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Public Assistance Program Delivery Guide

September 2022 (Operational Draft) Version 1.1



FEMA

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87 CHAPTER 1: INTRODUCTION

88 Purpose

89 The *Public Assistance Program Delivery Guide*
90 (*Operational Draft*) describes how the Federal
91 Emergency Management Agency (FEMA)
92 implements the Public Assistance (PA) Program.
93 The guide builds on the principles in the *Incident*
94 *Management and Support Keystone* (IMSK) and
95 the *Recovery Operations Support Manual*
96 (ROSM), and this guide establishes the
97 framework for Applicant-driven, state-led, and
98 federally supported delivery of PA. The *PA*
99 *Program Delivery Guide* defines objectives and
100 indicators of successful program delivery, along
101 with Applicant, Recipient, and FEMA roles and
102 responsibilities. This guide is an operational
103 draft and describes the program as it is
104 intended to be delivered. In some cases, current
105 roles or organizational structures may vary from the framework in this guide.

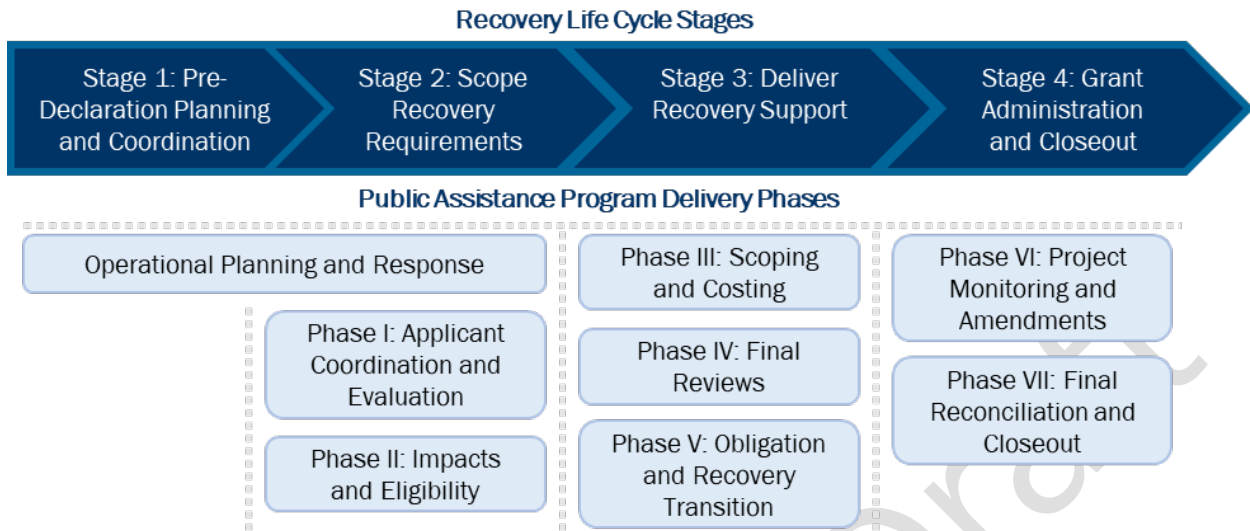
Terminology: Recipients, Subrecipients, and Applicants

When an entity is eligible and applies for PA funding, it is the Applicant. Once the Applicant receives funding, it is either the Recipient or a Subrecipient. For simplicity, FEMA uses the term Applicant throughout this document when referring to the responsible entity for a project rather than making distinctions between an entity as the Applicant, Recipient, or Subrecipient. FEMA uses the terms Recipient and Subrecipient when necessary to differentiate between the two entities.

106 The *PA Program Delivery Guide* aligns the PA Program delivery phases to the four stages of
107 the recovery life cycle (Figure 1):

- 108 • Stage 1: Pre-Declaration Planning and Coordination – Engage with federal and state,
109 local, tribal, and territorial (SLTT) partners to prepare for future recovery operations –
110 includes the beginning of the PA Operational Planning and Response phase.
- 111 • Stage 2: Scope Recovery Requirements – Develop and refine a mutual understanding of
112 goals, needs, priorities, and resource requirements – includes continuation of the
113 Operational Planning and Response phase and the beginning of phases I: Applicant
114 Coordination and Evaluation and II: Impacts and Eligibility.
- 115 • Stage 3: Deliver Recovery Support – Identify resources and deliver assistance with unity
116 of effort – includes PA phases III: Scoping and Costing, IV: Final Reviews, and V:
117 Obligation and Recovery Transition.
- 118 • Stage 4: Grant Administration and Closeout – Monitor financial activities that occur after
119 the initial obligation of disaster assistance – includes phases VI: Project Monitoring and
120 Amendments and VII: Final Reconciliation and Closeout.

121



122

123

Figure 1: Alignment of Public Assistance Phases and Activities to Recovery Lifecycle

124 **Scope and Applicability**

125 The *PA Program Delivery Guide* provides programmatic doctrine to guide PA operations for
 126 FEMA staff, particularly those in leadership and management positions executing PA
 127 recovery activities. SLTT partners may also use this guide to understand how FEMA delivers
 128 the PA Program. This guide enables a shared understanding of the program’s delivery model
 129 so all stakeholders may effectively contribute to its continuous improvement. Individuals
 130 with responsibilities managing, implementing, or pertaining to PA should refer to this
 131 document for responsibilities and procedural guidance to ensure timely, consistent program
 132 delivery across the enterprise.

133 When delivering the PA Program, staff should use the *PA Program Delivery Guide* in
 134 conjunction with the *Public Assistance Program and Policy Guide (PAPPG)* (which defines PA
 135 policy and procedural requirements), as well as the *State-Led Public Assistance Guide*
 136 (which provides guidance on the processes, resources, and capabilities required for
 137 Recipients to lead PA operations).

138

139 **Organization**

140 The *PA Program Delivery Guide* includes an overview of how PA operates as well as
 141 descriptions of each phase of the PA grant lifecycle. Chapter 2 provides the foundation of
 142 the program, including:

- 143 • Core Values
- 144 • Guiding Principles
- 145 • The PA Program Delivery Model

- 146 • Roles within the PA Process
- 147 Chapters 3-10 provide information specific to each phase of the grant lifecycle. Each
148 chapter includes:
- 149 • A **process map** indicating the specific steps that comprise that phase.
 - 150 • High-level **performance targets** for the phase, including targets for Level I, II, and III
151 incidents as available and appropriate. Performance targets are generally based on
152 actual baselines from the Recovery Performance Framework, developed in coordination
153 with the Recovery Reporting and Analytics Division and Branch leadership.
 - 154 • **Descriptions** of each step of the phase, including interim **deadlines** and **timeliness goals**
155 where available and appropriate. Note that not every regulatory deadline or timeliness
156 metric is included in each chapter. An exhaustive list of regulatory deadlines and
157 timeliness goals can be found in Appendix C and Appendix D, respectively.
 - 158 • A list of specific **positions** involved in the phase and corresponding **responsibilities**.
- 159 The Appendixes provide supplementary, detailed information. Appendix A lists the acronyms
160 used throughout this document. Appendix B provides information about authorities,
161 foundational documents, and other referenced resources. Appendix C lists regulatory and
162 policy deadlines, and Appendix D lists detailed timeliness goals. Appendix E provides an
163 overview of each role in the PA grant lifecycle. Appendix F provides considerations for
164 identifying complex and high-risk Applicants and projects.

165 **Supersession**

166 This document supersedes the *Public Assistance Operations Manual*.

167 **Authorities and Foundational Documents**

168 The following documents include foundational guidance for program delivery:

- 169 • Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)
- 170 • Title 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit
171 Requirements for Federal Awards
- 172 • Title 44 C.F.R., Emergency Management and Assistance
- 173 • Public Assistance Program and Policy Guide, FP 104- 009-2 (PAPPG)
- 174 • National Incident Management System (NIMS)
- 175 • National Response Framework (NRF)
- 176 • National Disaster Recovery Framework (NDRF)
- 177 • National Mitigation Framework (NMF)
- 178 • FEMA Publication 1
- 179 • Incident Management Support Keystone (IMSK)
- 180 • Recovery Operations Support Manual (ROSM)
- 181 • FEMA Manual 205-0-1 Grants Management (GMM)

182 Additional information about these documents can be found in Appendix B.

183 **Document Management and Maintenance**

184 The *PA Program Delivery Guide* is an operational draft that describes the program as it is
185 intended to be delivered. As PA continues to improve, many processes and initiatives,
186 including the National Delivery Model and several others mentioned in this guide, are under
187 review. Other initiatives highlighted in this document, such as the CRC Field Deployment
188 Process, are an example of where FEMA is already acting on feedback to improve program
189 delivery. In some cases, current guidance, processes, roles, and/or organizations may vary
190 from the framework described in this guide. Those elements will be updated and adjusted to
191 align with the intent in this guide based on input received by regional and other PA
192 stakeholders. In addition, FEMA will collect feedback from stakeholders while this guide
193 exists as an operational draft for 12 months. The final draft of the PA Program Delivery
194 Guide will be released following review and adjudication of feedback from the operational
195 draft period.

196 FEMA strives to continuously improve the PA Program and encourages feedback on all
197 aspects of the program. FEMA will review this document annually and update as necessary.
198 FEMA staff may provide best practices, lessons learned, and other feedback regarding this
199 document via PA's continuous improvement platform, the Change Control Tool. SLTT
200 partners may provide best practices, lessons learned, and other feedback regarding this
201 document by contacting the PA Grants Portal hotline at 1-866-337-8448 or your FEMA
202 Regional PA Officer to have a Change Control ticket submitted.

203

CHAPTER 2: FOUNDATION OF THE PROGRAM

204

205 FEMA's PA Program provides assistance to SLTT governments and eligible private nonprofit
206 (PNP) organizations so communities may quickly respond to, and recover from, major
207 disasters and emergencies declared by the President. This chapter provides an overview of
208 the foundational elements of the PA Program, including the application of FEMA's core
209 values, the PA Program's guiding principles, features of the national delivery model, and the
210 enterprise-wide approach to delivering the program.

211 FEMA Core Values

212 The PA Program embodies FEMA's core values, as
213 defined in *FEMA Publication 1*. FEMA's core values
214 are the foundation of how FEMA represents itself.
215 Table 1 defines how PA implements FEMA's core
216 values. PA staff must uphold these core values
217 when interacting with customers, partners,
218 stakeholders, and colleagues.

Customer

For the purposes of the PA Program, the term **customers** includes internal FEMA staff, SLTT governments, and PNPs that the program provides service to, as well as the communities and survivors that those entities protect and support.

219

Table 1: Implementation of FEMA's Core Values

FEMA Core Value	Public Assistance Program Implementation
Compassion	Express care for others through interactions, processes, and systems. Work with partners to identify and meet recovery goals and empathetically support partners and colleagues across regional, field, headquarters, and Consolidated Resource Center (CRC) offices.
Fairness	Ensure our program reaches and meets the needs of applicants. Treat everyone impartially by ensuring access to resources and tools through transparent technology and technical and programmatic support for all incidents. Offer impartial and consistent assistance through standardized processes and delegated decision making.
Integrity	Serve as stewards of federal resources, services, and programs by balancing quick action with careful consideration of FEMA's authorities and strong internal controls. Conduct ourselves professionally by being accountable, present, honest, and dependable in serving communities.
Respect	Acknowledge the value of the people we serve and work with by treating Applicants, Recipients, and FEMA staff with dignity; and by fostering healthy, safe, and positive environments across the PA enterprise.

220 Public Assistance Guiding Principles

221 FEMA follows seven guiding principles when delivering the PA Program, defined in Table 2.

Table 2: Guiding Principles for Public Assistance Program Delivery

Guiding Principle	Public Assistance Program Implementation
Recovery is strongest when State-led and locally driven	Enable Applicants to better recover by empowering them to directly request assistance; directly provide information to support eligible funding; and, when appropriate, transparently view the status of projects. Enable state, tribal, and territorial Recipients greater control over their recoveries, leverage existing Recipient-Applicant relationships, insulate recoveries from national resource shortfalls, and enhance mutual understanding of local issues by empowering SLTT organizations to lead the delivery of PA.
Standard operations support flexible and integrated recovery outcomes	Establish standard roles and processes to achieve progress without delay, support delivery of assistance, and provide flexibility for Applicants, Recipients, and federal leadership to integrate with other federal and Whole of Government partners. These roles and processes provide a starting point for Recipient and federal leadership to innovate and develop solutions to meet unique needs in complex environments.
Build communities to mitigate increasing incident impacts	Build stronger communities by working with communities before incidents to develop continuity plans and plans for emergency response and debris removal activities; plan for quick financial recovery; and identify hazard mitigation opportunities. After incidents, hold or promote discussions to educate Applicants on potential hazard mitigation measures, transferring risk to insurance, minimizing adverse impacts, and code compliance requirements.
Invest in the PA team to build and maintain capacity and manage resources strategically	Foster Recipient and Applicant capacity by investing in regional relationships, not supplanting Recipient roles, and maximizing the availability of management costs in order to optimize PA staff workload. Invest in the FEMA PA team and strategically manage resources by improving doctrine with a focus on clear roles; building regional capacity to handle routine incident years and national capacity to supplement; strategically identifying, adjudicating and meeting emerging resource needs; and, developing professionals with a focus on training, mentoring, and employee retention.
Take a risk-based approach to designing the program and delivering assistance	Prioritize time, resources, and administrative oversight where mission impact is greatest, including significant response and infrastructure operations and limit the resources, level of effort, and administrative requirements necessary to deliver assistance where the risks of unmet needs are low and compliance rates are high.
Continuously improve through lean management	Use an integrated leadership and management philosophy and systems necessary for controlled improvement as a guide for building a stable national delivery model that constantly evolves. Ensure this structure engages employees and partners to understand customer needs and identify and resolve identified problems.

223 Program Delivery Model

224 FEMA implements the PA program nationwide using a national program delivery model,
 225 through a combination of key workflow features, goals, philosophies, and techniques. FEMA
 226 leadership continues to review and improve the PA program delivery model and build on its

227 core features described in Table 3. Leadership evaluates performance against standard,
 228 cascading performance goals and indicators.

229 **Table 3: Features of the Program Delivery Model**

Delivery Model Features	Public Assistance Program Implementation
Specialized Roles	Assign the right skill sets, at the right time, to effectively support recovery.
Segmented Processes	Advance projects through defined phases and workflows based on work status and complexity to ensure recovery progresses and customers receive necessary support.
Standardization through Technology	Consistently and transparently manage projects through PA Grants Portal and Grants Manager using standardized policy, process, and tools, and implement improvements through change control.
Consolidated Resources	Share experts and technical resources across operations to improve efficiency and consistency. Where workload justifies, build capacity of existing organizations to improve readiness and offer a more consistent outcome to customers.

230 **Lean Management and Continuous Improvement**

231 Lean management is a philosophy and technique that minimizes process waste and
 232 maximizes the value of products and services to the customer. It is integral to the delivery of
 233 PA. Using lean management ensures PA’s approach is centered on:

- 234 • **Ensuring staff at all levels understand strategy, goals, and vision**, and translate it into
 235 action, with a sense of common purpose across the enterprise.
- 236 • **Discovering new and better ways of working** to deliver PA with minimal waste and in the
 237 shortest possible time without over-burdening employees or partners.
- 238 • **Meeting customer needs as efficiently as possible** while viewing problems as
 239 opportunities.
- 240 • **Enabling staff to lead and contribute to their fullest potential** to create continuous
 241 improvement.

242 The PA Program incorporates lean management into standard PA processes through:

- 243 • Performance metrics to connect strategy and goals to day-to-day work
- 244 • Demand and capacity reports and stakeholder feedback
- 245 • PA Grants Portal (GP) and Grants Manager (GM) to efficiently deliver the PA Program
- 246 • Standard work templates (e.g., time management tools, evaluation forms or work
 247 product review checklists)
- 248 • Skills matrices enabling staff to contribute to their fullest potential. They outline skills
 249 required to successfully do the job, areas where skills improvements are needed, and
 250 can help inform work assignments.

251 To deliver PA, FEMA uses the following lean management mechanisms:

- 252 • *Regular coordination*: Conduct huddles and coordination meetings consistent with
 253 operational tempo

- 254 • *Visual management:* Maintain huddle boards as visual communication and
255 management tools, identifying and coordinating on cross-cutting issues and key
256 deliverables
- 257 • *Individual support:* Provide one-on-one actionable coaching and mentoring
- 258 • *Direct evaluation:* Conduct sit-withs, a managerial tool to sit with staff as they perform
259 their duties to identify areas for staff improvement or process efficiency
- 260 • *Time management:* Leverage “day-in-the-life-of/week-in-the-life-of” (DILO/WILO) time-
261 management tools to ensure timely completion of tasks, identify challenges, and
262 support staff by prioritizing competing deadlines.

263 FEMA uses the lean management concept to facilitate continual improvement of products,
264 services, and processes. FEMA manages changes to the PA Program in a deliberate manner
265 by ensuring the change is necessary, obtaining stakeholder feedback, and considering the
266 customer experience.

267 FEMA partners may submit issues, opportunities, and feedback related to the PA Program,
268 including on this document, as a part of continuous improvement efforts via the “Feedback”
269 feature in PA Grants Portal or by working with their FEMA Regional PA officer to for a Change
270 Control Tool submission. FEMA staff may submit issues, opportunities, and feedback via the
271 Change Control Tool on FEMA’s intranet site. FEMA’s Change Control Unit reviews and
272 responds to requests through the Change Control Tool.

273 **Risk-Based Approach**

274 PA is designed to reimburse everything from an hour of overtime to the replacement of an
275 entire wastewater treatment facility. It is designed to be flexible and support the range of
276 recovery needs. The program delivery model, built on standard roles and processes, enables
277 FEMA to employ a risk-based approach that recognizes that not all Applicants or projects
278 require the same level of resources, documentation, or oversight. FEMA adjusts its approach
279 based on risks to:

- 280 • *Mission:* Achieving effective recovery in a timely manner
- 281 • *Finances:* Fulfilling our responsibilities as stewards of federal funds
- 282 • *Program:* Effectively delivering the PA program to meet community needs according to
283 law, regulation, and policy
- 284 • *Reputation:* Maintaining the American public’s confidence in government organizations
285 partnering to deliver the program

286 The risk-based approach balances developing policy, delivering the program, and prioritizing
287 resources to maintain an efficient use of resources. FEMA prioritizes resources and effort
288 where risk and complexity are high. That means ensuring personnel and technical resources
289 are made available, and administrative oversight is more in-depth, where a disaster,
290 Applicant, or project represents a higher risk in one or more of the four risk areas. Appendix

291 F provides additional considerations for identifying complex and high-risk applicants and
292 projects.

293 By contrast, FEMA limits level of effort, resources, and administrative oversight where risk is
294 low. That means assigning fewer personnel or technical resources and decreasing
295 requirements and level of review where an applicant or project does not pose a significant
296 risk in one or more of the four risk areas.

297 Program Delivery Performance Goals

298 FEMA measures the success of the PA Program and evaluates performance against
299 standardized, cascading performance goals and indicators. PA Program offices are
300 responsible for regularly communicating performance measures to program staff. Table 4
301 describes the five performance goals. Chapters 3-10 of this document define specific
302 objectives and indicators of success for conducting each phase of PA program delivery. For
303 additional information on how FEMA evaluates performance, refer to the *Recovery*
304 *Performance Framework Dashboard* (see Appendix B).

305 **Table 4: PA Program Delivery Performance Goals**

Performance Goals	Description
Timeliness	Initiate, develop, process, and close projects within established deadlines.
Simplicity	Develop transparent policies, processes, and systems that are easy for end-users to understand.
Accuracy	Deliver accurate, eligible, and well-documented projects that get it right the first time.
Efficiency	Reduce duplication, control administrative costs, and manage risk to maximize recovery outcomes.
Customer Experience	Support positive customer experiences with FEMA staff, processes, tools, and systems.

306

307 Roles Within the Public Assistance Process

308 The *NRF*, *NDRF*, *IMSK*, and *ROSM* explain that successful recovery extends beyond any
309 single program and is best executed through tiered government actions that are locally-
310 executed, state-managed, and federally supported. Applicants, Recipients, and other
311 federal agencies (OFAs) work with FEMA to complete the processes necessary to apply for
312 and receive public assistance, as outlined below.

313 Applicant Roles

314 Applicants drive recovery and ensure that PA funding helps the community achieve its
315 recovery goals in accordance with applicable provisions of laws and authorities. Applicants
316 are responsible for conducting recovery work and requesting funding for work and costs on
317 time and with complete information. Key Applicant roles include, but are not limited to:

- 318 • Planning for emergencies and disasters, including resiliency planning
- 319 • Conducting initial damage assessments and participating in joint damage assessments
- 320 as outlined in FEMA's *Preliminary Damage Assessment Guide*
- 321 • Removing debris and conducting emergency protective measures to address incident-
- 322 caused threats
- 323 • Requesting public assistance
- 324 • Identifying and reporting impacts and damage
- 325 • Providing information and documentation to substantiate claims
- 326 • Determining methods of restoration to address community recovery needs
- 327 • Conducting work to restore facilities in accordance with required codes and standards
- 328 • Identifying and understanding hazard mitigation opportunities
- 329 • Maintaining and providing documentation to support claimed work and costs
- 330 • Complying with all applicable laws, regulations, policies, and project conditions,
- 331 including those prohibiting discrimination
- 332 • Adhering to all applicable deadlines

333 Recipient Roles

334 Recipients serve as the PA Program's pass-through entity to Subrecipients and, when
 335 capable, lead the delivery of the PA Program in accordance with applicable provisions of
 336 laws and authorities. Recipients request the federal declaration and type(s) of assistance
 337 needed. Once a declaration is issued, Recipients communicate incident priorities and needs
 338 to FEMA during the response phase. The Recipient works with the respective local
 339 government entities year-round. Therefore, its commitment and active participation in the
 340 entire PA process is critical. Key Recipient roles^a include, but are not limited to:

- 341 • Leading the damage assessment process as outlined in FEMA's *Preliminary Damage*
- 342 *Assessment Guide*
- 343 • Requesting federal disaster assistance, including submitting Standard Form (SF) 424,
- 344 *Application for Federal Assistance*, and SF 424D, *Assurances for Construction Programs*
- 345 • Ensuring that all potential Applicants are aware of funding available under PA
- 346 • Conducting Applicant Briefings and educating Applicants on PA program requirements
- 347 • Determining, and conveying to Applicants, the cost share split between the Recipient
- 348 and its Subrecipients
- 349 • Reviewing Requests for Public Assistance (RPA), providing Applicant eligibility
- 350 recommendations, and ensuring submission to the Regional Administrator (RA) within
- 351 the deadline
- 352 • Providing technical advice and assistance to eligible Applicants
- 353 • Promoting and implementing PA Hazard Mitigation opportunities
- 354 • Reviewing Applicant-submitted claims

^a 44 C.F.R. §§ 206.202(b).

- 355 • Providing state support for project-related activities to include small and large project
- 356 formulation and the validation of small projects
- 357 • Reviewing all correspondence and forwarding to FEMA with a recommendation
- 358 • Submitting documents necessary for the funding award
- 359 • Disbursing funds to Applicants
- 360 • Monitoring financial actions and work progress and completing Large Project Quarterly
- 361 Progress Reports (QPR)
- 362 • Collecting and submitting closeout requests for additional information, documentation,
- 363 and reports
- 364 • Adhering to all deadlines

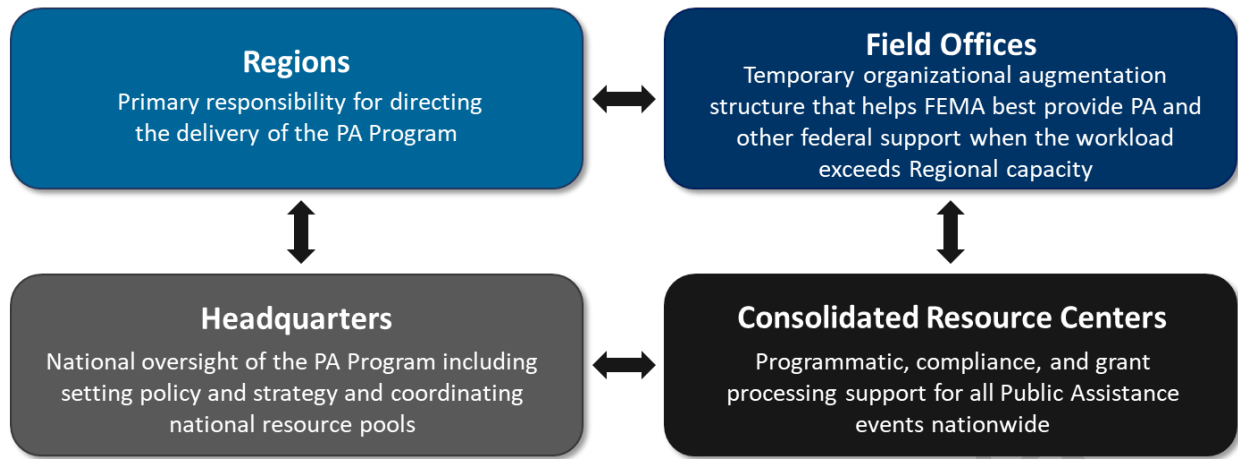
365 **Non-FEMA Federal Agency Roles**

366 FEMA is one of many partners that support SLTT governments and PNPs in recovery,
367 infrastructure restoration, and reliance. OFAs, organized into Emergency Support Functions
368 (ESF) and Recovery Support Functions (RSF), may provide significant capabilities to FEMA
369 staff and Applicants to improve the project development process, prevent duplication of
370 benefits and efforts, and support local recovery outcomes. OFAs may connect eligible PNPs
371 they work with to PA; connect PA Applicants to other federal program funding for activities
372 ineligible under PA; and provide coordination and subject matter expertise for complex
373 projects, codes and standards, environmental and historic preservation review and
374 permitting, and best practices. FEMA Interagency Recovery Coordination (IRC) staff help
375 ensure that appropriate interagency partners are available to the Joint Field Office
376 (JFO)/Joint Recovery Office (JRO). FEMA Zone Leads coordinate requests for other federal
377 partners to support program delivery.

378 **FEMA Roles**

379 FEMA provides support through statutory authorities and coordinates resources and the
380 support of federal and non-federal partners to achieve recovery outcomes. FEMA roles in
381 delivering the PA Program are scalable based on incident size and complexity. FEMA
382 conducts PA roles across four offices: regional offices, field offices, headquarters (HQ), and
383 CRC, as shown in Figure 2. Staff should refer to position-specific instructions and specific
384 task guides for detailed position guidance. In addition, PA staff coordinate with Grants
385 Management staff to ensure compliance with *FEMA Manual 205-0-1 Grants Management*
386 (*GMM*).

387



388

Figure 2: PA Staff Coordination Across Offices

389

390 *Regional Offices*

391 Regional offices are the keystone of successful federal support in the delivery of the PA
 392 Program. Regional Recovery Divisions have primary responsibility for implementing the PA
 393 Program and maintaining relationships with the states, tribes, and territories within the
 394 region’s area of responsibility. Regional PA responsibilities include the following:

- 395 • Build Regional and SLTT Government Capacity:
 - 396 ○ Manage routine incident years and ensure readiness to deliver PA:
 - 397 ○ Assess and maintain the capacity and capability to perform steady-state functions
 - 398 during an incident
 - 399 ○ Maintain the capacity and capability to perform all required leadership and staff
 - 400 roles for incidents for a routine incident year
 - 401 ○ Coordinate with HQ to forecast future work and develop an incident staffing and
 - 402 resource plan
 - 403 ○ Hire, train, and develop PA professionals
 - 404 ○ Develop and execute Incident Resource Plans (IRPs) with the national cadre
 - 405 ○ Participate in policy development, program design, and continuous improvement
 - 406 ○ Facilitate after-action review of incidents to promote continuous improvement
 - 407 ○ Coordinate with partners to ensure PA readiness for potential incidents:
 - 408 ○ Deliver pre-incident training to partners
 - 409 ○ Assess and help build SLTT government capabilities to manage PA operations
 - 410 ○ Provide technical assistance and support to partners on the delivery of the PA
 - 411 program, development of hazard mitigation plans, environmental planning and
 - 412 historic preservation issues, and debris management plans.
- 413 • Operational Planning and Response Phase:
 - 414 ○ Review Recipient Administrative Plans and SLTT hazard mitigation plans
 - 415 ○ Lead initial operational planning activities to lay a strong recovery foundation:

- 416 ○ Conduct joint Preliminary Damage Assessments (PDA) with the Recipient
- 417 ○ Provide recommendations for PA declaration requests
- 418 ▪ In coordination with Regional and Field leadership, determine need for a
- 419 JFO
- 420 ○ Coordinates with Field and Grants Management partners to ensure Recipient
- 421 completes all administrative requirements
- 422 ○ Oversee development of initial disaster operating profile and Strategic Resource
- 423 Plan (SRP)
- 424 ○ With Recipient, assess Applicant needs for assistance during the PA grant
- 425 development process
- 426 ○ Support incident management operations:
- 427 ▪ Staff infrastructure roles in the Regional Response Coordination Center
- 428 (RRCC)
- 429 • Phase I, Applicant Coordination and Evaluation:
- 430 ○ Lead PA operations:
- 431 ○ Execute Disaster Recovery Manager (DRM) authority, or delegate to field
- 432 leadership
- 433 ○ Fill PA leadership roles as detailed in incident staffing and resource plans
- 434 ○ Where field offices are not used, assume field office responsibilities detailed
- 435 below through a virtual recovery office
- 436 ○ Provide program leadership for all disasters and staff all required operational
- 437 roles
- 438 ○ For all incidents, prioritize and fill Program Delivery Manager (PDMG) roles for key
- 439 high impact or complex Applicants, ensuring assigned PDMGs can provide the
- 440 appropriate support based on experience and skillset in accordance with the
- 441 *Infrastructure Branch Director and Public Assistance Group Supervisor Position*
- 442 *Assist Addendum*., *Virtual Operations*, and *Tribal Support* located in the FEMA
- 443 Program Delivery Branch’s Delivery Toolbox.
- 444 ○ Support field offices with resolution of complex policy and operational issues
- 445 ○ Monitor performance of the field office against program delivery goals
- 446 • Phase II, Impacts and Eligibility:
- 447 ○ Conduct technical site inspections, as necessary and in coordination with the CRC
- 448 and JFO
- 449 ○ With PDMG, prioritize site inspections for complex Applicants.
- 450 • Phase III, Scoping and Costing
- 451 ○ Develop or validate scopes of work (SOW) and cost estimates for complex or
- 452 specialized projects in coordination with the CRC
- 453 ○ Coordinate with Applicants and Recipients on requests for information (RFI)
- 454 • Phase VI, Project Monitoring and Amendments:
- 455 ○ Respond to PA-related project correspondence such as changes in SOWs and
- 456 time extensions after an Applicant’s Recovery Transition Meeting (RTM)

- 457 ○ Enact changes for amendment requests that occur after an Applicant’s RTM,
- 458 including scoping and costing
- 459 ○ Coordinate recovery transition from JFO or JRO to the region
- 460 ○ Respond to first appeals
- 461 ○ Coordinate with Grants Division staff and the Office of Inspector General (OIG) to
- 462 respond to PA-related audits
- 463 ○ Coordinate with Grants Division staff to review Large Project QPRs, tracking work
- 464 completion and project deadlines
- 465 ● Phase VII, Final Reconciliation and Closeout:
- 466 ○ Coordinate with Grants Division staff to reconcile and close projects, Applicants,
- 467 and Recipient awards

468 **Field Offices**

469 Field offices are temporary organizational structures established to provide support when an
 470 incident generates workload that cannot be met using existing regional organizations. They
 471 augment regional capacity and provide a coordination point for incident oversight and
 472 direction. In large incidents (i.e., Level I and II incidents), field offices are central to ensuring
 473 FEMA can quickly expand to provide support to all Applicants in need of PA. Field offices are
 474 established at the direction and under the delegated authority of the regional office and are
 475 an extension of regional authorities and operations.

476 Three incident levels are used to categorize an incident based on its actual or anticipated
 477 impact, size, and complexity, as well as the federal assistance required. FEMA continues to
 478 evaluate incident level determination processes, with the intent of introducing a new incident
 479 leveling framework in the near future. Historically, FEMA leadership has designated incident
 480 levels and adjusted designations as the magnitude and complexity of the incident changes,
 481 as follows:

482

483

484

Table 5: Incident Level Descriptions

Incident Level	Description
Incident Level I	Due to its severity, size, location, actual or potential impact on public health, welfare, and infrastructure, the incident requires an extreme amount of direct federal assistance (DFA) for response and recovery efforts for which the capabilities to support does not exist at any level of government
Incident Level II	Due to its severity, size, location, actual or potential impact on public health, welfare, and infrastructure, the incident requires a high amount of DFA for response and recovery efforts

Incident Level III	Due to its severity, size, location, actual or potential impact on public health, welfare, and infrastructure, the incident requires a moderate amount of federal assistance
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485 **Joint Field Offices**

486 The JFO is a temporary federal facility, established to support response, recovery, and
 487 mitigation activities. When FEMA is involved in stabilizing community lifelines, there will
 488 always be a JFO facility. Typically, the JFO is located at or near the state/tribal emergency
 489 operations center (EOC). Area Field Offices (AFO) may be needed in the event of a larger
 490 incident or widespread damages.

491 The JFO is generally established within one to three weeks after a Stafford Act declaration
 492 and closes during Stage 3 of the recovery life cycle. JFOs are staffed mostly with deployed
 493 personnel, contractors, and local hires. The need for JFOs is determined in coordination with
 494 FEMA Regional and Field leadership and decides when to open and how long to maintain
 495 JFOs in coordination with state, tribal, and territorial partners. In some cases, the JFO may
 496 be virtual, depending on the needs of the disaster. JFOs may also support more than one
 497 incident at a time.

498 JFO responsibilities include:

- 499 • Operational Planning and Response Phase:
 - 500 ○ Coordinate with the regional office to ensure Recipient completes all
 - 501 administrative requirements
 - 502 ○ Coordinate with the regional office to evaluate PA declaration add-on requests
 - 503 ○ Review existing SLTT mitigation plans to assess potential mitigation planning
 - 504 priorities and strategies
 - 505 ○ Refine initial disaster operating profile and incident staffing and resource plans
 - 506 ○ Manage ongoing staffing and resource needs, in accordance with the *Strategic*
 - 507 *Resource Management SOP*, prioritizing needs of complex Applicants.
 - 508 ○ Assume management of infrastructure-related response coordination from the
 - 509 Incident Management Assistance Team (IMAT)
- 510 • Phase I, Applicant Coordination and Evaluation:
 - 511 ○ Assist Recipient with Applicant Briefings and educate Applicants on PA Program
 - 512 requirements, including through the early delivery of targeted webinars.
 - 513 ○ Review all RPAs and make PNP eligibility determinations in coordination with
 - 514 FEMA’s Office of Chief Counsel (OCC)
 - 515 ○ Conduct Exploratory Calls and Recovery Scoping Meetings (RSM)
 - 516 ○ Provide PA hazard mitigation information and guidance to Applicants
 - 517 ○ Work with Applicants to complete lists of impacts
- 518 • Phase II, Impacts and Eligibility:
 - 519 ○ Conduct initial eligibility evaluation

- 520 ○ Obtain impact and damage information and documentation
- 521 ○ Coordinate with Applicants and Recipients on RFIs
- 522 ○ Conduct site inspections, as necessary
- 523 ○ Help Applicants identify and understand mitigation opportunities
- 524 ○ Develop or validate detailed damage descriptions with dimensions
- 525 ○ Develop RFIs as necessary for missing information
- 526 ○ Coordinate with OFA partners to determine federal authorities
- 527 ○ Issue eligibility determinations
- 528 ● Phase III, Scoping and Costing:
 - 529 ○ Coordinate with CRCs to plan and share priorities and address project-specific
 - 530 issues
 - 531 ○ Support the development, costing, and analysis of hazard mitigation proposals for
 - 532 eligible projects
 - 533 ○ Coordinate with Applicants and Recipients on RFIs
 - 534 ○ Make scope and cost eligibility determinations
 - 535 ○ Coordinate with OFA partners to support Applicant’s desired recovery outcomes
- 536 ● Phase IV, Final Reviews:
 - 537 ○ Conduct final project reviews
- 538 ● Phase V, Obligation and Recovery Transition:
 - 539 ○ Obligate funds to Recipient
 - 540 ○ Conduct RTMs
- 541 ● Phase VI, Project Monitoring and Amendments:
 - 542 ○ Respond to PA-related project correspondence such as changes in SOWs and
 - 543 time extensions requested prior to an Applicant’s RTM
 - 544 ○ Coordinate recovery transition to the region

545 *Joint Recovery Offices*

546 A JRO is a facility that centralizes communication, collaboration, and coordination to achieve
 547 recovery outcomes for large, complex, Level I incidents in a post-JFO environment. FEMA
 548 establishes JROs, by exception, to address requirements that overwhelm the region’s
 549 capacity and are best addressed by a sustained field presence.

550 Initial JRO transition planning is managed by the Federal Coordinating Officer (FCO) or their
 551 delegated official. Once established, JROs are managed by a JRO Director who reports to the
 552 regional office. JROs are temporary facilities that execute functions normally transitioned to
 553 a regional office, and the JRO Director is responsible for managing and transitioning back to
 554 the regional office using data-driven decision-making with clear objectives defined by
 555 timelines and plans. More information on the role of the FCO is located in Appendix E.

556 Due to the significant resource requirements and extended lifespan of JROs, establishing a
 557 JRO requires a unique decision-making process between the RA and the Assistant
 558 Administrator for Recovery and additional reporting requirements which are not necessary

559 for smaller recovery operations. The RA and the Assistant Administrator for Recovery must
560 complete the decision-making process to establish a JRO within three months of the disaster
561 declaration. For more information, see the *Joint Recovery Office Guide*.

562 JRO responsibilities include:

- 563 • Phase III, Scoping and Costing:
 - 564 ○ Engage state, tribal, and territorial partners and OFAs to collaboratively define
 - 565 and support achieving recovery outcomes and objectives
 - 566 ○ Support building SLTT partner capability and capacity
 - 567 ○ Promote SLTT resiliency, mitigation, and preparedness
 - 568 ○ Deliver recovery-related technical assistance to impacted communities and
 - 569 survivors
 - 570 ○ Facilitate whole-community solutions to meet SLTT government recovery goals
 - 571 ○ Coordinate with CRCs to plan and share priorities and address project-specific
 - 572 issues
 - 573 ○ Coordinate with Applicants and Recipients on RFIs
 - 574 ○ Make scope and cost eligibility determinations
- 575 • Phase IV, Final Reviews:
 - 576 ○ Conduct final project reviews
- 577 • Phase V, Obligation and Recovery Transition:
 - 578 ○ Obligate funds to Recipient
 - 579 ○ Conduct RTMs
- 580 • Phase VI, Project Monitoring and Amendments:
 - 581 ○ Assist SLTT governments in developing the capability to plan for, manage, and
 - 582 execute long-term recovery solutions
 - 583 ○ Track program delivery to ensure that recovery goals are met
 - 584 ○ Respond to PA-related project correspondence such as changes in SOWs and
 - 585 time extensions requested prior to an Applicant's RTM
 - 586 ○ Monitor workload and milestones to support operational and staffing release
 - 587 planning
 - 588 ○ Coordinate recovery transition to the region

589 *Headquarters*

590 The Recovery Directorate at FEMA headquarters maintains national oversight of the PA
591 Program, Fire Management Assistance Grant (FMAG) Program, and Community Disaster
592 Loan (CDL) Program. The primary headquarters responsibilities of the PA program are
593 performed by the PA Division. HQ's responsibilities are to maintain national-level situational
594 awareness and actively manage risk and resources across the PA enterprise. The division
595 accomplishes this by (1) issuing policies and developing doctrine (process guidance and
596 tools) to support regions and drive consistent implementation of the PA Program; (2)

597 maintaining resource augmentation pools and adjudicating enterprise-wide resource
598 requirements; and (3) training and mentoring the PA enterprise. Responsibilities include:

- 599 • Lead the PA enterprise:
- 600 ○ Ensure PA program implementation is consistent with FEMA’s Core Values, PA
601 Guiding Principles, and the PA Program Delivery Model
 - 602 ○ Develop, maintain, and adjust regulations, policies, and doctrine for PA, FMAG,
603 and CDL programs
 - 604 ○ Provide standard processes, tools, systems, and training to ensure consistency in
605 PA operations across FEMA regions and incidents
 - 606 ○ Develop and improve on PA Grants Portal and Grants Manager and other
607 technology systems
 - 608 ○ Coordinate with OFAs on the development of Interagency Agreements and
609 Memoranda of Understanding
 - 610 ○ Coordinate with RSFs
 - 611 ○ Strategically plan to meet long-term resource needs through hiring, contracting,
612 and other augmentation structures, in accordance with the *Strategic Resource*
613 *Management (SRM) SOP* and other procedures
 - 614 ○ Build and maintain national training and mentorship capacity
 - 615 ○ Develop and monitor PA program performance measures
 - 616 ○ Support regional and field operations:
 - 617 ▪ Provide technical assistance for complex policy and operational challenges
 - 618 ▪ Provide Applicant, Recipient, and FEMA staff support
 - 619 ▪ Support development of SRP, including review and approval of plans and
620 staffing requests
 - 621 ▪ Monitor use of contract resources
 - 622 ▪ Provide training and mentors
 - 623 • Lead program’s continuous improvement:
 - 624 ○ Collaborate with field and regional stakeholders to collect, synthesize, and
625 validate lessons learned
 - 626 ○ Integrate best practices into updated guidance
 - 627 • Operational Planning and Response Phase:
 - 628 ○ Provide recommendations on PA declaration requests
 - 629 ○ Review PA-related Mission Assignments (MA), as applicable
 - 630 ○ Augment regional and field office capacity with national cadre staff, OFAs,
631 contract support and local hires
 - 632 ○ Approve Level I incident staffing and resource plans, in coordination with the FCO
 - 633 ○ Fill PA leadership roles for catastrophic incidents as detailed in incident staffing
634 and resource plans
 - 635 ○ Fill infrastructure roles in the National Response Coordination Center (NRCC)

- 636 ○ Support development of, and approve, Enterprise Resource Management (ERM)
- 637 guidance for PA program, including staffing requirements for expected workload
- 638 ○ Maintain national PA cadre positions
- 639 ○ Coordinate with FEMA regions to proactively assess PA readiness
- 640 • Phase III, Scoping and Costing:
- 641 ○ Provide oversight and national-level coordination for CRCs
- 642 • Phase VI, Project Monitoring and Amendments:
- 643 ○ Respond to second appeals
- 644 ○ Coordinate with the Government Accountability Office (GAO) and OIG and respond
- 645 to PA-related audits
- 646 ○ Provide technical assistance on improper payment testing and remediation
- 647 ○ Develop internal controls to prevent fraud
- 648 ○ Make decisions on all policy issues not delegated to regional or field levels
- 649 ○ Apply timeline extensions or other specific policy revisions or waivers
- 650 • Phase VII, Final Reconciliation and Closeout:
- 651 ○ Provide technical assistance on closeout

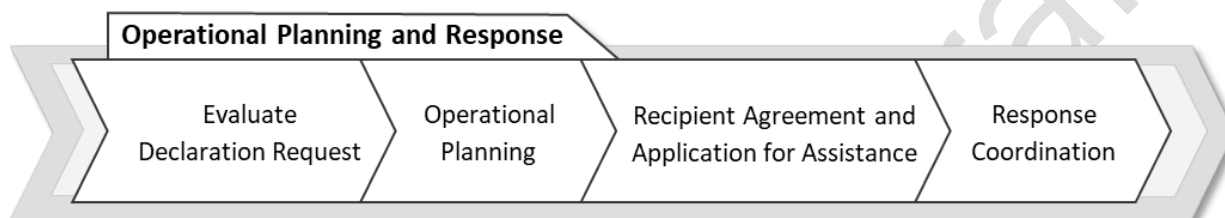
652 *Consolidated Resource Centers*

653 CRCs are permanent FEMA offices where specialized resources provide support to all PA
 654 field operations to help ensure consistency. CRC responsibilities on the initial versions of all
 655 projects as well as all projects before an Applicant's transition to the region, include:

- 656 • Phase II, Impacts and Eligibility:
- 657 ○ Support field and regional offices by providing technical assistance
- 658 • Phase III, Scoping and Costing
- 659 ○ Develop or validate scopes of work and cost estimates
- 660 ○ Conduct insurance reviews to ensure appropriate reductions
- 661 ○ Coordinate with mitigation staff to identify mitigation opportunities and support
- 662 hazard mitigation proposals and cost development for eligible projects.
- 663 ○ Conduct Environmental Planning and Historic Preservation (EHP) completeness
- 664 reviews and streamlined compliance reviews on projects that the Office of
- 665 Environmental Planning and Historic Preservation agrees do not require the
- 666 preparation of a Record of Environmental Consideration (REC) by EHP
- 667 ○ Coordinate with field and regional EHP staff to ensure projects will meet EHP
- 668 compliance requirements
- 669 ○ Develop project requests for information as necessary based on project reviews
- 670 ○ Add compliance conditions to the project
- 671 ○ Draft ineligibility determinations (if requested by the Infrastructure Branch
- 672 Director [IBD] or Public Assistance Group Supervisor [PAGS])
- 673 • Phase VI, Project Monitoring and Amendments:
- 674 ○ Perform scoping and costing on amendment requests that occur prior to an
- 675 Applicant's RTM.

676 **CHAPTER 3: OPERATIONAL PLANNING AND**
 677 **RESPONSE**

678 This chapter provides an overview of PA roles and responsibilities during Operational
 679 Planning and Response. During this phase, PA staff support immediate response efforts to
 680 stabilize lifelines, assess impacts and damage, evaluate declaration requests, develop
 681 disaster operating profiles, assess Applicant capacity and complexity, and define operational
 682 staffing and resource needs.



683
 684 **Figure 3: Public Assistance Process Steps during Operational Planning and Response**

- 685
- Operational Planning and Response Objectives:**

 - Evaluate incident need for federal support
 - Support incident response efforts and stabilize critical lifelines
 - Establish a foundation for applicant-driven, outcome-based recovery by identifying incident impacts and priorities

686
 687 **Table 6: Performance Indicators for Operational Planning and Response**

Goal Area	Metric	National Goal (% of Disasters)	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Accuracy	Obligations confirm the PDA determination that a federal disaster declaration was warranted.	98%	95%	100%	100%
Effectiveness	FEMA and the Recipient identify and document recovery goals and outcomes through strategic milestones.	100%	100%	100%	100%
Effectiveness	The Recipient assumes some or all customer service, site inspection, and scoping and costing functions.	20%	30%	20%	15%

Customer Experience	PDMG resource needs are prioritized for communities with Social Vulnerability Index (SVI) scores above .7	<i>Metric to be determined.</i>
Customer Experience	Technical assistance is tailored based on communities impacted and disaster-specific needs.	<i>Metric to be determined.</i>

688

689

690 Evaluate Declaration Request

691 The Governor or Tribal Chief Executive decides whether to request federal support. FEMA PA
 692 grants are contingent on a Presidential declaration that an Emergency or Major Disaster
 693 exists and that authorizes FEMA to deliver the PA Program. FEMA may approve time
 694 extension requests on declaration requests, with documented justification. For more
 695 information on how an incident is declared, visit www.fema.gov/disasters/how-declared or
 696 refer to the PAPPG.

697  The Governor or Tribal Chief Executive must request a declaration or extension
 698 from the President within 30 days of the incident.

699 FEMA encourages Recipients to lead PA operations when they have the capacity. When
 700 Recipients take on roles that FEMA may otherwise perform, this is referred to as state-led
 701 PA. State-led PA allows Recipients to:

- 702 • Drive their recovery
- 703 • Leverage and enhance existing relationships with Applicants
- 704 • Build knowledge and capacity
- 705 • Ensure consistent resourcing and insulate recoveries from FEMA resource shortfalls or
- 706 reallocation
- 707 • Ensure understanding of local issues by utilizing staff familiar with the area

708 State-led operations are scalable. Recipients may perform any one or more of the following
 709 key functions: customer service, site inspections, or scoping and costing. RAs have the
 710 authority to approve Recipient requests to lead PA operations. For more information refer to
 711 FEMA's *State-Led Public Assistance Guide*.

712 Assess Damage

713 After an incident, impacted local governments and PNPs coordinate with state, tribal, or
 714 territorial partners to document and report impacts. When a state, tribal, or territorial
 715 government determines that an incident may exceed SLTT partner capabilities to effectively
 716 recover, it requests a joint PDA with FEMA. Federal, SLTT government, and certain PNP

717 organization officials work together to estimate and document the impact and magnitude of
718 the incident. Joint PDAs provide an opportunity for other internal FEMA partners, such as
719 Mitigation and EHP, to begin gathering information on causes of damage as well as potential
720 environmental and historic impacts and funding opportunities to protect against future
721 similar damage FEMA's *Preliminary Damage Assessment Guide* contains detailed
722 information on how SLTT government officials and FEMA staff conduct PDAs and includes
723 position-specific roles and responsibilities.

724 **Operational Planning**

725 Operational Planning is critical to the success of PA Program Delivery and enables FEMA and
726 the Recipient to set priorities and ensure that program delivery meets communities' unique
727 needs. During Operational Planning, the Recipient and FEMA PA leadership develop a plan
728 for consistent communication and coordination, operational staffing, and resources, and
729 engage with EHP and mitigation leadership to strategize ways to maximize resiliency and
730 EHP compliance.

731 **Develop Disaster Operating Profile**

732 While FEMA is evaluating the declaration request, or in anticipation of a forecasted incident,
733 the region, with input from HQ PA Field Resource Branch, develops an initial Disaster
734 Operating Profile (DOP), which captures incident impacts and key information that is
735 continuously updated throughout the recovery life cycle. The regional PA Operations Branch
736 Chief oversees development of the initial profile in conjunction with the Recipient, OFAs,
737 regional EHP staff, and PA Hazard Mitigation staff to capture all known information that may
738 impact PA operations, including incident forecasts. The regional PA Operations Branch Chief
739 should request the Recipient's risk assessment from the regional Grants Division to help
740 inform necessary controls. The profile is input into PA Grants Manager to keep Recipient,
741 field, regional, and headquarters organizations aligned. The profile is the foundation for
742 resourcing and incident processing decisions and includes:

- 743 • Ongoing recovery status from other incidents
- 744 • Impacted counties
- 745 • Areas with high impacts
- 746 • Rough cost estimates by type of infrastructure/category of work
- 747 • Rough number of expected Applicants and projects
- 748 • Pre-identified environmental or historic preservation considerations
- 749 • Project threshold
- 750 • Declaration details, when available
- 751 • Assessment of hazard mitigation opportunities
- 752 • Initial assessment of high-impact applicants
- 753 • Specific critical infrastructure impacts

754 This information enables leadership to
755 determine initial staffing and training
756 requirements, organizational structure, and
757 logistical needs. Additionally, it enables
758 shared awareness on critical priorities,
759 potential policy issues, and other operational
760 aspects. The IBD/PAGS use the disaster
761 operating profile to make initial decisions,
762 and the Operations Support Task Force
763 Leader (OSTL) updates and refines the
764 disaster operating profile based on PDAs,
765 declaration data, and information included in
766 RPAs and Applicant Impact Surveys.

767 Evaluate Resource Needs and 768 Organization

769 While a declaration request is being
770 evaluated or in anticipation of a forecasted
771 incident, regional leadership uses the disaster
772 operating profile to decide the appropriate
773 organizational structure (regional office,
774 existing JFO/JRO, or new JFO) and location
775 (virtual or on-site) to deliver PA. Regional and
776 field leadership coordinate with the CRC
777 Director to determine whether CRC staff,
778 regional staff, or field staff will write
779 determination memoranda and hazard
780 mitigation proposals. Staff must use standard PA delivery roles and processes regardless of
781 the organizational structure or location of work.

782 Strategic Resource Management (SRM) provides a comprehensive process for the
783 management and deployment of PA staff to disaster operations. SRM offers a streamlined,
784 planned, and nationally coordinated process utilizing all types of staffing resources and in
785 accordance with the ROSM.

786 Organization Considerations

787 **Using Existing Organizations:** If the incident is within the region’s existing capacity, regions
788 should integrate the new declaration into its existing PA organizational structure. This may
789 include leveraging an existing field office to take on the new declaration or using regional PA
790 staff to conduct operations within existing organizations.
791

Virtual or In-Person: Hybrids are Best

FEMA historically evaluated the need for on-site staff primarily through a cost-savings lens: FEMA would trade high-quality but expensive in-person support for less-personal but less-expensive remote support. However, best practices show that virtualization of some roles—with just-in-time deployments to occasionally meet with Recipients and Applicants in person—can provide significantly improved customer experiences, more effectively use FEMA’s most experienced staff, and provide long-term recovery continuity. PA is standardizing this through the CRC Field Deployment process in 2022.

Infrastructure Branch Director (IBD) and PA Group Supervisor (PAGS)

When FEMA anticipates ESF activation on an incident, regional leadership designates an IBD. PAGS are then identified to report to the IBD and manage team leads. If ESFs are not activated and the incident is not complex, regional leadership should only designate a PAGS.

792 **Creating New Field Offices:** A field office is appropriate where the incident warrants
793 dedicated resources beyond the capacity of a region’s standing operations. Regional
794 leadership should consider the challenges commensurate with new and temporary
795 organizations when creating a new field office. In addition, regional leadership should
796 delegate PA authorities to the field when field offices are active and empower field staff to
797 resolve issues and make eligibility determinations. Field offices can take the form of virtual
798 recovery offices (optimal for small, low-complexity Level III incidents), JFOs (typically
799 necessary in Level I and II incidents), or JROs (necessary in catastrophic recovery incidents).
800 For specific criteria on when a field office is necessary, see Chapter 5 of the *ROSM*. For
801 information on JROs, refer to the *Joint Recovery Office Guide*.

802 *Location Considerations*

803 Regional and field leadership leverage virtual support and just-in-time deployments to
804 minimize staff downtime and maximize use of field resources. Field leadership should use
805 regional PA staff for high-impact or complex Applicants where FEMA expects PA Phases I-V to
806 require more than a year to complete. This ensures continuous engagement with regional
807 staff and enables efficient management of long-term recovery.

808 *Documenting Organizational Decisions and Resource Needs*

809 Regional leadership must identify a PA leadership team including PAGS and, if necessary, an
810 IBD. The region must document this and other organizational and location decisions and
811 resourcing needs in incident staffing and resourcing plans.

812 If an incident is expected to exceed a region’s routine incident year, regional leadership
813 must coordinate with the Field Resource Branch to develop an approved SRP and request
814 additional resources through SRM processes.

815 The PA Strategic Resource Plan (SRP) is developed in part based on the impacts identified in
816 the DOP. It provides estimates for the number of PA staff that will be necessary to support
817 PA delivery throughout the length of the operation, outlines the DOP, and identifies
818 mentoring and training needs.

819 In addition to FEMA staffing resources, strategic resource requests can include resources
820 from U.S. Army Corps of Engineers (USACE) Reemployed Annuitant Cadre and Bicentennial
821 Volunteers, incorporated under the Tennessee Valley Authority. In accordance with the
822 *ROSM*, for Level I incidents, leadership positions and all other incident staff planning must
823 be jointly approved by the field office, region, and FEMA HQ. For more information, refer to
824 the *SRM SOP*.

825 **Delegate Authorities**

826 The RA may delegate DRM authority to the FCO, IBD, PAGS, or regional PA Operations
827 Branch Chief depending on the size, scale, and makeup of the operation. The FCO, with
828 support from regional OCC and Grants Program staff, determines obligation and approval
829 authorities. When DRM Authority is delegated to incident staff, the formal notification of the
830 delegation is uploaded to Grants Manager.

831 **Develop Initial Projection**

832 The initial projection is part of the strategic planning for the incident which also
833 encompasses spend plan projections and strategic milestones. The projection is an overall
834 assessment of the costs for the life of the incident PA staff update the projections as
835 necessary to maintain accuracy. Strategic milestones are benchmarks that track specific
836 items leadership is working towards, including activity and phase completion targets. These
837 milestones are entered and updated in Grants Manager.

838 **Develop Spend Plan**

839 The spend plan tool is used to estimate month-to-month incident costs and project monthly
840 obligations. The spend plan helps ensure that FEMA has enough funds in the Disaster Relief
841 Fund (DRF) to award projects for all declared emergencies and major disasters. PA staff
842 must continually update projected projects and costs in Grants Manager to maintain spend
843 plan accuracy.

844 **Recipient Agreement and Application for Assistance**

845 FEMA implements PA when the declaration authorizes assistance to SLTT governments and
846 eligible PNP organizations. The Recipient signs a FEMA-State/Tribe/Territory Agreement,
847 submits an application for federal assistance (SF-424), and ensures it has an updated and
848 approved PA Administrative Plan and Hazard Mitigation Plan. Refer to the *PAPPG* for plan
849 requirements.

850 **Response Coordination**

851 When warranted, FEMA activates its RRCC and NRCC to facilitate multi-agency coordination
852 to prepare for and respond to the immediate needs of an incident. FEMA regional staff fill
853 the RRCC Infrastructure Branch Director (IBD) position and HQ PA staff fill the NRCC
854 Infrastructure Assets Group Supervisor (INGS) position to coordinate debris removal and
855 critical infrastructure activities across the various federal agencies. This includes ESFs #1
856 (Transportation), #3 (USACE), #10 (U.S. Environmental Protection Agency), and #12
857 (Energy). The INGS also facilitates responses to PA policy questions and coordinates with the
858 Operations Section Chief and the MA Manager to ensure MAs are only issued for work that is
859 otherwise eligible as Emergency Work and is not already covered under another federal

860 agency’s authorities. When the impact of an incident is so severe that SLTT governments
 861 lack the capability to perform or contract eligible Emergency Work themselves, the Recipient
 862 may request that the federal government provide this assistance. FEMA issues MAs to task
 863 work that falls under FEMA’s authority to another federal agency and refers to it as Federal
 864 Operations Support or Direct Federal Assistance (DFA).

865 FEMA may deploy a regional or national IMAT, including an Operations Branch Director for
 866 Critical Infrastructure (OBD-I), to support federal response operations from the field and
 867 provide additional situational awareness. Once a region designates and deploys an IBD to
 868 oversee PA and ESF operations, the OBD-I transitions information and duties to the PA-
 869 designated IBD to ensure continuity without duplicating effort. The PA-designated IBD
 870 coordinates directly with the Operations Section Chief (Ops Chief) and any geographic
 871 Operations Branch Directors. The Ops Chief ensures that MAs, which may overlap with PA
 872 areas of responsibilities, are reviewed by the IBD. This must occur to ensure that PA-related
 873 work funded via an MA is eligible under the PA Program, does not fall under the respective
 874 federal agency’s authority, and does not duplicate work funded via a project application. The
 875 IBD may be assigned the role of MA Project Manager for MAs that fall within their areas of
 876 responsibility.

877 FEMA uses lifelines to establish and track operational priorities during incident stabilization.
 878 Lifelines are critical services and include the associated infrastructure in the community as
 879 shown in Figure 4. As lifelines begin to stabilize, response operations transition to recovery.

880 For more information refer to the PAPPG, *National Incident Support Manual (NISM)*, *Incident*
 881 *Management Manual*, *Incident Stabilization Guide*, and *Incident Management Handbook*.



882
 883 **Figure 4: Community Lifelines**
 884

885 **Table 7: Roles and Responsibilities for Operational Planning and Response**

Position	Responsibilities
Regional PA Operations Branch Chief	<ul style="list-style-type: none"> Oversees development of initial disaster operating profile and incident staffing and resource plans, in coordination with field leadership, the Field Resource Branch, and the Recipient For Level 2 and 3 incidents, designates PA leadership; for Level 1 incidents, coordinates with HQ PA to identify PA leadership Reviews and approves Recipient application and administrative plan Performs other PA operational, planning and response duties as delegated by the Regional Recovery Division Director (RRDD)

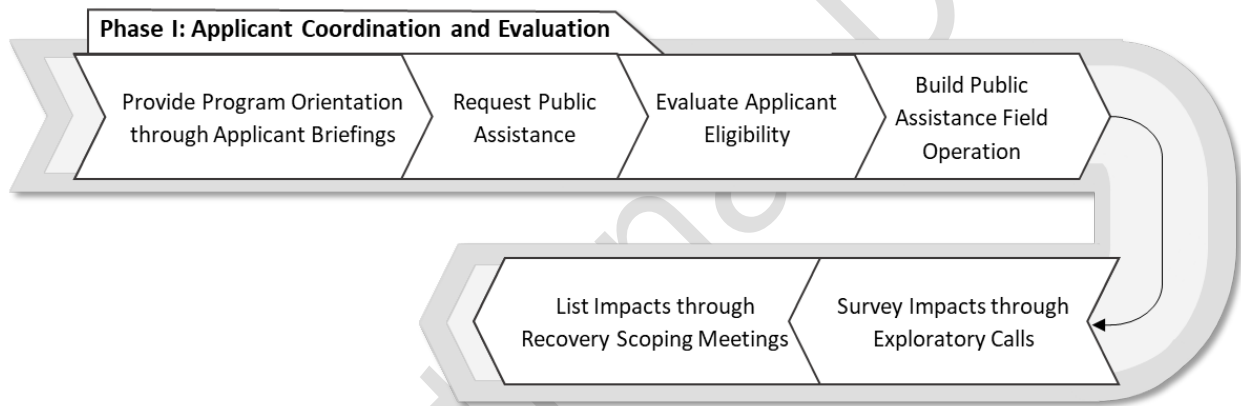
Position	Responsibilities
Infrastructure Group Supervisor (INGS)	<ul style="list-style-type: none"> • If the RA activates the RRCC, the INGS: • Coordinates debris removal and critical infrastructure activities across the various federal agencies • Facilitates responses to PA policy questions • Coordinates with the MA Manager • Coordinates with the NRCC if activated at HQ
Infrastructure Branch Director (IBD)	<ul style="list-style-type: none"> • Coordinates directly with the Operations Section Chief and Branch Directors • Coordinates debris removal and critical infrastructure activities across the various federal agencies • Facilitates responses to PA policy questions during response phase • Coordinates with the MA Manager • Coordinates with regional PA leadership and PA HQ Field Resources Branch to develop initial disaster operating profile and incident staffing and resource plans, including the SRP • In coordination with the Recipient and PAGS, assesses Applicant needs for assistance during the PA grant development process • Performs other operational, planning and response duties as delegated by the Operations Section Chief or FCO
Public Assistance Group Supervisor (PAGS)	<ul style="list-style-type: none"> • Serves as deputies to the IBD in Level I and II incidents • Facilitates responses to PA policy questions • Coordinates with regional PA leadership and PA HQ Field Resources Branch to develop initial disaster operating profile and incident staffing and resource plans on level III incidents • In coordination with the Recipient and IBD, assesses Applicant needs for assistance during the PA grant development process • Updates “Event Profile” to establish proper project routing and workflow <ul style="list-style-type: none"> • Refines and maintains the disaster operating profile • Performs other operational, planning and response duties as delegated by the IBD on Level I and II incidents, or by the FCO on Level III incidents
Operations Support Task Force Leader (OSTL)	<ul style="list-style-type: none"> • Coordinates deployments of PA staff as directed by the IBD/PAGS • Oversees check in and check out process for PA staff • Develops and maintains PA organizational chart and daily accountability • Compiles PA input in the Incident Action Plan (IAP) and situational report • Coordinates with Planning section on reports • Supports PAGS in refining and maintaining the disaster operating profile • Confirms the Recipient has submitted all administrative requirements • Oversees spend plan and coordinates with finance staff on the spend plan

CHAPTER 4: APPLICANT COORDINATION AND EVALUATION

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888 Operational Planning and Response activities transition to recovery when immediate threats
 889 to health and safety begin to stabilize. In less complex incidents, the transition may be
 890 clearly marked by a federal disaster declaration. In more complex incidents, the transition is
 891 often blended with Operational Planning and Response activities continuing to be conducted
 892 as PA begins coordination with impacted Applicants. During Phase I, Applicant Coordination
 893 and Evaluation, FEMA staff work with the Recipient to engage with and educate potential
 894 Applicants, prioritizing engagement with complex Applicants, collect and evaluate RPAs, and
 895 assess Applicants’ recovery and technical assistance needs. This chapter provides an
 896 overview of PA roles and responsibilities during Applicant Coordination and Evaluation.



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Figure 5: Public Assistance Process Steps During Phase I

- Phase I Objectives:**
- Develop an understanding of all incident impacts and Recipient and Applicant priorities
 - Collect and process RPAs
 - Conduct exploratory calls and RSMS
 - Develop draft lists of impacts for each Applicant

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Table 8: Performance Indicators for Applicant Coordination and Evaluation

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	Phase I completed within 56 days of declaration (% of Applicants)	75%	85%	75%	50%

Effectiveness	% of Applicants with EHP concerns identified at RSMs when needed	60%	70%	60%	50%
Effectiveness	% of Applicants with insurance issues identified at RSMs when needed	75%	80%	75%	70%
Customer Experience	% of Applicants satisfied with their interactions with FEMA staff during the RSM	90%	90%	90%	90%
Customer Experience	% of Applicants satisfied with their understanding of the FEMA Public Assistance process	85%	85%	85%	85%
Customer Experience	% of Applicants with SVI scores above .7 assigned appropriate PDMGs	<i>Metric to be determined.</i>			
Efficiency	% of FEMA staff whose assigned roles align with their qualifications, training	80%	TBD	TBD	TBD

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903 FEMA regional PA and Grants Division staff coordinate with the Recipient to ensure
 904 completion of the SF-424 and Administrative Plan to ensure that projects obligations are not
 905 delayed. The IBD/PAGS works with the Recipient to determine specific routing settings in
 906 Grants Manager. This includes whether the Recipient will review all RFIs and project
 907 applications.

908 Facilitators from FEMA’s Alternative Dispute Resolution Division, within the OCC, can be
 909 requested to conduct neutral third-party facilitations within FEMA or with Recipients,
 910 Applicants, or other PA stakeholders to resolve conflicts at the earliest opportunity. These
 911 facilitations are not used to determine eligibility and cannot conflict with policies or
 912 regulations, including determination or appeals procedures. Examples of conflicts that
 913 facilitation can address include conflicting working styles between disaster staff,
 914 misunderstandings, or challenges in helping Applicants complete the project application.

915 **Provide Program Orientation Through Applicant Briefings**

916 Following a Presidential declaration, the Recipient presents an overview of the PA Program
 917 to prospective applicants. This is typically referred to as an Applicant Briefing. The briefings
 918 vary by Recipient and typically include an overview of the PA Program delivery process,
 919 deadlines, general PA eligibility criteria, mitigation opportunities, and compliance
 920 requirements. FEMA personnel should attend briefings when possible and support the
 921 Recipient by clarifying information and answering questions. For more information, refer to
 922 the [PAPPG](#).

923 Request Public Assistance

924 The RPA is the Applicant’s pre-application to receive PA funding and is the first step to apply
925 for PA. For most Applicants, the RPA includes general information about the applicant’s
926 organization, physical location, and points of contact. PNP applicants submit additional
927 information about their organizations and affected facilities. Applicants submit RPAs via PA
928 Grants Portal. In coordination with Field leadership and the region, FEMA may approve
929 Applicant RPA time extensions based on extenuating circumstances.

930 *FEMA accepts RPAs up to 30 days from the date the area is designated in the*
931 *declaration.*

932 Evaluate Applicant Eligibility

933 Once an Applicant submits an RPA, the Recipient reviews the RPA and provides a
934 recommendation to FEMA regarding the Applicant’s eligibility. The Recipient also evaluates
935 each Applicant’s risk of noncompliance with federal statutes, regulations, and the terms and
936 conditions of the subaward. For more information on Applicant risk assessments refer to 2
937 C.F.R. §200.332.

938 *The PAGS reviews the RPA and determines Applicant eligibility within three days of*
939 *receiving from Recipient.*

940 If needed, the PAGS consults with FEMA OCC in evaluating Applicant eligibility. If FEMA
941 determines that an Applicant is ineligible, PA staff develop an eligibility determination,
942 explaining the rationale.

943 If an Applicant’s RPA is approved, the PAGS assigns an appropriate PDMG, if needed, to
944 engage with the Applicant, provide customer service, and guide the Applicant through the PA
945 process. Experienced Applicants with the capacity to navigate independently through the
946 grant process, or with limited impacts, may complete Phases I and II via direct application,
947 without a PDMG.

Direct Application

Some Applicants may submit impact information and project applications directly through Grants Portal without having to rely on a PDMG. Direct application enables Applicants to drive their own recoveries on their timelines based on information in the Applicant Impact Survey and streamlined project applications. For more information refer to the following guidance within the FEMA Program Delivery Branch’s Delivery Toolbox: *Applicant Information – Direct Application*, and *Applicant and Recipient Information – Completing and Submitting Streamlined Project Applications*.


948 **Build Public Assistance Field Operation**

949 In parallel to reviewing and adjudicating RPAs, the IBD/PAGS builds out a PA field operation
950 capable of managing the initial phases of the delivery of PA. Specifically, the IBD/PAGS
951 continues to update and distribute the DOP and uses the information to support staffing and
952 resources plans coordinated with HQ PA Field Resource Branch and other PA stakeholders
953 in line with the *SRM SOP*.

954 The IBD/PAGS ensures that staff assigned to the operation are trained and oriented to
955 ensure they understand the PA project development process and the incident's unique
956 environment. For certain complex Applicants, the IBD/PAGS, or their delegate, will consider
957 staff skillset (such as language or other technical skills) and experience when filing roles.
958 The IBD/PAGS requests trainings through the Field Training Office or PA Training liaison for
959 Recipients, potential Applicants, and other federal staff. FEMA also offers regular Grants
960 Manager/Grants Portal training to internal and external stakeholders. Past Recipient and
961 Applicant Webinars are available on FEMA's *Grants Portal and Grants Manager Training*
962 *YouTube Channel* or the Support Center in Grants Manager and Grants Portal. Schedules for
963 internal FEMA employee and contractor micro-trainings (webinars) are distributed by FEMA
964 staff on a regular basis.

965 **Survey Impacts Through Exploratory Calls**

966 The Applicant completes an Applicant Impact Survey after submitting its RPA. This is a short
967 questionnaire that expands on the type and extent of impacts listed in the RPA, identifies
968 critical needs, and provides information to the recipient and FEMA on potential needs for
969 technical assistance. The Exploratory Call is a 15 to 30-minute introductory phone
970 discussion between the PDMG and Applicant. This is meant to establish a relationship with
971 the Applicant, review or complete the survey, and schedule the RSM.


972  Upon assignment to the Applicant, the PDMG conducts the Exploratory Call within
973 seven days.


974 Following an Exploratory Call, the Applicant begins developing its impact list, which is an
975 inventory of all damaged facilities, debris removal activities, and emergency protective
976 measures for which the applicant intends to claim costs for reimbursement.

977 **List Impacts Through Recovery Scoping Meetings**

978 The Applicant, Recipient, and FEMA conduct an RSM to review and refine the list of impacts.
979 The PDMG, if assigned, facilitates discussion of the PA delivery process, hazard mitigation
980 opportunities and eligibility requirements, including insurance and environmental and
981 historic preservation considerations. For Applicants pursuing direct application, the Recovery
982 Scoping Video provides this information. The RSM or video starts a 60-day regulatory period

983 when the Applicant must identify and report all eligible impacts and damage for FEMA to
 984 review. For more information on application procedures please refer to 44 C.F.R. § 206.202.

985  Upon assignment to the Applicant, the PDMG conducts the RSM within 21 days.

986  The Applicant submits information on incident-related impacts within 60 days of the
 987 RSM.

988 At the RSM the Applicant, Recipient, and FEMA also
 989 begin a Project Development Plan, which is a work
 990 plan to guide the Applicant through project
 991 development and obligation. The Project Development
 992 Plan establishes a regular meeting schedule and
 993 target timelines for grouping impacts and damage into
 994 projects, scheduling site inspections, and submitting
 995 required documentation.

Project Development Plan

The Project Development Plan identifies key deliverables and defines recovery outcomes. The plan includes a 45- to 60-day schedule of key steps to complete project applications.

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Table 9: Roles and Responsibilities during Phase I

Position	Responsibilities
Infrastructure Branch Director (IBD)	<ul style="list-style-type: none"> Discusses program delivery options with Recipient Supports applicant briefings Monitors operational progress and strategic milestones and maintains disaster operating profile and incident staffing and resource plans, including the SRP In coordination with the Recipient and PAGS, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments
Public Assistance Group Supervisor (PAGS)	<ul style="list-style-type: none"> Reviews and determines PNP applicant eligibility, in coordination with OCC Approves eligible RPAs If FEMA determines an Applicant is ineligible, develops a Determination Memo (DM) in coordination with OCC to explain the reason for the determination In coordination with the Recipient and IBD, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments Works with the Program Delivery Task Force Lead (PDTL) to assign appropriate PDMG to the Applicant based on Applicant need and PDMG experience/skill
Program Delivery Task Force Leader (PDTL)	<ul style="list-style-type: none"> Works with PDMG to prepare for Exploratory Calls and RSM Works with PAGS to assign the Applicant to an appropriate PDMG, prioritizing support for complex Applicants.
Public Assistance Program Delivery Manager (PDMG)	<ul style="list-style-type: none"> Reviews the disaster operating profile and Applicant Impact Survey for assigned Applicant(s) and, as applicable, other

Position	Responsibilities
	<p>feedback on Applicant capacity and complexity, to prepare for the Exploratory Call</p> <ul style="list-style-type: none"> • Conducts the Exploratory Call • Prepares for the RSM, including assisting Applicant with impact list development • Coordinates with EHP and Hazard Mitigation specialists for support • Conducts the RSM, ensuring completion of the Project Development Plan • Provides Applicants with PA Hazard Mitigation information
Hazards and Performance Analyst Task Force Leader (TFL)	<ul style="list-style-type: none"> • Works with Mitigation (406) Specialist to prepare for Exploratory Calls and RSM
Mitigation (406) Specialist	<ul style="list-style-type: none"> • Provides technical support and hazard mitigation information to PDMGs and supports Applicant Briefings • Attends RSMs when necessary, based on RPA or Applicant Impact Survey information • Provides technical support and hazard mitigation information to PDMGs and Applicants to help Applicants understand potential mitigation opportunities
Environmental Planning and Historic Preservation Advisor (EHAD)	<ul style="list-style-type: none"> • Advises the IBD and FCO on any potential EHP considerations based on preliminary damage information • Coordinates with other regulatory agencies by initial consultation and notifications • When no EHP Manager is present, the EHAD assigns field EHP Specialists to RSMs • Creation and distribution of the initial Public Notice
Environmental Planning and Historic Preservation (EHP) Specialist	<ul style="list-style-type: none"> • Provides PDMGs with EHP information to ensure Applicants understand EHP laws, regulations, and Executive Orders • Provides technical support to PDMGs and Applicants • Attends RSMs, when necessary, based on RPA or Applicant Impact Survey information

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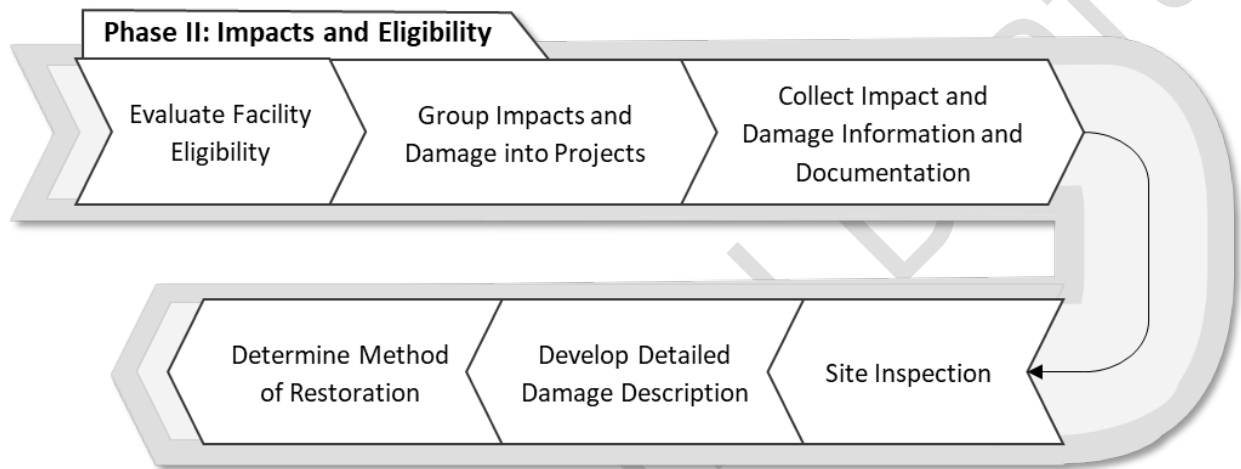
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CHAPTER 5: IMPACTS AND ELIGIBILITY

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After completion of the RSM, FEMA and the Applicant proceed to Phase II, the Impact and Eligibility phase, to obtain specific impact and damage details and review facilities for eligibility under the PA Program. During the Impacts and Eligibility Phase (Phase II), FEMA works with the Applicant to obtain specific information about impacts and damage to the Applicant’s facilities and logically group the impacts and damage into projects. This chapter provides an overview of PA roles and responsibilities during Impacts and Eligibility.



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Figure 6: PA Process Steps During Phase II

- Phase II Objectives:**
- Group impacts into projects
 - Gather all necessary documentation to support facility and work eligibility
 - Evaluate and make determinations on facility eligibility
 - Collect damage information and complete site inspections
 - Determine methods of restoration
 - Send projects to the CRC for scope of work and cost estimate development

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Table 10: Performance Indicators for Impacts and Eligibility

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	Phase II completed within 100 days of completing Phase 1	75%	85%	75%	50%
Simplicity	% of Applicants satisfied with the Grants Portal	90%	90%	90%	90%

Simplicity	Weekly average % of Applicants calling the PA Hotline	20%	10%	20%	25%
Accuracy	% projects sent to Phase III without rework	80%	85%	80%	75%
Accuracy	% of site inspections completed without rework	80%	85%	80%	75%
Effectiveness	% of permanent work damage line items with identified mitigation opportunity	75%	70%	75%	80%
Customer Experience	% of Applicants working with a single PDMG throughout Phase II	80%	85%	80%	75%

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1013 **Evaluate Facility Eligibility**

1014 Once the Applicant completes its list of impacts, the PDMG works with the PDTL to identify
 1015 sites and facilities that are under the authority of another federal agency or were not in use
 1016 at the time of the incident. If a PDMG identifies ineligible sites or facilities, they explain to
 1017 the Applicant the reason it is ineligible and either work with the Applicant to withdraw them
 1018 from its list of impacts or work with the PDTL and PAGS to issue an ineligibility
 1019 determination. Other eligibility concerns may be identified at this time or throughout the
 1020 grant process.

1021 **Group Impacts and Damage into Projects**

1022 The PDMG works with the Applicant and PDTL to identify sites and facilities that can be
 1023 combined into one project. This is a two-step process: 1) Create groups based on categories
 1024 of work and facility types. 2) Identify sites or facilities that logically group together. For more
 1025 information refer to the *PAPPG*.

1026 **Collect Impact and Damage Information and Documentation**

1027 Applicant-provided information and documentation are the core of project development. For
 1028 each impact identified, the Applicant provides information and documentation to describe
 1029 impacts, damage, and work. Applicants provide information through Grants Portal for each
 1030 item in the List of Impacts. Information requirements are based on the specific nature and
 1031 extent of each impact.

1032 For more information on specific documentation requirements, refer to the *PAPPG*.


1033 **Site Inspections**

1034 For some projects, FEMA obtains and validates specific information about the damaged site
 1035 or facility through a site inspection. PDMGs schedule the site inspections. When supporting

1036 complex Applicants, the PDMG works with SITL to ensure the Site Inspector can provide
1037 appropriate support. FEMA Site Inspectors (SIs) conduct inspections using various methods:

- 1038 • Applicants collect and submit impacts and damage-related information for FEMA review
1039 and validation (for sites with either completed or uncompleted work).
- 1040 • FEMA guides the Applicant through a virtual site inspection using video conference
1041 technology (for sites with uncompleted work).
- 1042 • FEMA physically visits the site with the Applicant (for sites with uncompleted work).


1043 FEMA mitigation and EHP specialists participate in site inspections as necessary to collect
1044 damage information and support subsequent mitigation and EHP reviews. For complex sites
1045 or facilities, FEMA Technical Specialists or other staff with technical specialties may conduct
1046 or engage with Applicants during the site inspection step to ensure adequate expertise and
1047 technical support through the project development process.

1048  *The Site Inspector completes Site Inspection within 21 days of a confirmed request*
1049 *for a site inspection.*

1050 **Develop Detailed Damage Description**

1051 FEMA works with the Applicant to develop detailed damage descriptions and dimensions
1052 (DDD) by developing narrative descriptions, documenting dimensions and quantities,
1053 answering key questions, and obtaining documentation related to the impacts and damage.
1054 FEMA and the Recipient work to ensure the Applicant has submitted all information and
1055 documentation required. As the DDD is the foundation of the project and becomes the basis
1056 for which FEMA determines the amount of funding, it is critical that the DDD is accurate.

1057  *The Site Inspector completes the DDD within seven days of completing the site*
1058 *inspection.*

1059  *The PDMG reviews the DDD within two days of receipt, and the Applicant approves*
1060 *the DDD within seven days of the PDMG's review.*

1061 **Determine Method of Restoration**

1062 Once FEMA, the Recipient, and the Applicant agree on the DDD, it is the Applicant's
1063 responsibility to define the method of repair, including the incorporation of hazard mitigation
1064 plans and building codes and standards. Some projects may require an engineering analysis
1065 to determine the method of repair. In these cases, FEMA may provide PA funding for
1066 engineering and design services.

1067 While Permanent Work funding is always based on pre-disaster size, capacity, and function,
1068 FEMA allows Applicants to accept funding at a fixed amount and use the funds in a more
1069 flexible manner to drive their own recovery.

Table 11: Roles and Responsibilities during Phase II

Position	Responsibilities
Public Assistance Group Supervisor (PAGS)	<ul style="list-style-type: none"> • Identifies and monitors complex and priority projects • Determines need for SIs, crew leads, and task force leads, and initiates deployments • Sets and manages goals and targets for program delivery • Determines eligibility of sites and facilities • Monitors operational progress and strategic milestones and informs maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
Operations Support Task Force Leader (OSTL)	<ul style="list-style-type: none"> • Continue Phase I activities, including coordinating staff deployment requests and onboarding, coordinating training and supply/equipment requests, maintenance of all org charts, dissemination of All-Hands guidance/notifications, creation and distribution of reports, and processing Grants Manager access requests • Oversees tracking of RTMs and Large Project Notifications (LPN) • Generate monthly and Life of Disaster spend plan projections in coordination with Planning Specialist(s), PDTL and PAGS • Facilitates PTB progression and performance reviews/evaluations for deployed staff • Ensures maintenance of accurate Deployment Tracking System (DTS) and Grants Manager deployment statuses, titles, and roles
Program Delivery Task Force Leader (PDTL)	<ul style="list-style-type: none"> • Coordinates with the PAGS to address eligibility issues • Tracks progress of staff and projects • Assists the PDMG as necessary • Reviews ineligibility recommendations
Site Inspector Task Force Lead (SITL)	<ul style="list-style-type: none"> • Coordinates with PDTL to identify and schedule site inspections • Reviews detailed DDD and Site Inspection Reports for completeness and accuracy
Program Delivery Manager	<ul style="list-style-type: none"> • Works with Recipient and Applicant to reach agreement on incident-related impacts • Generates site inspection work orders • Reviews detailed DDD and Site Inspection Report for completeness and accuracy • Raises eligibility concerns to PDTL • Works with the Applicant and PDTL to group sites and facilities into projects • Works with the Applicant to determine the method of restoration • Works with the Applicant to group sites and facilities into projects • Confirm logical grouping with EHP when there are sites with significant EHP concerns
Site Inspector	<ul style="list-style-type: none"> • Conducts site inspection of impacts and damage claimed by Applicants or validates Applicant-provided site inspection information

Position	Responsibilities
	<ul style="list-style-type: none"> • Develops or validates Site Inspection Reports and writes the detailed DDD for projects with uncompleted work • Ensures correct formulation of projects based on site inspection results and documents collected
Hazards and Performance Analyst Task Force Leader (TFL)	<ul style="list-style-type: none"> • Coordinates with the PAGS to address eligibility issues • Tracks progress of staff and projects • Assists the Mitigation Specialist as necessary • Reviews ineligibility recommendations
Mitigation Specialist	<ul style="list-style-type: none"> • Provides information on PA hazard mitigation opportunities to PDMG and/or Applicant • Attends Site Inspections as necessary to support development and evaluation of hazard mitigation SOW
Field Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> • Attends Site Inspections as assigned • Documents site conditions and begins early identification of potential EHP concerns
Technical Specialist	<ul style="list-style-type: none"> • Conducts site inspections and engages with Applicants on complex sites and projects

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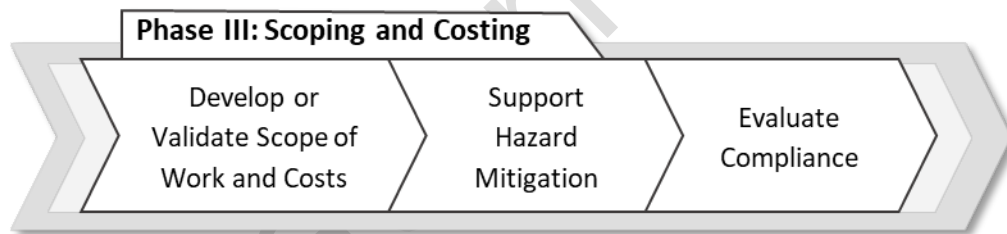
Operational Draft

CHAPTER 6: SCOPING AND COSTING

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1074 During Phase III, the Scoping and Costing phase, FEMA reviews Applicant-provided
 1075 information to develop or validate the SOW and cost estimate for each project, develop PA
 1076 hazard mitigation proposals, and ensure compliance with applicable requirements. This
 1077 chapter provides an overview of PA roles and responsibilities during Scoping and Costing.
 1078 For most applicants, the transition from Phase II to Phase III is a simple progression from
 1079 information collection to project development. For applicants with complex infrastructure
 1080 projects, activities that fall under Phases II and III may not be as clearly segmented as field,
 1081 regional, CRC, and Applicant staff work together to reach recovery outcomes. Projects with
 1082 uncompleted work transition to Phase III after FEMA has completed the Site Inspection and
 1083 DDD. Projects with all work completed transition to Phase III: Scoping and Costing, once
 1084 FEMA obtains all information and documentation necessary to substantiate work performed
 1085 and associated eligibility.

1086 The transition from Phase II to Phase III is also the transition from Stage 2: Scope Recovery
 1087 Requirements to Stage 3: Deliver Recovery Support. Where FEMA has determined that a JRO
 1088 is necessary, the transition of most Applicants from Stage 2 to Stage 3 also coincides with
 1089 the transition from a JFO structure to a JRO structure.



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Figure 7: Public Assistance Process Steps during Phase III

Phase III Objectives:

- Develop or validate scopes of work and cost estimates for all projects
- Ensure project compliance with program requirements

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Table 12: Performance Indicators for Scoping and Costing

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	% of completed work and standard projects developed within 30 days of project entering Phase III	90%	95%	85%	75%
Timeliness	% of specialized projects developed within 45 days of project entering Phase III	90%	95%	85%	75%


Timeliness	% of RFIs answered within 15 days	80%	85%	80%	75%
Accuracy	% of projects developed without rework from Phase IV	85%	90%	85%	80%
Accuracy	% cost estimates reviewed by Independent Expert Panel without cost adjustments.	90%	90%	90%	90%
Effectiveness	% of CRC specialist time spent actively working projects	75%	75%	75%	75%
Effectiveness	% of permanent work costs that are mitigation costs*	25%	20%	25%	30%
Effectiveness	% of permanent work projects that include mitigation	TBD	TBD	TBD	TBD

1095 *Improvements to the calculation of this metric are occurring during the Operational Draft period


1096 **Develop or Validate Scope of Work and Costs**

1097 The Applicant either submits the SOW and cost for FEMA review and validation, or it defines
 1098 the method of repair generally and FEMA develops the SOW and cost. For Emergency Work,
 1099 the SOW includes work required to address immediate threats and to remove debris and must
 1100 include quantitative information. For Permanent Work, the SOW includes a description of how
 1101 the Applicant plans to repair, or has repaired, the damage, including repair dimensions and
 1102 hazard mitigation description and dimensions.


1103 For projects where work is complete, validation specialists review Applicant-provided
 1104 information to develop the detailed DDD and validate that the work was necessary to
 1105 address impacts and damage claimed, and associated costs were reasonable and
 1106 necessary to perform the work.

1107  *The Validation Specialist completes the DDD and validation of documentation for
 1108 Completed Lane projects within 14 days of the PDMG routing the project to the CRC.*


1109 For projects where work is incomplete, costing or technical specialists either, a) develop a
 1110 SOW and cost estimate based on the detailed DDD and Applicant-provided information; or,
 1111 b) validate SOWs and cost estimates provided by the Applicant.

1112  *The Costing Specialist completes project development for Standard Lane projects
 1113 within 14 days of the PDMG routing the project to the CRC.*

1114 For certain complex projects, engagement with the Applicant may continue through Phase III
 1115 to develop or validate a SOW and cost estimate. Regional or CRC technical specialists may
 1116 work through the field office and directly with Applicants to ensure mutual understanding of
 1117 the intended method of repair, eligibility considerations, SOW, and cost estimate.

1118  *The Technical Specialist completes project development for Specialized Lane
 1119 projects within 24 days of the PDMG routing the project to the CRC.*

1120 During scoping and costing, FEMA may determine the Applicant did not provide information
 1121 to substantiate project eligibility. In these cases, FEMA submits an RFI to the Applicant for
 1122 additional project documentation. FEMA may also identify eligibility concerns related to the
 1123 work or cost claimed by the applicant. In these cases, CRC staff raise eligibility concerns
 1124 through the PDL to the PAGS to make an eligibility determination.

1125  *The Applicant responds to RFIs within the deadline specified, typically within 15*
 1126 *days of receipt of the RFI.*

1127 FEMA may have independent cost estimating experts review project costs. For more
 1128 information on Expert Panel Reviews, refer to the PAPPG.


1129 **Support Hazard Mitigation Efforts**

1130 For projects that include mitigation, FEMA works with Applicants to develop hazard
 1131 mitigation proposals. Hazard mitigation proposals draw from information collected
 1132 throughout the PA process, including the cause of damage, the type of mitigation desired by
 1133 the Applicant, and the repair scope of work and cost estimate. FEMA ensures that proposed
 1134 mitigation measures meet the cost effectiveness criteria defined in the PAPPG.

1135 Mitigation specialists coordinate with Applicants to address Applicant needs and goals, and
 1136 also coordinate with costing specialists as necessary. Once completed, FEMA reviews each
 1137 hazard mitigation proposal to ensure it includes a comprehensive scope of work for the
 1138 identified mitigation, detailed cost estimates, and documentation of cost-effectiveness.

1139 **Evaluate Compliance**

1140 Once FEMA validates the SOW and costs for a project, it conducts a series of reviews to
 1141 ensure program compliance. FEMA reviews projects for quality assurance, insurance
 1142 requirements, PA hazard mitigation eligibility, EHP completeness, and EHP compliance for
 1143 projects that do not require a Record of Environmental Consideration.

1144  *Insurance and Quality Assurance reviews are each completed within three days of*
 1145 *the specialist receiving the project.*

1146 **Table 13: Roles and Responsibilities during Phase III**

Positions	Responsibilities
Public Assistance Group Supervisor (PAGS)	<ul style="list-style-type: none"> • Coordinates with the CRC to communicate priorities, including complex Applicants, and address eligibility considerations • Monitors operational progress and strategic milestones and supports maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
CRC Director/Deputy Director	<ul style="list-style-type: none"> • Manages CRC staff • Coordinates with PAGS on priorities and eligibility considerations
Lane Manager	<ul style="list-style-type: none"> • Peer reviews projects

Positions	Responsibilities
	<ul style="list-style-type: none"> Assists specialists with any issues or concerns Works with other Lane Managers on compliance with policy
Program Delivery Manager (PDMG)	<ul style="list-style-type: none"> Reviews RFI Sends RFIs to Applicants for response Reviews Applicant responses to RFIs
Document Validation Specialist	<ul style="list-style-type: none"> Validates detailed DDD, SOW, and cost for completed projects based upon information and documents included with the project Reviews completed projects for potential eligibility concerns Initiates an RFI for documentation or information needed to complete projects
Costing Specialist	<ul style="list-style-type: none"> Writes SOW for projects with uncompleted work based upon the provided detailed DDD, Site Inspection Report, and other documents included with the project Estimates costs for projects with uncompleted work, based upon the SOW Support development of hazard mitigation SOW and estimates costs for projects with uncompleted work, based on input from the Applicant and Mitigation specialist Contacts Hazard Mitigation Specialist for technical assistance as needed to ensure mitigation is maximized Evaluates cost effectiveness of proposed hazard mitigation measures based on criteria for mitigation costs within 15% of repair costs and for measures listed in the PAPPG Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures Reviews projects with uncompleted work for potential eligibility concerns. Initiates an RFI for documentation or information needed to complete projects
Technical Specialist	<ul style="list-style-type: none"> Writes SOW for complex/specialized projects based upon the provided DDD, Site Inspection Report, and other documents included with the project Estimates costs for complex/specialized projects, based upon the SOW Writes hazard mitigation SOW and estimates costs for complex/specialized projects, based on input from the Applicant and Mitigation Specialist Evaluates cost effectiveness of proposed hazard mitigation measures based on cost criteria for mitigation costs within 15% of repair costs and for measures listed in the PAPPG Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures Reviews complex/specialized projects for potential eligibility concerns. Initiates an RFI for documentation or information needed to complete complex/specialized projects
Insurance Specialist	<ul style="list-style-type: none"> Identifies any prior “obtain and maintain” requirements placed on the damaged facility or item in previous incidents

Positions	Responsibilities
	<ul style="list-style-type: none"> • Communicates potential insurance issues or RFIs with the PDMG • Conducts final insurance review and makes required reductions • Determines the “obtain and maintain” insurance requirement for the damaged facility or item
Quality Assurance Specialist	<ul style="list-style-type: none"> • Reviews projects for compliance with policies, regulations, and laws • Works with Costing, Document Validation, and Technical Specialists for clarity and accuracy in projects
CRC EHP Specialist	<ul style="list-style-type: none"> • Conducts EHP Completeness Review to ensure projects contain all EHP required information • When necessary, serves as a liaison to field EHP Specialists to ensure SOW effectively incorporates EHP considerations • Completes a streamlined EHP compliance review for certain emergency protective measures
Mitigation Specialist	<ul style="list-style-type: none"> • Reviews Applicant submitted hazard mitigation SOW and cost estimates for projects with uncompleted work, and provides input to aid in the development of hazard mitigation SOW, based upon the provided detailed DDD, Site Inspection Report, input from the Applicant and other documents included with the project and ensures eligibility • Develops Benefit Cost Analysis • Reviews projects for cost-effectiveness

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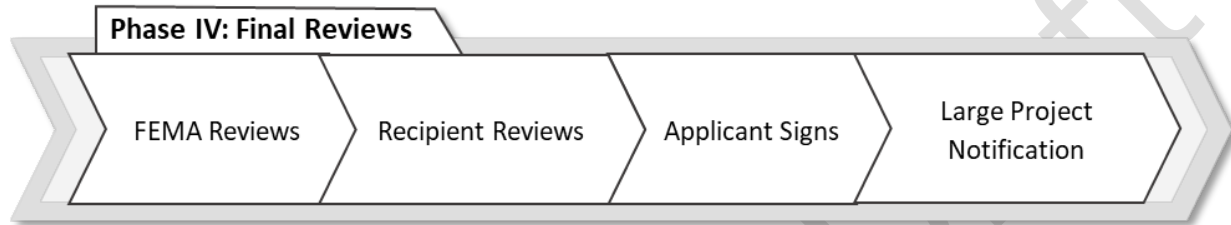
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Operational

CHAPTER 7: FINAL REVIEWS

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1150 Once all compliance evaluations are complete at the CRC, projects move forward to Phase
 1151 IV, the Final Reviews phase, for any additional EHP compliance review and final review.
 1152 Recipients and FEMA conduct final reviews and the Applicant signs the project prior to
 1153 obligation. This chapter provides an overview of PA roles and responsibilities during Phase
 1154 IV.



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Figure 8: PA Process Steps during Phase IV

- Phase IV Objectives:**
- FEMA, the Recipient, and the Applicant sign off on projects

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Table 14: Performance Indicators for Final Reviews

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	Final project reviews completed within 20 days of entering Phase IV	90%	95%	90%	80%
Accuracy	% of determinations upheld on first appeal (i.e., first appeal denied)*	55%	TBD	TBD	TBD

1159 *excludes partially granted or fully granted appeals.

FEMA Reviews

1160



1161 For projects that require a REC, EHP staff in the field or region conduct a review of the SOW
 1162 to ensure compliance with all applicable laws, regulations, and policies. and document the
 1163 EHP requirements as a condition of the award.

1164 The EHP specialist in the field or region complete reviews within 14 days.

1165 If an EHP Specialist determines the project application is missing information to support
 1166 compliance, the EHP Specialist submits an RFI to Applicant via the PDMG to submit to the
 1167 Applicant for additional project documentation. The EHP Specialist may also identify
 1168 eligibility concerns related to compliance. In these cases, EHP Specialists raise eligibility

1169 concerns through to the PDMG and the PDTL to the PAGS to make an eligibility
 1170 determination. Chapter 9 discusses the applicants right to appeal or arbitration.


1171 Once all compliance reviews are complete, the PDMG reviews the project and the PAGS
 1172 conducts the final review to verify eligibility.

1173  *The PDMG completes the project review within three days of receipt from the CRC.*
 1174  *The PAGS completes FEMA final review within five days of PDMG review.*

1175 If a PDMG identifies eligibility issues, they work with the PDTL and PAGS to explain to the
 1176 Applicant the reason it is ineligible and issue an ineligibility determination. Chapter 9
 1177 discusses the applicants right to appeal or arbitration.


1178 Recipient Reviews

1179 Once FEMA has approved the project, the Recipient reviews project applications to ensure
 1180 that the Applicant properly addressed all incident-related impacts, repair methods, and
 1181 costs.

1182  *The Recipient completes final project review within five days of FEMA's final
 1183 review.*

1184 Applicant Signs

1185 Once the Recipient completes its review, the Applicant reviews and signs the project and
 1186 acknowledges conditions (including EHP conditions), associated with PA subgrants.

1187  *The Applicant completes final Project review within seven days of the Recipient
 1188 review.*

1189 Large Project Notification

1190 If the federal cost share of a project is greater than \$1 million, it must go through the Large
 1191 Project Notification (LPN) process following applicant signature, prior to obligation. During
 1192 the LPN process, FEMA notifies Congress, the Department of Homeland Security (DHS), and
 1193 the Office of Management and Budget (OMB) prior to obligating funds.

1194 **Table 15: Roles and Responsibilities during Phase IV**

Roles	Responsibilities
Public Assistance Group Supervisor (PAGS)	<ul style="list-style-type: none"> • Performs final review to verify the project application is eligible before obligating funds • Signs determination memorandums • Compiles required LPN information and submits to the PA HQ Executive Office • Obligates project funding

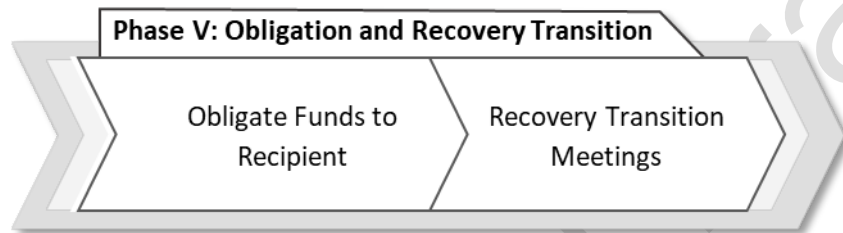
Roles	Responsibilities
	<ul style="list-style-type: none"> Monitors operational progress and strategic milestones and informs maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
Program Delivery Manger (PDMG)	<ul style="list-style-type: none"> Conducts a review of the project for eligibility following compliance reviews
Environmental and Historic Preservation Advisor (EHAD)	<ul style="list-style-type: none"> Conducts the Environmental Officer (EO) review of the project and approves the Recommendation of Environmental Consideration (REC) Provide advisement to EHP Specialist navigating projects with tiered EHP considerations
Field Environmental and Historic Preservation (EHP) Specialist	<ul style="list-style-type: none"> Ensure project complies with all applicable EHP laws, regulations, and Executive Orders Documents project compliance and identifies conditions that an Applicant must adhere to in PA Grants Manager Draft consultation letters to other agencies, as necessary
PA Headquarters LPN Team	<ul style="list-style-type: none"> Reviews the LPN information for completeness Submits the LPN to the Office of Chief Financial Officer (OCFO) Notifies the PAGS when FEMA HQ approves a project in the LPN queue
Office of the Chief Financial Officer (OCFO)	<ul style="list-style-type: none"> Processes LPN requests from PA Submits projects to FEMA Office of External Affairs (EA) for review and coordination
Office of External Affairs (EA)	<ul style="list-style-type: none"> Coordinates notifications and reviews with DHS, OMB, and Congress

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CHAPTER 8: OBLIGATION AND RECOVERY TRANSITION

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Once all final reviews are complete and the Applicant has signed the project application, the project moves to Phase V. During Phase V, the Obligation and Recovery Transition phase, FEMA obligates funding to Recipients and transitions recovery roles and responsibilities. This chapter provides an overview of PA roles and responsibilities during Obligation and Recovery Transition.



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Figure 9: PA Process Steps During Phase V

- Phase V Objectives:**
- Obligate funding to Recipient for disbursement to the Applicant
 - Transition Applicant’s primary point of contact from FEMA to the Recipient

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
Table 16: Performance Indicators for Obligation and Recovery Transition

Goal Area	Metric	Acceptable Ranges			
		National Goal	Level III Incident	Level II Incident	Level I Incident
Timeliness	% of projects are obligated within three days of Applicant signature or completion of LPN process	75%	80%	75%	70%
Timeliness	% of RTMs are completed within seven days of the obligation of its last project	95%	95%	90%	85%
Customer Experience	% of Applicants overall satisfied with FEMA's Public Assistance program	90%	90%	90%	90%

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1212 Obligate Funds to Recipient

1213 Following final reviews, FEMA obligates funding to Recipients for disbursement to
1214 Applicants. After FEMA obligates funds, the Recipient notifies the Subrecipient that funds
1215 are available and disburses funds based on the Administrative Plan.

1216  FEMA obligates the project within three days of Applicant signature or, if applicable,
1217 completion of the LPN process.

1218 Strategic Funds Management

1219 When a Permanent Work project has a federal cost share greater than \$1 million and the
1220 Applicant does not require funding within 180 days after the project is ready for obligation,
1221 FEMA obligates the funds based on the project completion schedule. FEMA refers to this as
1222 Strategic Funds Management (SFM). For more information refer to FEMA SOP 9570.24
1223 *Strategic Funds Management – Implementation Procedures for the Public Assistance*
1224 *Program*.

1225 Recovery Transition Meetings

1226 In general, the PDMG conducts an RTM once the Applicant has signed all of its projects. The
1227 RTM transitions the primary point of contact for the Applicant from FEMA personnel to the
1228 Recipient. FEMA, the Recipient, and the Applicant attend the RTM. In cases where the
1229 Applicant has projects that require lengthy assessments prior to finalizing a SOW, the PDMG
1230 conducts the RTM once the Applicant has obligated its other projects. Upon completion of
1231 the assessments, the Recipient and FEMA regional staff coordinate with the Applicant and
1232 the CRC to finalize any remaining project reviews.

1233 **Table 17: Roles and Responsibilities during Phase V**

Roles	Responsibilities
Infrastructure Branch Director	<ul style="list-style-type: none">• Readies PA operation for transition to steady-state operations (region)• Monitors operational progress and strategic milestones as well as incident staffing and resource plans, including the SRP
Public Assistance Group Supervisor	<ul style="list-style-type: none">• Process obligations and de-obligations for Public Assistance projects, as delegated• Monitors unliquidated obligations for each project• Executes staffing releases and transitions as needed, prioritizing national-level assets for release
Program Delivery Manager	<ul style="list-style-type: none">• Coordinates with the Recipient to schedule a Recovery Transition Meeting (RTM)• Facilitates the RTM

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CHAPTER 9: PROJECT MONITORING AND AMENDMENTS

Applicants transition from Phase V to Phase VI upon completion of the RTM. Upon completion of the RTM, applicants transition to the region’s responsibility. During Phase VI, the Project Monitoring and Amendments phase, PA staff monitor the status of PA projects to ensure Subrecipients spend funds according to the approved SOW, within the approved deadline, and in accordance with compliance conditions on the project. During this Phase, PA staff monitor overall progress and respond to requests for changes in scopes of work, time extensions, appeals, audits, and arbitration.

Transition from Phase V to Phase VI is also the transition from Stage 3: Delivery Recovery Support to Stage 4: Grant Administration and Closeout. Federal Coordinating Officers should closely coordinate with the respective Region’s Recovery Division Director to establish metrics for transitioning an event from field office management to the Region with concurrence from the State Coordinating Officer and approval of the Regional Administrator. Incidents managed by a JRO are the responsibility of the Region, and the workload and duties should be allocated based on the capacity of the PA staff to administer and close the grant activity.

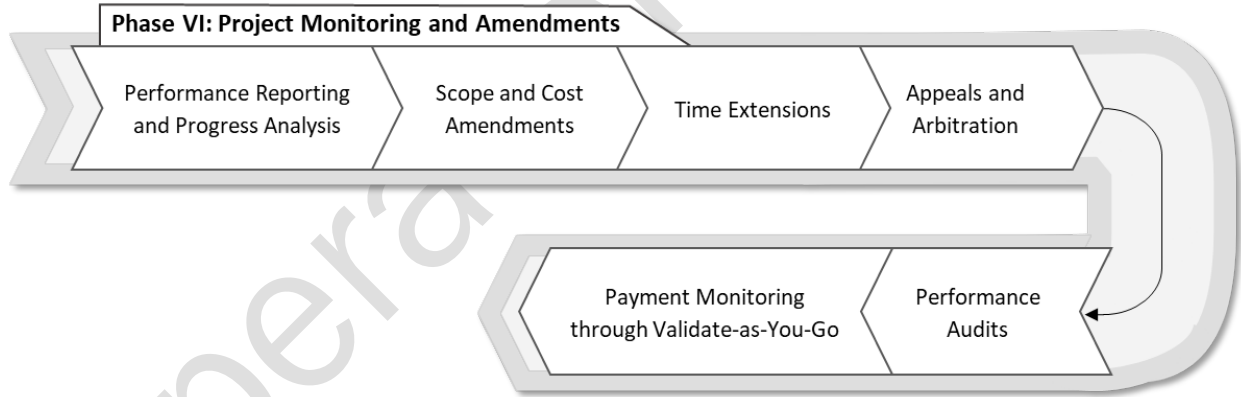


Figure 10: PA Process Steps During Phase VI

Phase VI Objectives:

- Ensure Recipients and Subrecipients make sustained progress toward completing work within scope and on schedule
- Where necessary, escalate and address under-performance of any Subrecipient or project

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Table 18: Performance Indicators for Project Monitoring and Amendments

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	% of projects completed within the period of performance	90%	TBD	TBD	TBD
Timeliness	% of extension requests submitted and processed within the current period of performance	100%	TBD	TBD	TBD
Timeliness	% of amendment requests processed and approved within 30 days	90%	TBD	TBD	TBD
Timeliness	% of first appeals processed within 90 days	90%	TBD	TBD	TBD
Accuracy	% of first appeals upheld on second appeal (i.e., second appeal denied)*	85%	TBD	TBD	TBD
Accuracy	% of improper payments detected and remediated within 90 days	TBD	TBD	TBD	TBD

1260 *excludes partially granted or fully granted appeals.

1261 Performance Reporting and Progress Analysis

1262 Regional FEMA PA and Grants Management staff monitor financial and performance
 1263 reporting through quarterly meetings and QPRs. QPRs list all open Large Projects where the
 1264 Recipient has not processed the final federal share payment to the Subrecipient and include
 1265 the status of work for each project. QPRs are an important tool for managing the progress of
 1266 recovery, tracking potential time extension requests, and planning for closeout.

1267  The Recipient provides Large Project QPRs to the region quarterly until the final
 1268 Federal share payment is processed to the Subrecipient for the project.

1269 Scope and Cost Amendments

1270 Some projects require changes to the originally obligated project. If a Subrecipient requires
 1271 a change, it requests approval prior to performing the work. PA staff evaluate Subrecipient
 1272 amendment requests for compliance and make necessary cost adjustments via a project
 1273 amendment.

1274 Time Extensions

1275 If the Subrecipient determines that it needs additional time to complete work, it submits a
 1276 written request to extend the work completion deadline to the Recipient. In some instances,
 1277 the Recipient has the authority to approve time extension requests. If the time requested
 1278 falls within the Recipient's authority, it notifies FEMA when it approves a time extension.
 1279 Otherwise, the Recipient forwards the request to FEMA with a recommendation and PA staff
 1280 review the request.

1281 In addition, work completion time extensions may not
1282 exceed the Recipient's prime award period of
1283 performance (POP). the initial period of performance
1284 for the prime award starts on the first day of the
1285 disaster incident period and extends four years. The
1286 Recipient must request approval from FEMA for an
1287 extension to the prime award if it anticipates project
1288 work to extend beyond the POP deadline.

Terminology: Prime Award

The "prime award" is the disaster grant that FEMA provides to the Recipient upon approving the SF-424. The prime award accounts for all program funding associated with the federally declared disaster.

1289 In considering and responding to project related
1290 extension requests, PA staff follow the procedures in
1291 the Work Completion Deadlines section of the PAPPG.
1292 When reviewing extension requests that may affect the
1293 prime award, PA staff coordinate with Grants
1294 Management and Office of the Chief Financial Officer
1295 (OCFO) staff based on the *FEMA Manual 205-0-1*
1296 *Grants Management (GMM)* and FEMA-State/Territory/Tribe Agreements.

Terminology: Subaward

Each project FEMA approves for Applicants is a "subaward" to the prime award and carries the same legal and administrative requirements.


1297 **Appeals and Arbitration**

1298 During any phase, FEMA may determine that certain Applicants, facilities, work, or costs are
1299 ineligible. Applicants may appeal such determinations and, in some instances, request
1300 arbitration. FEMA provides two opportunities to appeal an eligibility determination. First, the
1301 Applicant may appeal a decision to the FEMA RA.

1302 Second, if the RA denies all or part of the first appeal, the Applicant may appeal to the
1303 Assistant Administrator of the Recovery Directorate at FEMA HQ.

1304 Note that there are differences in appeals-related regulations and policy for disasters
1305 declared before or after January 1, 2022. For example, for disasters declared after January
1306 1, 2022, Applicants must submit appeals electronically using Grants Portal/Grants
1307 Manager. (Most other appeals may also be submitted electronically in this system.)

1308 Under certain circumstances for disasters declared after January 1, 2016, an Applicant that
1309 disputes a FEMA eligibility determination has a right of arbitration. To request arbitration,
1310 the disputed amount must be at least \$500,000 (or \$100,000 for rural locations) and
1311 Applicants must submit a timely first appeal. Applicants may not submit both a second
1312 appeal and request arbitration.

1313
1314  *For incidents declared before January 1, 2022, the Applicant may appeal a*
1315 *determination to the Recipient within 60 days of receiving FEMA's written*
1316 *notification of its determination. The Recipient must submit the Applicant's appeal*

1317 *and its recommendation to FEMA within 60 days of receiving the appeal from the*
1318 *Applicant.*

1319 *For incidents declared after January 1, 2022, the Applicant may appeal a*
1320 *determination to the Recipient within 60 days of the date FEMA electronically*
1321 *transmitted its determination. The Recipient must submit the Applicant's appeal and*
1322 *its recommendation within 120 days from that same date.*

1323 *FEMA Provides Appeal Decision within 90 days of receiving the appeal, or after*
1324 *receiving additional information FEMA requested to adjudicate an appeal, or after*
1325 *submitting for technical review.*

1326 *The Applicant must submit a Request for Arbitration to the Civilian Board of Contract*
1327 *Appeals within 60-days of receiving the first appeals decision. If FEMA does not issue*
1328 *a first-level appeal decision within 180 days of receiving the appeal, the Applicant*
1329 *may withdraw the first-level appeal and request arbitration.*

1330 For more information refer to 44 C.F.R. §206.206, 48 C.F.R. 6106.601 - .613, the PAPPG,
1331 the PA Program Appeals Guide, Public Assistance Appeals and Arbitration under the
1332 Disaster Recovery Reform Act fact sheet, and additional PA Policy, Guidance, and Fact
1333 Sheets available online at [www.fema.gov/assistance/public/policy-guidance-fact-](http://www.fema.gov/assistance/public/policy-guidance-fact-sheets#pappg)
1334 [sheets#pappg](http://www.fema.gov/assistance/public/policy-guidance-fact-sheets#pappg).

1335 **Performance Audits**

1336 Performance audits are examinations of programs to determine effectiveness and suggest
1337 improvements. All PA projects are subject to audits by the U.S. Government Accountability
1338 Office (GAO) and the DHS Office of Inspector General (OIG). When the GAO or OIG conducts a
1339 performance audit of the PA Program or how Recipients or Subrecipients expend federal
1340 funds, it submits a report to the FEMA Audit Liaison Office (ALO) detailing the review and
1341 findings that may also include recommendations for FEMA to develop and implement
1342 corrective actions.

1343 The ALO serves as an internal and external liaison for FEMA and its components to provide
1344 oversight to the audit follow-up process. The ALO supports and coordinates audits at both
1345 HQ and regions. Regions have primary responsibility for responding to audit-related action
1346 items related to specific projects, incidents, Subrecipients, Recipients, and operations within
1347 the region. HQ has primary responsibility for responding to audit-related action items related
1348 to overall or national-level program implementation and audit-related action items that
1349 address operations across multiple regions. FEMA PA and Grants Management staff
1350 contribute to the preparation of a Management Response Letter (prior to the publication of a
1351 Final Report by the GAO or OIG) and a Corrective Action Plan (CAP) (after the publication of a
1352 Final Report by the GAO or OIG). PA and Grants Management staff prepare content for

1353 incorporation within the CAP that contains corrective actions for each recommendation for
 1354 which FEMA concurs and an explanation of nonconcurrence when FEMA does not concur.
 1355 For incident-specific audits, FEMA also notifies the Recipient, providing reference to any
 1356 associated projects. Subrecipients may appeal when FEMA de-obligates funding in response
 1357 to an audit. For more information refer to the Audit Liaison Office’s SharePoint site.

1358 **Payment Monitoring through Validate-as-You-Go**

1359 As required by the Payment Integrity Information Act of 2019 (PIIA 2019), FEMA’s OCFO
 1360 oversees periodic validation of project payments to identify and correct questioned costs
 1361 through the Validate as You Go (VAYGo) initiative. Under VAYGo, FEMA ensures consistent
 1362 monitoring of payments across the agency by reviewing a random sample of Recipient
 1363 drawdowns. FEMA requests documentation of the selected drawdowns from the Recipient
 1364 and reviews it to confirm PA funding is properly paid from drawdown, to disbursement, to
 1365 payment to the entity that executes eligible project work as identified in an obligated
 1366 subaward. VAYGo applies to all disasters declared in Fiscal Year 2020 and beyond.

1367 In a memorandum dated April 18, 2022, the OCFO memorialized the Administrator’s intent
 1368 to pause and evaluate opportunities to streamline and reduce the complexity of VAYGO
 1369 processes if they are restarted following the pause.

1370 **Table 19: Roles and Responsibilities during Phase VI**

Roles	Responsibilities
PA Division Director	<ul style="list-style-type: none"> • Approves and signs second appeal decisions
Regional PA Closeout Branch Chief	<ul style="list-style-type: none"> • Reviews and concurs on time extension responses • Coordinates with Grants Management Division on prime award extensions • Reviews and concurs on PA-related correspondence • Makes eligibility determinations on project amendments • Oversees QPR review • Conducts Final Reviews on amendments processed by regional staff
PA State Liaison	<ul style="list-style-type: none"> • Conducts quarterly meetings with assigned states • Reviews QPR for assigned states • Evaluates and draft responses to time extension requests • Serves as the intermediary between the OCFO and the Recipient, confirming Quarterly Drawdown Sample Report (QDSR) data and alerting the Recipient when FEMA has selected a drawdown for testing or validation • Processes project withdrawal requests • Conducts Initial Review for amendments processed by regional staff for projects within assigned state(s)
Operations Support Specialist	<ul style="list-style-type: none"> • Tracks PA-related correspondence • Maintains spend plan • Supports PA state liaisons

Roles	Responsibilities
Validation Specialist	<ul style="list-style-type: none"> Reviews and reconciles Category Z management costs quarterly as necessary
Costing Specialist	<ul style="list-style-type: none"> Reviews change in SOW requests and processes related amendments Evaluates proposed use of excess funds on Alternative Procedure projects Sends RFIs to Recipients, as necessary
Technical Specialist	<ul style="list-style-type: none"> Reviews change in SOW requests and processes related amendments for complex projects. for Applicants transitioned to region Reviews requests for Alternative Procedures, Alternate or Improved Projects and process amendments Sends RFIs to Recipients, as necessary
Insurance Specialist	<ul style="list-style-type: none"> Reviews changes for impacts to insurance deduction
Field EHP Specialist	<ul style="list-style-type: none"> Reviews SOW amendments for compliance with EHP laws, regulations, and Executive Orders (EOs)
Hazards and Performance Analyst Task Force Leader (TFL)	<ul style="list-style-type: none"> Tracks progress of Mitigation Specialists projects Assists the Mitigation Specialist as necessary Reviews ineligibility recommendations on amendment requests
Mitigation (406) Specialist	<ul style="list-style-type: none"> Reviews and reconciles amendment requests related to hazard mitigation for eligibility and cost effectiveness
Appeals Unit Lead	<ul style="list-style-type: none"> Assigns appeals to analysts Reviews and concurs on draft responses
First Appeal Analyst	<ul style="list-style-type: none"> Evaluates first appeals and drafts responses Coordinates with regional Technical Specialists when necessary Processes versions and other actions triggered by second appeal decisions
Second Appeal Analyst	<ul style="list-style-type: none"> Evaluates second appeals and drafts responses
PA Audit Coordinator	<ul style="list-style-type: none"> Oversees daily activities associated with GAO or OIG audits Reviews audit-related products and documentation Works with relevant PA staff to prepare audit-related responses and deliverables Support PA personnel with completion of audit-related action items Prepare for and facilitate audit-related meetings
Office of the Chief Financial Officer	<ul style="list-style-type: none"> Provides technical and oversight assistance for PIIA 2019 and VAYGo activities

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CHAPTER 10: FINAL RECONCILIATION AND CLOSEOUT

A project transitions to Phase VII: Final Reconciliation and Closeout, within 90 days of work completion. Phase VII is the final phase of PA Program delivery and includes closing projects (subawards), Subrecipients, and Recipients (PA prime awards). During Phase VII, timely submission of complete project-level information from the Recipient facilitates efficient and effective closeout of the Recipient’s prime award.

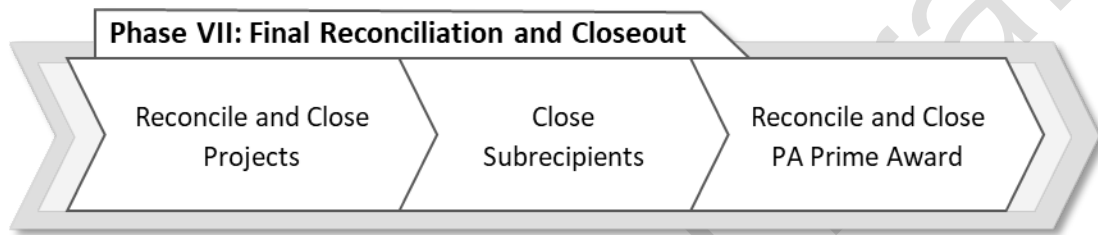


Figure 11: PA Process Steps During Phase VII

Phase VII Objectives:

- Close out all projects, Subrecipients, Recipients, and PA awards within regulatory timelines and budgets

Table 20: Performance Indicators for Closeout

Goal Area	Metric	National Goal	Acceptable Ranges		
			Level III Incident	Level II Incident	Level I Incident
Timeliness	% of closeout certifications submitted within 120 days of work completion	90%	TBD	TBD	TBD

Reconcile and Close Projects

To initiate project-level closeout, the Subrecipient informs the Recipient that its project is complete and certifies to work completion with the date work was completed. FEMA establishes project thresholds for each Federal fiscal year. If a project’s net costs fall above the minimum threshold but below the large project threshold, it is considered a Small Project. If a project’s net costs fall at, or above, the large project threshold, it is considered a Large Project. To ensure a timely closeout process, the Subrecipient should notify the Recipient immediately as it completes each Large Project and when it has completed its last Small Project.

1393 Large Projects

1394 FEMA approves closeout of Large Projects individually, as each is completed.

1395 • Prior to closing Large Projects, FEMA:

- 1396 • Verifies there are no outstanding appeals or arbitration cases that warrant leaving the
- 1397 project open (for more information, see the *GMM* and 2 C.F.R. 200.345)
- 1398 • Reviews the invoices and other documentation related to the work performed to validate
- 1399 it was consistent with the approved SOW, including completion of any approved PA
- 1400 mitigation
- 1401 • Determines whether the Subrecipient completed the work within the approved deadline
- 1402 (FEMA limits reimbursement to costs incurred within the deadline)
- 1403 • Ensures no duplication of funding exists (e.g., with insurance or costs in any other
- 1404 related projects)
- 1405 • Validates compliance with 2 C.F.R. cost principles
- 1406 • Validates compliance with all terms and conditions of the award
- 1407 • FEMA reviews and verifies the accuracy of the actual costs and evaluates and reconciles
- 1408 any cost overruns or underruns. For projects with funding changes, FEMA prepares a
- 1409 project amendment and obligates additional funds or reduces funding based on actual
- 1410 costs to complete the eligible SOW.



1411  *The Subrecipient must provide documentation to support actual project costs within*
1412  *90 days of work completion.*

1413 Once FEMA completes its review and funding adjustments, FEMA approves closeout of the
1414 project and notifies the Recipient in writing.



1415 Small Projects

1416 To close Small Projects, the Recipient submits a Small Project Completion Certification and
1417 certifies that:

- 1418 • The Subrecipient completed the approved SOW for all of its Small Projects in accordance
- 1419 with the FEMA-State/Territory/Tribe Agreement
- 1420 • It made all payments in accordance with the FEMA-State/Territory/Tribe agreement

1421
1422  *The Applicant submits the Small Project Completion Certification to the Recipient*
1423  *and the Recipient must submit it to FEMA within 90 days of work completion or the*
1424 *latest approved deadline of its last Small Project, whichever is sooner.*


1425 If the total actual cost of all a Subrecipient's Small Projects combined exceeds the total
1426 amount obligated for all its Small Projects, the Subrecipient may request additional funding.

1427  *The Subrecipient must request the additional funding as a Net Small Project Overrun*
1428  *through the appeal process, within 60 days of work completion on its last Small*
1429 *Project.*

1430 Once FEMA receives a Small Project Completion Certification from the Recipient and
1431 completes the necessary review, FEMA approves closeout of the respective Small Projects
1432 and notifies the Recipient in writing.

1433 Close Subrecipients

1434 The Recipient requests that FEMA close a Subrecipient once all its respective projects have
1435 been completed and closed for the incident. The Recipient may either request this in the
1436 same submittal as the Subrecipient's last project closeout request or may submit a separate
1437 request. The request includes a Project Completion Certification Report listing all the
1438 Subrecipient's projects.


1439  *The Recipient must request that FEMA close each Subrecipient within 180 days of*
1440 *the work completion date or the project deadline, whichever occurs first.*


1441 If all the Subrecipient's projects are closed and there are no outstanding audits, FEMA
1442 closes the Subrecipient and notifies the Recipient in writing. If a Subrecipient does have
1443 outstanding audits, PA staff should refer to the *GMM* and contact Grants Management staff
1444 for additional assistance.

1445 For more information refer to the *PAPPG* and the *GMM*.

1446 Reconcile and Close PA Prime Award

1447 The Recipient initiates the PA Prime Award closeout process once FEMA has closed all
1448 projects and Subrecipients. The Recipient must submit its final Federal Financial Report (SF-
1449 425) with a written request to close the PA Prime award. FEMA PA and Grants Management
1450 staff coordinate with the Recipient certify that all work was completed and all eligible costs
1451 have been reimbursed and financially reconciled.

1452  *For incidents declared before November 12, 2020, the Recipient must liquidate all*
1453 *obligations within 90 days of the end of the prime award period of performance.*

1454  *For incidents declared after November 12, 2020, the Recipient must liquidate all*
1455 *obligations within 120 days of the end of the prime award period of performance.*

1456 When the FEMA region receives the closeout request, PA and Grants Management staff
1457 work together to initiate the closeout process and complete a reconciliation of the PA Prime
1458 Award, as explained in the *GMM*. Grants Management staff then submit the reconciliation
1459 report to the FEMA Finance Center (FFC) for verification and final reconciliation. Upon final
1460 reconciliation by the FCC, FEMA closes the Recipient's PA Prime Award.

1461

Table 21: Roles and Responsibilities during Phase VII

Roles	Responsibilities
Regional PA Closeout Branch Chief	<ul style="list-style-type: none"> • Reviews and concurs on PA-related correspondence. • Conducts Final Reviews on amendments
PA State Liaison	<ul style="list-style-type: none"> • Coordinates with the Grants Division on PA Program closure • Conducts Initial Review for amendments on projects within assigned state(s)
Operations Support Specialist	<ul style="list-style-type: none"> • Tracks PA-related correspondence • Assists PA State Liaison with PA Program closure
Validation Specialist	<ul style="list-style-type: none"> • Reviews Large Project closeout requests and process necessary amendments • Processes small project closeout requests and process necessary amendments • Confirms appropriate use of funds based on the approved SOW • Sends RFIs to Recipients, as necessary • Identifies debts and initiates debt collection • Reviews and reconciles Cat Z management costs • Reviews and process requests to close Subrecipients
Insurance Specialist	<ul style="list-style-type: none"> • Reviews and makes final insurance proceeds adjustments
Field EHP Specialist	<ul style="list-style-type: none"> • Reviews final work completed for compliance with EHP conditions
Grants Management Staff	<ul style="list-style-type: none"> • Review the submittal of quarterly SF-425 • Monitor grant conditions as outlined in the SF-424 • Monitor Recipient compliance with cash management requirements in the Payment Management System • Review QPRs • Forward PA Program disaster Closeout Packages to the FEMA Finance Center (FFC) • Prepare Prime Award disaster grant Closeout Packages • Track disaster grant closeout projections • Periodic compliance testing on Recipient transactions and internal controls

1462

1463 *If you suspect corruption, waste, fraud, abuse, mismanagement or misconduct contact the*
 1464 [Department of Homeland Security Office of Inspector General](#) *hotline or submit a concern*
 1465 *online.*

APPENDIX A: LIST OF ACRONYMS

1466		
1467	AFO	Area Field Office
1468	ALO	Audit Liaison Office
1469	BVI	Bicentennial Volunteers, Inc.
1470	CDL	Community Disaster Loan
1471	CAP	Corrective Action Plan
1472	COS	Chief of Staff
1473	CCHCO	Chief Component Human Capital Officer
1474	CRC	Consolidated Resource Center
1475	DDD	Damage Description and Dimensions
1476	DFA	Direct Federal Assistance
1477	DHS	Department of Homeland Security
1478	DM	Determination Memo
1479	DOP	Disaster Operating Profile
1480	DRF	Disaster Relief Fund
1481	DRM	Disaster Recovery Manager
1482	DTS	Deployment Tracking System
1483	EA	Office of External Affairs
1484	ECO	Emergency Operations Center
1485	EHAD	Environmental Planning and Historic Preservation Advisor
1486	EHP	Environmental Planning and Historic Preservation
1487	EO	Environmental Officer
1488	ERM	Enterprise Resource Management
1489	ESF	Emergency Support Function
1490	FCO	Federal Coordinating Officer
1491	FEMA	Federal Emergency Management Agency
1492	FFC	FEMA Finance Center
1493	FFR	Federal Financial Report
1494	FIMA	Federal Insurance and Mitigation Administration

1495	FMAG	Fire Management Assistance Grant
1496	GAO	Government Accountability Office
1497	GM	Grants Manager
1498	HQ	Headquarters
1499	IA	Individual Assistance
1500	IAP	Incident Action Plan
1501	IBD	Infrastructure Branch Director
1502	IMAT	Incident Management Assistance Team
1503	IMSK	Incident Management and Support Keystone
1504	INGS	Infrastructure Assets Group Supervisor
1505	IPERA	Improper Payments Elimination and Recovery Act
1506	IPERIA	Improper Payments Elimination and Recovery Improvement Act
1507	IRC	Interagency Recovery Coordination
1508	IRP	Incident Resource Plan
1509	JFO	Joint Field Office
1510	JRO	Joint Recovery Office
1511	LPN	Large Project Notification
1512	MA	Mission Assignment
1513	NDRF	National Disaster Recovery Framework
1514	NIMS	National Incident Management System
1515	NMF	National Mitigation Framework
1516	NRCC	National Response Coordination Center
1517	OBD-I	Operations Branch Director for Critical Infrastructure
1518	OCC	Office of Chief Counsel
1519	OCFO	Office of the Chief Financial Officer
1520	OFA	Other Federal Agencies
1521	OIG	Office of Inspector General
1522	OMB	Office of Management and Budget

1523	ORR	Office of Response and Recovery
1524	Ops Chief	Operations Section Chief
1525	OS	Operations Support
1526	OSTL	Operations Support Task Force Leader
1527	PA	Public Assistance
1528	PAGS	PA Group Supervisor
1529	PDTL	Program Delivery Task Force Leader
1530	PDA	Preliminary Damage Assessment
1531	PDMG	Program Delivery Manager
1532	PIAA	Payment Integrity Information Act
1533	PNP	Private Non-Profit
1534	POP	Period of Performance
1535	QDSR	Quarterly Drawdown Sample Report
1536	QPR	Quarterly Progress Report
1537	RA	Regional Administrator
1538	REC	Record of Environmental Consideration
1539	RFI	Request for Information
1540	ROSM	Recovery Operations Support Manual
1541	RPA	Request for Public Assistance
1542	RRCC	Regional Response Coordination Center
1543	RRDD	Regional Recovery Division Director
1544	RSF	Recovery Support Function
1545	RSM	Recovery Scoping Meeting
1546	RTM	Recovery Transition Meeting
1547	SF	Standard Form
1548	SFM	Strategic Funds Management
1549	SI	Site Inspector
1550	SITL	Site Inspector Task Force Leader

1551	SLTT	State, Local, Tribal, and Territorial
1552	SME	Subject Matter Expert
1553	SRM	Strategic Resource Management
1554	SRP	Strategic Resource Plan
1555	SOP	Standard Operating Procedure
1556	SOW	Scope of Work
1557	SVI	Social Vulnerability Index
1558	TFL	Task Force Leader
1559	USACE	U.S. Army Corps of Engineers
1560	VAYGo	Validate as You Go
1561		

Operational Draft

1562 APPENDIX B: AUTHORITIES, DOCUMENTS, AND 1563 RESOURCES

1564 Authorities

1565 Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) 1566 (Public Law 93-288, as amended, 42 United States Code [U.S.C.] 5121-5207), 1567 2018

1568 The Stafford Act authorizes the programs and processes by which the Federal Government
1569 provides disaster and emergency assistance to state, local, tribal, and territorial (SLTT)
1570 governments, eligible PNP organizations, households, and individuals affected by a declared
1571 major disaster or emergency. The Stafford Act covers all hazards, including natural disasters
1572 and terrorist incidents.

1573 Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et 1574 seq.), 2002

1575 The Homeland Security Act of 2002 created the DHS as an executive department of the
1576 Federal Government. The Homeland Security Act consolidated component agencies,
1577 including FEMA, into DHS. The Secretary of Homeland Security is the head of DHS and has
1578 direction, authority, and control over it. All functions of all officers, employees, and
1579 organizational units of DHS are vested in the Secretary of Homeland Security.

1580 Post-Katrina Emergency Management Reform Act (PKEMRA) (Public Law 109- 1581 295), 2006

1582 PKEMRA clarified and modified the Homeland Security Act with respect to the organizational
1583 structure, authorities, and responsibilities of FEMA and the FEMA Administrator. Additionally,
1584 PKEMRA also modified the Stafford Act. Per PKEMRA, FEMA is to lead and support the
1585 Nation in a risk-based, comprehensive emergency management system of preparedness,
1586 protection, response, recovery, and mitigation. Under the PKEMRA, the FEMA Administrator
1587 reports directly to the Secretary of Homeland Security for all matters relating to emergency
1588 management in the United States.

1589 Sandy Recovery Improvement Act (SRIA) (Public Law 113-2), 2013

1590 The SRIA, signed into law on January 29, 2013, amended the Robert T. Stafford Disaster
1591 Relief and Emergency Assistance Act (Public Law 100-707) to allow Indian tribal
1592 governments to directly request emergency and major disaster declarations and Fire

1593 Management Assistance Grants. The SRIA authorizes the most significant changes to the
1594 way that FEMA may deliver federal disaster assistance to SLTT governments, as well as
1595 disaster survivors since the passage of the Stafford Act.

1596 **Disaster Recovery Reform Act (DRRA) (Public Law 115-254), 2018**

1597 These reforms acknowledge the shared responsibility for disaster response and recovery,
1598 aim to reduce the complexity of FEMA, and build the Nation’s capacity for the next
1599 catastrophic event. Some of the reforms include amending the Stafford Act to improve PA
1600 programs, authorize state-administered housing, and expand individuals and household
1601 assistance.

1602 **Regulations**

1603 **Title 44 of the Code of Federal Regulations (CFR), Emergency Management** 1604 **and Assistance**

1605 The CFR is a codification of the general and permanent rules and regulations published in
1606 the Federal Register that contain basic policies and procedures. Title 44 is titled,
1607 “Emergency Management and Assistance,” and Chapter 1 of Title 44 contains the
1608 regulations issued by FEMA, including those related to implementing the Stafford Act.

1609 **Title 48 of the CFR, Federal Acquisition Regulations System**

1610 The *Federal Acquisition Regulations System* codifies uniform policies and procedures for
1611 acquisition by all executive agencies. The Federal Acquisition Regulation System consists of
1612 the Federal Acquisition Regulations (FAR) and FEMA acquisition regulations that implement
1613 or supplement the FAR. The intent of the Federal Acquisition System is to deliver the best
1614 value product or service to the customer on a timely basis while maintaining the public’s
1615 trust and fulfilling public policy objectives.

1616 **Title 2 of the CFR, Part 200, Uniform Administrative Requirements, Cost** 1617 **Principles, and Audit Requirements for Federal Awards**

1618 This document provides guidance for non-federal entity recipients and subrecipients of
1619 federal financial assistance awarded by FEMA when using that assistance to finance
1620 procurements of property and services. The guidance provided by this document only
1621 applies to federal financial assistance (e.g., grants and cooperative agreements) subject to
1622 the procurement standards of the government-wide uniform administrative requirements,
1623 cost principles, and audit requirements for federal awards.

1624 **Policy, Manuals, and Instructions**

1625 **National Disaster Recovery Framework (NDRF), June 2016**

1626 The Department of Homeland Security's *National Disaster Recovery Framework (NDRF)*
1627 enables effective recovery support to disaster-impacted states, tribes, territorial
1628 governments and local jurisdictions. The NDRF provides a flexible structure that enables
1629 disaster recovery managers to operate in a unified and collaborative manner. The NDRF also
1630 focuses on how best to restore, redevelop, and revitalize the health, social, economic,
1631 natural, and environmental fabric of the community and build a more resilient Nation.

1632 The *NDRF* can be found at: [https://www.fema.gov/emergency-managers/national-](https://www.fema.gov/emergency-managers/national-preparedness/frameworks/recovery)
1633 [preparedness/frameworks/recovery](https://www.fema.gov/emergency-managers/national-preparedness/frameworks/recovery)

1634 **National Response Framework (NRF), October 2019**

1635 The Department of Homeland Security's *National Response Framework (NRF)* provides
1636 foundational emergency management doctrine for how the Nation responds to all types of
1637 incidents. The NRF is built on scalable, flexible, and adaptable concepts identified in NIMS
1638 to align key roles and responsibilities across the Nation. Since publication of the third edition
1639 of the NRF in 2016, disaster response operations have underscored the paramount
1640 importance of sustaining essential community lifelines. The NRF defines community lifelines
1641 as those services that enable the continuous operation of critical government and business
1642 functions and are essential to human health and safety or economic security.

1643 The *NRF* can be found at: [www.fema.gov/emergency-managers/national-](http://www.fema.gov/emergency-managers/national-preparedness/frameworks/response)
1644 [preparedness/frameworks/response](http://www.fema.gov/emergency-managers/national-preparedness/frameworks/response)

1645 **FEMA Incident Management and Support Keystone (IMSK), January 2011**

1646 The *Incident Management and Support Keystone (IMSK)* is the primary document from
1647 which all other FEMA disaster response directives and policies are derived. The IMSK
1648 describes how the response doctrine, articulated in the NRF, is implemented in FEMA
1649 disaster response operations.

1650 FEMA's *IMSK* can be found in the [ORR Doctrine, Policy and Directives Library](#) or may be
1651 accessed directly at [www.fema.gov/sites/default/files/2020-](http://www.fema.gov/sites/default/files/2020-07/fema_incident_management_and_support_keystone-Jan2011.pdf)
1652 [07/fema_incident_management_and_support_keystone-Jan2011.pdf](http://www.fema.gov/sites/default/files/2020-07/fema_incident_management_and_support_keystone-Jan2011.pdf)

1653 **FEMA Incident Management Handbook, November 2017**

1654 FEMA's *Incident Management Handbook* is a tool to assist FEMA emergency management
1655 personnel in conducting their assigned missions in the field. The handbook provides
1656 information on FEMA's incident-level operating concepts, organizational structures,
1657 functions, position descriptions, and key assets and teams. It supplements the FEMA
1658 Incident Management Manual by providing additional detail on how FEMA personnel plan
1659 and execute their assigned missions in the field.

1660 FEMA's *Incident Management Handbook* can be found in the [ORR Doctrine, Policy and](#)
1661 [Directives Library](#).

1662 **FEMA Incident Management Manual, September 2015**

1663 FEMA's *Incident Management Manual* describes how FEMA organizes and conducts incident
1664 management when responding to, recovering from, and mitigating disasters. The manual
1665 bridges the gap between the IMSK, which provides overarching guidance for all of FEMA,
1666 and the tactical-level descriptions of how FEMA conducts incident management, found in the
1667 Incident Management Handbook.

1668 FEMA's *Incident Management Manual* can be found in the [ORR Doctrine, Policy and](#)
1669 [Directives Library](#).

1670 **FEMA Incident Stabilization Guide (Operational Draft), November 2019**

1671 The *FEMA Incident Stabilization Guide* describes how FEMA implements lifelines and guides
1672 how FEMA applies these concepts to disaster operations. It provides guidance to all FEMA
1673 employees who plan for and who conduct disaster operations in accordance with the NRF,
1674 4th Edition, and serves as a resource for partners on how FEMA approaches and conducts
1675 response operations.

1676 FEMA's *Incident Stabilization Guide (Operational Draft)* can be found in the [ORR Doctrine,](#)
1677 [Policy and Directives Library](#)

1678 **FEMA Joint Recovery Office Guide, June 2021**

1679 FEMA's *Joint Recovery Office Guide* defines a standard operational framework for
1680 establishing, transitioning to, operating, and closing a JRO. The JRO Guide is applicable
1681 solely to incidents with extraordinary recovery and coordination requirements where a JRO
1682 may be necessary.

1683 FEMA's *Joint Recovery Office Guide* can be found in the [ORR Doctrine, Policy and Directives](#)
1684 [Library](#)

1685 **FEMA National Incident Support Manual (NISM), January 2013**

1686 The *National Incident Support Manual (NISM)* describes how the FEMA national staff
1687 supports FEMA incident operations and discusses steady-state activities pertinent to
1688 incident operations. The manual defines the activities of Federal assistance—across the
1689 nation and within FEMA's statutory authority—supporting citizens and first responders in
1690 responding to, recovering from, and mitigating all hazards. It includes definitions and
1691 descriptions of roles and responsibilities, functions, and organizational structures for those
1692 conducting FEMA incident support duties.

1693 FEMA's *NISM* can be found in the Office of Response and Recovery (ORR) [Doctrine, Policy](#)
1694 [and Directives Library](#)

1695 **FEMA Policy 104-009-02, Public Assistance Program and Policy Guide (PAPPG),** 1696 **June 2020**

1697 FEMA's *Public Assistance Program and Policy Guide (PAPPG)* defines FEMA's policy and
1698 procedural requirements for the PA Program and is intended to guide decision making and
1699 ensure consistent implementation of the PA Program.

1700 The *PAPPG* can be found at: www.fema.gov/assistance/public/policy-guidance-fact-sheets

1701 **FEMA Preliminary Damage Assessment Guide, August 2021**

1702 The *Preliminary Damage Assessment Guide* defines a standard national-level framework for
1703 how SLTT government officials and FEMA staff collect, validate, quantify, and document the
1704 cause, location, and details of damage following a disaster. The guide outlines a common
1705 concept of operations, defines major roles and responsibilities, recommends methodologies,
1706 and establishes national-level damage assessment standards and procedures.

1707 The *Preliminary Damage Assessment Guide* can be found at: [www.fema.gov/disaster/how-](http://www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide)
1708 [declared/preliminary-damage-assessments/guide](http://www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide)

1709 **FEMA Public Assistance Appeals and Arbitration under the Disaster Recovery** 1710 **Reform Act, Fact Sheet**

1711 This fact explains how certain applicants for FEMA Public Assistance may request arbitration
1712 with the Civilian Board of Contract Appeals (CBCA).

1713 The fact sheet can be accessed directly at: www.fema.gov/sites/default/files/2020-07/fema_DRRRA-1219-public-assistance-arbitration-right_fact-sheet.pdf
1714

1715 **FEMA Public Assistance Program Appeals Guide, November 2019**

1716 The *FEMA Public Assistance Program Appeals Guide* identifies the policies, provides the
1717 procedures, and sets forth the responsibilities related to the FEMA PA Program appeals
1718 process. The guide outlines roles and responsibilities related to processing PA appeals;
1719 provides guidance on appeal and arbitration rights and requirements; establishes uniform
1720 appeals-related processes and procedures for FEMA regional and headquarters (HQ) staff;
1721 defines terms related to the appeals process; and includes resources for researching,
1722 drafting, and publishing appeals.

1723 FEMA's *Public Assistance Program Appeals Guide* can be found in the [ORR Doctrine, Policy
1724 and Directives Library](#)

1725 **FEMA Public Assistance SOP 9570.24, Strategic Funds Management, 1726 December 2012**

1727 This Standard Operating Procedure (SOP) establishes the process for implementing
1728 Strategic Funds Management (SFM) in the PA Program.

1729 *FEMA SOP 9570.24: Strategic Funds Management – Implementation Procedures for the
1730 Public Assistance Program* can be found with other PA SOPs and operations manuals at:
1731 www.fema.gov/assistance/public/policy-guidance-fact-sheets/sops-operations-manuals

1732 **FEMA Public Assistance Strategic Resource Management Standard Operating 1733 Procedure (Operational Draft), July 2021**

1734 The *Strategic Resource Management (SRM)* provides a comprehensive process for the
1735 management and deployment of PA staff to disaster operations. SRM offers a streamlined,
1736 planned, and nationally coordinated process utilizing all types of staffing resources and in
1737 accordance with the Recovery Operations Support Manual (ROSM).

1738 FEMA's *Strategic Resource Management Standard Operating Procedure (Operational Draft)*
1739 can be found in the Program Delivery Branch's *Delivery Toolbox* on SharePoint at:
1740 [https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-
1741 Toolbox.aspx](https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx) in the "FEMA Process" section

1742 **FEMA Publication 1, November 2019**

1743 *Publication 1 (Pub 1)* is FEMA's capstone doctrine. Pub 1 describes FEMA's ethos and
1744 identifies FEMA's core values of compassion, fairness, integrity, and respect. Pub 1 also
1745 delineates nine guiding principles that provide overarching direction to FEMA employees for
1746 the performance of their duties.

1747 FEMA's *Publication 1* can be found at: www.fema.gov/about/pub-1

1748 **FEMA Recovery Operations Support Manual (ROSM), March 2021**

1749 FEMA's *Recovery Operations Support Manual (ROSM)* describes how FEMA executes its
1750 recovery mission. It establishes a framework for enterprise-wide management of recovery
1751 operations and provides a foundation for risk-based decision making at all operational
1752 levels. The ROSM defines the full scope of FEMA's capabilities and responsibilities, and
1753 communicates how the Agency executes its recovery responsibilities in an integrated way
1754 with the full spectrum of FEMA's recovery partners.

1755 FEMA's *ROSM* can be found in the [ORR Doctrine, Policy and Directives Library](#)

1756 **FEMA State-Led Public Assistance Guide, February 2019**

1757 FEMA's *State-Led Public Assistance Guide* provides clear and streamlined guidance on the
1758 processes, resources, and capabilities required for Recipients to lead PA operations. This
1759 guidance outlines the process for Recipients and FEMA to determine if and under what
1760 conditions Recipients may elect to perform certain PA disaster grant functions.

1761 FEMA's *State-Led Public Assistance Guide* can be found with other FEMA PA Policies and
1762 Guidance at: www.fema.gov/assistance/public/policy-guidance-fact-sheets/other

1763 **FEMA Manual 205-0-1 Grants Management, January 2018**

1764 The *FEMA Grants Management Manual (GMM)* provides FEMA officials with an overview of
1765 the policies and procedures that govern FEMA's grant awards, cooperative agreements, and
1766 other federal financial assistance. GMM also serves as a basic reference and framework for
1767 FEMA staff involved in the various aspects of administering FEMA financial assistance
1768 programs and is intended to function as a supplement to applicable statutes, federal
1769 regulations, policies, and other requirements.

1770 The *GMM* can be found with other Grants Management and closeout related guidance at:
1771 [https://usfema.sharepoint.com/teams/RESGPD/collab/EGS/CloseoutCoordination/Forms/](https://usfema.sharepoint.com/teams/RESGPD/collab/EGS/CloseoutCoordination/Forms/Subject.aspx)
1772 [Subject.aspx](https://usfema.sharepoint.com/teams/RESGPD/collab/EGS/CloseoutCoordination/Forms/Subject.aspx)

1773 **Additional Resources**

1774 **FEMA Audit Liaison Office SharePoint site**

1775 FEMA's Audit Liaison Office (ALO) serves as an internal and external liaison for FEMA and its
1776 components relating to performance audits and provides agency oversight to the audit follow-
1777 up process. The ALO SharePoint site contains dashboards, templates, infographics, and
1778 other resources.

1779 The ALO SharePoint site can be accessed at:

1780 <https://usfema.sharepoint.com/sites/OPPA/Pages/GAOOIGAuditLiaisonOffice.aspx>.

1781 **FEMA Program Design Branch, Delivery Toolbox**

1782 FEMA's Program Design Branch *Delivery Toolbox* contains all resources that FEMA PA staff
1783 may need during the grant writing process. Please use the Change Control Tool to submit
1784 feedback and comments on documents.

1785 The *Delivery Toolbox* can be accessed on SharePoint at:

1786 [https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-
1787 Toolbox.aspx](https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx)

1788 **FEMA Public Assistance Change Control Tool**

1789 FEMA staff use the PA *Change Control Tool* to participate in continuous improvement. FEMA
1790 staff submit issues, opportunities, and feedback using the Change Control Tool.

1791 Submissions are categorized, prioritized, and reviewed by PA Subject Matter Experts and
1792 adjudicated as appropriate. FEMA strives to continuously improve the PA Program and
1793 encourages feedback on all aspects of the program. FEMA partners may submit issues,
1794 opportunities, and feedback related to the PA Program via the "Feedback" feature in PA
1795 Grants Portal.

1796 The *Change Control Tool* can be accessed via SharePoint at:

1797 [https://usfema.sharepoint.com/teams/ORRApps/NewPA/Pages/SubmitRequest-CCT-
1798 P3.aspx](https://usfema.sharepoint.com/teams/ORRApps/NewPA/Pages/SubmitRequest-CCT-P3.aspx)

1799 **FEMA Public Assistance Grants Manager and Grants Portal Tool**

1800 The *Grants Manager* and *Grants Portal* tool is a two-part, online platform that is used to
1801 formulate and track award packages. Grants Manager is the internal platform used by FEMA
1802 specialists, while the Grants Portal is the external platform used by Applicants, Recipients,
1803 and Subrecipients to manage their projects.

1804 The *Grants Manager Tool* can be accessed at:
1805 <https://pagrants.fema.gov/Account/Login?ReturnUrl=%2f>

1806 The *Grants Portal Tool* can be accessed at: <https://grantee.fema.gov>

1807 **FEMA Public Assistance Grants Portal and Grants Manager Training, YouTube** 1808 **Channel**

1809 Previously-recorded Recipient and Applicant Webinars are available on FEMA's *Grants*
1810 *Manager/Grants Portal* YouTube channel or the Support Center in *Grants Manager* and
1811 *Grants Portal*. FEMA also offers regular *Grants Manager/Grants Portal* training to internal
1812 and external stakeholders. Schedules for internal FEMA employee and contractor micro-
1813 trainings (webinars) are distributed by FEMA staff on a regular basis.

1814 FEMA's training YouTube channel for *Grants Manager* and *Grants Portal* can be accessed at:
1815 www.youtube.com/channel/UCIjp91Ds2laVIR1t8uXcEKg

1816 **FEMA Public Assistance Recovery Performance Framework Dashboard**

1817 FEMA's *Recovery Performance Framework Dashboard* is a fully automated and interactive
1818 dashboard based on the PA program's standardized, cascading performance goals and
1819 indicators.

1820 The *Recovery Performance Framework Dashboard* can be accessed at:
1821 <https://analytics.fema.net/t/RAB/views/PAREcoveryPerformanceFramework/RPF?iframeSizedToWindow=true&%3Aembed=y#1>
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APPENDIX C: PUBLIC ASSISTANCE DEADLINES

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This table provides a list of regulatory and policy deadlines for tasks in applicable phase of PA program delivery.

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Table 22: Regulatory and Policy Deadlines

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
Operational Planning and Response				
Declaration Request	Within 30 days after the incident	Regulatory 44 C.F.R. § 206.36(A) Policy PAPPG, Chapter 1, Sec. 2	Governor and/or Tribal Chief Executive	The President
Request for Time Extension to submit declaration request.	Within 30 days after the incident	Regulatory 44 C.F.R., § 206.36(A) Policy PAPPG, Chapter 1, Sec. 2	Governor and/or Tribal Chief Executive	Assistant Administrator for Recovery
Additional Designated Areas	Within 30 days after the declaration date or the end of the incident period, whichever is later	Regulatory 44 C.F.R., § 206.40(C) Policy PAPPG, Chapter 1, Sec. 4C	Governor and/or Tribal Chief Executive	Assistant Administrator for Recovery
Additional Types of Assistance	Within 30 days after the declaration date or the end of the incident period, whichever is later	Regulatory 44 C.F.R., § 206.40(C) Policy PAPPG, Chapter 1, Sec. 4D	Governor and/or Tribal Chief Executive	Assistant Administrator for the Disaster Assistance Directorate
Phase I: Applicant Coordination and Evaluation				
Request for Public Assistance (RPA)	Within 30 days after area is designated within the declaration	Regulatory 44 C.F.R., § 206.202(C) Policy PAPPG, Chapter 3, Sec. 3	Applicant	Regional Administrator
Submit Request for Expedited Projects	Within 60 days of the Recovery Scoping Meeting	Regulatory 44 C.F.R., § 206.202(D)(1)(II)	Applicant	Regional Administrator

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
		Policy PAPPG, Chapter 5, Sec. 1 PAPPG, Chapter 9, Sec. 2B		
Submit information on incident-related impacts	Within 60 days after Recovery Scoping Meeting	Regulatory 44 C.F.R., § 206.202(D)(1)(II) Policy PAPPG, Chapter 5, Sec. 1	Applicant	Regional Administrator
Phase III: Scoping and Costing				
Fixed Cost Offer Request	Up to 18 months from the declaration and within 30 days from the transmittal of FEMA's fixed-cost offer (date not to exceed the 18-month deadline). Once SOW is approved, any changes must be approved within 18-month deadline and fixed cost offer is adjusted	Policy PAPPG, Chapter 9, Sec. 6A	Applicant	Assistant Administrator for Recovery (Time Extensions)
Cost Documentation (if work was completed prior to obligation)	Within 90 days after the Recovery Scoping Meeting or the work completion date	Policy PAPPG, Chapter 12, Sec. 1A-B	Applicant	Regional Administrator
Respond to Request for Information (RFI)	Within the deadline specified in the RFI. Response is usually required within 15 days of receipt of RFI	Policy PAPPG, Chapter 3, Sec.4-5A	Applicant	Regional Administrator
Phase V: Project Obligation				
Obligate funding for Expedited Projects	Within 90 days of receipt of Request	Regulatory 44 C.F.R. § 206.205(a)	Public Assistance	Disaster Recovery Manager

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
	for Expedited Projects	Statutory 31 U.S.C. § 1501 Policy PAPPG, Chapter 3, Sec. VC1 (pg. 184)	Group Supervisor	
Phase VI: Project Monitoring and Amendments				
Submit Large Project Quarterly Progress Reports	Submitted quarterly by: January 30; April 30; July 30; and October 30	Regulatory 44 C.F.R § 206.204(f) Policy PAPPG, Chapter 11, Sec. I	Recipient	PA Closeout Branch Chief
Submit Federal Financial Status Reports (FFRs) (SF-425) to the Regional Office	Quarterly, or as required by the terms and conditions of the PA award	Regulatory 2 C.F.R. § 200.328 Policy PAPPG, Chapter 11, Sec. II	Recipient	Regional Administrator
Appeal of Determination to Recipient	For incidents before January 1, 2022, within 60 days of receiving FEMA's written notification of its determination.	Regulatory 44 C.F.R. § 206.206(c)(1) Policy PAPPG, Chapter 3, Sec. IV.C.1	Applicant	Recipient forward recommendation
Appeal of Determination to Recipient	For incidents after January 2022, within 60 days of FEMA electronically transmitting its determination.	Regulatory 44 C.F.R. § 206.206(c)(1) Policy PAPPG, Chapter 3, Sec. IV.C.1	Applicant	Recipient forward recommendation
Submit Applicant Appeal of Determination and Recommendation	Within 120 days of FEMA's notification of its determination.	Regulatory 44 C.F.R. § 206.206(c)(2) Policy PAPPG, Chapter 3, Sec. V.C.1	Recipient	First Appeals Analyst
FEMA Provides Appeal Decision	Within 90 days of receiving the appeal, or after receiving additional information FEMA	Regulatory 44 C.F.R. § 206.206(c)(3)(d)	FEMA	Regional Administrator (1 st Appeals) HQ PA Division Director (2 nd Appeals)

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
	requested to adjudicate an appeal, or after submitting for technical review.	Policy PAPPG, Chapter 3, Sec. V.C.3		
Request for Arbitration	Within 60 days of receiving the first appeal decision. If FEMA does not issue a first-level appeal decision within 180 days of receiving the appeal, the Applicant may withdraw the first-level appeal and request arbitration.	Regulatory 48 C.F.R. § 206.206 (c) Policy Public Assistance Appeals and Arbitration under the Disaster Recovery Reform Act Fact Sheet	Applicants	Civilian Board of Contract Appeals
Completion of Debris Removal activities	6 months from the declaration date	Regulatory 44 C.F.R. § 206.204(c)(1) Policy PAPPG, Chapter 11, Sec. V	Applicant	
Completion of Emergency Protective Measure activities	6 months from the declaration date	Regulatory 44 C.F.R. § 206.204(c)(1) Policy PAPPG, Chapter 11, Sec. V	Applicant	
Completion of Permanent Work	18 months from the declaration date	Regulatory 44 C.F.R. § 206.204(c)(1) Policy PAPPG, Chapter 11, Sec. V	Applicant	
Phase VII: Final Reconciliation and Closeout				
Net Small Project Overrun Appeal	Within 60 days of work completion on Subrecipient's last Small Project	Regulatory: . 44 C.F.R. § 206.204(e)(2). Policy PAPPG, Chapter 3, Sec. VC1 (pg. 39)	Subrecipient	Regional Administrator (First Appeal) Assistant Administrator of Recovery Directorate at FEMA Headquarters (Second Appeal)

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
		PAPPG, Chapter 12, Sec. 1A (pg. 199)		
Small Project Certification (Subrecipient)	Within 90 days of work completion or the latest approved deadline of its last Small Projects, whichever is sooner	Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1A (pg. 200)	Subrecipient projects to Recipient/ Recipient projects to FEMA	Regional Administrator
Small Project Certification (Recipient)	Within 120 days of work completion or the latest approved deadline of the Subrecipient's Small Projects, whichever is sooner	Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1A (pg. 200)	Recipient forwards subrecipient projects to FEMA	Regional Administrator
Large Project Certification (Subrecipient)	Within 90 days of the work completion date or the Project deadline, whichever occurs first.	Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1B (pg. 200)	Subrecipient projects to Recipient/ Recipient projects to FEMA	Regional Administrator
Large Project Certification (Recipient)	Within 120 days of the work completion date or the Project deadline, whichever occurs first.	Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1B (pg. 200)	Recipient forwards subrecipient projects to FEMA	Regional Administrator
Request for Use of Excess Funds on Permanent Work Pilot Projects	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.	Policy PAPPG, Chapter 8, Sec. VIB1 (pg. 165)	Applicant	Recipient Recommendation to FEMA
Forward Request for Use of Excess Funds on Permanent Work Pilot Projects	Forward the request to FEMA within 180 days of date the last Alternative Procedures Project was completed.	Policy PAPPG, Chapter 8, Sec. VIB1 (pg. 165)	Recipient	Regional Administrator

Task	Deadline	Deadline Driver	Responsible Entity	Approving Official
Liquidate all obligations incurred under award	For incidents before November 12, 2020, within 90 days of the end of the prime award period of performance.	Regulatory 2 C.F.R. § 200 Policy PAPPG, Chapter 12, Sec. III (pg. 203)	Recipient	Regional Administrator
Liquidate all obligations incurred under award	For incidents after November 12, 2020, within 120 days of the end of the prime award period of performance.	Regulatory 2 C.F.R. § 200	Recipient	Regional Administrator

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APPENDIX D: TIMELINESS GOALS

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This table provides a list of timeliness expectations for tasks in the first five phases of PA program delivery. The metrics referenced in this appendix, and throughout the guide, were compiled from the Recovery Performance Framework, PA doctrine guidance, and in coordination with other Agency partners, including the Federal Insurance and Mitigation Administration (FIMA). Throughout the Operational Draft period, PA staff will compile feedback from users and work with Recovery Reporting and Analytics Division to further refine the metrics.

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Table 23: Timeliness Goals

Phase	Outcome	Goal	Responsible Role
Phase 1	Review Request for Public Assistance (RPA)	Within 3 days of receiving RPA	PAGS
	Conduct Exploratory Call	Within 7 days of Applicant assignment	PDMG
	Conduct Recovery Scoping Meeting	Within 21 days of Applicant assignment	PDMG
Phase 2	Schedule Site Inspection	Within 3 days of RSM	PDMG
	Complete Site Inspections	Within 21 days of a confirmed request for a site inspection	Site Inspector
	Complete damage documentation	Within 21 days of RSM, damage documentation is complete	PDMG
	Complete DDD	Within 7 days of completing the site inspection	Site Inspector
	Review DDD	Within 2 days after receipt of the site inspection	PDMG
	Approve DDD	Within 7 days after receiving it from the PDMG	Applicant
Phase 3	Complete the DDD and validation of documentation for Completed Lane Projects	14 days after the PDMG routes the project to the CRC	Validation Specialist
	Complete project development for Standard Lane projects	14 days after the PDMG routes the project to the CRC	Costing Specialist
	Complete project development for Specialized Lane projects	24 days after the PDMG routes the project to the CRC	Technical Specialist

Phase	Outcome	Goal	Responsible Role
	Complete Insurance Review	3 days after the Specialist receives the project	Insurance Specialist
	Complete Quality Assurance (QA) review	Within 3 days after the Specialist receives the project	Quality Assurance Specialist
Phase 4	Complete EHP Compliance Reviews	Within 14 days of receipt from the CRC	Environmental Planning and Historic Preservation Specialist
	Complete Final Project Review	5 days after receipt from FEMA	Recipient
	Complete Final Project Review	7 days after receipt from Recipient	Applicant
Phase 5	Obligate Project	% of RTMs are completed within 7 days of the obligation of its last project.	PDMG
	Obligate Project	Within four days of applicant signature or once Congress, DHS, and OMB have approved the LPN	PAGS

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1839 APPENDIX E: PUBLIC ASSISTANCE PROGRAM

1840 POSITIONS AND FUNCTIONS

1841 Further guidance for PA Program positions and functions can be found in the [Delivery](#)
1842 [Toolbox](#) and on the [Grants Manager Resources](#) page.

1843 Field Positions

1844 Federal Coordinating Officer

1845 The Federal Coordinating Officer (FCO) is responsible for the leadership and overall
1846 management of the federal response to and recovery from Presidentially declared incidents.
1847 FCOs execute DRM authority, delegated from the RA, to manage all disaster staff and
1848 offices, including PA. As such, the FCO has the influence to set priorities for PA program
1849 delivery, oversee PA staff and disaster deployments, work with state, tribal, or territorial
1850 officials, and even work directly with some applicants. FCOs often re-delegate certain
1851 authorities, including project obligation, to the IBD/PAGS. The FCO may choose to establish
1852 financial controls to manage fiduciary risks, such as limiting delegated approvals to certain
1853 dollar thresholds.

1854 Infrastructure Branch Director

1855 The Infrastructure Branch Director (IBD) reports to the Operations (Ops) Section Chief and is
1856 responsible for coordination of infrastructure-related activities performed by staff assigned
1857 to the Infrastructure Branch, and field leadership of the PA Program. The IBD oversees the
1858 infrastructure ESFs during response. In coordination with the Recipient and the PAGS, the
1859 IBD also assesses Applicant needs for assistance. The IBD position is determined as Type 1
1860 or Type 2 to correspond to the appropriate incident level. In Level I incidents, Deputy
1861 Infrastructure Branch Chiefs may support the Branch Chief.

1862 Public Assistance Group Supervisor

1863 The Public Assistance Group Supervisor (PAGS) has a variety of responsibilities across PA
1864 Program delivery. Acting in mostly an oversight role, the PAGS sets and manages goals for
1865 each phase, monitors interactions with Applicants and Recipients, and coordinates with
1866 other offices or individuals as necessary. In coordination with the Recipient and the IBD, the
1867 PAGS also assesses Applicant needs for assistance. The PAGS is also involved in the
1868 eligibility determination process and is responsible for determining accuracy of eligibility
1869 determinations and development of a DM. The PAGS supports the IBD in Level I and II
1870 incidents and manages Level III incidents.

1871 **Site Inspector Task Force Leader**

1872 Site Inspector Task Force Leaders (SITLs) are responsible for overseeing the site inspection
1873 process, ensuring SI successfully complete site inspections and develop accurate DDD.
1874 SITLs are engaged as early as Phase I, where they use the Disaster Operating Profile to
1875 assist in gauging staffing resource requirements; and during RSM, where they begin
1876 scheduling physical and virtual inspections alongside the Applicant and PDMG. SITLs assign
1877 Site Inspection Work Orders to SI, ensuring SI coordinate with Environmental and Historic
1878 Preservation and Mitigation prior to the site inspection as necessary, and ensuring assigned
1879 Site Inspectors have the information and resources necessary to complete their duties.
1880 Subject Matter Experts may have SI Crew Leaders to assist with the management of SI staff.

1881 **Site Inspector Crew Leader**

1882 The Site Inspector Crew Leader provides oversight regarding personnel, administrative, and
1883 resource needs. The SI Crew Leader manages SI Site Inspector Specialists to ensure the
1884 entire site inspection work order cycle is complete, including preparing and performing
1885 quality and timely site inspections and developing accurate, detailed DDD with supporting
1886 photos, sketches, and calculations.

1887 **Site Inspector**

1888 The Site Inspector (SI) collects and validates information about Applicants' damage claims.
1889 The SI prepares for and performs timely site inspections and develops detailed DDDs with
1890 supporting photos, sketches, and calculations. The SI role is critical as it is one of the only
1891 PA roles that sees claimed impacts and damage in person.

1892 **Operations Support Task Force Lead**

1893 Operations Support Task Force Leaders (OSTLs) are responsible for providing support to the
1894 PAGS to ensure overall operational efficiency, including managing required administrative,
1895 reporting, planning and staffing tasks of the PA section. The OSTLs, at the request of the
1896 PAGS or a PAGS designee, communicate the JFO operational priorities to staff as they relate
1897 to Operations Support. OSTLs also ensure that the day-to-day administrative operations are
1898 efficiently and effectively conducted to provide optimal support to the PAGS and JFO staff.
1899 The OSTL manages and mentors the Operations Support staff in the JFO.

1900 **Program Delivery Task Force Leader**

1901 The Program Delivery Task Force Leader (PDTL) is the first-level supervisor for the PDMG
1902 and serves as a conduit between the PAGS and the Program Delivery Manager (PDMG),
1903 communicates the JFO operational priorities to the PDMGs, and ensures that an appropriate
1904 program delivery strategy is developed by the PDMGs to accomplish operational objectives.
1905 The PDTL manages PDMG workflow and reviews PDMG deliverables. The PDTL resolves any
1906 operational issues arising in the field impeding delivery of the program and service to

1907 Applicants by their assigned PDMGs. This is all done to ensure timely, accurate delivery of
1908 the PA program throughout all phases of program delivery.

1909 **Program Delivery Manager**

1910 The PDMG provides customer service to assigned Applicants throughout the PA grant
1911 delivery process. When supporting complex Applicants the PDMG works to understand
1912 needs and ensure appropriate support. The PDMG facilitates and coordinates the effective,
1913 efficient, and accurate delivery of project funding while coordinating the Applicant's recovery
1914 priorities, understanding capacity to develop projects and participate in site inspections, and
1915 provides customer services.

1916 **Region-Specific Positions**

1917 **Regional Administrator**

1918 The Regional Administrator (RA) is the primary FEMA representative to state governors,
1919 OFAs, and local, tribal, and territorial authorities during day-to-day operations within their
1920 region. The RA reviews and recommends approval/denial of declaration requests. In the
1921 event of a Stafford Act declaration, the RA has control of FEMA resources within the region
1922 and is designated as the DRM. The RA executes DRM authority, including activating and
1923 tasking support functions, selecting field leadership from within the FEMA region, or
1924 recommending leadership for Level I incidents, approving MAs, approving incident staffing
1925 plan for Level I incidents, engaging with policy as necessary, and supporting development of
1926 regional All-Hazards plans and other relevant pre-disaster recovery plans. The RA delegates
1927 DRM authority to field leadership, usually the FCO, once they have established operational
1928 capability, or to regional program leadership, as needed.

1929 **Regional Recovery Division Director**

1930 The Regional Recovery Division Director (RRDD) oversees all PA-related functions in the
1931 region, and supports joint PDAs, emergency declarations, and MAs, as applicable. The RRDD
1932 recommends approval/denial of declaration requests to the RA and makes formal
1933 recommendations to the RA on appeals. The RRDD also analyzes quarterly JFO data to
1934 identify field offices ready for transition to the region, conducts final reviews at closeout for
1935 incidents that have been transitioned back to the region, and delegates day-to-day
1936 responsibility for their branch chiefs.

1937 **Regional PA Operations Branch Chief**

1938 Regional PA Operations Branch Chiefs report to the Regional Recovery Division Director and
1939 are responsible for providing direction, oversight, and coordination of activities performed by
1940 regional PA staff to deliver the PA Program in the field; and coordinating with SLTT
1941 governments and OFA to deliver the PA Program during the response phase.

1942 **Regional PA Closeout Branch Chief**
1943 Regional PA Closeout Branch Chiefs report to the Regional Recovery Division Director and
1944 are responsible for providing direction, oversight, and coordination of project monitoring and
1945 closeout activities performed by regional PA staff; and coordinating with state, tribal, and
1946 territorial governments on project monitoring and compliance.

1947 **Public Assistance State/Tribal Liaison**
1948 The PA State/Tribal liaison provides customer service to assigned states, tribes, and
1949 territories throughout the project monitoring and closeout process. While not all regions
1950 have a Tribal Liaison, this is a best practice as the Tribal Liaison serves as the primary point
1951 of contact for tribes.

1952 **Headquarters-Specific Positions**

1953 **Assistant Administrator for Recovery**
1954 The Assistant Administrator for Recovery oversees all FEMA Recovery programs, including
1955 PA. The Assistant Administrator, or their designee, has the sole authority to modify or waive
1956 PA Policy, and issue specific deadline extensions or exemptions. They may delegate these
1957 authorities to the PA Division Director. In order to establish a JRO, the RA must work with the
1958 Assistant Administrator and gain their concurrence. Alongside the Chief Component Human
1959 Capital Officer (CCHCO), the Assistant Administrator for Recovery approves the Incident
1960 Resource Plan (IRP) for Level I disasters and for all other disasters for which the FEMA
1961 region plans to set up a JRO,

1962 **Public Assistance Division Director and Deputies**
1963 The PA Division Director reports to the Assistant Administrator for Recovery and oversees PA
1964 program development and delivery across the recovery enterprise. The Deputy Director for
1965 Operations oversees program implementation and controls and provides national-level
1966 support for incidents that exceed regional routine incident years. The deputy manages the
1967 CRCs, Contracts Management, Field Resources, and Training and Development Branches.
1968 The Deputy Director for Policy oversees the development and design of the program and
1969 manages the Appeals, Audits, and Arbitration; Policy; Program Design; and Program Support
1970 and Monitoring Branches.

1971 **Consolidated Resource Center Director and Deputies**
1972 The CRC Director manages a CRC and ensures exceptional support to field and region led
1973 program delivery. The CRC Deputy Directors manage the staff within their assigned lanes.
1974 Operations Lane Deputy Director manages lane staff conducting quality assurance, DM
1975 drafting, EHP completeness reviews, insurance compliance reviews, and document integrity
1976 management. The Standard Lane Deputy Director manages Standard Lane staff, and the

1977 Completed and Specialized Lane Deputy Director manages the Completed and Specialized
1978 Lane staff.

1979 **Executive Officer**

1980 The CRC Executive Officer reports to the CRC Director and is responsible for leading the day-
1981 to-day operations, resource management, and human resources coordination. They serve as
1982 senior office administrator, providing advice and recommendations on all matters related to
1983 the coordination, and synchronization of staff actions and activities affecting the CRC. They
1984 analyze and evaluate operations and the management of administrative processes;
1985 managing critical support functions such as scheduling, budget monitoring, supplies, space
1986 utilization, training and coordinating with human resources and other internal partners to
1987 post job announcements, recruit candidates, and select candidates.

1988 **Consolidated Resource Center Lane Manager**

1989 The CRC Lane Manager oversees consolidated resources using a standardized approach to
1990 project development in all categories of work. Lane Managers should have situational
1991 awareness of Incident and Applicant profiles to forecast resource requirements and prepare
1992 for efficient work processing. Lane Managers are responsible for managing work of specific
1993 teams of specialists within CRCs, including assigning work, conducting peer reviews, and
1994 ensuring production goals are met. Lane Managers oversee costing specialists (i.e.,
1995 Standard Lane), Determination Analysts, Document Integrity Unit Specialists, EHP
1996 Specialists, Insurance Specialists, Technical Specialists, and Quality Assurance Specialists.

1997 **Cross-Enterprise Public Assistance Positions**

1998 **Operations Branch Director**

1999 The Operations Branch Director oversees activities for a modular unit. Branch Directors
2000 operate in a geographical or functional capacity, directing operations for either a
2001 geographical subset of incident operations (i.e., at a Branch or AFO), or for a functional
2002 branch (i.e., Emergency Services, Air Operations, Infrastructure, Individual Assistance).
2003 During an incident, the Operations Branch Director for Critical Infrastructure (OBD-I) will
2004 transition roles and responsibilities over to the PA IBD as the incident stabilizes.

2005 **Operations Section Chief**

2006 The Operations Section Chief is responsible for coordinating tactical activities focused on
2007 reducing immediate hazards, saving lives and property, establishing situational control, and
2008 restoring normal operations after an event or incident. They lead and manage the conduct of
2009 incident operations including advising the FCO, provide key input for IAPs, and lead and
2010 supervise Operations Section staff, including Operations Branch Directors. As response

2011 activities transition to recovery, the PA IBD or PA Group Supervisor maintains situational
2012 awareness with the Ops Section Chief, who liaises with the FCO.

2013 **Operations Support Specialist**

2014 The Operations Support Specialist assists with deployment coordination and obtaining staff
2015 needed for the workload. Also helps in overseeing and aiding staff, including check-in,
2016 check-out, staff reporting, accountability, and any administrative requirements. In addition,
2017 the Operations Support Specialist prepares PA input for the IAP and situational report and
2018 tracks correspondence.

2019 **Costing Specialist**

2020 The Costing Specialist contributes to the timeliness, quality, and reliability of program
2021 delivery in providing project funding based on a codified, detailed DDD. Cost Specialists
2022 work on projects in the Standard Lane and validate Scope of Work (SOW) and Cost
2023 Estimates for uncompleted work. For work completed, the Costing Specialist reviews
2024 applicant-provided documents to develop the SOW and validate the costs. Costing
2025 Specialists may support the CRC or regional office.

2026 **Validation Specialist**

2027 The Validation Specialist reviews documentation and ensures the completeness, accuracy,
2028 and eligibility of SOW and costs associated with work that is 100% completed and
2029 documented. Validation Specialists work on projects where the work is 100% completed and
2030 documented and develops the entire project or amendment consisting of the detailed DDD,
2031 SOW, and costs. The Validation Specialist may support the CRC or regional office.

2032 **Environmental Planning and Historic Preservation Specialist**

2033 The Environmental Planning and Historic Preservation (EHP) Specialist provides technical
2034 assistance to PA staff, Recipients and Applicants to identify EHP compliance considerations
2035 that may be applicable to an Applicant's recovery actions. The EHP Specialist integrates the
2036 protection and enhancement of environmental, historic, and cultural resources into the
2037 FEMA PA Program by ensuring that FEMA actions comply with federal EHP laws and
2038 Executive Orders. The EHP Specialist may support the Field, CRC, regional office, or HQ.

2039 **Environmental Planning and Historic Preservation Advisor**

2040 The Environmental Planning and Historic Preservation Advisor (EHAD) oversees all
2041 consultation and coordination activity and National Environmental Policy Act (NEPA)
2042 document preparation. The EHAD is typically the disaster Environmental Officer and is the
2043 final reviewer for Records of Environmental Consideration (RECs) submitted by EHP staff.
2044 The EHAD is responsible for tracking EHP productivity and staffing needs and participates in
2045 consultation with regulatory agencies. The EHAD operates outside the Operations chain of
2046 command and reports to the FCO or Chief of Staff (COS).

2047 **IMAT Team Lead**

2048 Incident Management Assistance Teams (IMAT) exist at the regional and national level. They
2049 deploy first when an incident strikes to provide immediate response, gain situational
2050 awareness, and establish FEMA's staffing framework for response and recovery. The IMAT
2051 Team Lead works closely with regional leadership and SLTT organizations to ensure
2052 immediate hazards are identified and FEMA's response is coordinated expeditiously. Once a
2053 framework for remaining response and recovery has been established at the incident level,
2054 the IMAT Team Lead transitions duties to the FCO and Operations Section Chief.

2055 **Insurance Specialist**

2056 The Insurance Specialist supports PA Program delivery to Recipients and Subrecipients by
2057 applying statutory and regulatory insurance requirements during the PDA, project
2058 formulation, and compliance review. before determining the amount of net eligible PA
2059 funding for eligible but insured elements. The Insurance Specialist may support the CRC or
2060 regional office.

2061 **Interagency Recovery Coordination Staff**

2062 PA is responsible for seeking opportunities to leverage post-incident funding and technical
2063 assistance of federal interagency partners, including by working with IRC staff, who help
2064 coordinate interagency recovery support for problems, issues, and needs that are not
2065 covered by PA. While the IRC itself does not control funding or resources, its job is to act as a
2066 hub of information and contacts, assisting stakeholders to narrow down their need or
2067 request, then finding information or a point of contact (often a federal partner) who can offer
2068 support. IRC staff provide HQ and Field support.

2069 **Hazards and Performance Analysis Task Force Leader (TFL)**

2070 The Hazard and Performance Analyst Task Force Leader (TFL) is the first-level supervisor for
2071 the Mitigation Specialists and communicates the JFO operational priorities to the Mitigation
2072 Specialists to accomplish operational objectives. The HPATFL manages Mitigation Specialist
2073 workflow and reviews Mitigation Specialist deliverables. The HPATFL resolves any
2074 operational issues arising in the field impeding delivery of the program and service to
2075 Applicants by their assigned Mitigation Specialists.

2076 **Mitigation Specialist**

2077 The Mitigation Specialist focuses on providing technical assistance to PA staff, Recipients
2078 and Applicants to identify PA hazard mitigation actions that enhance an eligible facility's
2079 ability to resist damage in future incidents. Mitigation Specialists work closely with PDMGs,
2080 and their counterparts in the CRC and region and may support the CRC, field, or regional
2081 office.

2082 **Reports Specialist**

2083 The Reports Specialist is responsible for extracting data from grant management systems
2084 and associated tools used by the PA Program; conducting quantitative data analysis with
2085 varied data sets; developing reports and other analytical products; and identifying
2086 opportunities to evaluate project development effectiveness and performance.

2087 **Technical Specialist**

2088 The Technical Specialist contributes to the timeliness, quality, and reliability of program
2089 delivery in providing project funding based on a codified, detailed DDD. Technical Specialists
2090 work on projects in the Specialized Lane, conducting site inspections or completing
2091 assessments for complex/specialized damages, validating SOW and Cost Estimates for
2092 complex/specialized projects, and/or reviewing Applicant-provided documents to develop
2093 the SOW and costs. Technical Specialists may support the Field Office, CRC or region.

2094 **Quality Assurance Specialist**

2095 The Quality Assurance (QA) Specialist reviews the detailed DDD, SOW, and Cost Estimate for
2096 accuracy and proper documentation, prior to a project submittal to Program Compliance
2097 Review for Insurance, PA Hazard Mitigation, and EHP. The QA Specialist's reviews ensure
2098 consistency in program delivery and development of a quality project. The QA Specialist
2099 works with Costing, Document Validation, and Technical Specialists for clarity and accuracy
2100 in projects. This role is integral to ensuring Applicant-provided documentation is complete in
2101 support of project development and may support the CRC or regional office.

2102 **Determination Analyst**

2103 The Determination Analyst drafts DMs based on Eligibility Reviews. Determination Analysts
2104 may support the CRC or regional office.

2105 **Policy Analyst**

2106 The Policy Analyst focuses on reviewing the laws and regulations that govern the PA Program
2107 and developing policy, guidance, fact sheets, and other documents that articulate FEMA's
2108 intent and direction for administering PA grants to external stakeholders. Policy Analysts
2109 work on policy related to program administration, emergency work, permanent work, and
2110 costs and grant awards. The Policy Analyst may support HQ, field operations, or the regional
2111 office.

2112 **PA Audit Liaison**

2113 The PA Audit Liaison reviews audit findings, draft versions of Management Response Letters
2114 and contribute to the timely resolution of audit recommendations. The Audit Liaison may
2115 support the regional office or FEMA HQ.

2116 **Appeal Analyst**

2117 The Appeal Analyst performs the completeness review, preparing analysis for each appeal
2118 and presenting it to leadership, researching and drafting all first appeal decisions within the
2119 prescribed regulatory timeframes. Appeal Analysts must be certified by the HQ PA Appeals
2120 and Audits Branch. Appeal Analysts may support first appeals in the regional office or
2121 second appeals at FEMA HQ.

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2122 APPENDIX F: IDENTIFYING COMPLEX AND HIGH- 2123 RISK APPLICANTS AND PROJECTS

2124 This appendix provides considerations for identifying complex and high-risk Applicants and
2125 projects to prioritize resources against competing needs and enable effective and timely
2126 recovery outcomes.

2127 Complex PA Applicants and projects are those that: have interconnecting parts, elements, or
2128 sites; are difficult to analyze, understand, or explain; require specialized technical
2129 knowledge, or have a high probability of difficult eligibility criteria to navigate.

2130 High-risk PA Applicants and projects are those that: have cascading impacts that will either
2131 trigger a chain of events that exponentially increase the incident's impacts or may be
2132 prevented if caught and resolved early; have impacts to interdependent facilities such that
2133 one facility must be addressed to continue operations at another facility; entail fiduciary risk
2134 of federal funds (e.g., risk of funds not being used for intended purpose or not achieving
2135 value for money); program risk of not effectively meeting community needs; legal risk of not
2136 complying with law, regulation, or policy; or reputational risk of harm to the American
2137 public's confidence in FEMA's delivery of the PA program.

2138 Applicants

2139 These criteria are useful in identifying complex and high-risk applicants.

2140 Complex Applicants

2141 The following criteria may indicate that an Applicant is complex:

- 2142 • Applicant is interested in restoring the community in a manner that is different from how
2143 it was prior to the incident occurring.
- 2144 • Applicant represents large metropolitan or densely populated areas such as the City of
2145 Houston.
- 2146 • Interstate interests, such as the Port Authority of New York and New Jersey.
- 2147 • Tribal governments.
- 2148 • PNP organizations, that have additional eligibility requirements including the need to
2149 demonstrate that they own or operate a facility that provides an eligible service.
- 2150 • Applicant has significant impacts to critical infrastructure.

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2152 High-Risk Applicants

2153 The following criteria may indicate that an Applicant is high-risk:

- 2154 • Applicant has potentially non-compliant or complex contract costs

- 2155 • Applicant has been the subject of a Congressional Inquiry
- 2156 • High-profile (attracting political interest or media attention)
- 2157 • Fiduciary concerns or financial constraints
- 2158 • Impacts to all categories of work; impacts to numerous facilities

2159 **Projects**

2160 These criteria are useful in identifying complex and high-risk projects.

2161 **Complex Projects**

2162 The following criteria may be useful in identifying complex projects:

- 2163 • Project requires architectural and engineering (A&E) drawings before cost estimates
- 2164 • Project requires significant codes and standards upgrades (e.g., adding a tornado shelter)
- 2165 • Projects with changes to pre-disaster size, function, or capacity of facilities, such as:
 - 2166 ○ Major hazard mitigation measures (e.g., floodproofing)
 - 2167 ○ Replacement project
 - 2168 ○ Relocation project
 - 2169 ○ Improved or Alternate projects involving facilities
- 2170 • Significant impacts to a facility or utilities that have complex structural elements such as:
 - 2171 ○ Major mechanical systems that are inoperable (e.g., electrical, plumbing, heating, ventilation, air conditioning, etc.)
 - 2172 ○ Nuclear power generating station
 - 2173 ○ Water and wastewater treatment facilities
 - 2174 ○ Rail systems
- 2175 • Structures with impacts to underwater components (e.g., bridges, dams, piers, and breakwaters)
- 2176 • Slope or embankment failure on major or highly trafficked transportation route
- 2177 • Beaches due to eligibility requirements
- 2178 • Unique geographic conditions (e.g., volcanic areas or structures built into a mountain or cliff)

2184 **High-Risk Projects**

2185 The following criteria may be useful in identifying high-risk projects:

- 2186 • Project triggers complex Environmental and Historic Preservation (EHP) concern, such as an Environmental Assessment (EA) or an Environmental Impact Statement.
- 2187 • Projects with potential duplication of benefits requiring Intra/Interagency coordination, such as:
 - 2188 ○ The project may be eligible for multiple FEMA funding sources
 - 2189 ○ Another federal agency may have overlapping authorities
- 2190 • Floodplain Management or Environmental and Historic Preservation concerns, including the following:

- 2194 ○ Ground disturbance, such as when increasing the size of the preexisting footprint
- 2195 ○ Work in or near a historic district or building/structure/object over 45 years old
- 2196 ○ Work on or near archaeological resources
- 2197 ○ Work near threatened or endangered species or critical habitat
- 2198 ○ Work in floodplains or within 200 feet of a waterway, body of water, or wetland
- 2199 • Project cost equal to or greater than \$1 billion in federal share
- 2200 • Fiduciary concerns or financial constraints
- 2201 • Projects requiring 50% rule determinations and with a Federal cost share equal to or
- 2202 greater than \$1 million
- 2203 • Nuclear power generating station
- 2204 • Relocation of facilities
- 2205 • Impacts causing inaccessibility to populated areas or critical service facilities
- 2206 • Project with a non-competitively bid contract equal to or greater than \$1 million
- 2207 • Significant impacts to facilities or utilities that serve a large amount of the population
- 2208 such as:
 - 2209 ○ Medical
 - 2210 ○ Transportation systems
 - 2211 ○ Water and wastewater treatment facilities
 - 2212 ○ Transmission and distribution power lines
 - 2213 ○ Water control infrastructure (e.g., levees and dams)
- 2214 • Leads to significant cascading impacts such as:
 - 2215 ○ Water control infrastructure (e.g., levees and dams)
 - 2216 ○ Transmission and distribution power lines
 - 2217 ○ Transportation systems

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APPENDIX G: FEMA PUBLIC ASSISTANCE NATIONAL WORKFLOW

FEMA Public Assistance National Workflow

PROGRAM DELIVERY PROCESS STEPS August 2022, Operational Draft Not for Distribution

