



FEMA Public Assistance Cost Documentation

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April 18, 2023

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- Public Assistance Basics
 - Program Delivery Model
 - Cost Eligibility
 - Reasonable Costs
 - Force Account Labor
 - Equipment and Supplies
 - Procurement and Contracting
 - Other Costs
 - Duplication of Benefits
 - Ineligible Costs

- **FEMA**

- Federal Awarding Agency

- **Recipients**

- The State, Territorial, or Tribal Government that Receives and Manages the Federal Award

- **Applicants**

- Entities Submitting a Request for Assistance Under the Recipient

- **Subrecipients**

- Applicants who have Received a Subaward

4 Basic Components of Eligibility



1. Applicant

- state, territory, tribe, local government, or certain type of private nonprofit organization

2. Facility

- a building, public works system, equipment, or improved and maintained natural feature

3. Work

- "emergency" or "permanent"

4. Costs

- expenses tied directly to eligible work

Eligible Types of Work



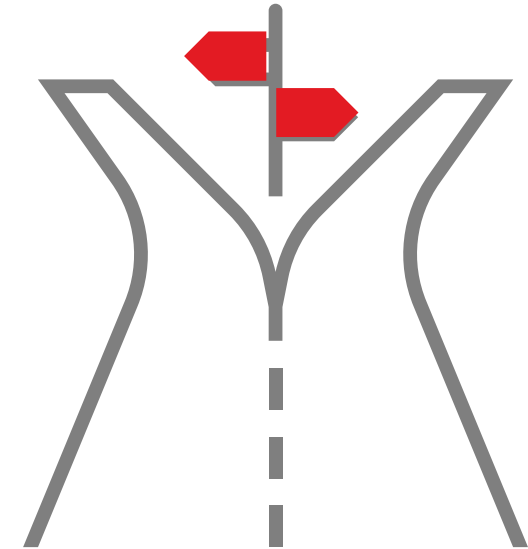
- **Emergency Work**
 - **Category A:** Debris Removal
 - Example: Broken Trees Limbs over Sidewalks
 - **Category B:** Emergency Protective Measures
 - Example: Emergency Access, Medical Care and Transport
- **Must Be Completed Within 6 Months**



Eligible Types of Work



- **Permanent Work**
 - **Category C:** Roads and Bridges
 - **Category D:** Water Control Facilities
 - **Category E:** Public Buildings and Equipment
 - **Category F:** Public Utilities
 - **Category G:** Parks, Recreational, and Other Facilities
- **Must Be Completed Within 18 Months**



■ Applicant Coordination and Evaluation

- Presidential Declaration
- Applicant Briefings
 - Grants Portal Orientation
- Register for PA Grants Portal Access
- Submit Requests for Public Assistance
- Program Delivery Manager (PDMG) Assigned
 - Exploratory Call
 - Recovery Scoping Meeting

■ Impacts and Eligibility

- 60 Days from Recovery Scope Meeting to Identify Disaster Related Impacts
- Development of Project Applications
- Site Inspections
 - DDD (Damage Description and Dimensions)

■ Scoping and Costing

- Damage Description and Dimensions
- Scopes of Work
 - Hazard Mitigation Proposals
- Project Costs
- FEMA Reviews Documentation
 - Document Integrity and Quality Assurance
 - Compliance with Laws and Regulations
 - Duplication of Benefits

■ Final Reviews

- FEMA Project Application Review
 - Completeness
 - Eligibility
 - Compliance
- FEMA Approval
- Recipient Review
- Applicant Review
 - Subgrant Conditions
 - Agreement Signature

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- **Obligation and Recovery Transition**
 - FEMA Obligates Funds to the Recipient
 - Recipient Disburses Funding to the Applicant
 - Recovery Transition Meeting (RTM) Scheduled
 - After All Projects are Signed by Applicant
 - Recipient Becomes POC for Applicant

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- **Post-Award Monitoring and Amendments**
 - Quarterly Status Reports
 - Amendment Requests
 - Scope of Work
 - Project Costs
 - POP Extension

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- **Final Reconciliation and Closeout**
 - Project Closeout
 - Recipient Works with Applicant
 - Applicant Closeout
 - Recipient Requests Applicant Closeout
 - Disaster Closeout
 - FEMA and Recipient Closeout PA Award

Eligible Costs Must Be:

- Tied Directly to Eligible Work
- Adequately Documented
- Not Duplicated (Insurance, etc.)
- Authorized
- Follow Laws and Regulations
- Necessary and Reasonable

Reasonable Costs

- **Reasonableness is Determined by:**
 - Ordinary and Necessary (Skill Level)
 - Ethical Practices
 - Established Practices
 - Procurement Compliance
 - Current Market Price

Reasonable Costs

- **Documenting Reasonable Costs**
 - Current Market Price
 - Historical Documentation
 - Average Costs
 - Published Unit Costs
 - Unique Services or Level of Effort
 - Shortages or Procurement Challenges

Reasonable Costs

- **FEMA Checklist**

- Verifies Valid Estimate
- Verifies Scope of Work

- **Unreasonable Costs**

- Disallow All or Part
- Lowest Cost Alternative
- Lowest Bid Received
- Properly Procured Price

Applicant (Force Account) Labor

- **Reimbursed by:**
 - Actual Hourly Rates
 - Actual Fringe Benefits
 - % of Hourly Rate
 - Different Calculation for OT

Applicant (Force Account) Labor

▪ Labor Documentation

- Summary of Costs
- For Each Employee:
 - Name
 - Job Title and Function
 - Type of Employee
 - Days and Hours Worked
 - Pay Rates and Fringe Rate
 - Description of Work

Applicant (Force Account) Labor

■ Labor Documentation

- Timesheets (when requested)
- Fringe Benefit Calculations
- Pay Policy



Fringe Benefits Calculation

DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
APPLICANT'S BENEFITS CALCULATION WORKSHEET

O.M.B. Control Number: 1660-0017
Expires: June 30, 2020

PAPERWORK BURDEN DISCLOSURE NOTICE

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APPLICANT		PA ID #
DISASTER		PROJECT #
FRINGE BENEFITS (by %)	REGULAR TIME	OVERTIME
HOLIDAYS		
VACATION LEAVE		
SICK LEAVE		
SOCIAL SECURITY		
MEDICARE		
UNEMPLOYMENT		
WORKER'S COMP.		
RETIREMENT		
HEALTH BENEFITS		
LIFE INS. BENEFITS		
OTHER		
TOTAL IN % ANNUAL SALARY		
COMMENTS		
I CERTIFY THAT THE INFORMATION ABOVE WAS TRANSCRIBED FROM PAYROLL RECORDS OR OTHER DOCUMENTS WHICH ARE AVAILABLE		
NAME	TITLE	DATE

Applicant-Owned and Purchased Equipment

▪ Applicant-Owned (Force Account)

- Hourly Rates for Equipment
- Mileage for Vehicles

▪ Applicant Purchased

- Purchase Price
- Equipment Rates
- Actual Fuel and Maintenance



Applicant-Owned and Purchased Equipment

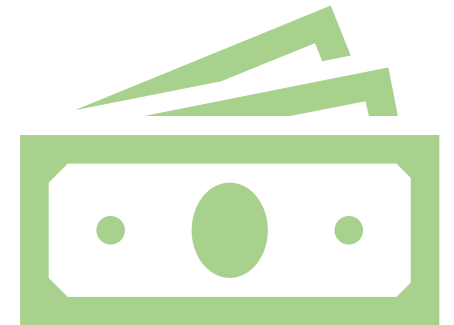
■ Cost Documentation

- Type of Equipment and Attachments Used
- Size/Capacity
- Locations and Days/Hours Used (Usage Logs)
- Operator Name
- Schedule of Rates, Including Rate Components
- Invoices or Receipts (Purchased Equipment)

Applicant-Owned and Purchased Equipment

▪ Equipment Rates

- FEMA Rates
- State, Territorial, or Tribal Rates
- Local Rates
- Equipment with No Established Rate



Leased Equipment

- **Cost Analysis Must Be Performed**
- **Total Leasing Costs < Purchase & Maintenance**
 - Evaluation of Reasonableness
- **Lease-Purchase Agreement**
 - Hourly Equipment Rate

Leased Equipment

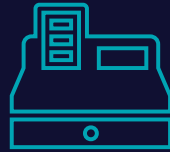
■ Cost Documentation

- Lease Agreements
- Invoices or Receipts
- Locations and Days Used
- Hours Used (Hourly Rate Lease Agreement)
- Fuel Costs (if not included in rental cost)

Supplies

- **Purchased for Response or Recovery**
- **Applicant's Stock Used for Incident**
 - Invoices
 - Established Method of Price Inventory
 - Historical Data/Prices from Area Vendors

Cost Documentation



Purchased Supplies

- Receipts or Invoices
- Quantities Used
- Justification



Supplies from Stock

- Invoices or Cost Records
- Inventory Records
- Types of Supplies and Quantities Used
- Location Used

Procurement and Contracting Requirements

- **State and Territorial Applicants (2 C.F.R. § 200.317)**
 - Procurement
 - Must Follow Local Procurement Policies
 - EPA guidelines in 2 C.F.R. § 200.322, Procurement of recovered materials
 - Contracting
 - Provisions in 2 C.F.R. § 200.326 in All Contracts
 - T&M, Cost+%, %Construction are Allowed (High Risk)

Procurement and Contracting Requirements

- **Tribal and Local Government Agencies and PNPs**
 - Must Follow Most Restrictive Requirements:
 - Documented Procurement Procedures
 - SLTT Laws and Regulations
 - Federal Laws and Regulations
 - Pre-Procurement
 - Establish Written Procurement Procedures
 - Maintain Written Standards for Conflicts of Interest

Procurement and Contracting Requirements

- **Tribal and Local Government Agencies and PNPs**
 - General Federal Procurement Requirements
 - 2 C.F.R. § 200.318 through 200.326
 - Procurement Methods
 - Micro-purchase
 - Small Purchase Procedure
 - Sealed Bid
 - Competitive proposal
 - Noncompetitive Proposal

Procurement and Contracting Requirements

- **Tribal and Local Government Agencies and PNPs**
 - Noncompetitive (Sole Source) Documentation
 - Description of Product or Service
 - Explanation for Noncompetitive Procurement
 - Length of Contract for SOW
 - Steps Taken to Determine Sole Source
 - Conflicts of Interest Identified
 - Any Other Justification

Procurement and Contracting Requirements

- **Tribal and Local Government Agencies and PNPs**
 - Allowable Contract Types
 - Fixed Price
 - Cost-Reimbursement
 - Time & Materials
 - Not Allowed
 - Cost-Plus-Percentage-of-Cost
 - Percentage-of-Construction

Procurement and Contracting Requirements

- **Tribal and Local Government Agencies and PNPs**
 - Contract Documentation
 - Procurement Policy
 - Procurement Documents
 - Cost or Price Analysis
 - Contracts, Change Orders, Summary of Invoices
 - Dates Worked
 - Contractor Oversight (T&M Contracts)

Mutual Aid

■ Cost Documentation

- Written Agreement
- Services Requested and Received
- Labor, Equipment, and Supplied Records
- Invoices

Prisoners

■ Cost Documentation

- Estimated Hours and Rates for Work
- Prison Labor Pay Policy and Pay Rate
- Individual Information
 - Name
 - Days and Hours Worked
 - Description of Work Performed
 - Locations Worked



National Guard

- **State Active Duty**
 - Straight-time
 - Overtime
 - Fringe Benefits
- **Full-Time National Guard Duty (Title 32) or**
- **Active Duty (Title 10)**
 - Ineligible



Donated Resources

▪ **Volunteers Hours**

- Sign-in Sheet
- Name
- Title and Function
- Days and Hours Worked
- Location of Work and Work Performed



Donated Resources

■ Equipment

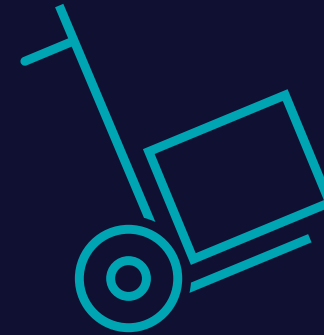
- Type of Equipment and Attachments Used
- Size/Capacity
- Locations and Days/Hours Used (Usage Logs)
- Operator Name
- Schedule of Rates, Including Rate Components
- Who Donated Equipment



Donated Resources

■ Supplies or Materials

- Quantity Used
- Who Donated
- Locations Used
- Invoices or Other Documentation for Value



Duplication of Benefits

- **Insurance Proceeds**
- **Non-Federal Grants and Cash Donations**
- **Third-Party Liability**
- **Other Federal Awards**

Duplication of Benefits

■ Insurance Proceeds - Documentation

- Summary of Insurance Coverage
- Actual Insurance Proceeds
- General Property Insurance Policy
- Flood Insurance Policy
- Wind Policy
- Auto Insurance Policy
- Insurance Settlement Information

Duplication of Benefits

■ Non-Federal Grants and Cash Donations

- May Be Used Towards Non-Federal Cost Share
- If Not Applied to Non-Federal Cost Share, FEMA Reduces Eligible Costs by Duplicated Amount
- If Funds Exceed Non-Federal Cost Share, FEMA Reduces Eligible Costs by Excess Amount

Duplication of Benefits

■ **Third-Party Liability**

- FEMA Requires Reasonable Efforts to Pursue Claims
- FEMA Reduces Eligible Costs by Recovered Amount

■ **Other Federal Awards**

- Duplication of Benefits

- **Duplication of Funding Between FEMA Programs**
 - Individual Assistance
 - Public Assistance
 - Hazard Mitigation Grant Program
- **Example:**
 - IHP Assistance for Debris Clearance for Privately-Owned Road and PA Funding for Debris Clearance from the Same Road for Emergency Vehicle Access

Ineligible Costs

- **Loss of Revenue**
- **Loss of Useful Service Life**
- **Tax Assessments**
- **Increased Operating Costs**

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- FEMA, Process of Public Assistance Grants. Available at: <https://www.fema.gov/assistance/public/process>
 - FEMA, Public Assistance Program and Policy Guide, Version 4, Effective June 1, 2020. Available at: https://www.fema.gov/sites/default/files/documents/fema_pappg-v4-updated-links_policy_6-1-2020.pdf

Thank you!!



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