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# Unlocking the power of the VAYGo closeout benefit

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Insurance & Federal Claims Services

October 2025

The Validate As You Go (VAYGo) initiative, from the Federal Emergency Management Agency (FEMA), emphasizes early detection and resolution of discrepancies, ultimately enhancing accountability and efficiency in the recovery process. By engaging in ongoing reviews of project documentation, FEMA empowers grantees to tackle challenges head on, allowing them to focus on what truly matters: rebuilding their communities.

But what does it take to succeed in this initiative? How can grantees harness the full potential of VAYGo to not only meet compliance standards but also benefit from reduced documentation requirements at closeout through the “VAYGo closeout benefit”?

In this article, we explore leading practices that can help state grantees navigate the VAYGo process, confirming that they are not only compliant but also thrive in their recovery efforts.

## VAYGo and the closeout benefit

Under VAYGo, FEMA conducts ongoing reviews of project documentation for a sample of grant expenditures to confirm that funding is utilized appropriately. A primary objective of VAYGo is to identify potential issues early in the project lifecycle, enabling FEMA and state grantees to address deficiencies promptly rather than face challenges during the lengthy grant closeout process. This proactive approach not only enhances accountability but also streamlines the overall recovery effort, as grantees that successfully complete two consecutive VAYGo testing cycles with an error rate of 1.5% or less receive the VAYGo closeout benefit.

The VAYGo closeout benefit significantly enhances the efficiency of the project closeout process for federal disaster recovery grantees as qualified grantees can bypass extensive financial documentation, such as contracts and proof of payment. Instead, they are required to submit a certification confirming that costs were validated according to the obligated scope of work.



The better the question. The better the answer. The better the world works.

While the VAYGo closeout benefit reduces documentation requirements at closeout, challenges remain in the midstream testing of project expenditures, highlighting the need for continuous improvement in the implementation of VAYGo processes.

## A carrot-and-stick approach to compliance

At its core, the VAYGo program employs a carrot-and-stick approach to compliance. It operates on the premise that heightened compliance awareness throughout the grant management lifecycle can considerably reduce the risk of noncompliance for state grantees. Conversely, noncompliant grantees may be required to pay back improper payments and undergo traditional closeout procedures.

## Leading practices for success during VAYGo reviews

As state grantees navigate the complexities of FEMA's VAYGo program, several leading practices can enhance the validation process and promote compliance:

- **Establish a robust reimbursement process:** Establish a thorough reimbursement process that systematically collects, organizes and reviews all expenditure documentation. This approach confirms that every expense is transparently accounted for.

- **Maintain transaction-level tracking:** Maintain a meticulous record of the responses you provide at a transaction level. This level of granularity allows you to address concerns effectively and efficiently.
- **Utilize grants management systems:** Leverage FEMA's Grants Portal as a centralized repository for retaining documentation. Complement this with your own grants management systems to establish an organized and easily accessible record-keeping system.
- **Provide detailed and organized responses:** When responding to FEMA requests, provide responses that are detailed and logically structured. Ambiguities can lead to additional RFIs, causing unnecessary delays.
- **Engage in direct communication:** Request calls or in-person meetings, when necessary, to help clarify uncertainties with the process or regarding RFIs.
- **Conduct proactive documentation remediation:** Identify potential weaknesses in documentation proactively. Address and rectify these issues before providing responses to FEMA.
- **Adhere to deadlines:** Comply diligently with all deadlines specified in the process. In cases where timely submission proves challenging, request extensions promptly. Additionally, if you receive a Notice of Potential Debt letter, keep timely adherence to all appeal timelines to prevent adverse consequences.
- This streamlined approach not only expedites the closeout process but also allows grantees to focus on rebuilding and revitalizing their communities, ultimately improving recovery efforts and resilience against future disasters.

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29280-251US  
2509-12030-CS  
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