

# MISSOURI

State Emergency Management Agency

Public Assistance Program

# SEMA PUBLIC ASSISTANCE TEAM ASSIGNMENTS

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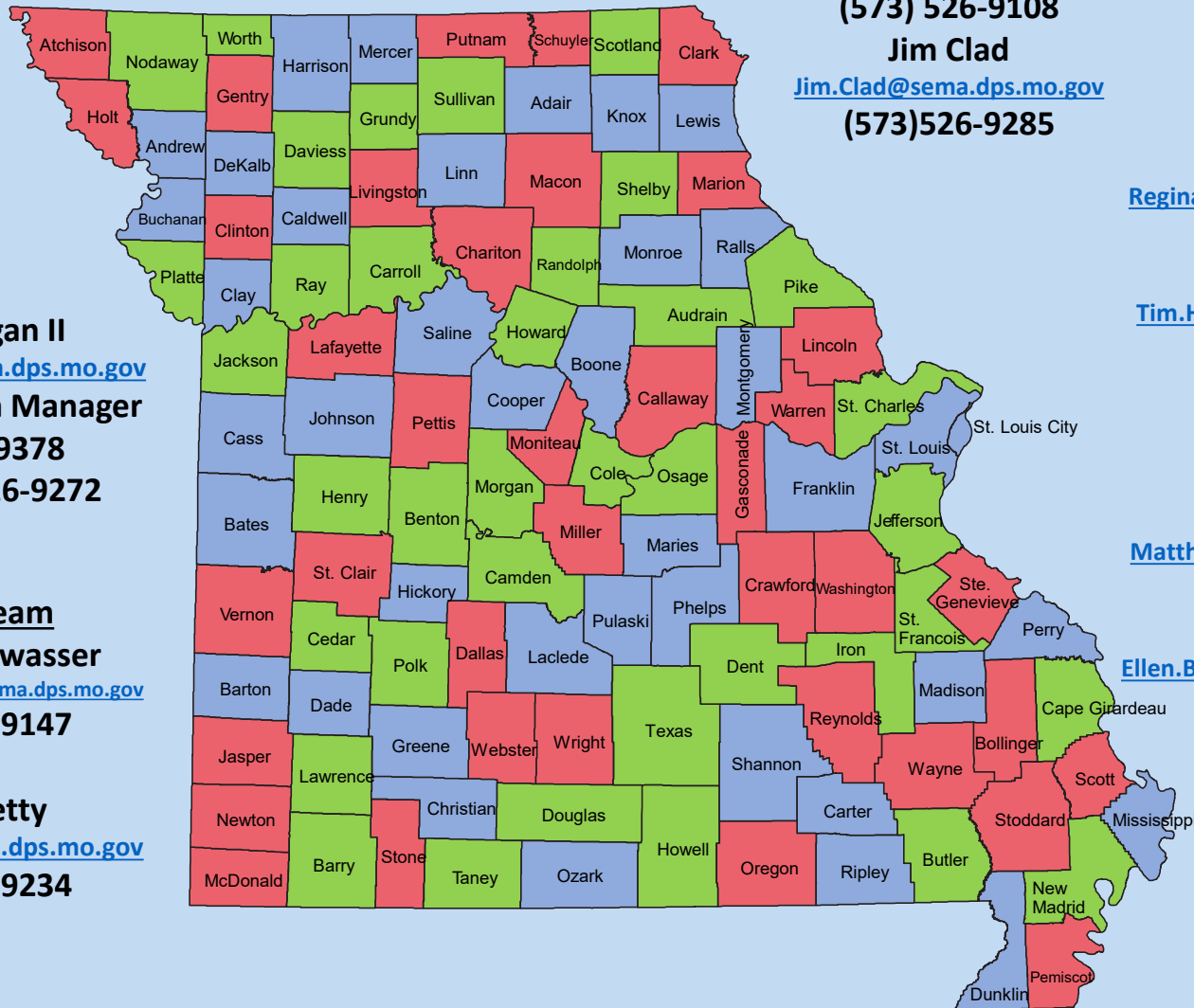
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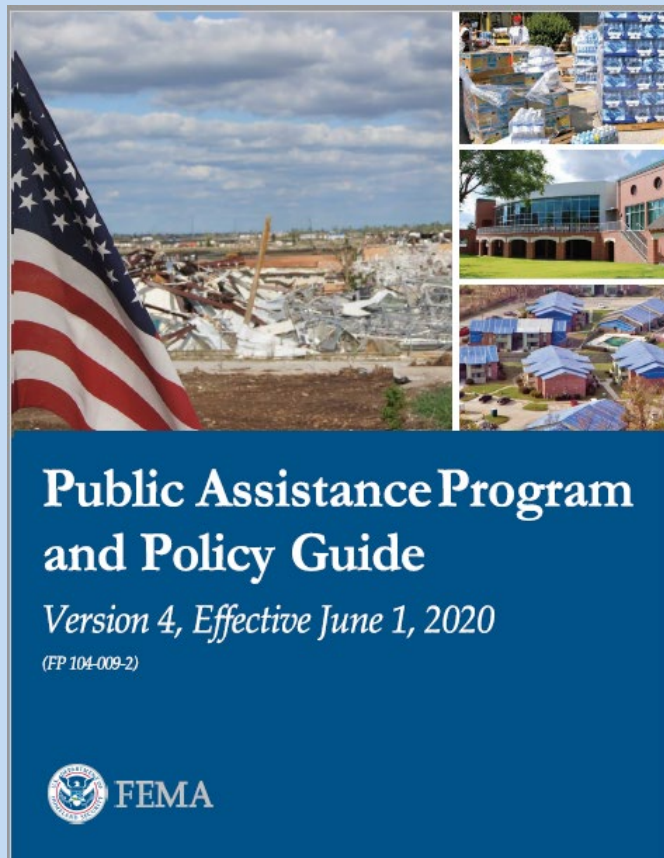
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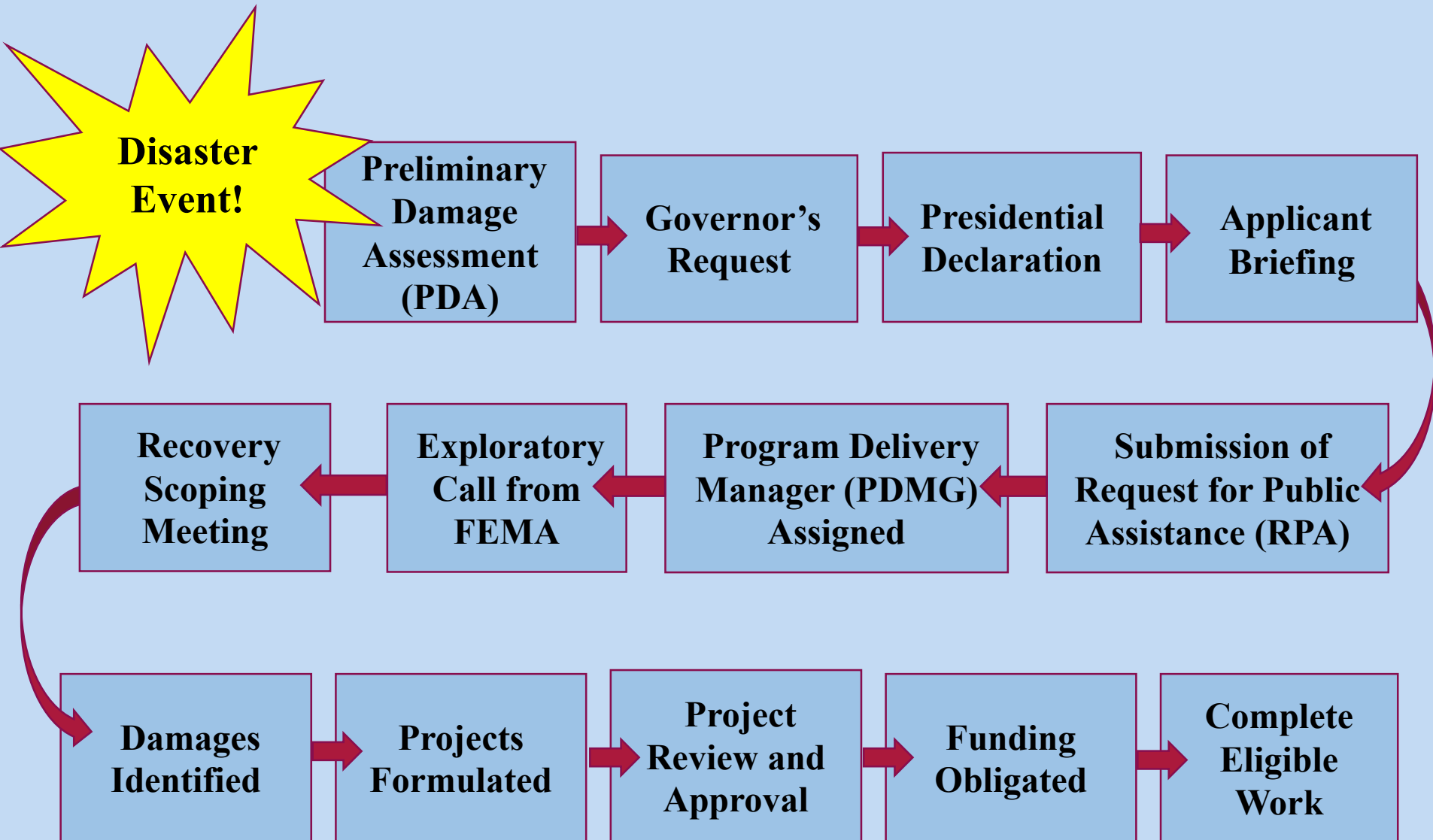
## Public Assistance Program and Policy Guide, Version 4, Effective June 1, 2020



The Public Assistance Program and Policy Guide (PAPPG) combines all Public Assistance (PA) policy into a single volume and provides an overview of the PA Program.

The PAPPG includes links to other publications and documents that provide additional process details.

# The PUBLIC ASSISTANCE Process



# Submission of Request for Public Assistance (RPA)

The RPA must be submitted within  
**30** days of declaration.

PNPs must also include PNP Questionnaire and Checklist.

DR-4552 was declared on: July 09, 2020

RPA's are due on or before: August 09, 2020

SEMA recommends submission of completed State forms within 60 days  
of the declaration date which is:  
September 09, 2020

# Submission of Request for Public Assistance (RPA)

## TO APPLY:

1. Set up your Grants Portal account at <https://grantee.fema.gov/> and **THEN**
2. Submit your Request for Public Assistance through the Grants Portal **OR**
3. Download and complete a Request for Public Assistance form at:  
[https://sema.dps.mo.gov/programs/state\\_public\\_assistance.php](https://sema.dps.mo.gov/programs/state_public_assistance.php) and then
4. Upload and submit the completed RPA to SEMA at: [sema.pa@sema.dps.mo.gov](mailto:sema.pa@sema.dps.mo.gov)

**PLEASE DO NOT SUBMIT BOTH PAPER COPY AND ONLINE.**

*Upon submission of your RPA to SEMA the Primary and Alternate contact that you've provided will receive an email with instructions for accessing FEMA's Grant Portal.*

# Next Steps: What to Expect

## Exploratory Call (EC)

- Meet your FEMA Program Delivery Manager (PDMG).
- Provide FEMA with an initial sense of damages and needs.
- Identify who needs to be at the Recovery Scoping Meeting (RSM)

## Recovery Scoping Meeting (RSM)

- In-depth meeting to review damages.
- Gather documentation.
- Develop list of projects.
- Identify priorities.
- Schedule site inspections.
- Starts a 60 day clock to identify any/all additional damages and report to FEMA.

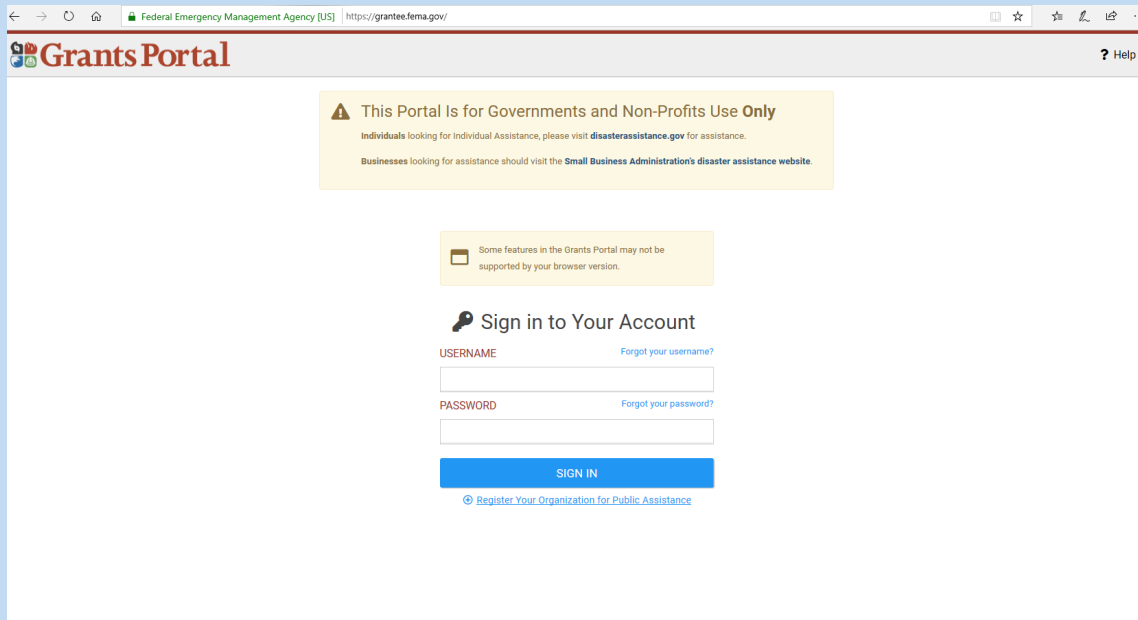
# GRANTS PORTAL

## CUSTOMER RELATIONSHIP MANAGEMENT TOOL (CRM)

Go to this web address to update your organization information, register a new organization, and submit your Request for Public Assistance.

<https://grantee.fema.gov/>

Follow the onscreen instructions.



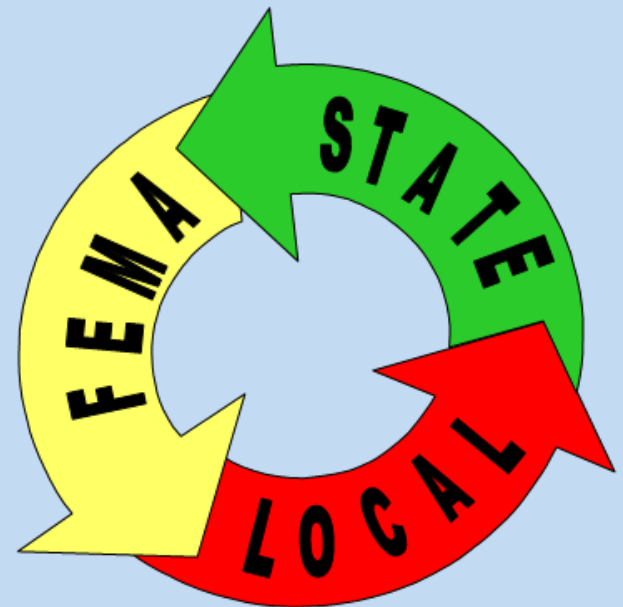
The screenshot shows the FEMA Grants Portal login page. At the top, the browser address bar displays "Federal Emergency Management Agency [US] | https://grantee.fema.gov/". The page header includes the "Grants Portal" logo and a "Help" link. A yellow warning box states: "This Portal Is for Governments and Non-Profits Use Only. Individuals looking for Individual Assistance, please visit [disasterassistance.gov](https://disasterassistance.gov) for assistance. Businesses looking for assistance should visit the [Small Business Administration's disaster assistance website](#)." Below this, a message indicates that some features may not be supported by the browser version. The main section is titled "Sign in to Your Account" and contains fields for "USERNAME" and "PASSWORD", each with a "Forgot your [username/password]?" link. A blue "SIGN IN" button is at the bottom, with a link to "Register Your Organization for Public Assistance" below it.



# WHAT IS PUBLIC ASSISTANCE?

A Federal grant program providing supplemental cost share assistance to eligible state and local governments and certain non-profit organizations for response and recovery in a Presidentially declared disaster or emergency.

The Federal share is not less than 75% of the eligible costs.



# PUBLIC ASSISTANCE: Basic Eligibility

The four basic components of the PA eligibility are:

Applicant  
Facility  
Work  
Cost

FEMA refers to these components as the building blocks of an “eligibility pyramid.” (PAPPG, v.4 pg. 38) FEMA evaluates each building block to determine eligibility, starting at the foundation (Applicant) and working up to the top (Cost).

# **PUBLIC ASSISTANCE: Eligibility Determinations**

## **Requests for Information (RFI)**

FEMA may require additional information or documentation to evaluate eligibility. In these cases, FEMA requests the information or documentation by submitting a Request for Information. Responses to RFIs are due by the deadline specified in the RFI.

## **Notification of an Ineligibility Determination**

When determining that the Applicant, facility, work, or cost is ineligible, FEMA provides written notice via a Determination Memorandum (DM) or a letter that includes:

- Explanation of what assistance FEMA denied and, as applicable, the amount of assistance denied for each item
- The basis for FEMA's denial, including the provisions of law, regulations, or policy that support the determination
- A complete list of all documents reviewed (clearly titled for future reference)
- Information regarding the Applicant's rights and procedures to appeal

## PUBLIC ASSISTANCE: APPEALS

# A DETERMINATION RELATED TO FEDERAL ASSISTANCE MAY BE APPEALED.

The time limit for appeal submission is

**60 days**

from receipt of notice of the action which is being appealed.

Submit WRITTEN appeals to SEMA for processing.

### **Applicants Include:**

- **State**
- **County**
- **City/Town/Village**
- **Other State Political Subdivisions**
- **Certain Private Non-Profit Organizations (PNPs)**
- **Native American Tribes and Tribal Organizations**

## **Private Non-Profit Entities (PNPs)**

### **Critical service facilities:**

- Education
- Utility
- Emergency Medical
- Emergency Services

### **Non-critical, but essential social services to the general public:**

- Childcare
- Custodial Care
- Rehabilitation
- Libraries
- Museums & Zoos
- Houses of Worship

### **Private Non-Profit (PNP) Entities Must Submit With RPA:**

1. PNP Facility Questionnaire (FEMA Form 90-121),
2. A current tax exemption status letter, or non-revenue producing/non-profit status letter from the state,
3. Proof of ownership or legal responsibility,
4. Established purpose of facility (charter or bylaws),
  - a) Services Provided
  - b) To Whom The Services Are Provided
  - c) Calendar Of Service
5. Insurance,
6. Accreditation for Educational Facilities.

### **PNP: Small Business Administration Loan Requirement**

Following a Major Disaster Declaration, the U.S. Small Business Administration (SBA) can provide loans to businesses for facility restoration. For PNPs with facilities that provide non-critical, essential social services, FEMA only provides PA funding for eligible Permanent Work costs that an SBA loan will not cover for those facilities.



### **PNP: Small Business Administration Loan Requirement**

Therefore, non-critical PNPs must also apply for a disaster loan from the SBA and receive a determination for Permanent Work on facilities that:

- Provide non-critical services; or
- Are mixed-use facilities and the eligible portion of the facility is used to provide services that are entirely non-critical.

## Basic Eligibility Requirements

- Damage must be the direct result of a declared event and have occurred during the established incident period.
- Damage or work must be located within a County declared by the President.
- Repairs must be the legal responsibility of the eligible Applicant at the time of the disaster event.

### **Environmental & Historic Preservation (EHP) Requirements**

**Several statutes, executive orders (EOs), and regulations establish requirements to protect the environment and preserve the Nation's historic and archaeological resources. FEMA reviews each PA project to ensure the work complies with applicable Federal EHP laws and implementing regulations, and applicable EOs.**

**The Applicant is responsible for complying with applicable Federal, State, Territorial, or Tribal EHP laws even if FEMA is not providing PA funding for all of the work.**

## Environmental & Historic Preservation (EHP) Requirements

FEMA provides technical support to Applicants throughout the recovery process to help ensure compliance with all EHP laws, regulations, and EOs, as well as to identify opportunities to incorporate conservation measures in the project area for the protection and preservation of environmental or historic resources.

See Appendix A (PAPPG Version 4 2020): *Environmental and Historic Preservation Compliance* for a description of frequently encountered EHP statutes, EOs, and regulations.

### **Summary of Commonly Applicable EHP Statutes and Executive Orders for the State of Missouri**

- **National Environmental Policy Act (NEPA)**
- **National Historic Preservation Act (NHPA)**
- **Endangered Species Act (ESA)**
- **Clean Water Act (CWA)**
- **Clean Air Act (CAA)**
- **Executive Order 11988, Floodplain Management**
- **Executive Order 13112, Invasive Species**
- **Farmland Protection Policy Act**
- **Wild and Scenic Rivers Act**
- **Resource Conservation and Recovery Act (RCRA)**

### National Historic Preservation Act (NHPA)

- Ground disturbing activities, such as sources of fill (borrow pits), realignment or expanding roadways, change in construction footprint, must be reviewed by FEMA and the State Historic Preservation Office (SHPO).
- Structures over 50 years of age must be reviewed by FEMA and the SHPO.

### Endangered Species Act (ESA)

- All projects will be reviewed for their effects to threatened and endangered species and their critical habitat in coordination with the MO Department of Conservation Heritage Review and consultation with the United States Fish and Wildlife Service (USFWS).

### **Clean Water Act (CWA)**

- All projects involving work in Waters of the U.S. require permits and coordination with the USACE; documentation of the coordination, logic, and decision processes, is required. A compliance narrative may also be required.

### **Clean Air Act (CAA)**

- Debris removal/reduction from burning does require a burn permit from Missouri Department of Natural Resources (MO DNR); copies of compliance documentation may be required.



# PUBLIC ASSISTANCE: FACILITY ELIGIBILITY

## FACILITY DEFINITION [44 CFR 206.201(c)]

A facility is a building, system, or equipment, built or manufactured, or an improved and maintained natural feature.

### **Examples Include:**

- Flood control, navigation, irrigation, reclamation, public power, sewage treatment and collection, water supply and distribution, watershed development, or airport facility;
- Non-Federal aid street, road, or highway. (Federal aid roads are only eligible for emergency protective measures);
- Other public buildings, structures, or systems, including those used for educational, recreational, or cultural purpose; and
- Public parks.

### **Inactive or Partially Inactive Facility [44 CFR 206.226(k)(2)]**

To be eligible, a facility must have been in active use at the start of the incident period. Inactive facilities are ineligible, unless one of the following conditions is met:

- **The facility was only temporarily inactive for repairs or remodeling (provided a contractor is not responsible for repair of disaster-related damage);**
- **The Applicant firmly established future active use in an approved budget; or**
- **The Applicant can clearly demonstrate its intent to begin use within a reasonable amount of time.**

### **Facility Scheduled for Repair or Replacement**

Facilities that are not yet under contract but are scheduled for repair or replacement using non-Federal funds are eligible provided that the claimed damage did not exist prior to the incident. If damage existed prior to the incident, only the repair of damage caused by the incident is eligible.

A facility scheduled for replacement within 12 months of the start of the incident period using Federal funds is ineligible. In such a case, the Applicant should coordinate with the agency funding the project to expedite replacement, if possible.

### **List of Impacts / Damage Inventory Reporting Deadline**

- The Applicant is required to identify and report all of its incident-related impacts to FEMA within 60 days of the Recovery Scoping Meeting. [44 CFR 206.202(d)(1)(ii)]
- FEMA may extend the deadline to identify and report the impacts if the Applicant submits a request with justification based on extenuating circumstances beyond the Recipient's or Applicant's control. [44 CFR 206.202(f)(2)]
- A Damage Inventory Form is available for download from Grants Portal in an Excel spreadsheet format.

## Grouping Impacts into Projects

The Program Delivery Manager (PDMG) works with the Applicant and Program Delivery Task Force Leader (PDTFL) to identify sites and facilities that can be combined into one project. This is a two-step process:

1. Create groups on categories of work and facility types.
2. Identify sites or facilities that should be formulated into separate projects.

After initially grouping sites and facilities into one project, identify sites or facilities that need to be separated from the initial grouping and formulated into separate projects.

## Site Inspections and Obtaining Damage Information

### Obtaining Damage Information

FEMA gathers project-specific information by conducting site inspections and obtaining documentation.

FEMA requests information and documentation required to substantiate the eligibility of a project. The Applicant is responsible for providing this information and documentation to support that its facilities, work, and costs are eligible based on the applicable laws, regulations, EOs, and policies.

At a minimum, FEMA usually requires the “who, what, when, where, why, and how much” for each item claimed.

# Site Inspections and Obtaining Damage Information

### Site Inspections

Damage information is the foundation of the overall project award (i.e. Scope of Work and cost eligibility are tied to the eligible damage). Therefore, FEMA and the Applicant need to reach agreement on the disaster-related damage description and dimensions, emergency protective measures, and debris impacts before proceeding with SOW development. If there are unresolved issues, FEMA documents the decision in a Determination Memo. Applicants should still concur on the portion of the damage that is agreed-upon so that the process can move forward.

To expedite the process, in lieu of FEMA inspections at all sites, the Applicant may submit damage information and documentation for FEMA to review and validate using a sampling methodology.

**The Project Worksheet (PW) identifies and describes the approved repair/replacement and eligible costs for completing the project work.**

**The Applicant is responsible for completing the Scope of Work (SOW) as specified in the obligated Project Worksheet (PW).**

**Any variance to the Scope of Work must be reported to SEMA prior to beginning the repairs.**



## PUBLIC ASSISTANCE: COST ELIGIBILITY

Although costs are the final component evaluated for eligibility, this criterion applies to all costs claimed. Not all costs incurred as a result of the incident are eligible. To be eligible, costs must be:

- Directly tied to the performance of **eligible work**;
- **Adequately documented**;
- **Reduced by all applicable credits**, such as insurance proceeds and salvage values;
- **Authorized and not prohibited** under Federal and State/Local/Tribal/Territorial (SLTT) government laws or regulations;
- **Consistent with the Applicant's internal policies, regulations, and procedures** that apply uniformly to both Federal awards and other activities of the Applicant; and
- **Necessary and reasonable** to accomplish the work properly and efficiently.

# PUBLIC ASSISTANCE: COST ELIGIBILITY

## Reasonable Costs

**A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the Applicant makes the decision to incur the cost. [2 CFR 200.404]**

**A cost that is both fair and equitable for the type of work being performed.**

**Establish reasonable costs through;**

- The use of historical documentation for similar work, such as timesheets,
  - Hours worked (versus overtime, time and a half, or double time rates), and
  - Eligible charges.
- Average costs for similar work in the area,
- Published unit costs from national cost estimating databases, and
- FEMA cost codes.

***REMEMBER:***

***Cost incurred/paid does not necessarily equal  
a reimbursable expense.***

**It is essential that you accurately document the expenses incurred.  
(2 CFR Part 200)**

**Plan responsibly and record diligently for:**

- Project Development
- Eligible Cost Recovery
- Small Project Accuracy for Validation
- Large Project Accuracy for Validation and Reimbursement
- Federal/State Audits and Financial Review Preparation

# PUBLIC ASSISTANCE: COST ELIGIBILITY

## **Applicant (Force Account) Labor & Fringe Benefits**

FEMA refers to an Applicant's personnel as "force account." FEMA reimburses force account labor based on actual hourly rates plus the cost of the employee's actual fringe benefits. FEMA calculates the fringe benefit cost based on a percentage of the hourly pay rate. Because certain items in a benefit package are not dependent on hours worked, the percentage for overtime is usually different than the percentage for straight-time. Fringe benefits may include:

- Holiday Leave;
- Accrued vacation leave;
- Sick leave;
- Social Security matching;
- Medicare matching;
- Unemployment insurance;
- Workers compensation;
- Retirement;
- Health insurance;
- Life and disability insurance; and/or
- Administrative leave.

Grants Portal provides a Fringe Benefit Calculator for Applicant use.

## LABOR COSTS

FEMA determines the eligibility of overtime, premium pay, and compensatory time costs based on the Applicant's pre-disaster written labor policy, provided the policy:

- Does not include a contingency clause that payment is subject to Federal funding;
- Is applied uniformly regardless of a Presidential declaration; and
- Has set non-discretionary criteria for when the Applicant activates various pay types.

All costs must be reasonable and equitable for the type of work being performed.

REMINDER: For emergency work, only overtime hours are eligible.

### **REASSIGNED EMPLOYEES**

The Applicant may assign an employee to perform work that is not part of the employee's normal job.

FEMA provides PA funding based on the reassigned employee's normal pay rate, not the pay level appropriate to the work, because the Applicant's incurred cost is the employee's normal pay rate.

# TEMPORARY EMPLOYEES

Temporary employees are extra personnel hired as a direct result of the disaster to perform eligible work.

Reasonable wages paid to temporary or part-time employees hired in response to the disaster or emergency who perform eligible emergency work are eligible; including straight time and overtime.

**STATE LABOR REQUIREMENT**

**The Revised Statutes of Missouri (RSMo)  
Sections 285.525 through 285.555  
(Illegal Immigrants) ensures that,  
“....no business entity or employer shall  
knowingly employ, hire for employment, or  
continue to employ an unauthorized alien to  
perform work within the State of Missouri.”**



# PUBLIC ASSISTANCE: COST ELIGIBILITY

## Applicant-Owned Equipment

FEMA provides PA funding for the use of Applicant-owned equipment, including permanently mounted generators, based on hourly rates.

[44 CFR 206.228(a)(1)]

FEMA may provide PA funding based on mileage for vehicles, if the mileage is documented and is less costly than hourly rates.

FEMA only applies equipment rates to the time the Applicant is actually operating equipment. Although costs associated with transporting equipment to an eligible site are eligible, costs for standby time (time spent on hold or in reserve) are ineligible unless the equipment operator uses the equipment intermittently for more than half of the working hours for a given day. In this case the intermittent standby time is eligible.

## FEMA Schedule of Equipment Rates

FEMA has published a Schedule of Equipment Rates that is applicable on a national basis. The rates on this Schedule of Equipment Rates are for applicant-owned equipment in good mechanical condition, complete with all required attachments.

The currently applicable Schedule of Equipment Rates is dated August 27, 2019. The Schedule of Equipment Rates can be found on FEMA's website:

<https://www.fema.gov/schedule-equipment-rates>

# PUBLIC ASSISTANCE: COST ELIGIBILITY

## Local Rates & Equipment with No Established Rate

- Local Rates are those developed under the local government guidelines for use in normal day-to-day operations. FEMA generally provides PA funding for equipment usage on the lower of either the local rate or the FEMA rate.
- However, if the local rate is lower, but it does not reflect all of the costs associated with operating the equipment, FEMA may provide PA funding based on the higher FEMA rate.
- Additionally, if the local rate is higher, the Applicant must document the bases for that rate and obtain approval from FEMA for the higher rate. [44 CFR 206.228(a)(1)(i)]
- If FEMA does not have a rate established for the equipment, the Applicant may either submit a rate for approval or request that FEMA provide a rate.
- If the Applicant submits a rate, it must include documentation demonstrating that each component of the rate is comparable to current market prices.

# PUBLIC ASSISTANCE: COST ELIGIBILITY

## Leased Equipment

When the Applicant leases equipment, FEMA provides PA funding based on the terms of the lease. Leasing costs are eligible if:

- The Applicant performed an analysis of the cost of leasing versus purchasing the equipment; and
- The total leasing costs do not exceed the cost of purchasing and maintaining equipment during the life of the eligible project.

If the leasing costs exceed the cost of purchasing and maintaining the equipment, FEMA determines the amount of eligible costs based on an evaluation of the reasonableness of the costs claimed, including whether the Applicant acted with prudence under the circumstances at the time it leased the equipment.

Leased equipment is subject to procurement guidelines.

### Material Costs

- When available, actual costs for materials/supplies should be taken from invoices/receipts.
- The cost of materials/supplies that were purchased or taken from Applicant stock and used during the performance of eligible work are eligible.
- Cost of materials/supplies taken from stock with no available invoices may be calculated based on Applicant's historical data or current cost as per area vendors' estimates.

## Procurement and Contracting Requirements

- Applicants must comply with Federal procurement requirements as a condition of receiving PA funding for contract costs for eligible work.
- In the case of noncompliance, FEMA applies an appropriate remedy in accordance with its authorities. [2 CFR 200.338]
- FEMA has determined an appropriate remedy under these circumstances is to either deny all costs associated with the contract or, if sufficient information is provided to substantiate a reasonable amount for the eligible work completed.
- FEMA may reimburse the portion of the costs it determines are reasonable and allowable based on all available information and documentation provided.

## Procurement and Contracting Requirements

Tribal and local governments, including Tribal Recipients, and PNPs must comply with:

- Their own documented procurement procedures;
- Applicable State/Local/Territorial/Tribal (SLTT) government laws and regulations; and
- Applicable Federal laws and regulations. [2 CFR 200.318(a)]

If a Federal requirement is different than the SLTT requirement, or the Applicant's own requirements, the Applicant must use the more restrictive requirement.

## Procurement and Contracting Requirements

### Pre-procurement Considerations

Tribal and local governments and PNPs must:

- Establish or update written procurement procedures that reflect applicable SLTT laws and regulations; [2 CFR 200.318(a)] and
- Maintain required written standards of conduct covering conflicts of interest and governing the performance of employees who engage in the selection, award, and administration of contracts. [2 CFR 200.318(c)(1)]

Tribal and local governments and PNPs should also create a prequalified list of responsible contractors identified to possess the qualifications and technical abilities to satisfy the Applicant's potential requirement. [2 CFR 200.319(d)]



## **Procurement and Contracting Requirements**

### **Contracting and Reasonableness of Cost**

FEMA evaluates reasonableness when price competition is lacking or when the selection was noncompliant with the applicable procurement under grant requirements even though there may have been price competition.

If the Applicant selected a contractor with a higher bid than others, it must substantiate its selection based on the selection criteria set forth in its Request for Proposal. Written justification must be submitted to and approved in writing by SEMA PRIOR to awarding of contract.

## Procurement and Contracting Requirements

### General Federal Procurement Requirements

Federal procurement requirements for Tribal and local governments and PNPs are found at 2 CFR 200.318 through 200.326. The requirements include, but are not limited to:

- Providing full and open competition. [2 CFR 200.319(a)]
- Soliciting bids and encouraging the participation of small and minority business, women's business enterprises, and labor surplus area firms when possible. [2 CFR 200.321]
- Performing a cost or price analysis in connection with every procurement action above the simplified acquisition threshold, [48 CFR 2.101] including contract modifications.

## Procurement and Contracting Requirements

### General Federal Procurement Requirements

- Evaluating and documenting the contractor's integrity, compliance with public policy, record of past performance, and financial and technical resources. [2 CFR 200.318(h)]
- Ensuring that the contractor was not suspended or debarred. [2 CFR 200.213]
- Prohibiting the use of statutorily or administratively imposed SLTT geographic preferences in evaluating bids or proposals except where expressly encouraged by applicable Federal law. [2 CFR 200.319(b)]

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## Procurement and Contracting Requirements

### General Federal Procurement Requirements

- Excluding contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals from competing for such procurements to ensure objective contractor performance and eliminate unfair competitive advantage. [2 CFR 200.319(a)]
- Maintaining records to detail the history of the procurement including, but are not limited to:
  - Rationale for the method of procurement;
  - Selection of contract type;
  - Contractor selection or rejection; and
  - The basis for the contract price. [2 CFR 200.318(i)]

## Procurement and Contracting Requirements

### Procurement Methods

Tribal and local governments and PNPs must use one of the following procurements methods:

- Micro-purchase;
- Small purchase procedure;
- Sealed bid (formal advertising);
- Competitive proposal; or
- Noncompetitive proposal (sole-sourcing).

## Procurement and Contracting Requirements

### Noncompetitive Procurement

FEMA may reimburse costs incurred under a contract procured through a noncompetitive proposal, also referred to as sole-source, only when one or more of the following circumstances apply:

- The item is only available from one source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- FEMA or the Recipient expressly authorizes a noncompetitive proposal in response to a written request from the Applicant; or
- After solicitation of several sources, competition is determined inadequate.  
[2 CFR 200.320(f)]

The Applicant must identify the circumstance and provide documentation of the justification.

## Procurement and Contracting Requirements

### Contract Types

FEMA reimburses costs incurred by Tribal and local governments and PNPs using three types of contract payment obligations: fixed price, cost-reimbursement and, to a limited extent, time & materials (T&M) contracts.

Local governments and PNPs must maintain oversight on all contracts to ensure contractors perform according to the conditions and specifications of the contract and any purchase orders. [2 CFR 200.318(b)]

## Procurement and Contracting Requirements

### Time and Material (T&M) Contracts

T&M contracts do not provide incentives to the contractor for cost control or labor efficiency. Therefore, use of T&M contracts are only allowed if all of the following apply:

- No other contract type was suitable;
- The contract has a ceiling price that the contractor exceeds at its own risk; and
- The Applicant maintains a high degree of oversight to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

[2 CFR 200.318(j)]



## Procurement and Contracting Requirements

### **Cost-Plus-Percentage-of-Cost or Percentage-of-Construction Contracts**

In addition to limiting reimbursement to costs that can be determined to be reasonable, FEMA does not reimburse the increased cost associated with the percentage on a cost-plus-percentage-of-cost calculation or percentage-of-construction cost method. [2 CFR 200.323(d)]

This type of contract billing is prohibited as it does not provide incentive to contractors to control costs because the contractor's profit increases as the cost of performance increases.

## Procurement and Contracting Requirements

### Documentation Requirements

The Applicant should submit the following to support contract costs claimed (this is not an all-inclusive list):

- Procurement policy;
- Procurement documents (i.e. requests for proposals, bids, selection process, etc.);
- A cost or price analysis;
- Contracts, change orders, and summary of invoices;
- Dates worked; and
- Documentation that substantiates a high degree of contractor oversight such as daily or weekly logs and records of performance meetings.

### **Donated Resources**

FEMA allows Applicants to use the value of donated resources to offset the non-Federal cost share of its eligible Emergency Work Project Worksheets (PWs) and Direct Federal Assistance.

FEMA applies the offsets regardless of the cost share arrangements between the Recipient and the Applicants.

### Donated Resources

In addition to overarching Federal PA Program requirements as defined in the FEMA Public Assistance Program and Policy Guide (PAPPG), the following also applies.

**Offset may be applied if *ALL* of the following conditions are met:**

- Donated resource is from a third-party (private entity or individual not employed by the Applicant, Federal, State, Territorial, or Tribal government),
- Resource is necessary and reasonable for accomplishment of the project,
- Applicant uses the resource in the performance of eligible work and within the respective project's period of performance, and
- Applicant or volunteer organization tracks the resources and work performed, including description, specific locations, and hours.

# Duplication of Benefits is Not Allowed

- FEMA cannot provide funding that duplicates insurance proceeds,
- FEMA cannot duplicate funds provided by another Federal Agency, and
- Grants and cash donations from other sources such as Community Development Block Grants (CDBGs) may only be used toward the non-Federal cost share or Public Assistance ineligible work.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Insurance Requirements

- Actual or anticipated insurance proceeds must be deducted from the eligible project costs for facilities that are insured, or should have been insured at the time of the disaster event (National Flood Insurance Program) and/or obtain and maintain conditions of previous PA grants.
- All Applicants are required to obtain and maintain insurance coverage on all insurable facilities, as a condition of Public Assistance funding.
- Additional specific requirements will be applied to all flood damaged facilities located within the Special Flood Hazard Area.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Emergency Work (Category A & B)

Are required actions taken to:

- Save lives;
- Protect public health and safety;
- Protect improved property; or
- Eliminate or lessen an immediate threat of additional damage.

[44 CFR 206.201(b)]

“Immediate threat” is the threat of additional damage or destruction from an incident that can reasonably be expected to occur within 5 years of the declared incident. [44 CFR 206.221(c)]

The deadline to complete Emergency Work is 6 months from the declaration date unless the Recipient or FEMA authorize an extension.

[44 CFR 206.204(c)&(d)]

## Category A – Debris Removal

Debris removal activities, such as clearance, removal, and disposal, are eligible as Category A if the removal is in the public interest based on whether the work:

- Eliminates immediate threats to lives, public health, and safety;
- Eliminates immediate threats of significant damage to improved public or private property;
- Ensures economic recovery of the affected community to the benefit of the community at large; or
- Mitigates risk to life and property by removing Substantially Damaged structures and associated structures and appurtenances as needed to convert property acquired using HMGP funds to uses compatible with open space, recreation, or wetlands management practices. Such removal must be completed within 2 years of the declaration date unless extended by the FEMA Assistant Administrator of the Recovery Directorate.



## Category A – Debris Removal

### Debris Removal From Private Property

- Debris removal from private property (PPDR) is the responsibility of the property owner and is usually ineligible under the PA Program.
- In limited circumstances, based on the severity of the impact of an incident and whether debris on private property is so widespread that it threatens public health and safety or the economic recovery of the community, FEMA may determine that debris removal from private property is eligible under the PA Program.
- In such cases, FEMA works with the SLTT governments to designate specific areas where debris removal from private property, including private waterways, is eligible. The debris removal must be in the public interest, not merely benefiting an individual or a limited group of individuals.

## **Category A – Debris Removal**

### **Alternative Procedures for Debris Removal**

The Applicant may elect to participate in the Alternative Procedures for debris removal and receive reimbursement for straight-time for the Applicant's budgeted employees that conduct debris removal activities. The Applicant opts-in by including straight-time in their debris removal (Category A) project claims.

## Category B – Emergency Protective Measures

Emergency Protective Measures conducted before, during, and after an incident are eligible if the measures:

- Eliminate or lessen immediate threats to lives, public health, or safety;  
OR
- Eliminate or lessen immediate threats of significant additional damage to improved public or private property in a cost-effective manner.

[44 CFR 206.225(a)(3)]

FEMA may require certification by Federal or SLTT government officials that a threat exists, including:

- Identification and evaluation of the threat; and
- Recommendations of the work necessary to cope with the threat.

[44 CFR 206.225(a)(2)]

## Category B – Emergency Protective Measures

Eligible Emergency Protective Measures may include but are not limited to the following:

- Saving Lives and Protecting Public Health and Safety
- Protecting Improved Property
- Emergency Protective Measures Conducted by PNP Organizations
- Flood Fighting
- Emergency Operations Centers
- Emergency Access
- Evacuation and Sheltering
- Temporary Relocation of Essential Services
- Emergency Repair or Stabilization

Some Emergency Protective Measures are temporary in nature. Costs related to placement and removal should be included in the Scope of Work.

## Permanent Work

Permanent Work (Categories C-G) is work required to restore a facility to its pre-disaster design (size and capacity) and function in accordance with applicable codes and standards. [44 CFR 206.201(j)]

The deadline to complete Permanent Work is 18 months from the declaration date unless the Recipient or FEMA authorize an extension. [44 CFR 206.204(c)&(d)]

# Categories of Eligible Permanent Work

- C. Road and Bridge systems
- D. Water Control Facilities
- E. Public Buildings and Equipment
- F. Public Utilities
- G. Parks, Recreational, and Other Facilities

**REMINDER: Eligible permanent work is intended to repair, restore, or replace damaged facilities that are currently in use and the legal responsibility of the Applicant.**

## Permanent Work

### **Environmental and Historic Preservation Considerations**

The Applicant needs to make every effort to afford FEMA the opportunity to perform EHP reviews prior to starting any work that has potential to impact the environment or historic properties, including archaeological services. FEMA must ensure that the project complies with appropriate EHP laws, regulations, and EOs.

Permanent Work Projects that restore a damage facility essentially to pre-disaster design are excluded from National Environmental Policy Act (NEPA) review through a statutory exclusion (STATEX). All others require NEPA review. Many qualify for one of the Categorical Exclusions (CATEXs) under NEPA which apply to actions that typically have little or no impact on the environment, as long as there are no “extraordinary circumstances” as defined by DHS.

## Permanent Work

### **Environmental and Historic Preservation Considerations**

If a project does not meet a CATEX, it will require a higher level of NEPA analysis. The most common higher-level analysis is referred to as an environmental assessment (EA). In rare circumstances, a project may require an environmental impact statement (EIS), the highest level of analysis, which requires a much more detailed analysis than an EA. FEMA is responsible for NEPA compliance and identifying the required level of review.

FEMA may be required to consult with Federal, State, Territorial, and Tribal government resource agencies before the Applicant begins work. Examples include:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Army Corps of Engineers (USACE)
- State Historic Preservation Office (SHPO)



# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### **Requirement to Obtain and Maintain Insurance**

Applicants that receive PA funding for permanent work to replace, repair, reconstruct, or construct a facility must obtain and maintain insurance to protect the facility against future loss. [44 CFR 206 Subpart I] This requirement applies to insurable facilities or property, including those funded as an Alternate, Improved, or Alternate Procedures Project.

The Applicant must insure facilities with the types and extent of insurance reasonably available, adequate, and necessary to protect against future loss to the property.

The Applicant is not required to obtain and maintain insurance on facilities with \$5,000 or less in eligible costs (prior to any reductions). [44 CFR 206.253(d)]

If the Applicant does not comply with the requirement to obtain and maintain insurance, FEMA will deny or deobligate PA funds related to the noncompliance from the current disaster.

**Review the Conditions Information in the obligated Project Worksheet for possible Obtain and Maintain requirements.**

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

The primary objective of Public Assistance is to repair a facility to pre-disaster condition. However, in some circumstances, FEMA may apply upgrades to facilities as required by Codes and Standards or through the use of Hazard Mitigation.

### **Codes and Standards – Upgrades to Facilities**

FEMA provides PA funding to restore facilities based on pre-disaster design and function in conformity with current applicable codes, specifications, and standards. The Applicant needs to provide documentation to support the eligibility of code or standard upgrades, including, but not limited to, the requirement to apply the codes or standards and to support they were formally adopted, implemented, and uniformly applied.

**Codes and standards must be reasonable.**

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### Codes and Standards - Eligibility Criteria

Facility repairs and new construction may “trigger” upgrade requirements established by codes or standards. Upgrades required by Federal or SLTT repair or replacement codes or standards are eligible only if the code or standard: [44 CFR 206.226(d)]

- Applies to the type of restoration required;
- Is appropriate to the pre-disaster use of the facility;
- Is reasonable, in writing, formally adopted by the SLTT government, and implemented by the Applicant on or before the declaration date, OR is a legal Federal requirement;
- Applies uniformly; and
- Was enforced during the time it was in effect.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### FEMA Consensus-Based Codes, Specifications and Standards

For buildings, electric power, roads, bridges, potable water supply, and wastewater, FEMA **requires** that Applicants incorporate specific codes, specifications, and standards in accordance with FEMA Recovery Interim Policy FP 104-009-11 *Consensus-Based Codes, Specifications and Standards for Public Assistance (v2.1)*.

**Effective as of: August 1, 2017**

Source: Section 1235(b) of the Disaster Recovery Reform Act of 2018 (DRRA)

Located at: <http://www.fema.gov/media-library/assets/documents/184615>

FEMA will update Appendix A of this interim policy periodically to incorporate additional consensus-based codes, specifications and standards.

- The Applicant will be responsible for identifying and applying the applicable consensus-based codes, specifications and standards used in each PA project.
- The Applicant will use the consensus-based codes, specifications, and standards outlined in Appendix A as the minimum design criteria for eligible projects.

## Permanent Work

### **Hazard Mitigation (PA Program – Section 406 of the Stafford Act)**

Hazard mitigation is any sustained action taken to reduce or eliminate long-term risk to people and property from natural hazards and their effects.

FEMA has authority to provide PA funding for cost-effective hazard mitigation measures for facilities damaged by the incident. [44 CFR 206.226(e)]

FEMA evaluates proposed PA mitigation measures for eligibility, cost-effectiveness, technical feasibility and effectiveness, and compliance with EHP laws, regulations, and EOs. In addition, FEMA ensures that the mitigation does not negatively impact the facility's operation or surrounding areas or create susceptibility to damage from another hazard.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### Repair vs. Replacement

When evaluating whether a damaged facility is eligible for replacement, FEMA compares the repair cost with the replacement cost and evaluates the feasibility of repairing the facility. [44 CFR 206.226(f)]

A facility is considered repairable when:

- The cost to repair the disaster-related damage does not exceed 50 percent of the cost to replace the facility based on its pre-disaster size, capacity, and function; and
- It is feasible to repair the facility so that it can perform the pre-disaster function as well as it did prior to the incident. [44 CFR 206.226(f)(1)]

### Relocation

FEMA may approve funding for and require restoration of an Applicant's destroyed (i.e., eligible for replacement) facility at a new location. See pages 160 and 161 of the PAPPG (Version 4) for more information.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### Capped Projects

FEMA provides three options that provide flexibility for the Applicant to use PA funding differently than restoring the pre-disaster design and function of the facility. For these options, FEMA caps the amount of PA funding based on the estimated amount to restore the damaged facility to its pre-disaster design and function, including current eligible codes and standards.

The three capped project options are:

- Alternative Procedures Project under Section 428 (Large Project only)
- Improved Projects
- Alternate Projects

Capped projects may involve significant changes to the pre-disaster configuration of a facility (e.g., location, footprint, or size). FEMA conducts EHP compliance reviews on the actual proposed SOW to be performed, prior to approving the project.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### **Capped Projects – Alternative Procedures Projects**

This type of project offers the maximum amount of flexibility with how the Applicant may use PA funding, including use of excess funds which are not eligible under the Improved or Alternate Project options. The Applicant may use funds across all Permanent Work Alternative Procedures Projects with no requirement to rebuild communities back to what existed prior to the disaster.

FEMA caps Federal funding for an Alternative Procedures Project based on the aggregate Federal share of the approved estimated cost:

- To restore the damaged facilities to pre-disaster design and function in accordance with eligible codes and standards; and
- For cost-effective PA mitigation measures associated with the actual restoration SOW that the Applicant will perform.

FEMA will complete a fixed-cost estimate for all large Permanent Work Projects. FEMA will transmit this estimate as a fixed-cost offer to the Applicant for consideration. When the Applicant accepts a fixed cost offer for a Large Project, FEMA considers it an Alternative Procedures Project.



# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### **Capped Projects – Alternative Procedures Projects**

The Applicant may use Alternative Procedures Permanent Work Project funds, including any excess funds across all of its Alternative Procedures Permanent Work Projects.

Any excess funds remaining after the approved SOW is complete may be used for cost-effective activities that reduce the risk of future damage, hardship, or suffering from a major disaster, and activities that improve future PA operations or planning. The Applicant must submit a proposed SOW for use of any excess funds, along with a project timeline to the Recipient within 90 days of completing its last Alternative Procedures Project.

FEMA evaluates the proposed use of excess funds for reasonableness to ensure prudent use of funds, the submitted project timeline, and approves an appropriate deadline for work completion.

If the Applicant does not accept the fixed-cost offer, the project will be processed utilizing standard procedures and final funding will be based on actual costs.

# PUBLIC ASSISTANCE: WORK ELIGIBILITY

## Permanent Work

### Capped Projects – Improved Projects

The Applicant may wish to make improvements to a damaged facility that are not required by eligible codes or standards. A project that restores the pre-disaster function of a facility and incorporates improvements or changes to the pre-disaster design is an Improved Project.

### Capped Projects – Alternate Projects

The Applicant may determine that the public welfare is not best served by restoring the function of the damaged facility. When this occurs, the Applicant must obtain FEMA's approval to apply PA funding toward a different facility (or facilities). The Alternate Project must be a permanent project that benefits the general public, serving the same general area that was being served by the original facility.

FEMA limits Federal funding for an Improved or Alternate Project to the lesser of the following:

- The Federal share of the approved estimate to restore the damaged facility to its pre-disaster design and function; or
- The Federal share of the actual costs of completing the Improved or Alternate Project.

# **Interim Policy: FP104-11-2; effective August 1, 2017**

## **Management Costs under the Interim Policy**

The following procedures apply to all Applicants that receive management cost contributions under the Interim Policy (including DR-4552). Applicants may only request the initial Category Z Project Worksheet (PW) once projects have been obligated.

The Category Z PW will be based on the Total Award Amount. The Total Award Amount is the actual eligible PA Project cost, including the non-Federal share, after insurance and any other reductions. It does not include Donated Resources or management costs.

Applicants need to certify that the management activities and associated costs claimed are eligible, consistent with the Interim Policy, and not related to ineligible projects.

## **Interim Policy: FP104-11-2; effective August 1, 2017**

If and when a Applicant requests a Category Z PW, the PDMG will formulate a Category Z PW for 5% of the Total Award Amount obligated for a Applicant at the time of its request. FEMA may process amendments up to once a quarter for 5% of the Total Award Amount obligated for the Applicant at the time of its amendment request.

If all final actual management costs are known at the time the Applicant requests a Category Z PW, the Applicant should submit its claim for all eligible costs incurred and FEMA will obligate the Category Z PW based on the actual eligible costs up to the 5% maximum.

All Category Z PWs will be reconciled and reimbursed based on actual costs; this includes Category Z PWs that are below the large project threshold.

**EXAMPLE:** A Applicant has 5 PW's with a combined Total Award Amount obligated at \$300,000. The Category Z PW would be obligated for a maximum of 5% of \$300,000, or \$15,000. If another PW is obligated, 5% of those costs would be added to the Category Z PW as an amendment request.

# **Interim Policy: FP104-11-2; effective August 1, 2017**

## **Strategic Funds Management (SFM)**

- In an effort to obligate management cost funds in a fiscally responsible manner, FEMA applies SFM requirements to Interim Policy Category Z PWs.
- FEMA will use the SFM process for Category Z PWs or versions where the Applicant will not require funds for more than one year.
- In such cases, Applicants must provide projected dates for when and how much management cost funding is needed, and a plan for expending management costs funds.

# **Interim Policy: FP104-11-2; effective August 1, 2017**

## **TRACKING AND DOCUMENTING MANAGEMENT COSTS**

- Applicants must provide documentation to substantiate costs claimed for eligible management activities. Additionally, costs claimed must be **reasonable**.
- An explanation of work performed with a representative sample of daily logs/activity reports. The activity must be related to eligible projects. Therefore, management costs associated with an appeal that is ultimately denied are not eligible.
- Documentation to substantiate the necessity of any claimed office supplies, equipment, office space, meetings or site inspections, travel costs (must include copy of travel policy), and training costs (including the location, dates, and title of the course).

## **Interim Policy: FP104-11-2; effective August 1, 2017**

The Applicant may claim management costs incurred up to whichever of the following occurs first:

- a. 180 days after the Applicant completes its last non-management cost PA project; or
- b. 180 days after the latest performance period of the Applicant's non-management cost PA project; or
- c. Two years from the date of an Emergency Declaration; or
- d. Eight years from the date of the Major Disaster Declaration.

## Scope of Work Development

For completed work, the Applicant must describe the completed SOW for each of the projects and provide supporting documentation.

For Emergency Work, the SOW includes work required to address immediate threats and to remove debris and must include quantitative information. For Permanent Work, the SOW includes a description of how the Applicant plans to repair, or has repaired, the damage, including repair dimensions and hazard mitigation description and dimensions.

The Applicant should provide the following for each site (not an all-inclusive list):

- Whether the work is complete;
- Who performed, or will perform, the work (e.g., force account, contract, etc.);
- Proposed or completed, repair scope of work, including PA mitigation measures; and
- Technical studies, reports, and assessments.



## Cost Development

### Project Thresholds

FEMA establishes a minimum project threshold for each Federal fiscal year. If a project application totals less than the minimum threshold after the Applicant has accounted for all project costs—including insurance proceeds and other reductions to avoid duplication of benefits—the project is ineligible. [44 CFR 206.202(d)(2)]

**The minimum project threshold for FY 2020 is \$3,300.00**

FEMA also establishes a dollar threshold each Federal fiscal year for the implementation of Simplified Procedures under Section 422 of the Stafford Act. This threshold defines a project as large or small.

**The small project cap threshold for FY 2020 is \$131,100.00**

## Small Projects

- Minimum request of \$3,300.00.
- Paid upon Project Worksheet obligation.

For Small Projects, FEMA may accept certification in lieu of documentation and may process the projects based on estimated costs even if all work is completed. However, Small Project estimates are not subsequently adjusted to reflect actual costs. The Applicant must still retain documentation for Net Small Project Overrun appeals and audits.

A Net Small Project Overrun appeal must be submitted to the Recipient within 60 days of the completion of the final small project.

### Large Projects

With the exception of Capped Projects, the final eligible amount for a Large Project is the actual documented cost incurred to complete the eligible SOW. [44 CFR 206.203(c)(1)].

The Applicant must provide documentation to support the actual costs within 90 days of work completion.  
[44 CFR 206.205(b)(1) & 2 CFR 200.343]

Final reimbursement is made following project completion, site inspection, file reviews, and project closeout by FEMA.

## Quarterly Progress Reports

The Applicant must submit the following for each incomplete on a quarterly basis:

- Total expenditures to date;
- Status of the project (either construction phase or percent complete);
- Whether the work is complete;
- Projected or actual work completion date; and
- Any circumstances that could delay the project.

Quarters end on the last day of March, June, September, and December. Quarterly Reports are due to be submitted to SEMA by the last day of the following month.

## Change in Scope of Work Requests

While proceeding with the project, the Applicant must ensure that it uses PA funding only for eligible work as identified in the Project. The Applicant may identify a need to change the SOW. The Applicant should engage the Recipient and FEMA as soon as it identifies a change to the SOW to allow FEMA time to review changes for eligibility and EHP compliance requirements prior to commencement of work. If the Applicant begins work associated with a change before FEMA review and approval, it jeopardizes PA funding.

A change requires a written request with detailed justification and documentation to support the eligibility of the requested revision.

[44 CFR 206.204(e) and 2 CFR 200.308]

If the request involves previously unreported damage, the Applicant must also provide documentation demonstrating how the incident caused the damage. The Recipient must forward the request to FEMA with its written recommendation.

[44 CFR 206.204(e)]

### **Change in Scope of Work Requests**

Changes in SOW due to one of the following reasons are generally eligible:

- Alternate repair method is more cost-effective than the original proposed repair method;
- Original repair method is not technically feasible;
- Increase in previously approved quantities due to errors and omissions;
- Hidden damage discovered during construction and is disaster-related; or
- The Applicant wishes to pursue an Improved or Alternate Project.

# **Work Completion Deadlines – Extension Requests**

**The deadline for Emergency Work is 6 months from the declaration date.**

**The deadline for Permanent Work is 18 months from the declaration date.**

If the Applicant determines it needs additional time to complete work, it must submit a written request for a time extension to the Recipient with the following information:

- Documentation substantiating delays beyond its control;
- A detailed justification for the delay;
- Status of the work; and
- The project timeline with the projected completion date.

SEMA has authority to extend deadlines for individual projects based on extenuating circumstances. Except for temporary relocation projects, SEMA may extend Emergency Work up to an additional 6 months and Permanent Work up to an additional 30 months.

## Work Completion Deadlines

Although FEMA only provides PA funding for work performed on or before the approved deadline, the Applicant must still complete the approved SOW for funding to be eligible.

[44 CFR 206.204(d)(2)]

FEMA deobligates funding for any project that the Applicant does not complete. If the Applicant completes a portion of the approved SOW and the completed work is distinct from the uncompleted work, FEMA only deobligates funding for the uncompleted work.



## Audits and Compliance

Recipients and Applicants are subject to Federal and non-Federal audits. Records are subject to audit by State or Territorial government auditors, FEMA, the U.S. Department of Homeland Security Office of Inspector General, and the U.S. Government Accountability Office (GAO). [2 CFR 200.336] FEMA may adjust project funding due to audit findings.

### Single Audit Requirement

A Recipient or Applicant that expends \$750,000 or more in Federal funds during its fiscal year must perform a single or program-specific audit.

[2 CFR 200.501]

SEMA reserves the right to conduct periodic reviews of any Applicant records and non-compliant applicants.

Approval of procurement procedures, cost documentation, source documents, etc. by FEMA representatives DOES NOT provide assurance that auditors will not require that you return disaster grant funds should the Office of the Inspector General (OIG) disagree with those procedures.

## **Documentation Retention Requirements**

Applicants must maintain all source documentation for each project for 3 years after the date of transmission of the final expenditure report for project completion as certified by the Recipient.  
[2 CFR 200.302(b)(3)]

# SEMA RECOMMENDATIONS

**Maintain effective communications throughout the process between Applicant, SEMA, and FEMA. Contact your SEMA Public Assistance Team with any and all questions.**

**When in doubt, ask before performing work. Submit requests to make changes to projects PRIOR to beginning work to maintain eligibility.**

**Request time extensions prior to the expiration of Period of Performance deadlines.**

**Use proper procurement standards. Follow contracting rules. Maintain appropriate oversight of contractors.**

**Follow your established annual operating revenue internal controls (or more stringent) when accounting for and expending disaster grant funds.**

**It is not recommended to deposit grant funds in an interest bearing account prior to the completion of work. Any/all interest earned must be remitted to SEMA.**

**Contact SEMA to request interim payments and when projects are completed.**

# SEMA RECOMMENDATIONS

## **MAINTAIN ELIGIBILITY BY COMPLYING WITH WRITTEN SCOPE OF WORK FOR ALL OBLIGATED PROJECTS.**

**Identify Permitting, EHP, and Codes and Standards opportunities.**

**Begin documentation immediately. Record volunteers for Donated Resources projects. Take photographs of damages incurred. Identify all damages as soon as possible.**

**Maintain detailed records identifying the source and application of funds for financially assisted activities.**

**Organize timesheets, equipment logs, and materials by facility or site.**

**Establish a project file (or site files) containing the approved corresponding Project Worksheet (PW) and all documentation pertaining to the Project (or site).**

**Review invoices prior to payment and submission to SEMA. Costs incurred and paid do not necessarily equal reimbursable expenses.**

**Document completed work with photographs for closeout.**

# SUBMISSION OF REQUEST FOR PUBLIC ASSISTANCE FORM

# SUBMIT YOUR RPA NOW!

# REFER TO SLIDE 6 FOR GUIDANCE!

DEPARTMENT OF HOMELAND SECURITY FEDERAL EMERGENCY MANAGEMENT AGENCY REQUEST FOR PUBLIC ASSISTANCE				O.M.B. NO. 1660-0017 Expires April 30, 2013	
<b>PAPERWORK BURDEN DISCLOSURE NOTICE</b> Public reporting burden for this form is estimated to average 10 minutes. Burden means the time, effort and financial resources expended by persons to generate, maintain, disclose, or to provide information to us. You may send comments regarding the burden estimate or any aspect of the collection, including suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, Paperwork Reduction Project (OMB Control Number 1660-0017). You are not required to respond to this collection of information unless it displays a valid OMB number. <b>NOTE: Do not send your completed questionnaire to this address.</b>					
APPLICANT (Political subdivision or eligible applicant)				DATE SUBMITTED	
COUNTY (Location of Damages. If located in multiple counties, please indicate)				DUNS NUMBER	
APPLICANT PHYSICAL LOCATION					
STREET ADDRESS					
CITY		COUNTY		STATE	ZIP CODE
MAILING ADDRESS (if different from Physical Location)					
STREET ADDRESS					
POST OFFICE BOX		CITY		STATE	ZIP CODE
Primary Contact/Applicant's Authorized Agent			Alternate Contact		
NAME			NAME		
TITLE			TITLE		
BUSINESS PHONE			BUSINESS PHONE		
FAX NUMBER			FAX NUMBER		
HOME PHONE (Optional)			HOME PHONE (Optional)		
CELL PHONE			CELL PHONE		
E-MAIL ADDRESS			E-MAIL ADDRESS		
PAGER & PIN NUMBER			PAGER & PIN NUMBER		
Did you participate in the Federal/State Preliminary Damage Assessment (PDA)? <input type="checkbox"/> YES <input type="checkbox"/> NO					
Private Non-Profit Organization? <input type="checkbox"/> YES <input type="checkbox"/> NO					
If yes, which of the facilities identified below best describe your organization?					
<small>Title 44 CFR, part 208.221(e) defines an eligible private non-profit facility as: "any private non-profit educational, utility, emergency, medical or custodial care facility, including a facility for the aged or disabled, and other facility providing essential governmental type services to the general public, and such facilities on Indian reservations." "Other essential governmental service facility" means museums, zoos, community centers, libraries, homeless shelters, senior citizen centers, rehabilitation facilities, shelter workshops and facilities which provide health and safety services of a governmental nature. All such facilities must be open to the general public."</small>					
<small>Private Non-Profit Organizations must attach copies of their Tax Exemption Certificate and Organization Charter or By-Laws. If your organization is a school or educational facility, please attach information on accreditation or certification.</small>					
OFFICIAL USE ONLY: FEMA -		-DR-		FIPS#	DATE RECEIVED

FEMA Form 90-49 AUG 10 REPLACES ALL PREVIOUS EDITIONS