reimbursed.

#### 7.14. Appeals:

##### 7.14.1. Appeal of State Decision:

- 7.14.1.1. An eligible applicant, subgrantee, or grantee may appeal any previously made determination related to an application for federal assistance through the grantee (DHS&EM) to the FEMA Region X Director (IAW 44 CFR § 206.440). Applicants whose projects are not selected by the Disaster Policy Cabinet will be notified by the State Hazard Mitigation Officer, and advised of the following appeal process:
- DHS&EM will provide guidance or technical assistance with writing an appeal if needed.

- Appeals must be submitted to the Governor’s Authorized Representative (GAR) at DHS&EM, within 60 days of receipt of notice of non-selection.
- The written appeal must contain sufficient additional information and supporting documentation to warrant reconsideration. DHS&EM will review and evaluate the appeal then submit the documentation for the appellant’s position, sighting specific monetary discrepancies or disputed provisions in Federal law, regulation, or policy. Upon completion of the review and evaluation, DHS&EM will forward with a written recommendation to the Regional Director for action.
- The grantee will review and forward appeals from an applicant or subgrantee, within 60 days of receipt.
- All appeals must be resolved by the GAR or his representative prior to the grant closeout period.

#### 7.14.2. Appeal of a Federal Decision:

- 7.14.2.1. The applicant may also appeal if its project is turned down by FEMA. This appeal must be made in writing to the GAR within 60 days of receipt of notice on non-selection by FEMA.
- Within 60 days of receipt of the appeal, the GAR will make an evaluation, and forward the appeal to the FEMA, Region X Director with a written recommendation.
  - After the Regional Director receives the appeal, a response must be made within 90 days. That response may take the form of a determination or a request for additional information from the applicant. After receipt of any additional information, which is requested, the Regional Director has an additional 90 days to make a determination.
  - If the appeal is denied by the FEMA Regional Director, the GAR may appeal to the FEMA Associate Director, Mitigation. The same time limits for submission and response apply to the second appeal.
  - The Associate Director shall decide on the appeal within 90 days from receipt of all related information. In most cases, the Associate Director’s decision will be considered final.

#### 7.15. Records and Reports:

##### 7.15.1. Progress Reports:

- 7.15.1.1. The subgrantee will submit a Project Quarterly Report, (DHS&EM Form 30-60) ([Subgrantee’s Handbook, Attachment 2](#)), to the State which will serve as the basis for the State reporting on the status of all open projects to FEMA. The report will contain the status of open projects as prescribed by 44 CFR § 13.40 (b)-(c) and 206.438(C). The progress report will be submitted to DHS&EM within twenty (20) days after the end of the first federal quarter following the initial grant award and shall be submitted each quarter thereafter for State administered disaster assistance programs authorized by the Stafford Act. Reports are due to DHS&EM January 20, April 20, July 20, and October 20.
- 7.15.1.2. The State will submit quarterly progress reports to FEMA detailing the status of open projects as required by 44 CFR § 13.40 (b)-(c) and 206.438(C). Quarterly progress reports are due on January 30, April 30, July 30, and October 30.
- 7.15.1.3. Quarterly reports are due the 20<sup>th</sup> of the month following the end of the quarter. If a jurisdiction has not submitted its reports in a timely manner, DHS&EM will contact this jurisdiction as a reminder of its reporting duties. DHS&EM will attempt to contact the jurisdiction by phone, email and/or letter several times during the quarter following the due date of the missing report. If no report for the prior quarter is received before the end of the

next quarter, the grant may be terminated, and recoupment of all reimbursed expenditures may be sought.

7.15.2. Financial Status Reports:

7.15.2.1. The grantee will submit a quarterly Financial Status Report (SF FEMA 20-10) to the FEMA Region X office 30 days after the end of the first federal quarter following the initial grant award. Financial reports will be submitted quarterly thereafter for State administered disaster assistance programs authorized by the Stafford Act. Reports are due January 30, April 30, July 30, and October 30.

7.15.2.2. The subgrantee will submit a quarterly financial report (Federal Cash Transaction Report) to DHS&EM twenty (20) days after the end of the first federal quarter following the initial grant award. Financial reports will be submitted quarterly thereafter for State administered disaster assistance programs authorized by the Stafford Act. Reports are due January 20, April 20, July 20, and October 20.

7.15.2.3. This report will consist of the following at a minimum:

- Total authorized for the project
- Total expenditures to date
- Total payments received to date
- Total advances received
- Total project funds remaining
- The grantee will submit the Federal Cash Transaction Report (FCTR) to FEMA 30 days after the end of the quarter, but no later than the 15th of the following month.

7.15.3. Receipt of Hazard Mitigation Grant Program funding is a contractual agreement between the grantee and subgrantee. As the grantee, DHS&EM requires that quarterly and annual fiscal status reports be completed as a condition of receiving these funds. Project funding can be suspended or reimbursement sought if the required reports are not received as indicated above.

7.15.4. Project Documentation Record Retention (44 CFR § 13.42): The applicant will be required to keep complete records of all work including (i.e. receipts, checks, job orders, contracts, equipment, equipment usage documentation and payroll information in paper, electronic or microfiche formats) funded under the Hazard Mitigation Grant Program as follows:

7.15.4.1. Except as noted below, FEMA requires that records must be retained for three years from the date of the last expenditure report or if waived, the date the report would have been due. However, the State of Alaska requires that records be retained for 3 years after final closeout of the disaster. This includes support documentation of all soft match dollars, such as force account labor and use of existing inventory,

7.15.4.2. If litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues arising from the action or three years whichever is later.

7.15.4.3. Grantee and subgrantees are required to retain real estate transaction and property tracking records indefinitely.

7.15.4.4. To avoid duplicate recordkeeping, awarding agencies may make special arrangements with grantees and subgrantees to retain any records which are continuously needed for joint use.

7.15.4.5. Records for income transactions after grant or subgrant support will be retained for three years starting from the end of the grantee's fiscal year in which the income is earned.

7.15.4.6. Alternate forms of documentation such as microfilming, photocopying, or similar methods may be substituted for the original records.

7.15.5. Access to Records (44 CFR § 13.42 (e)): All projects are subject to State and Federal audit or, examinations during the retention period. However, grantees and subgrantees are not required to permit public access to their records unless required by Federal, State, or local law.

7.15.5.1. The State may make random audits, checks, or inspections to determine that records are retained and available as required.

#### 7.16. Equipment Management:

7.16.1. 44 CFR § 13.32(a)-(d) is very explicit concerning equipment management responsibilities. The grantee will use, manage, and dispose of equipment acquired under this grant IAW State laws and procedures. Additionally, the grantee and subgrantees will use the equipment for the project for which it is acquired for as long as needed. Once the original need is terminated, the equipment can be used for other activities supported by the federal government.

7.16.2. All equipment acquired with grant funding will be maintained on inventory following State of Alaska Procurement guidelines to include serial number, property identification tag, location, cost, and other tracking data. Physical inventory will be conducted annually and reconciled with property records every two years. Maintenance will be performed to ensure the equipment remains in functional order until disposition and appropriate records will be kept current in the Division's logistics office.

7.16.3. Equipment will be disposed of following State disposition regulations and as delineated in 44 CFR § 13.32(e).

#### 7.17. Facilities and Real Property:

7.17.1. DHS&EM makes no claim to any capital facilities or real property improved or constructed with funds under this Grant Agreement, and by this grant of funds does not and will not acquire any ownership interest or title to such property of the applicant. The applicant shall assume all liabilities arising from the ownership and operation of the project and agrees to hold DHS&EM and the State of Alaska harmless from any and all causes of action arising from the ownership and operation of the project.

7.17.2. Every two years the State will contact the communities that have purchased land with HMGP monies and have them verify in writing that the land requirements (open space, public ownership, etc.) are being adhered to.

#### 7.18. Close-out Procedures:

7.18.1. The SHMO reserves the right to inspect all projects for compliance at any time and FEMA may also conduct an inspection of any project at any time.

7.18.2. Upon completion of all work approved in a project application the SHMO, or designee, will make a final inspection and submit certification of the project to the GAR. At the request of the GAR or the Regional Director (RD), a joint DHS&EM/FEMA team will perform the inspection for large projects. Projects less than \$100,000 may be certified by a desk audit of all project documentation.

7.18.3. If inspection and review of Subgrantee support documentation reveals problems in work performance and/or documentation of such work, the SHMO shall work with the subgrantee to correct the deficiencies before program closure. The State will forward final inspection documents to the RD to close the project.

7.18.4. The GAR will submit a final report to FEMA when all subgrants have been closed. The report will include a certification that all funds have been expended in accordance with the FEMA-State Agreement, a listing of all projects and total expenditures, and a final request for reimbursement or de-obligation of funds.

**7.19. Audits:**

7.19.1. The State and subgrantees are responsible for obtaining audits IAW 44 CFR § 13.26, the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507), and revised OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations. This requirement applies to all §404 Hazard Mitigation Grant Projects

7.19.2. Audit requirements will be IAW 44 CFR § 14 or OMB Circular A-128, as appropriate for all projects \$25,000 - \$100,000.

7.19.3. Applicants expending \$500,000 or more in total Federal financial assistance in a fiscal year will be required to have an audit made in accordance with the Single Audit Act Amendments of 1996 - OMB Circular A-133.

7.19.4. Applicants will be required to provide Alaska Division of Homeland Security and Emergency Management a copy of the Single Audit.

7.19.5. Even though a Single Audit is performed, grant recipients also are subject to additional audits by FEMA Office of Inspector General and State auditors for items not covered by the Single Audit.

7.19.6. Applicants will be advised to retain records and supporting documentation for 3 years after closeout of the disaster.

7.19.7. The GAR may request an audit for funds disbursed to a subgrantee at any time. The audit results will be submitted to the Regional Director for resolution based on the FEMA-State Agreement. The audit will determine whether the subgrantees have met the requirements outlined in this plan and expended HMGP funds IAW 44 CFR §§13.26 and 14.2, the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507), and revised OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations. If non-compliance is determined, the SHMO will ensure that appropriate corrective action is taken within six (6) months of audit completion.

**8. DEVELOPMENT AND MAINTENANCE**

8.1 This plan will be reviewed annually. Amendments will be made to meet current policy guidelines, as required. Revisions will be forwarded to the Regional Director of the Federal Emergency Management Agency.

**9. APPENDICES**

9.1. Staffing Plan

9.2. HMGP Application - PROJECT

9.3. HMGP Application - PLANNING

9.4. Sub-grantee's Handbook