



VALIDATE AS YOU GO (VAYGo) FREQUENTLY ASKED QUESTIONS

What is FEMA's Validate As You Go (VAYGo) process?

VAYGo is FEMA's internal control review of federal Public Assistance funds awarded to the grant recipient, the Governor's Office of Emergency Services (Cal OES), intended to validate fund usage throughout project lifecycles, expedite the grant closeout process, and reduce the possibility of debt recovery during closeout. The Cal OES VAYGo process is the concurrent validation of project cost-supporting documentation to ensure expenditures are accurate, appropriate, and accounted for *before* the recipient disburses funding to the sub-recipient (the state agency) thus improving payment integrity and reducing the likelihood of improper payments. For more information on the FEMA VAYGo process, the FEMA VAYGo Fact Sheet is linked at the end of this document.

FEMA's VAYGo process allows recipients who achieve and maintain low error rates of 1.5 percent or less for two consecutive FEMA VAYGo testing cycles (two total years) to be eligible for a simplified closeout benefit during the FEMA VAYGo review. A simplified closeout benefit could potentially reduce documentation requirements at project closeout. A full comparative list showing documentation required for a standard closeout versus a simplified closeout may be found on the VAYGo Closeout Benefit fact sheet, linked at the end of this document.

What is Cal OES' VAYGo review?

The Cal OES VAYGo team acts as an intermediary between FEMA and the sub-recipient. The Cal OES VAYGo team takes a proactive approach by gathering required documentation to perform an internal review of projects in anticipation of a potential FEMA VAYGo sampling audit. This proactive approach was implemented to assist sub-recipients with a more expeditious grant closeout process, lower risks of debt recovery during closeout, and help expedite the FEMA VAYGo process.

What starts Cal OES' VAYGo review for my department's projects?

Large projects that are 100 percent complete at the time of obligation are submitted to the Cal OES VAYGo team and placed in the queue for VAYGo review. Large projects less than 100 percent complete at the time of obligation or Category Z projects require a Cal OES 132, *Reimbursement Request for Large Project Expenditures* form before the project can be submitted to the Cal OES VAYGo team and placed in the queue for VAYGo review.

Are all project payment requests subject to Cal OES VAYGo review?

All large projects and Category Z projects are subject to VAYGo review.

What starts Cal OES' VAYGo review and who completes it?

The Cal OES VAYGo team within the Cal OES Recovery Directorate will review large projects and all Category Z projects. Cost-supporting documentation is required to be

uploaded in Grants Portal and validated prior to fund disbursement. The VAYGo analyst assigned to the project will contact the sub-recipient if additional documentation is required. The Cal OES VAYGo team is available to provide technical assistance as needed and can be contacted at VAYGo@caloes.ca.gov.

What are the required documents and how to submit them?

Backup documentation is required for the following categories:

- Force Account Labor
- Equipment (Both Owned and Rented)
- Supplies (Both from Existing Stock and Purchased)
- Contracts and Procurement
- Mutual Aid

The types of required documentation can include:

- Description of work performed
- Payroll records
- Location and usage records
- Equipment/supply invoices or receipts
- Quantity of usage
- Price analysis
- Contracts/Purchase order records
- Written agreements of services requested/received
- Proof of payment documentation, including:
 - Accounts Payable Report or Voucher
 - Bank Statement
 - Financial Accounting Systems Reports
 - Example: FI\$CAL AP02 Report
 - Electronic Funds Transfer (EFT)
 - Warrant or Cancelled Check
 - **Note:** A warrant or cancelled check from the State Controller's Office is no longer required as the main proof of payment.

This list is not comprehensive. For a complete list of types of work and documentation, please refer to FEMA's Validate As You Go Guide (linked at the end of this document) under Section 4.6 *Documentation to Support Eligibility of Costs Claimed*. This documentation should be uploaded to Grants Portal.

What are the timelines to provide the required documents?

Cal OES requires documents to be uploaded to Grants Portal as soon as the sub-recipient has the documents.

What consequences does a non-submittal of required documents have?

Cal OES will not be able to disburse any large project and Category Z funding to sub-recipients until all required documentation is received and reviewed for appropriateness and accuracy of activities and costs.

How long is the Cal OES VAYGo review process?

The Cal OES VAYGo review process can vary in length depending on the amount and complexity of the documentation to review. To assist in minimizing this timeframe, sub-recipients should keep all project documentation readily available as part of their ongoing grant management process, provide information to Cal OES in an organized manner, and provide all requested documentation as soon as possible.

Once reviewed for VAYGo, how is my department's funding disbursed?

On 100 percent complete projects and Category Z projects, the project funding will be released once Cal OES' VAYGo review is complete.

On projects that are less than 100 percent complete, the project funding can be drawn down by submitting a Cal OES Form 132, *Reimbursement Request for Large Project Expenditures*. Once this form is received by the Financial Processing Unit, the project will be submitted to the Cal OES VAYGO team and placed in the queue for VAYGo review.

Projects for Categories A and B work will go through the normal review process with the Disaster Financial Recovery and Reconciliation office and the Department of Finance to determine if the funds will be used to refund the state General Fund or be distributed to the department.

Will I be notified of the VAYGo review completion?

The sub-recipient will receive a Notification of Payment after the Cal OES VAYGo review process is complete.

Who do I contact in case of VAYGo related questions?

For any questions related to the VAYGo process, please email the Cal OES VAYGo Team at VAYGo@caloes.ca.gov.

You may also email any questions or concerns to your Disaster Financial Recovery and Reconciliation analyst at disastercostrecovery@caloes.ca.gov.

Useful links and Additional Resources:

[FEMA's Validate As You Go Home Page](#)

[FEMA's Validate As You Go Fact Sheet](#)

[FEMA's Validate As You Go Guide](#)

[FEMA's Validate As You Go Closeout Benefit Guide](#)

[Cal OES Recovery Public Assistance Division](#)

If you have any questions and/or would like to discuss further, please contact DFRR at disastercostrecovery@caloes.ca.gov.