



## Hazard Mitigation Grant Program Administrative Plan Checklist

With the publication of FEMA Policy #104-11-1 *Hazard Mitigation Grant Program (HMGP) Management Costs (Interim)*, this checklist replaces and updates the Administrative Plan checklist in NEMIS. The checklist identifies the minimum criteria a plan must contain to be approvable by FEMA. In this document, unless otherwise indicated, the term “recipient” or “pass-through entity” will refer to states, federally-recognized tribes and territories that receive HMGP funds directly from FEMA.<sup>1</sup>

The Administrative Plan is a procedural guide that details how the recipient will administer the grant. Recipients must have a current Administrative Plan approved by FEMA before receiving HMGP funds. This checklist must be submitted with the Administrative Plan.

A recipient may forward a new or updated Administrative Plan to FEMA for approval at any time. A recipient should review and update its Administrative Plan annually and must review and update the Administrative Plan following a Presidential major disaster declaration, if required, to meet current policy guidance or changes to the administration of the program.

Submit questions to [fema-hma-grants-policy@fema.dhs.gov](mailto:fema-hma-grants-policy@fema.dhs.gov).

### PROCESS FOR REVIEWING THE ADMINISTRATIVE PLAN

1. **Recipient Submits Administrative Plan and Checklist to FEMA:** The recipient submits the Administrative Plan and completed checklist to FEMA for review.
2. **FEMA Reviews Administrative Plan:** FEMA will use the checklist to verify that the requirements are met. FEMA may require additional information to make a final determination.
  - a. If FEMA determines a requirement is not addressed, FEMA will return the checklist identifying outstanding items to the recipient and ask that the Administrative Plan be revised to ensure compliance.
  - b. If FEMA approves the Administrative Plan, FEMA will notify the recipient the Administrative Plan was approved.

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<sup>1</sup> Section 1110 of the Sandy Recovery Improvement Act (2013) amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act to provide federally-recognized Indian tribal governments the option to make their own request for a Presidential emergency or major disaster declaration independently of a state in addition to the pre-existing option of seeking assistance under a declaration for a state.



## HMGP Administrative Plan Checklist

### Section 1: Recipient Information (completed by Recipient)

**Recipient Name:**

**Disaster Number:**

**Date:**

### Section 2: Minimum Administrative Plan Criteria

The recipient should answer “YES” or “NO” for the following questions. If “YES”, add page and section where information is provided. For additional comments, use Section 3: Additional Comments.

	Administrative Plan Component	Completed by Recipient			Meets FEMA Requirements (completed by FEMA)
		Yes	No	Page/Section	
1.	Does the recipient have a FEMA-approved Mitigation Plan (44 Code of Federal Regulations (CFR) Part 201)?				
2.	Does the plan designate the recipient agency with responsibility for administration of the HMGP (44 CFR § 206.437(b)(1))?				
3.	Does the plan identify the Hazard Mitigation Officer responsible for all matters related to the HMGP (44 CFR § 206.437(b)(2))? <sup>2</sup>				
4.	Does the plan establish an interagency mitigation team (HMA Guidance (2015), Part VIII.A.2.2)? <sup>3</sup>				
5.	Does the plan determine the staffing requirements and sources of staff necessary for administration of the program (44 CFR § 206.437(b)(3))? <sup>4</sup>				

<sup>2</sup> The Hazard Mitigation Officer is typically responsible for managing the recipient’s mitigation program, coordinating the mitigation team, and developing as well as implementing the hazard mitigation plan.

<sup>3</sup> The mitigation team may include representatives of agencies involved with emergency management, natural resources, floodplain management, environmental issues, historic preservation and archeology, soil conservation, transportation, planning, zoning, housing, economic development, building regulations, infrastructure, regulations or construction, public information, insurance, regional and local government, academia, business, and nonprofit organizations.

<sup>4</sup> This includes the identification of all necessary positions as well as the identification of the minimum number of personnel needed to implement the HMGP (HMA Guidance, Part VIII.A.2.2). Key positions may include clerical, administrative, and financial management staff; program specialists to support mitigation planning and the implementation of mitigation activities and to conduct Benefit Cost Analyses (BCA); and environmental planners.



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		Yes	No	Page/Section	
6.	Does the plan include a procedure for expanding staff temporarily following a disaster if necessary (HMA Guidance (2015), Part VIII.A.2.2)?				
7.	Does the plan contain the procedures used to identify and notify potential subrecipients of the availability of the program (44 CFR § 206.437(b)(4)(i))?				
8.	Does the plan contain the procedures used to ensure that potential subrecipients are provided information on the application process, program eligibility and availability of management cost funding and deadlines (44 CFR § 206.437(b)(4)(ii))?				
9.	Does the plan contain procedures used to determine subrecipient eligibility (44 CFR § 206.437(b)(4)(iii))?				
10.	Does the plan contain the procedures used to provide information for Environmental and Historic Preservation (EHP) and floodplain management reviews in conformance with 44 CFR Part 9 and FEMA Directive 108-1 (44 CFR § 206.437(b)(4)(iv))? <sup>5</sup>				
11.	Does the plan contain the procedures used to establish priorities for the selection of mitigation projects and plans (44 CFR § 206.437(b)(4)(v))?				
12.	Does the plan contain the procedures used to process requests for advances of funds and reimbursement (44 CFR § 206.437(b)(4)(vi))?				

<sup>5</sup> The FEMA Directive 108-1 replaces 44 CFR Part 10 Environmental Considerations.



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		Yes	No	Page/Section	
13.	Does the plan contain procedures for subrecipients to apply for management costs (44 CFR § 206.437(b)(4)((ii) & (iii))?				
14.	Does the plan contain procedures to document when subrecipients choose not to apply for management costs provided under HMGP Management Costs (Interim) policy? (Policy #104-11-1 Program Requirements and Procedures (B)(2))?				
15.	Does the plan contain procedures to document when subrecipients do not to use all their management costs provided by the HMGP Management Costs (Interim) Policy (Policy #104-11-1 Program Requirements and Procedures (B)(2))?				
16.	Does the plan contain the procedures used to monitor and evaluate the progress and completion of the selected mitigation activities and management costs (44 CFR § 206.437(b)(4)(vii))?				
17.	Does the plan contain the procedures used to review and approve cost overruns (44 § CFR 206.437(b)(4)(viii))?				
18.	Does the plan contain the procedures used to process appeals (44 CFR § 206.437(b)(4)(ix))?				
19.	Does the plan contain the procedures used to provide technical assistance, as required, to the subrecipients (44 CFR § 206.437(b)(4)(x))?				



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		Yes	No	Page/Section	
20.	Does the plan contain the procedures used to comply with the administrative requirements of 2 CFR Part 200, 2 CFR Part 3002 and 44 CFR Part 206 (§ 206.437(b)(4)(xi))?				
21.	Does the plan contain the procedures used to comply with the audit requirements of 2 CFR Part 200, Subpart F; 2 CFR Part 3002; and 44 CFR § 206.437(b)(4)(xi)?				
22.	Does the plan identify roles and procedures to implement the recipient's authority to address a subrecipient's noncompliance with grant requirements by providing an opportunity to subrecipients to bring the grant into compliance, if applicable, or by imposing remedy actions or special conditions on subrecipients that fail to comply with grant requirements (2 CFR § 200.207 and 2 CFR § 200.338)?				
23.	Does the plan contain the procedures used to provide quarterly progress reports to the FEMA Regional Administrator on funded mitigation activities and management costs (44 CFR § 206.437(b)(4)(xii))?				
24.	Does the plan fully document the recipient program for the administration of the HMGP and Section 404 funds (44 CFR § 206.437(c))?				
25.	Has the plan been incorporated into the recipient Emergency Operations Plan as a separate annex or chapter (44 CFR § 206.437(c))? <sup>6</sup>				

<sup>6</sup> Item 23 is optional per language in 44 CFR § 206.437(c) yet recommended by FEMA.



	Administrative Plan Component	Completed by Recipient			Meets FEMA Requirements (completed by FEMA)
		Yes	No	Page/Section	
26.	Does the plan incorporate updates, amendments, or plan revisions required to meet current policy guidance or changes in the administration of the HMGP (44 CFR § 206.437(d))?				
27.	<b>Program Administration by States (PAS):</b> For recipients with a PAS Agreement, does the plan provide a procedural guide that details how the recipient will administer delegated activities (Addendum to the HMA Guidance Program Administration by States Pilot, HMGP)?				
28.	<b>HMGP Cost Share Strategy:</b> For recipients using a cost share strategy, does the plan meet the requirements of the HMA Guidance (2015) Part VIII.A.8?				



Section 3: Additional Comments