Course Overview, Goal, and Objectives

Welcome to the Documenting Disaster Damage and Developing Project Files course.

The course will provide an overview of disaster-related damage documentation and project file development for the Public Assistance Grant Program. By the end of the course, State, Local, Tribal, and Territorial Applicants and Recipients will be able to document disaster-related damage, collect appropriate documentation, and identify best practices for project file organization.

Upon completion of this course, participants will be able to:

- Identify documentation requirements to receive Public Assistance grant funding
- Explain the Essential Elements of Information process and how documentation requirements are communicated by FEMA
- Identify applicable resources and tools that allow Applicants to provide required documentation
- Discuss various ways to document damage through annotated maps, photographs, and other documentation
- Upload and organize documentation into Grants Portal

Select this link to access the Public Assistance acronym list.

Lesson 1 Overview and Objectives

This lesson provides an overview of administrative requirements, course goal and objectives, and discusses Applicant responsibility for documenting disaster-related damage and developing project files.

At the end of this lesson, the participants should be able to:

- Identify Administrative requirements of the course
- State the goals and objectives of the course
- Define Applicant responsibility for documenting disaster-related damage and developing project files

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Documentation

Throughout the Public Assistance process, FEMA, Recipient, and the Applicant use documentation or records to justify the provision of grant funding. The purpose of project documentation is to support an Applicant's claim and the eligibility of the Applicant, facility, work, and cost. All project documentation must be in accordance with statutes, regulations, Executive Orders, and policies.

It is the responsibility of the Applicant to provide all documentation, required by the Public Assistance

Program in a timely fashion in order to receive grant funding.
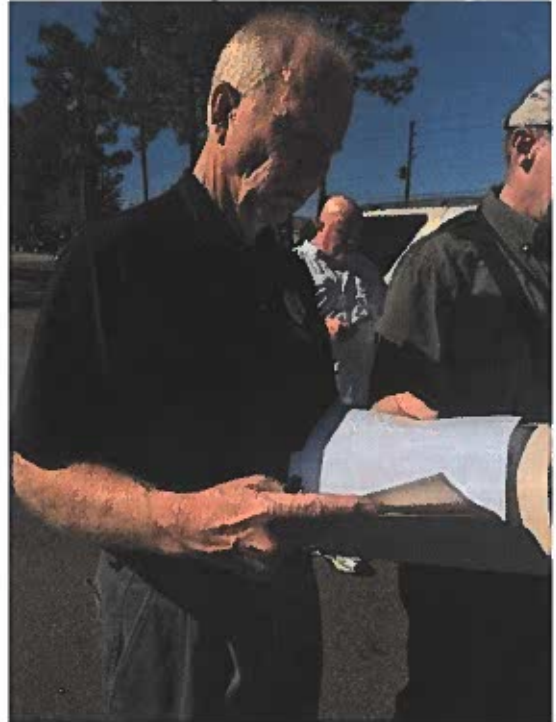
FEMA Documentation Requirements

FEMA requires the Applicant to provide documentation throughout the Public Assistance process. Documentation requirements depend on the type of project, specifically the Category of Work. Once FEMA and the Applicant determine the Category of Work, the Applicant provides documentation to fulfill Essential Elements of Information that support the eligibility of their project.

The Program Delivery Manager discusses documentation requirements with the Applicant as they go through the Public Assistance process. This discussion begins during the Exploratory Call. If at any point in time an Applicant has a question about documentation, they should immediately ask their Program Delivery Manager.

What Constitutes a "Record"?

In the context of this course, a record, or the administrative record, includes all documents and materials considered by FEMA in making a Public Assistance eligibility determination and subsequent appeal decision(s).

For the purpose of this course, all records will be referred to as documentation.
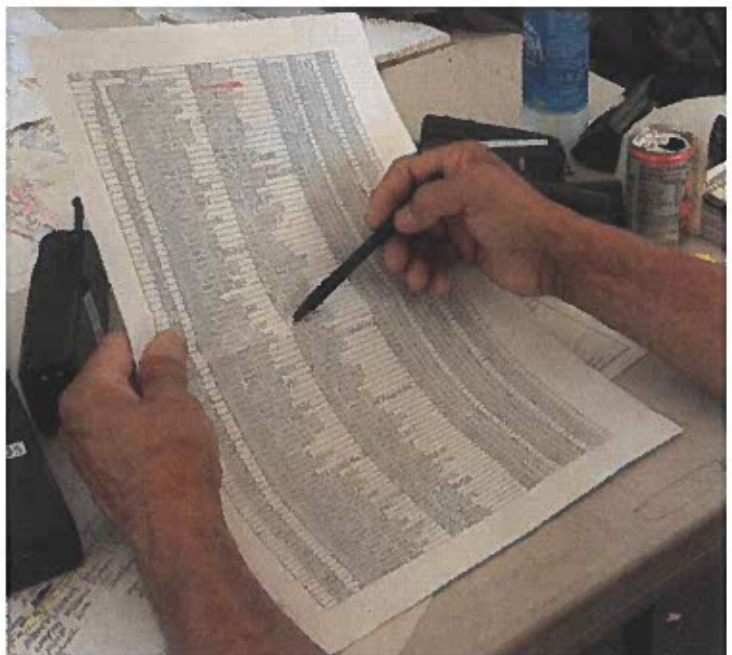
Types of Documentation

Documentation comes in a variety of forms. FEMA requires steady-state documentation and project-specific documentation. All documentation FEMA requests should support the Applicant's claim for grant funding.

Documentation includes, but is not limited to:

- Photo documentation of pre-disaster conditions
- Photo documentation of the damaged facility
- Annotated damage maps
- Receipts for work performed since the incident
- Technical reports
- Payroll policies

Content of Documentation

The goal of documentation is to determine how and why the damage occurred. For each item claimed, documentation should support:

- Who?
- What?
- Where?
- When?
- Why?
- How Much?

If the Applicant does not provide sufficient documentation to support its claim as eligible, they jeopardize receiving FEMA Public Assistance funding for the work.

Types of Requested Information

There are two types of information FEMA requests at different stages of the grant process:

- **Essential Elements of Information**

  - The Program Delivery Manager sends a request for Essential Elements of Information to the Applicant through the Grants Manager and the Grants Portal
  - It is developed based on the results of the Recovery Scoping Meeting and the Essential Elements of Information questions
  - It details the documentation and information needed to support damage claims
  - The Applicant is expected to return the Essential Elements of Information to the Program Delivery Manager through the Grants Portal

- **Request for Information**

  - The intent of the Request for Information is to obtain all disaster-related documentation
  - The Consolidated Resource Center can execute a Request for Information
  - FEMA uses this form of request if the Applicant does not submit their Essential Elements of Information in a timely manner, if the Consolidated Resource Center needs more documentation for eligibility purposes, or if additional information is needed during the appeals process
  - Applicants have a 15-day window to fulfill the first level formal Request for Information and a 7-day window to fulfill the second level formal Request for Information

Personal Identifiable Information

Prior to submittal of documentation, the Applicant must take necessary measures to verify the protection of Personal Identifiable Information. They must remove unnecessary personal information included in the documentation.

Personal Identifiable Information that Applicants should remove from documentation includes:

- Home address
- Social Security Number(s)
- Telephone number(s)
- Date of birth
- Place of birth
- Mother's maiden name
- Biometric records
- Any other information that is linked or is linkable to an individual such as medical, educational, or financial records

Maintaining, Updating, and Retaining Documents

The Applicant has the responsibility to maintain and update documents throughout the entire length of the grant application process. They should retain documents per Federal, State, Local, Tribal, and Territorial requirements.

2 CFR 200.333 states "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities."

Additional Documentation Requirements

The Applicant may encounter additional documentation requirements, specifically for State, Local, Tribal, or Territorial governments.

The Applicant must know what specific requirements are placed upon them by their State, Local, Tribal, or Territorial governments in order to obtain Public Assistance grant funding.

Some examples of additional documentation requirements Applicants may be required to complete are:

- Quarterly Reports
- Payment of Funds Request
- Direct Deposit Authorization Form
- Designation Authorized Subrecipient's Agent Form

Select this link for a full image description.

Lesson 1 Summary

In this lesson, an overview of the requirements from FEMA and other government entities were discussed.

The next lesson reviews "steady-state" documentation and its importance to the Public Assistance grant process.

Select this link for a full image description.

Lesson 2 Overview and Objectives

This lesson discusses collecting current, steady-state documentation prior to an event and updating and maintaining common records/policies necessary for a Public Assistance grant.

Upon completion of this lesson, participants will be able to:

- Explain why it is important for an Applicant to have general operating policies and other similar documentation easily accessible before a disaster event
- Identify current, steady-state documentation relevant to the development of a Public Assistance grant

Select this link to for a full image description.

Required Documentation for Public Assistance Grants

Public Assistance requires different types of documentation. These types of documentation can be grouped together into two categories of documentation:

- Steady-state documentation

- Project-specific documentation

The Program Delivery Manager discusses documentation requirements in-depth during the Exploratory Call and Recovery Scoping Meeting.

This lesson discusses steady-state documentation. Later lessons will discuss project-specific documentation.

Steady-State Documentation

Steady-state documentation is fundamental documentation required for all projects.

- The Applicant provides this documentation to begin supporting their claim and eligibility of the Applicant, facility, work, and cost for a project
- Steady-state documentation is typically documentation valid for set periods of time and may apply to all projects associated with a Public Assistance grant
- Private Nonprofit Applicants must submit additional steady-state documentation
- Not having or producing these written policies may jeopardize potential grant funding

Examples of Steady-State Documentation

Common documentation and policies make up steady-state documentation.

Steady-state documentation includes, but is not limited to:

- Insurance policies
- Mutual aid agreements, if applicable
- Purchasing/procurement policies
- General operating policies
- Documentation to support legal responsibility of the facility:

  - Deeds
  - Titles
  - Lease agreements
  - Contracts for facilities under construction

- Pre-disaster photographs of the site or facility
- Personnel/payroll policies (including fringe benefits)
- Maintenance records

Requirements for Private Nonprofits

A private nonprofit must submit the following additional documentation on top of other steady-state documentation for eligibility purposes:

- Private and Nonprofit Facility Questionnaire (FEMA Form 90-121) available at http://www.fema.gov/media-library/assets/documents/10579?id=2726.
- A current ruling letter from the Internal Revenue Service granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954; OR documentation from

the State substantiating it is a non-revenue producing, nonprofit entity organized or doing business under State law
- If the Applicant owns the facility, proof of ownership
- If the Applicant leases the facility, proof of legal responsibility to repair the incident-related damage
- List of services provided in the facility and when and to whom

PNP RPA Documentation Requirements
All PNP Applicants
☐ PNP Facility Questionnaire (FEMA Form 90-121) available at http://www.fema.gov/media-library/assets/documents/10579?id=2726.
☐ A current ruling letter from the Internal Revenue Service granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954; OR documentation from the State substantiating it is a non-revenue producing, nonprofit entity organized or doing business under State law
☐ If the Applicant owns the facility, proof of ownership
☐ If the Applicant leases the facility, proof of legal responsibility to repair the incident-related damage
☐ List of services provided in the facility and when and to whom

Additional Information Requirements for Private Nonprofits

Certain types of private nonprofits must provide other specific documentation as part of the Request for Public Assistance Process.

Membership Organizations:

- Who is allowed membership?
- What fees are charged?
- What is their policy regarding waiving membership fees?

Education/School:

- Proof that the school is accredited or recognized by the State Department of Education

Child Care Facility:

- Proof that the State Department of Children and Family Services, Department of Human Services, or similar agency, recognizes it as a licensed child care facility

Mixed-Use Facility:

- Proof of the established purpose of the facility with documentation such as pre-disaster charter, bylaws, and amendments, and a calendar of activities

Note: For more information on private nonprofits, please refer to the course IS-1026: Eligibility of Private Nonprofit Organizations.

Proactive Documentation Collection

Steady-state documentation is documentation that an Applicant can and should proactively collect. FEMA asks that the Applicant proactively collect and manage documentation for their facilities. An Applicant who collects their documentation early in the Public Assistance process, or even before the disaster, speeds up the process of obligating grant funding.

Ways to proactively collect and manage documentation include:

- Upload and store documentation online
- Upload and store documentation on Grants Portal
- Store documentation in a location that is easily accessible and cannot be damaged by an event

Maintain and Update Steady-State Documentation

An Applicant should not only proactively collect steady-state documentation, but they should also maintain and update it.

Ways to maintain and update steady-state documentation include:

- If the documentation is on Grants Portal, upload the updated version and delete the older version
- If documentation is online, upload the updated version and delete the older version
- Replace the older version of the documentation with the updated version

Lesson 2 Summary

This lesson covered the importance of collecting current, steady-state documentation prior to an event, and what documentation will be required for a Public Assistance Grant.

The next lesson will provide an overview of the process of uploading and organizing documentation in the Public Assistance Grants Portal.

Select this link for a full image description.

Lesson 3 Overview and Objectives

This lesson provides an overview of the process of uploading and organizing documentation in the Public Assistance Grants Portal. The Organization Profile, the Applicant Profile, and the project-specific section of Grants Portal are discussed, including what documents should be uploaded where and who has access to each section of the Portal.

Upon completion of this lesson, participants will be able to:

- Demonstrate how to properly navigate the Public Assistance Grants Portal to upload required documentation
- Explain how to organize and label documents within the Applicant Profile section of the Grants Portal system

Select this link to access a full image description.

Grants Portal

Grants Portal is an online system that FEMA, Recipient, and Applicant use to process Public Assistance projects. Grants Portal's capabilities include, but are not limited to:

- Storing Applicant documentation
- Communicating and coordinating between FEMA, Recipient, and Applicant
- Providing the status of the Applicant's project
- Storing the Damage Inventory
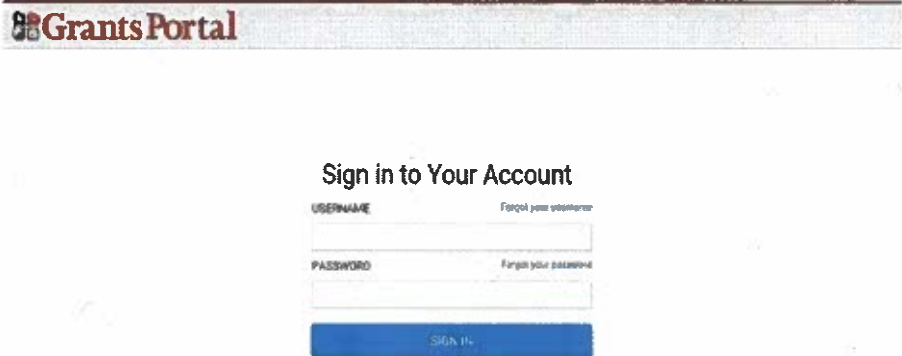- Storing and approving the scope of work and cost estimate

Applicants upload all documentation related to a project to Grants Portal, including steady-state documentation and project-specific documentation.

- If an Applicant does not have access to Grants Portal, they may have either the Recipient or Program Delivery Manager upload the documentation for them

Grants Portal

Sign in to Your Account

USERNAME   Forgot your username

PASSWORD   Forgot your password

SIGN IN

Select this link for a full image description.

Overview of Documentation Within Grants Portal

FEMA, Recipient, and Applicant use Grants Portal as a repository for documentation.

The Applicant performs the following with their documentation in Grants Portal:

- Uploads documentation
- Organizes and labels documentation

This lesson discusses these two subjects in further detail.
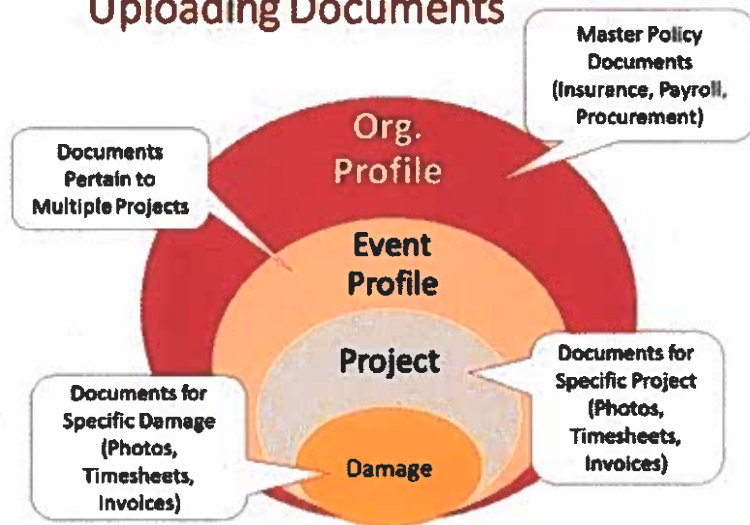
Uploading Documentation: Locations

When uploading documentation to Grants Portal, there are four main locations:

- Organization profile
- Event profile
- Project-specific profile
- Damage-specific profile

Each profile site requires specific documentation. The process for uploading documents may vary slightly though generally follows the same process.
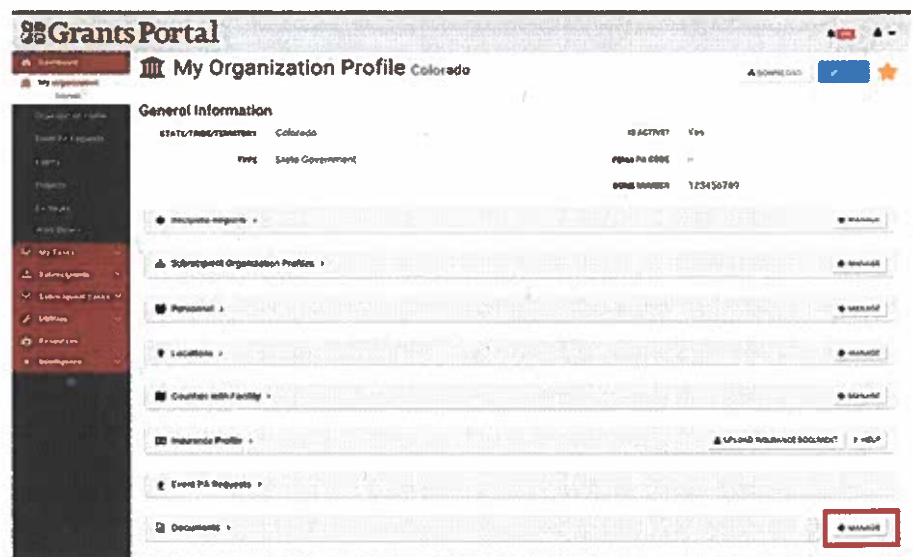
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Uploading Documentation: Directions (1 of 2)

These next two slides will provide directions on how to upload files and other forms of documentation to the Grants Portal.

To begin the process of uploading documentation:

- Select the "My Organization" tab on the left side of screen
- Select one of the four locations below

the "My Organization" tab
- Select the "Manage button" to the right of the documents drop-down list

Once the organization selects the "Manage" button, Grants Portal directs the user to the "Manage Documents" page. The user will upload their documentation on this page.

Select this link for a full image description.

Uploading Documentation: Directions (2 of 2)

After selecting the "Add Document" button in the top-right corner of the screen of the "Manage Documents" page:

- Select the "Select Document" button and upload the insurance documentation file
- Select the text box to the right of "Filename" and enter the filename
- Select the text box next to "Description" and enter a description of the file
- Select the drop-down list to the right of "Category" and choose the appropriate category
- Select the "Add Document" button

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Uploading Documentation: Insurance (1 of 2)

Grants Portal has a different location to upload insurance documentation than other documentation in the organization profile. Insurance documents are any of the following documents:

- General insurance documents
- Insurance certificate
- Insurance policy
- Insurance settlement
- Insurance worksheet
- Proof of insurance

Directions to upload insurance documentation are similar to other documentation:

- Select the "My Organization" tab on the left side of screen
- Select the "Organization Profile" tab below the "My Organization" tab
- Select the "Upload insurance Document" button to the right of the insurance profile drop-down list
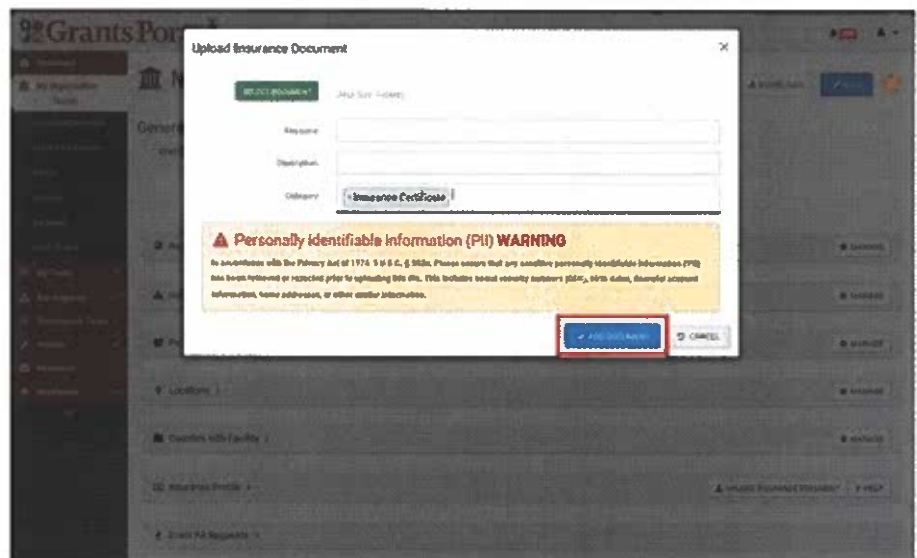
Select this link for a full image description.

Uploading Documentation: Insurance (2 of 2)

A pop-up window appears once the "Upload Insurance Document" button is selected.

Directions to upload insurance documentation:

- Select the "Select Document" button and upload the insurance documentation file
- Select the text box to the right of "Filename" and enter the filename
- Select the text box next to "Description" and enter a description of the file
- Select the drop-down list to the right

of "Category" and
choose the
appropriate category
- Select the "Add
Document" button

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image description.

Organization Profile

The first location where
documentation can be
uploaded is the
organization profile. The
organization profile is the
page in Grants Portal that
provides general
information on the
organization. The
organization can check
events they are involved in
and their projects from this
page. Those that have an
organization profile include:

- Recipient
- Applicant

Those that can upload
documents to the
organization profile include:

- FEMA
- Recipient
- Applicant

State, Local, Tribal, and
Territorial entities upload
their steady-state
documentation to this page
in Grants Portal. Insurance
documentation is to be
uploaded via the
organization profile as well
but separately from other
documentation.

Select this link for a full
image description.

Event Profile

The second location in Grants Portal where documentation can be uploaded is the event profile. The event profile will only appear after your first disaster declaration and approval of the submission of a Request for Public Assistance. The event profile allows the organization to view disaster-specific information for a declared event. Those that have an event profile include:

- Recipient
- Applicant

As per 2 CFR 200.333, "Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities.
The organization can upload numerous types of

documents to the event profile, including:

- Damage Inventory
- Steady-state documentation that applies to the disaster

For information on how to upload the Damage Inventory or other documentation (e.g., steady-state documentation) to the event profile, please refer to the course IS-1002: FEMA Grants Portal - Transparency at Every Step.

Select this link for a full image description.

Project-Specific Profile

The third location in Grants Portal where documentation can be uploaded is the project-specific profile. The project-specific profile allows the Applicant to view project-specific information and upload project-specific documentation for a declared event. The Applicant has a project-specific profile.

Those that can upload documents to the project-specific profile include:

- FEMA
- The Applicant

The Applicant can upload numerous types of documents to the project-

specific profile, including documentation for:

- Essential Elements of Information
- Request for Information
- Sketches
- Photographs

The Applicant can also view numerous items, such as:

- Damage line item for the project
- Environmental and historic preservation profile
- Insurance profile
- Scope and cost summary
- 406 mitigation profile

For information on how to upload documentation for a request for Essential Elements of Information or Request for Information, or upload photographs and sketches, please refer to the course IS-1002: FEMA Grants Portal – Transparency at Every Step.

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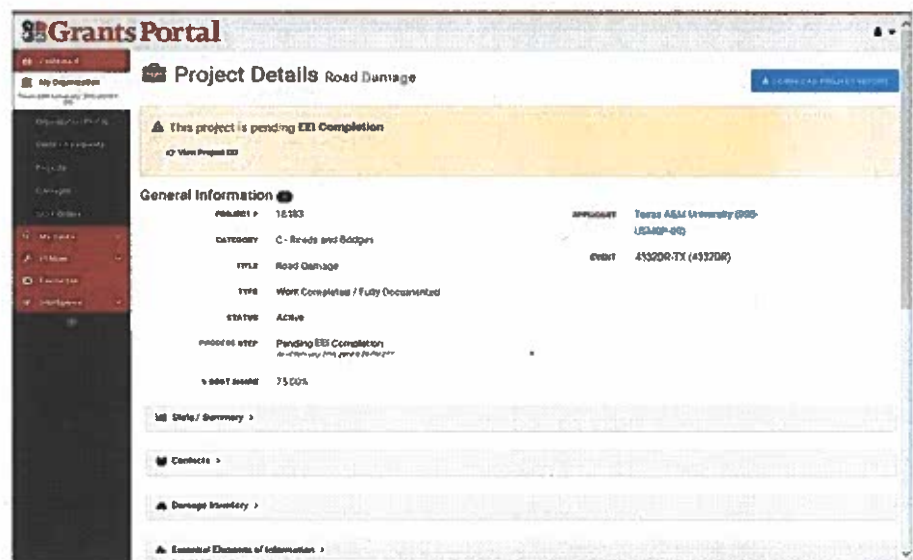# Damage-Specific Profile

The fourth profile where documentation can be uploaded is the damage-specific profile. The damage-specific profile allows the Applicant to view damage-specific information and upload damage-specific

documentation. The Applicant has a damage-specific profile.

Those that can upload documents to the damage-specific profile include:

- FEMA
- Applicant

The Applicant can upload documentation to the damage-specific profile, such as:

- Photographs
- Sketches
- As-builts

The Applicant can also view numerous items, such as:

- Site inspection information
- Damage information (e.g., damage description)
- Environmental and historic preservation profile

For information on how to upload photographs, sketches, or as-builts please refer to the course IS-1002: FEMA Grants Portal - Transparency at Every Step.

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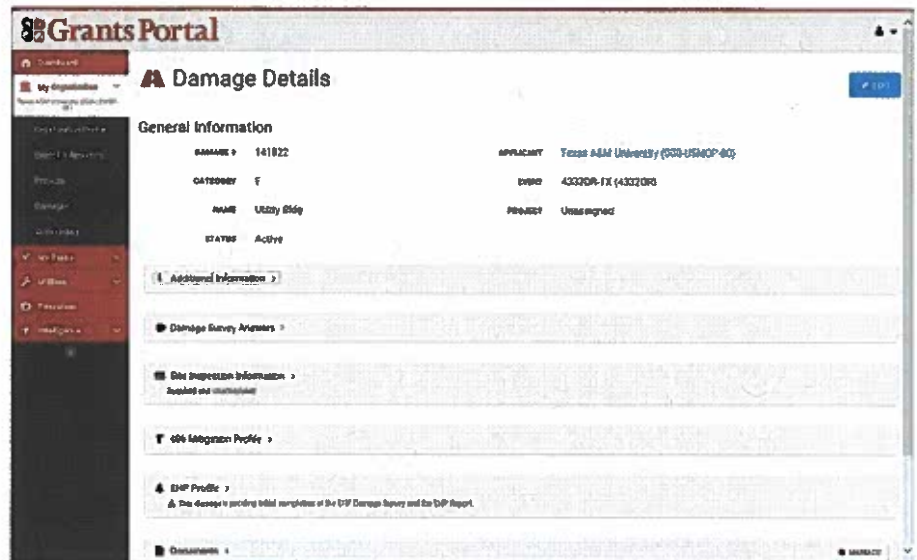
Organizing and Labeling Documentation

When uploading documentation to Grants Portal, the Applicant should consider how they will organize and label their documentation. With proper organization and labeling, FEMA does not have to take extra time to locate documentation needed to process the Applicant's grant or reach out to the Applicant to locate documentation already uploaded to Grants Portal. This will help FEMA as they process the grant.

Organizing Documentation

An Applicant can help organize the documentation within the Documentation itself and on Grants Portal.

Organizational practices include:
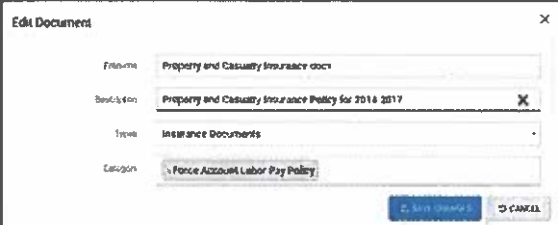
- Group project-specific or damage-specific documents together, whenever possible.

    - For example, the Applicant should upload and catalog photos of disaster-related damage such that they correspond with that specific project

- If the Applicant has a master document containing separate documents, they should place a summary sheet or a table of contents at the beginning

Labeling Documentation

Applicants should provide specific, descriptive language when labeling documentation in Grants Portal rather than just a simple categorization of the document file.

- For example, if the Applicant uploads information about their insurance policy to Grants Portal, they should qualify it by labeling it by type. The information should be labeled "Property and Casualty Insurance" or "National Flood Insurance Policy" instead of just "insurance policy"
- Another example is that an Applicant should label their document "FIRMette," rather than "Map"

If the Applicant encounters any issues with regard to

labeling their documents,
they may contact their
FEMA Program Delivery
Manager for assistance.

Select this link for a full
image description.

Lesson 3 Summary

In this lesson, documenting disaster-related damage and developing project files in Grants Portal were discussed.

The next lesson will cover the Essential Elements of Information and necessary documentation for substantiating disaster damage.

Select this link for a full image description.

Lesson 4 Overview and Objectives

This lesson covers communication between the Program Delivery Manager and the Applicant regarding documentation, the process of requesting Essential Elements of Information and Requests for Information and identifying records necessary to substantiate disaster-related work.

Upon completion of this lesson, participants will be able to:

- Describe FEMA's process for requesting Essential Elements of Information and Requests for Information
- Identify documents necessary to substantiate disaster-related work

Select this link for a full image description.

Project-Specific Documentation

As discussed in Lesson 2, there are two categories of documentation the Applicant provides to FEMA to support their claim and eligibility. The two types are:

- Steady-state documentation
- Project-specific documentation

This lesson discusses the second category of documentation: Project-specific documentation. This type of documentation is specific to the disaster-related damages incurred by the Applicant.

Documentation Requests for Project-Specific Documentation

The Applicant must provide project-specific documentation to FEMA to support their claim and is used to demonstrate eligibility.

FEMA works with the Applicant in three ways to inform them of what project-specific documentation they need to provide FEMA.

- Communication with the Program Delivery Manager
- Essential Elements of Information
- Request for Information

FEMA uses all of these methods to obtain documentation. If the Applicant fails to provide FEMA with the correct documentation, they may jeopardize their grant funding.

The FEMA Program Delivery Manager

As the Applicant's single point of contact, the FEMA Program Delivery Manager, is the first way that FEMA works with the Applicant to inform them of what project-specific documentation they need to provide.

The Program Delivery Manager facilitates and coordinates the effective, efficient, and accurate delivery of grant funding while coordinating the Applicant's recovery priorities, understanding their capabilities and capacity to develop projects and participate in site inspections.

Communication on documentation requirements:

- The dialogue between the Program Delivery Manager and the Applicant on documentation begins during the Exploratory Call and expands during the Recovery Scoping Meeting
- Communication between the Program Delivery Manager and the Applicant is constant throughout the entire delivery process and should begin with the Exploratory Call
- Proactive communication with the Program Delivery Manager is critical for early identification of eligibility issues, special consideration concerns, and opportunities to avoid delays in grant development

The Exploratory Call

The Exploratory Call is the first opportunity for FEMA to establish a relationship with the Applicant and sets the foundation for the Applicant to have an efficient and successful Public Assistance grant process.

During the Exploratory Call, the Program Delivery Manager begins the discussion of documentation. Most of this discussion centers around the Damage Inventory and steady-state documentation. The Program Delivery Manager also discusses special considerations and the implications these considerations have on documentation.

The information gathered during the Exploratory Call enables the Program Delivery Manager to create a tailored agenda for the Recovery Scoping Meeting that meets the recovery priorities of the Applicant, including the discussion of documentation.

The following slides provide an overview of the Exploratory Call and Recovery Scoping Meeting. For more information please refer to the course IS-1003: Exploratory Call, Damage Inventory, and Recovery Scoping Meeting.

The Exploratory Call Checklist

During the Exploratory Call, the Program Delivery Manager and the Applicant discuss many topics, all of which are outlined on the Exploratory Call Checklist. Topics of discussion include, but are not limited to, the following:

- Disaster-related damages
- The Damage Inventory and its importance
- Documentation needed to support damage claims (including those that the Applicant should bring to the Recovery Scoping Meeting)

    ○ Complete insurance policies and claims
    ○ Permits
    ○ Use of force account labor
    ○ Use of contract labor
    ○ Documentation that demonstrates the Applicant's legal responsibility to perform the work or repair to the facility

- Recovery Scoping Meeting objectives, determining attendees and points-of-contact, and scheduling the meeting
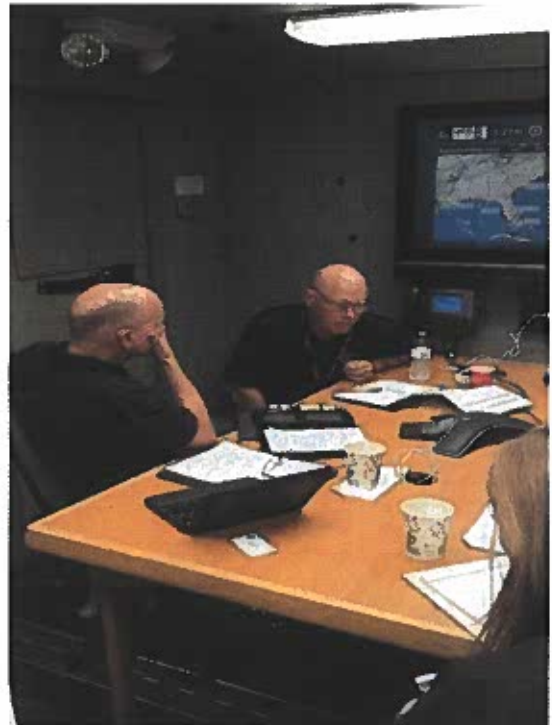
The Recovery Scoping Meeting

The Recovery Scoping Meeting is the first substantive meeting between the Applicant and the Program Delivery Manager. It also starts the 60-day regulatory timeframe for the Applicant to identify and report damages.

The meeting largely concerns the Damage Inventory. It is a detailed and in-depth meeting regarding the Applicant's disaster-related damages and the Public Assistance process.

The Program Delivery Manager and the Applicant also discuss documentation, including:

- Documentation the Applicant brought to the meeting
- Future documentation requirements

The Recovery Scoping Meeting: Applicant Documentation

In addition to the Damage Inventory, the Program Delivery Manager and the Applicant discuss documentation the Applicant brought with them to the Recovery Scoping Meeting. This documentation begins the Applicant's documentation process to support project eligibility. Documentation includes, but is not limited to:

- Map of jurisdiction showing all sites
- Facility names
- Pre-incident photographs of the impacted site or facility
- Emergency Work activities
- Estimated costs
- Who performed, or will perform, the work
- Potential environmental issues or historic preservation concerns

The Recovery Scoping Meeting: Future Documentation Requirements

After discussing damages listed on the Damage Inventory and the documentation the Applicant brought to the meeting, the Program Delivery Manager explains FEMA's documentation expectations and requirements. This conversation includes the following:

- The Applicant must meet all requested Essential Elements of Information

  ◦ The Program Delivery Manager may show the Applicant where Essential Elements of Information requests are located in Grants Portal

- The Applicant must meet all documentation requested in a Request for Information

  ◦ The Program Delivery Manager may show the Applicant where a Request for Information is located in Grants Portal, if they receive one

The Program Delivery Manager discusses the process for Essential Elements of Information and the Request for Information and ensures the Applicant knows how to provide FEMA with documentation in Grants Portal.

Essential Elements of Information: What is It?

Essential Elements of Information are project-specific documentation required from the Applicant. They are the second way FEMA informs Applicants of required project-specific documentation. During the Recovery Scoping Meeting, the Program Delivery Manager discusses Essential Elements of Information with the Applicant.

During the Recovery Scoping Meeting when discussing Essential Elements of Information, the Program Delivery Manager will:

- Explain what Essential Elements of Information are to the Applicant
- Inform the Applicant that FEMA requests Essential Elements of Information based off the answers the Applicant provides to the Essential Elements of Information questionnaire
- Ask the Applicant questions from the Essential Elements of Information questionnaire
- Notify the Applicant that all Essential Elements of Information take place in Grants Portal
- Inform the Applicant that they will receive a notification in Grants Portal and an email when a Program Delivery Manager sends them a request for Essential Elements of Information
- Guide the Applicant through the process of submitting an Essential Elements of Information in Grants Portal, if necessary

Essential Elements of Information: Why are they Requested?

Essential Elements of Information are requested by the Program Delivery Manager throughout the Public Assistance process to substantiate damage claims.

The Program Delivery Manager issues requests for Essential Elements of Information when:

- The Applicant answers questions from the Essential Elements of Information questionnaire(s) at the Recovery Scoping Meeting
- FEMA requires additional documentation to support the eligibility of the facility, work, or cost
- A damage line item constitutes a different Category of Work than the project

  - E.g., A hurricane impacts a school campus. The Category of Work, due to the project, aligns to Category E. However, the Program Delivery Manager also requests Essential Elements of Information for Category C due to the interior access road and Category G for the school's perimeter fencing

Essential Elements of Information: Example

This is an example of a Category A Debris Clearance Essential Elements of Information Questionnaire.

Select this link for a full image description.

Category A EEI Questionnaire

All Projects

Was the work performed in a designated disaster area?	☐ Yes
	☐ No
Does the Applicant have the legal responsibility to perform this work?	☐ Yes
	☐ No
Was the work required to lessen an immediate threat to public health and safety or improved property that existed as a direct result of the incident?	☐ Yes
	☐ No
Does the Applicant have a FEMA accepted Debris Management Plan?	☐ Yes
	☐ No
Did the Applicant establish and utilize a TDSR(s)?	☐ Yes
	☐ No

Type of debris removed		
	☐ Vegetative ☐ Construction and Demolition ☐ White Goods ☐ E-waste ☐ Sand/Soil/Mud ☐ Stumps ☐ Hazardous Leaning Trees ☐ Hanging Limbs	- Was the debris removed to ☐ Landfill ☐ TDSR
	☐ Wet Debris	- Was the debris removed to ☐ Landfill ☐ TDSR - Was the location under the authority of another federal agency? ☐ Yes - What agency? ☐ No

Request for Information: What is it?

The final way to inform the Applicant of the documentation required to support their claims and eligibility is through the Request for Information process. The Program Delivery Manager discusses this process at the Recovery Scoping Meeting as well.

A Request for Information is an official written means of requesting information or documentation from an Applicant necessary to make an eligibility determination or validate claimed scope and costs of a project.

Request for Information: Why is it Issued?

The Request for Information is a more formal version of the Essential Elements of Information.

A Request for Information is issued:

- In order to gain clarity or additional information on a specific issue
- When the Program Delivery Manager or Consolidated Resource Center personnel identify a need to gain clarity or additional information
- When an Applicant has not completed an Essential Element of Information
- To acquire additional information that may be necessary for first and second level appeals

Request for Information: What is the Process?

The Program Delivery Manager issues a Request for Information, when the Applicant does not provide documentation to support the required Essential Elements of Information, or in other circumstances mentioned previously.

- The Program Delivery Manager meets with the Applicant in person to discuss the Request for Information, or calls if the two cannot meet

The FEMA Public Assistance process consists of two levels of Requests for Information.

- First Level Formal Request for Information

  - The Applicant has 15 days to respond to the request with the appropriate documentation
  - If the Applicant fails to comply with the First Level Formal Request for Information, the Public Assistance Program issues a second request

- Second Level Formal Request for Information

  - The Applicant has seven days to respond to the request with the appropriate documentation
  - If the Applicant fails to comply with the Second Level Formal Request for Information, FEMA issues a Determination Memorandum

For more information on how to provide documentation for a Request for Information, please refer to the course IS-1002: Grants Portal - Transparency at Every Step.

Lesson 4 Summary

In this lesson, participants learned about the FEMA Program Delivery Manager, the Exploratory Call and Recovery Scoping Meeting, and the Essential Elements of Information process.

The next lesson covers the documentation requirements for force account, maintenance, and contracting records.

Select this link for a full image description.

Lesson 5 Overview and Objectives

This lesson covers the documentation requirements for force account, maintenance, and contracting records.

Upon completion of this lesson, participants will be able to:

- Identify FEMA documentation requirements for force account labor, equipment, and material costs
- Identify FEMA documentation requirements for contracted labor, equipment, and material costs
- Identify FEMA documentation requirements for facility maintenance to support eligibility

The Recovery Scoping Meeting

A substantive portion of the discussion on documentation requirements occurs during the Recovery Scoping Meeting. Here, the Program Delivery Manager and the Applicant discuss the disaster-related damages described in the Damage Inventory and the required documentation to substantiate the claims.

Documentation required by FEMA assists in determining eligibility. The Applicant supplies FEMA with documentation related to their organization, facility, work, and cost of the project in order to assist the Agency in determining eligibility. This lesson focuses a portion of that documentation, including the following:

- Documentation to support facility maintenance and disaster-related damage
- Documentation for force account (labor, equipment, and materials)
- Documentation for contracted labor, equipment, and material

Overview: Facility Maintenance and Documenting Disaster-Related Damage

This section of the lesson provides an overview of FEMA documentation requirements for facility maintenance to support eligibility as well as documentation needed to establish disaster-related damage.

This documentation assists FEMA in making eligibility considerations.

Applicant Documentation to Establish Maintenance

FEMA asks for a variety of documentation to show facility maintenance and that the disaster caused the damage for which the Applicant is seeking grant funding.

FEMA requests maintenance documentation to ensure the damage was not as a result of deferred maintenance issues that existed prior to the disaster.

Facility maintenance documentation the Applicant may provide to FEMA includes, but is not limited to:

- Written maintenance plan

- Maintenance records

  - In the absence of maintenance records, FEMA may review material purchase invoices and activity logs

- Inspection records
- Activity logs

For example, in the case of damaged equipment, FEMA may request maintenance records that demonstrate that the equipment was regularly maintained and in good operational order prior to the incident.

Applicant Documentation to Establish Disaster-Related Damage

In addition to documentation that supports facility maintenance FEMA asks for a variety of documentation to show that the disaster caused the damage for which the Applicant is seeking grant funding.

Required documentation for establishing disaster-related damage includes, but is not limited to:

- Map of jurisdiction showing all sites
- Specific location of debris impacts and facility damage using either the address or latitude and longitude location
- Facility names
- Documentation to support legal responsibility

  - Deeds
  - Titles
  - Lease agreements
  - Contracts for facilities under construction

- Whether the facility was damaged in a prior incident
- Pre-incident photographs of impacted site or facility, if available
- Photographs of debris impacts or facility damage

  - Estimated quantities of debris by type
  - Brief description of damage with dimensions

- Estimated costs
- Potential environmental issues or historic preservation concerns
- Age of the facility
- Debris reduction and disposal sites
- Summary of insurance coverage, including copy of policy, schedule of values, statements of loss, and settlement documents

Applicant Documentation Supporting Immediate Threats, Debris Impacts, or Damage

Additional specific documentation is required to support the Category of Work and the costs to complete the work.

For Emergency Work (Category A-B) documentation includes, but is not limited to:

- Description of immediate threat
- Records demonstrating presence of immediate threat (e.g., technical reports, safety inspector report, photographs)
- Additionally, for debris specifically:

  - Actual debris quantities by type
  - For waterway debris, documentation supporting pre-and post-incident levels, such as waterway soundings
  - Temporary debris reduction locations
  - Permits
  - Final disposal location of debris

For Permanent Work (Category C-G)

Plan View

Cross Section
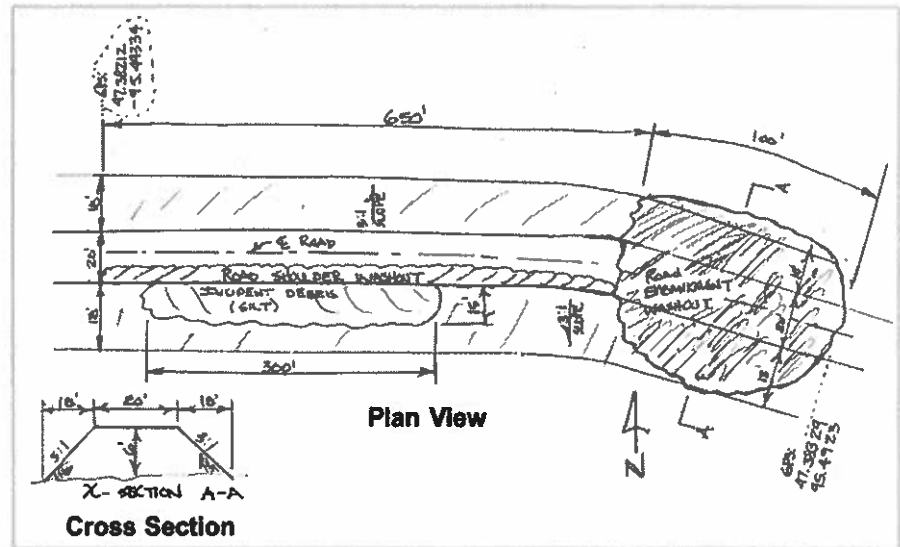
documentation includes, but is not limited to:

- Photographs of site, overall facility, and specific damage
- Detailed description of damage with specific dimensions
- Drawings, sketches, and plans (to scale) of disaster-related damage
- Plans and specifications showing pre-disaster design of the facility
- Documentation supporting pre-disaster condition of facility (e.g., facility maintenance records, inspection/safety reports)

Select this link for a full image description.

Shifting from Documenting Disaster-Related Damage to Repair and Replacement

FEMA provides Public Assistance funding to restore facilities on the basis of pre-disaster design and function in conformity with current applicable codes, specifications, and standards.

After documenting disaster-related damage to the facility, an Applicant must think about repairing or replacing the facility. To conduct work an Applicant either uses force account or procures outside resources to conduct work such as contractors.

Overview: Force Account

FEMA refers to the Applicant's personnel (i.e., labor force) and equipment as their "force account" and reimburses Applicants for the labor, equipment, and material usage associated with responding to an

incident and work for specific, disaster-related response and recovery projects.

- Both types of force account require different documentation to support eligibility of costs

An Applicant's force account costs break down into two groups in order to calculate their eligible costs. The two force accounts groups are:

- Force account labor
- Force account equipment and materials

Force Account Labor: How FEMA Calculates Reimbursement

When determining what is eligible for Public Assistance grant funding, FEMA takes the actual hourly rates of labor and adds it to the fringe benefits.

FEMA calculates the fringe benefit cost based on a percentage of the hourly pay rate. Since certain items in a benefit package are not dependent on hours worked (e.g., health insurance), the percentage for overtime is usually different than the percentage for straight-time.

Fringe benefits may include:

- Holiday leave
- Accrued vacation leave
- Sick leave
- Social security matching
- Medicare matching
- Unemployment insurance
- Workers compensation
- Retirement
- Health insurance
- Life and disability insurance
- Administrative leave

Force Account Labor: Timesheets and Employee Information

The amount of Public Assistance grant funding relies heavily on documentation of the labor worked. The first part in calculating cost reimbursement for force account labor, is determining the actual hourly rates of labor. The documentation from which the Applicant calculates this needs to be provided to FEMA.

Applicants should submit documentation for each employee to support costs claimed including, but not limited to:

- Timesheets

    ◦ Days and hours worked by employees

- Employee information

    ◦ Name
    ◦ Job title and function
    ◦ Type of employee (e.g., full-time exempt, full-time non-exempt, part-time, temporary, prisoner)
    ◦ Days and hours worked
    ◦ Description of work performed with representative sample of daily logs / activity reports, if available
    ◦ Pay rate(s) and fringe benefit rate(s)
    ◦ Fringe benefit calculations

Force Account Labor: Applicant Policies

The policies the Applicant has in place at the time of the disaster assists FEMA in determining grant funding for force account labor. These policies help determine the fringe benefits and provides information on the Applicant's labor categories when calculating the cost of force account labor.

The Applicant should provide FEMA with documentation that discuss labor categories and benefits including, but not limited to:

- Payroll policy
- Labor policy

Eligibility of overtime, premium pay, and other compensatory time costs is determined based on the Applicant's pre-disaster written labor policy, provided the policy:

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

If these requirements are not met, FEMA may limit Public Assistance grant funding to the Applicant's non-discretionary, uniformly applied pay rates. All costs must be reasonable and equitable for the type of work being performed.

Employee Type and Work Performed

Within the Applicant's labor policy or payroll policy, the documentation should discuss the types of labor at the Applicant's organization and the breakdown of their responsibilities. FEMA uses the policies to assist in determining eligibility. FEMA's eligibility criteria in part is based on the type of employee and the work performed.

For Emergency Work (Category A-B), only overtime labor is eligible for budgeted employees. For unbudgeted employees performing Emergency Work, both straight-time and overtime labor costs are eligible.

For Permanent Work (Category C-G), both straight-time and overtime labor costs are eligible for both budgeted and unbudgeted employees.

Under the alternative procedures authorized by Section 428 of the Stafford Act, if the Applicant opts to participate in the straight-time procedure for debris removal, straight-time labor costs are eligible for budgeted employees conducting eligible debris removal (Category A) activities.

Emergency Work Labor Eligibility

Budgeted Employees	Overtime	Straight-Time
Permanent employee	X	
Seasonal employee working during normal season of employment	X	
Essential employee called back from administrative leave	X	X
Permanent employee funded from external source	X	X
Temporary employee hired to perform eligible work	X	X
Seasonal employee working outside normal season of employment	X	X

Other Types of Employees and Work Performed

Over the course of the response and recovery to a disaster, an employee's status may change, and they may be assigned to fill additional roles. This change in status may have an effect on which labor costs are eligible for Public Assistance grant funding and documentation requirements. These labor categories include:

- Reassigned employees
- Backfill employees
- Supervisors
- Employees on stand-by time
- Employees on administrative leave

For information on eligibility of employees and their work, please refer to the course IS-1000: Public Assistance Program and Eligibility.

Force Account Equipment

As with force account labor, if the Applicant uses force account equipment, they need to provide documentation of the use of the equipment to receive Public Assistance grant funding from FEMA. Examples of force account equipment include, but are not limited to:

- Permanently mounted generators
- Backhoes
- Tactical vehicles

The Applicant should provide FEMA with documentation that pertains to the use of force account equipment including, but not limited to:

- Type of equipment and attachments used (include the year, make, and model)
- Size/capacity of the equipment used (e.g., horsepower/wattage)
- Locations and hours used with usage logs
- The operator's name
- A schedule of rates, including rate components

  - Rates can either be FEMA, State/Territory, Tribal, or Local
  - If the Applicant submits a rate, it must include documentation demonstrating that each component of the rate is comparable to current market prices
  - If the Applicant's equipment use rate is higher than FEMA's $75 threshold, the Applicant must supply documentation supporting their case to acquire the additional grant funding
  - For more information on equipment rates and their eligibility, please refer to the course: IS-1000 Public Assistance Program and Eligibility

Force Account Materials

FEMA also provides Public Assistance grant funding for the use of force account materials. Examples of force account materials include, but are not limited to:

- Sandbags
- Items taken from stock
- Tarps to protect damaged roofs from further damages

Force account materials used during the response or recovery mission, the Applicant should submit documentation that supports their claims, including, but not limited to:

- Historical cost records
- Inventory records
- Type of supplies and quantities used, with support documentation such as daily logs

Overview: Contracts and Procurement

In addition to using force account labor, equipment, and materials, the Applicant may use contractors through procurement methods to repair or replace their facility. This section provides an overview of contracting and procurement and the documentation required to support grant funding.

FEMA provides Public Assistance funding for contract costs based on the terms of the contract if the Applicant meets Federal procurement and contracting requirements.

The Applicant should submit the documentation for contracts and procurement to support costs claimed including, but not limited to:

- Procurement policy
- Procurement and bid documents
- For procurements in excess of the simplified acquisition threshold, a cost/price analysis
- Contracts, change orders, and invoices
- Dates worked
- For time and materials contracts, monitoring documentation

Contracts and Procurement: Federal Procurement Standards (1 of 2)

Applicants must show that they comply with Federal procurement standards as a condition of receiving Public Assistance funding for contract costs for eligible work. Federal procurement standards for State and Territorial governments are different than those for Tribal and Local governments and private nonprofits.

State and Territorial government Applicants must:

- Comply with 2 CFR 200.322, Procurement of Recovered Materials
- Ensure that every purchase order or other contract includes any clauses required by 2 CFR 200.326, Contract Provisions

Non-State Applicants (Tribal and Local governments and private nonprofits) must:

- Use their own documented procurement procedures that reflect applicable State, Territorial, Tribal, and Local government laws and regulations, provided that the procurements conform to applicable Federal law and procurement standards

Contracts and Procurement: Federal Procurement Standards (2 of 2)

FEMA Public Assistance staff coordinate with FEMA's Office of Chief Counsel when evaluating whether the Applicant complied with Federal procurement requirements. The two groups review Applicant-submitted documentation to determine compliance.

Tribal and Local governments and private nonprofits must provide documentation that shows they conduct procurement transactions in compliance with the following Federal standards:

- Full and open competition
- All necessary affirmative steps to ensure the use of minority businesses, women's business enterprises, and labor surplus area firms when possible
- Objective contractor performance
- Written standards of conduct covering conflicts of interest and governing the performance of employees who engage in the selection, award, and administration of contracts
- Records sufficient to detail the history of the procurement. These records will include, but are not limited to:

    ○ Rationale for the method of procurement
    ○ Selection of contract type
    ○ Contractor selection or rejection
    ○ The basis for the contract price

Contracts and Procurement: Procurement Methods

- In order to obtain contracts, Applicants must use eligible procurement methods and document the process. Applicants must use one of the following procurement methods and document each in a unique way:
- Micro-purchase

    ○ The purchase of supplies or services
    ○ Documentation should show that the aggregate dollar amount of which does not exceed the micro-purchase threshold

- Small purchase procedure

    ○ A simple and informal procurement method for securing services, supplies, or other property
    ○ Documentation should show that the services, supplies, or other property do not cost more than the simplified acquisition threshold set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1
    ○ Applicants must submit additional documentation for procurements in excess of the simplified acquisition threshold, such as a cost price analysis

- Sealed bid (formal advertising)

    ○ A publicly solicited bid
    ○ Documentation should show a firm fixed price contract awarded to the lowest bidder

- Competitive proposal

    ○ Conducted with more than one source submitting an offer and generally used when conditions are not appropriate for the use of sealed bids

- Documentation should include records of the sources who bid, what they bid, and the process to select the awardee
- FEMA may reimburse costs incurred under a contract procured through a noncompetitive proposal as well in limited circumstances

- Noncompetitive procurement

  - Procurement through solicitation of a proposal from only one source or inadequate competition
  - Documentation should include a description of the unique features that prohibit competition; documented research conducted to verify the vendor as the only known source; a description of the marketplace to include distributors, dealers, resellers, etc.; known compatibility issues; and/or timing issues
  - This type of procurement may only be used when (a) full and open competition is infeasible because: (i) the item is only available from a single source; (ii) it is a case of public exigency or emergency; (iii) authorization is provided by the awarding agency; or (iiii) competition is determined inadequate after solicitation of a number of sources; as well as (b) a cost analysis is performed to determine cost reasonableness

Contracts and Procurement: Contract Payment Obligations

FEMA reimburses costs incurred using three types of contract payment obligations. For each of these three contracts, the Applicant should supply FEMA with all documentation pertaining to the contracts. The contracts FEMA reimburses the Applicant for include:

- Fixed-price
- Cost-reimbursement
- Time and materials (only to a limited extent)

  - Time and materials contracts do not provide incentives to the contractor for cost control or labor efficiency
  - FEMA does not reimburse costs incurred under a cost plus a percentage of cost contract or a contract with a percentage of construction cost method

The specific contract types related to each of these are described in FEMA's Procurement Guidance for Recipients and Sub-Recipients Under 2 C.F.R. Part 200 (Uniform Rules).

The Applicant must include required provisions in all contracts awarded and maintain oversight to ensure contractors perform according to the conditions and specifications of the contract and any purchase orders.

Lesson 5 Summary

In this lesson, participants have had the opportunity to learn about the documentation requirements for force account, maintenance, and contracting records.

The next lesson covers maps, the importance of latitude and longitude coordinates in compliance, photos, and other necessary documentation.

Select this link for a full image description.

Lesson 6 Overview and Objectives

This lesson addresses annotated maps, photographic documentation, and other documentation necessary to provide information about the facility and the damages.

Upon completion of this lesson, participants should be able to:

- Describe an annotated map with all damaged sites and latitude and longitude coordinates
- Discuss best practices in documenting and annotating site photos
- Identify other resources for documenting Disaster Damage and Dimensions, including as-built drawings and other plans

Select this link for a full image description.

Maps, Photographs, and Other Documentation

Maps, photographs, and other documentation that captures the Applicant's disaster related damage helps support eligibility of the Applicant's project.

The Applicant can assist in determining eligibility to receive Public Assistance grant funding for completed and work to be completed facilities by providing FEMA with:

- Damage maps with site annotation
- Photographs of the facility pre-disaster and post-disaster
- Other documentation that supports eligibility

Site Annotation and Development of Damage Maps

The provision of damage maps and site annotations to FEMA assists in establishing eligibility. Latitude and longitude coordinates bolster the Applicant's documentation and is asked for by FEMA. Providing FEMA latitude and longitude coordinates:

- Notifies FEMA if the location of the facility is a prior-damage site

  - This reduces the amount of eligible grant money an Applicant receives depending on their insurance status

- Ensures National Flood Insurance Program compliance

  - An Applicant must comply with National Flood Insurance Program regulations or they jeopardize their grant funding

- Determines hazard mitigation requirements for the facility location

  - In certain locations, the Applicant must meet minimum building standards due to hazards

- Shows that the facility is within the designated area

    ◦ The Applicant must be within the declared area in order to receive grant funding

Mapping Overview, Latitude and Longitude Coordinates

The Applicant should familiarize themselves with map grids, the latitude and longitude coordinates, to best relay pertinent information to FEMA. Maps with latitude and longitude coordinates provide FEMA with the best context to locate the damage and damaged facilities.

Map grids:

Map grids make it faster and easier to identify any point on a map.

- Letter/number combinations or numbers strings are used on maps, depending on their type

Latitude and Longitude:

- Latitude: Identifies the north-south location of a point on the Earth. The latitudinal lines run horizontally around the Earth, starting at the Equator
- Longitude: Identifies the east-west location of a point on the earth. The longitudinal lines run vertically around the Earth starting at the Prime Meridian
- When latitudinal and longitudinal lines are combined, the intersection identifies a location on Earth. The exact location on Earth depends on the degree of the latitudinal and longitudinal points

    ◦ Longitude is measured as negative when west of the Prime Meridian
    ◦ Latitude and longitude are used for giving coordinate positions in a decimal format

Types of Damage Maps and Site Annotation

FEMA suggests that the Applicant provides annotated damage maps.

The Agency understands that not everyone has access to a computer or the internet; therefore, they accept a spectrum of annotated maps from the Applicant. Types of annotated maps that FEMA accepts include, but are not limited to:

- Geospatial software programs

    ◦ Programs, such as Google Earth Pro, provide the Applicant with a map grid that pinpoints their location

- Rudimentary paper maps

    ◦ At a minimum, rudimentary paper maps should be supplied as supporting documentation

Geospatial Software Programs

As stated on the previous screen, geospatial software programs can render damage maps annotated sites. The Applicant can use this software to provide FEMA with a piece of their documentation requirement.

This section of the lesson provides the Applicant with general features that geospatial programs feature. Items may include:

- An interface to navigate a three-dimensional (3D) model of the Earth's surface through satellite, aerial imagery, and other sources
- Other data, such as boundaries and roads
- Placemark features
- Ruler tools
- Printing

Geospatial Software Programs: Navigating

Programs often possess a wide variety of tools. All the tools assist the Applicant to move around in the software.

Navigating tools allow the Applicant to have more control over the area of the map they need to substantiate their claim. Features of the navigation often include:

- View rotation control (outer)

  - Allows the Applicant to quickly reorient the view

- Move (pan) control

  - Moves the Applicant around the map

- Street view control

  - Allows the user to view street imagery

- Zoom slider

  - Increases or decreases map scale

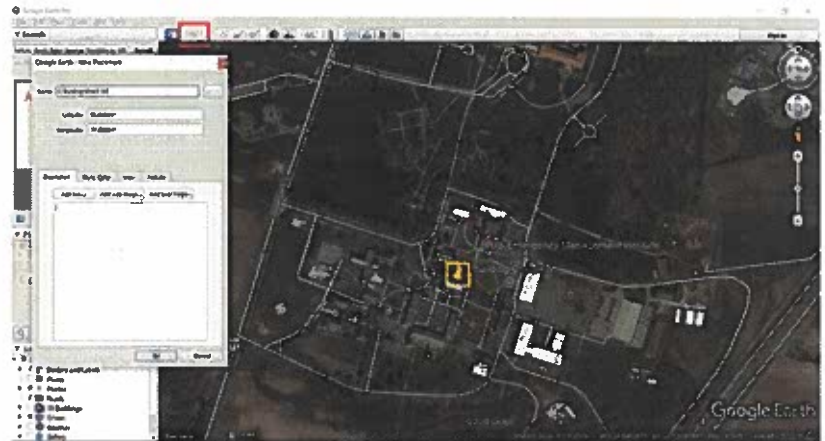# Geospatial Software Programs: Placemark

Placemark tools allow the
Applicant to identify a single point

as a location in the software. Placemarks provide the following benefit to the Applicant when used correctly:

- Single point with an identifying label

    - Placemarks are generally useful for identifying single points of interest, such as site locations

- The ability to view coordinates, which can be easily passed along to FEMA
- Customizable symbols and characteristics

Select this link for a full image description.

Geospatial Software Programs: Ruler Tools

Ruler tools allow the Applicant to identify a measure between two points. They also:

- Allow the Applicant to measure distances using various means

    - Applicants can provide length of the disaster damage if need be, like a crack in a road

- Provide measurements appropriate to the type (length of paths)

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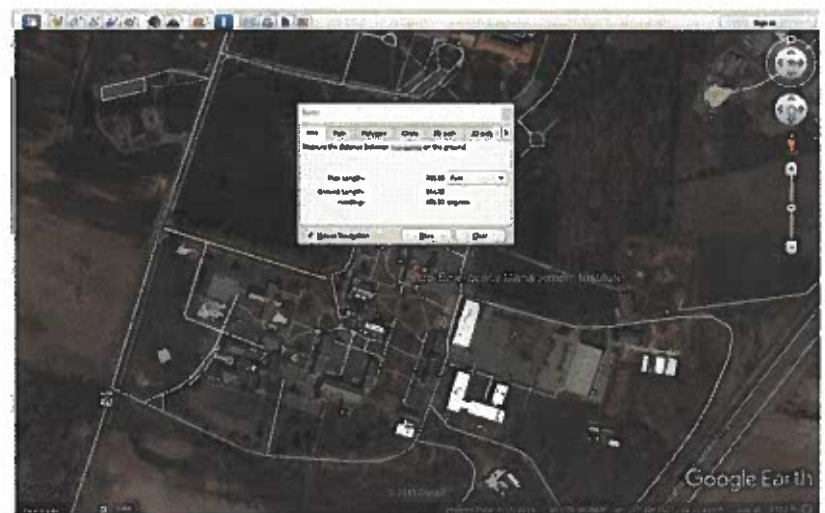
Geospatial Software Programs: Printing Photos

Most geospatial software programs also have the ability to print out photos. This provides the Applicant with at least one photo of their site or facility prior to the event.

The Applicant can also hand the latitude and longitude printout to FEMA for documentation purposes. As will be discussed next, photos like ones that can be developed in geospatial software programs are critical in substantiating disaster-related damage.

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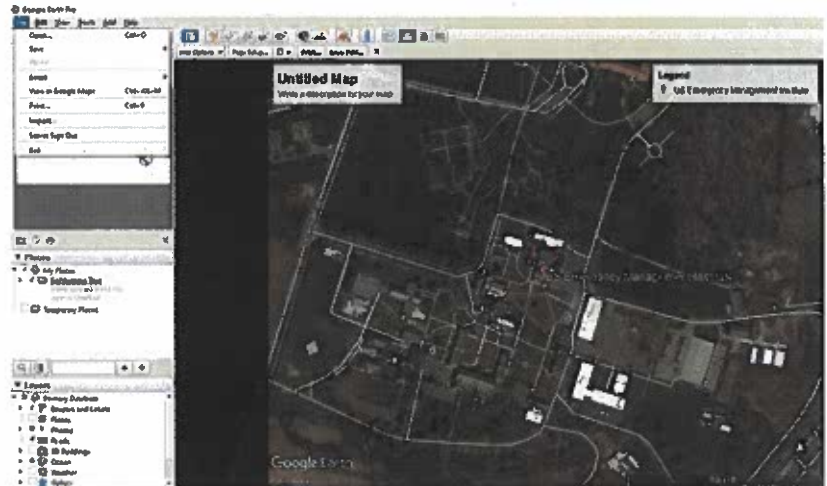
Photographic Documentation

Photographs are one of the most essential pieces of documentation that substantiates disaster-related damage. Photos support work and cost eligibility. The Applicant provides FEMA with two types of photos:

- Pre-disaster photos
- Post-disaster photos (damage-specific photos)

The more illustrative the photos are of the damaged site or facility, the easier it will be for FEMA personnel to develop subsequent project files throughout the grant process. Photos can be for Work Completed and Work to be Completed.

Best Practices for Capturing High-Quality Photos

The Applicant provides FEMA with not only pre-disaster photos, but also damage-specific photos after an event occurs. To provide the best photos to FEMA an Applicant should follow these best practices:

- Take photos from multiple angles
- Use landmarks for perspective
- Include a measuring tool with pictures to provide scale
- Ensure there is sufficient lighting to allow others to see damage accurately
- Attempt to take photos on the inside of culverts
- Maintain a descriptive list of the photos, including latitude and longitude coordinates and perspective to use as a reference

Other Documentation (1 of 2)

Other documentation is useful in determining the extent of damage and the intent of the use of the facility. There are two types of documentation that FEMA Site Inspectors and/or Applicants should consider adding to Grants Portal to ensure all pre-disaster and disaster-related damages are captured.

The two types of other documentation are:

- **As-built drawing:** A revised set of drawings submitted by a contractor upon completion of a construction project. As-built drawings show the dimensions, geometry, and location of all components of the project. They show the original design revised to reflect any changes made in the field, e.g., design changes issued by a change order, component relocations required for coordination, and/or rerouting of distribution systems
- **Sketches:** These are usually hand-drawn sketches that the Site Inspector or Applicant draws of the damaged area. These sketches enable Site Inspector and Applicant to make
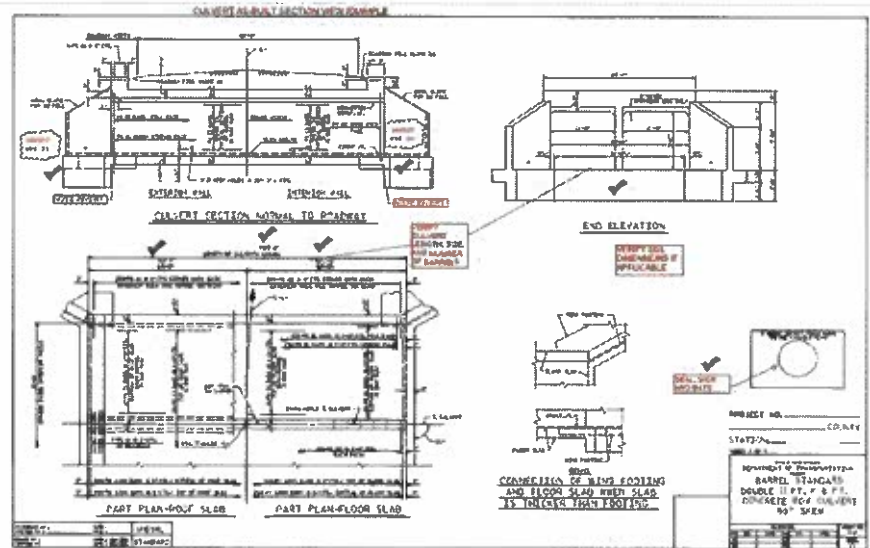
notations regarding
the disaster-related
damages

Other Documentation (2 of 2)

As-built drawings are useful supporting documentation as they can show the original intent of the building's pre-disaster design.

- As-built drawings are a record from which future system changes or additions to the facility can be designed
- Future renovation or repair projects will be more efficient and less disruptive if the as-built documents can be accessed for critical information about the site or facility

Sketches of the Applicant's facility or site also suffice as documentation.

- Sketches provide context to the printed photos
- If Applicants capture their facility pre-disaster or post-disaster in a sketch they can provide the image to FEMA

Identify the Quality of the Image (1 of 3)

Please review the image below. Note that this is a good photo of linear debris. If the picture was taken from another direction, the type and extent of the debris impacts would not be representative. This vantage point provides a good view of the overall site.

Please review the image below. Note that this is a good close-up photo of an embankment failure. However, in order to best document the damaged area, additional photos are needed to show the entire washout.

Identify the Quality of the Image (3 of 3)

Please review the image below. Note that this photo was taken up close to the fatigue cracking. The photo does not accurately and appropriately capture the disaster damage because the photo lacks scale.

Lesson 6 Summary

In this lesson, participants learned about annotated maps, photographic documentation, and other documentation necessary to provide information about the facility and the damages.

The next lesson covers how to document special considerations.

Select this link for a full image description.

Lesson 7 Overview and Objectives

This lesson covers conditions of the Public Assistance Grant Program and non-compliance with special considerations.

Upon completion of this lesson, participants will be able to:

- Discuss compliance requirements specified in the Public Assistance Grant conditions and associated documentation

Select this link for a full image description.

Special Considerations of the Grant

The Applicant must comply with a multitude of conditions that attach themselves to the Public Assistance Grant. One such condition, that is discussed in this lesson is special considerations. Special considerations are made up of the following:

- Environmental and historic preservation
- Hazard mitigation
- Insurance considerations

The Program Delivery Manager works with the Applicant to identify special considerations as soon as possible in the Public Assistance process. The Site Inspector also discusses special considerations with the Applicant at the site inspection. Based upon the outcomes of the discussion, the Applicant may need to submit additional documentation to show that their project complies with the special considerations.

This lesson discusses the following:

- The Special Considerations Questionnaire, which is a list of questions FEMA personnel ask of the Applicant to determine if their project needs special consideration considerations
- Documentation FEMA may ask for if the Applicant replies in the affirmative or is unsure
- Non-compliance with special considerations and the consequences

The Special Considerations Questionnaire

FEMA has developed the special considerations questions form as a guide for identifying special considerations issues for each project. This form must be completed for every project.

FEMA personnel are responsible for completing this form in a manner that informs potential issues.

Select this link for a full image description.

The 9 Special Considerations Questions

The Special
Considerations
Questions
form has nine
questions

addressing the special consideration issues.

In some cases, however, Applicants should be prepared to answer additional questions if the disaster presents important issues that must be captured. For example, if a disaster generates a large volume of debris, the FEMA Environmental and Historic Preservation Specialist can add additional questions to the form that ask if the Applicant has identified a debris staging area.

Select this link for a full image description.

Damage #_____   **Special Considerations**   Cat A

NOTE FOR SITE INSPECTOR: During the site inspection, please ask the Applicant the following questions. The PDMG may have already asked these questions; however, the Applicant representative at the site inspection may have additional information. Use Notes section on next page if additional space is needed for comments.

1. Does the damaged facility have insurance coverage and/or is it an insurable risk (e.g., buildings, equipment, vehicles)?   Unsure   Yes   No

Comments:

2. Is the damaged facility(ies) located within a floodplain or a coastal high hazard area and/or does it have an impact on a floodplain or wetland? Can the project site be impacted by flooding? Will work occur within 200 feet of a waterway/waterbody?
   Is the final disposal located in a floodplain or wetland?   Unsure   Yes   No
   Will the final disposal impact a floodplain or wetland?
   Can the disposal site be impacted by flooding?

Comments:

3. Is the damaged facility located within or adjacent to a Coastal Barrier Resource System Unit or an Otherwise Protected Area?   Unsure   Yes   No

Comments:

4. Is the damaged facility on the National Register of Historic Places or state historic listing? Is it older than 45 years?
   Did any ground disturbance occur during removal or disposal? Including when establishing, operating, or decommissioning a staging/reduction site?   Unsure   Yes   No
   Was there coordination with or a permit obtained from the State Historic Preservation Office or a Tribe or the appropriate state agency?

Comments:

5. Does the Applicant have a hazard mitigation proposal or would the applicant like technical assistance for hazard mitigation proposal?   Unsure   Yes   No

Comments:

Completing the 9 Special Considerations Questions

Each of the nine answers can be answered with a response of "Yes," "No," or "Unsure." When completing the form, comments should be provided wherever possible to explain a response of "Yes" or "Unsure." In some cases, a "No" response may also warrant an explanation.

Note that if the FEMA personnel does not know the answer, an "Unsure" response is appropriate, not "No." Responses should correlate to the information provided in the project's Damage Description and Dimensions and the scope of work.

For instance, if a response indicates that a site is not located in a floodplain, but the Damage Description and Dimensions states that a facility was inundated with 6 feet of water, FEMA personnel should confirm their "No" response by consulting the Flood Insurance Rate Map.

Special Considerations Question #1 and Response

Does the damaged facility or item of work have insurance and/or is it an insurable risk (e.g., buildings, equipment, vehicles, etc.)?

The response to this question should consider and provide commentary on the following:

- Is the facility insurable?
- Is the facility insured?
- Was the facility damaged in past declared disasters and required to obtain and maintain insurance?
- Is the facility in a floodplain (Special Flood Hazard Area)?
- Does the facility have general hazard insurance or flood insurance or both?

A "Yes" or "Unsure" response triggers an initial review by an Environmental and Historic Preservation Specialist to determine the necessary level of environmental or historic preservation review.

If the disaster was multi-hazard, i.e. flood and wind, then the project's scope of work should clearly identify which hazard caused which damage because the insurance coverage will be different.

Guidance should be provided by FEMA personnel regarding the existence of any unusual insurance situations. For example, some states have insurance on bridge facilities.

Special Considerations Question #2

Is the damaged facility located within a floodplain or coastal high hazard area, or does it have an impact on a floodplain or wetland?

This question is intended to capture any potential issues associated with Executive Orders 11988, Floodplain Management and 11990, Protection of Wetlands. Issues regarding flood insurance through the National Flood Insurance Program may be triggered by the response to this question.

If the response to this question is "Yes" or "Unsure," then the Reconnaissance/Review Report for Floodplain Management form may need to be completed.

Special Considerations Question #2 Response

The response to this question should consider and provide commentary on the following:

- Is the damaged facility or item of work located within a 100-year or 500-year floodplain?
- Is the damaged facility in a Coastal High Hazard Area/V Zone?

- Are there any wetlands on or near the site?
- Is the site subject to tides?
- Will the project have potential upstream or downstream impacts? Are there any surface water bodies on or near the site (ponds, lakes, rivers, estuaries, etc.)?
- Will access to repair the facility cross a wetland or floodplain area? Is the damaged facility classified as a critical facility as defined by 44 CFR 9.4?
- If the project involves debris removal and disposal, are there debris staging areas that will be established in floodplain or coastal high hazard areas?

A "Yes" or "Unsure response triggers an initial review by an Environmental and Historic Preservation Specialist to determine the necessary level of environmental or historic preservation review.
Compliance may be necessary for the following Federal laws and regulations:

- Clean Water Act
- Coastal Barrier Resources Act
- Endangered Species Act
- Executive Order 11988: Floodplain Management
- Executive Order 11990: Protection of Wetlands
- Coastal Zone Management Act

Special Considerations Question #3

Is the damaged facility or item of work located within or adjacent to a Coastal Barrier Resource System Unit or an Otherwise Protected Area?

This question is intended to identify whether there are potential Coastal Barrier Resources Act (44 CFR 206, Subpart J) issues with a particular item of work or damaged facility. Federal funding is very limited in these areas.

These areas have been designated by Congress and are found along the Great Lakes, Atlantic, and Gulf coastal areas. Often, if a disaster has impacted many of these areas, a Technical Specialist will be assigned to assist the Program Delivery Manager or FEMA Public Assistance Leadership in resolving eligibility and compliance issues.

Special Considerations Question #3 Response

The response to this question should consider and provide commentary on the following:

- Is the project located in a Coastal Barrier Resource System Unit or an Otherwise Protected Area?

  - Do not assume that because a project is along a coastline that it is in one of these areas. The System Units are distinctly identified areas designated by Congress
  - This information may be found on a Flood Insurance Rate Map

- When was the facility constructed?

  - The date that construction was initiated is important because some projects could be "grandfathered" or exempted from the Coastal Barrier Resources Act requirements if

they existed prior to the Coastal Barrier Resources Act designation by Congress. This information can be provided by the local building permit official.

- Is the facility a critical link as defined by 44 CFR Subpart J - Coastal Barrier Resources Act?

  ◦ Critical links, such as some power lines and roads, may be exempt from these requirements. If applicable, describe how the damaged facility is part of a larger system.

Special Considerations Question #4 and Response

Will the proposed facility repairs/reconstruction change the pre-disaster condition? (e.g., footprint, material, location, capacity, use or function)

This question is intended to capture any potential National Environmental Policy Act or National Historic Preservation Act issues in the event that the project will not be returned to its pre-disaster condition.

The response to this question should consider and provide commentary on the following:

- If the response to question 4 is "Yes" or "Unsure," describe what is changing about the project's pre-disaster design and why it is being changed (i.e., codes and standards, aesthetics, hazard mitigation, etc.)
- If the response to question 4 is "Yes" or "Unsure," is the work completed? The Project Worksheet scope of work should provide information on the work completed and the work to be completed

Additional Compliance Concerns: Compliance may be necessary for the following Federal laws and regulations:

- National Environmental Policy Act
- National Historic Preservation Act

Special Considerations Question #5 and Response

Does the Applicant have a hazard mitigation proposal or would the Applicant like technical assistance for a hazard mitigation proposal?

This question is intended to capture any hazard mitigation opportunities. If mitigation is not described in the scope of work, then a brief description should be included in the comment field.

The response to this question should consider and provide commentary on the following:

- Is there an opportunity to repair the facility in such a manner that future similar damages can be minimized or avoided?

Supporting Documentation for a hazard mitigation proposal includes:

- Eligibility
- Technically feasible
- Cost-effective

- In compliance with Federal laws, regulations, and Executive Orders

Special Considerations Question #6

Is the damaged facility on the National Register of Historic Places or the State historic listing? Is it older than 50 years? Are there more, similar buildings near the site?

This question is intended to capture any potential historic issues.

Special Considerations Question #6 Response

The response to this question should consider and provide commentary on the following:

- Does the proposed action directly or indirectly affect structure 50 years in age or older?
- Are there nearby structures that are 50 years in age or older?
- Is the property recognized locally or nationally as a place where something significant occurred?
- Does the property have cultural significance?
- Are there existing or potential archaeological artifacts on the property?
- Will the repair involve construction or debris staging on or accessing through previously undisturbed property?
- Will the repair involve ground disturbance outside of the project footprint?

If there is uncertainty regarding the historical significance of a facility, applicants should take digital pictures of the damaged component, the overall facility, and surrounding properties, and forward them to the appropriate Historic Preservation Specialist. A location marked on a U.S. Geological Survey Quadrangle map, as well as an address, can be helpful to the Program Delivery Manager.

Should Applicants answer "Yes" or Unsure" to any of these questions, this would trigger the need for an environmental or historic preservation compliance review.

Special Considerations Question #7 and Response

Are there any pristine or undisturbed areas on, or near, the project site? Are there large tracts of forestland?

These questions are meant to capture any potential environmental issues.

The response to these questions should consider and provide commentary on the following:

- Does the site include streams, lakes, estuaries, or wetlands?
- Have there been endangered species issues associated with the site?
- Are there National, State, or local parks or open areas next to the site? If so, provide the names

Information resources for answering these questions include a site visit or delineation of the site on an aerial map and local government environmental or public works staff.

Should Applicants answer "Yes" or Unsure" to any of these questions, this would trigger the need for an environmental or historic preservation compliance review.

Special Considerations Question #8

Are there any hazardous materials at or adjacent to the damaged facility and/or item of work?

This question is intended to capture any potential hazardous materials issues.

Special Considerations Question #8 Response

The response to this question should consider and provide commentary on the following questions:

- Is there evidence of drums or other containers?
- Are there any aboveground storage tanks?
- Are there any underground storage tanks that will be impacted?
- Has household or industrial debris been dumped on the site?
- Has the site been used for commercial purposes, and if so, what type?
- Is there evidence of soil staining on the site or oil slicks in water?
- Are there a large number of animal carcasses that need to be disposed?
- Could the cleanup operations possibly impact air quality?
- Are there any noxious or foul odors at the site?
- Is there evidence of dead or "burned" vegetation?
- Was the facility constructed prior to 1975 (lead, asbestos)?
- Is demolition proposed?
- Will any previously undisturbed areas be impacted?

Supplementary documentation should include visual observations at the site, hazardous materials storage information for the site, and the age of the building facility, which would be an indicator for asbestos and lead.

"Yes" or "Unsure" responses trigger the need for review by an environmental specialist to determine the necessary level of environmental review.

Special Considerations Question #9 and Response

Are there any other environmentally or controversial issues associated with the damaged facility and/or item of work?

This question is intended to capture any other possible issues that could be associated with the project.

Responses to this question should consider and provide commentary on the following:

- Will the project impact air quality? If so, are there schools, daycare centers, nursing homes, or hospitals near the site?
- Has there been public controversy or interest associated with the proposed work or on or near the location of the facility, explain
- Is any portion of the project site active farmland?
- Will the project impact a low-income or minority population?

A "Yes" or "Unsure" response triggers the need for environmental or historic preservation compliance review.

Non-Compliance with Special Considerations

Not providing information or documentation to show compliance with special considerations may hurt an Applicant's grant funding opportunity. If the Applicant does not comply it may:

- Jeopardize grant funding from the Public Assistance Program, **or**
- Delay grant funding from the Public Assistance Program

Lesson 7 Summary

In this lesson, documenting Special Considerations was discussed.

The next lesson will review the key points of the course.

Select this link for a full image description.

Lesson 8 Overview and Objectives

This lesson covers conditions of the Public Assistance Grant Program and non-compliance with special considerations.

Upon completion of this lesson, participants will be able to:

- Discuss compliance requirements specified in the Public Assistance Grant conditions and associated documentation

Select this link for a full image description.

Course Objectives

In this course, participants learned how to:

- Identify documentation requirements to receive Public Assistance grant funding
- Explain the Essential Elements of Information process and how documentation requirements are communicated by FEMA
- Explain the Request for Information process and how documentation requirements are communicated by FEMA
- Identify applicable resources and tools that allow Applicants to provide required documentation
- Discuss various ways to document damage through annotated maps, photographs, and other documentation
- Upload and organize documentation into Grants Portal

Lesson 1 Objectives

Lesson 1 covered Applicant responsibility for documenting disaster-related damage and developing project files.

You should now be able to:

- Identify administrative requirements of the course
- State the goals and objectives of the course
- Define Applicant responsibility for documenting disaster-related damage and developing project files

Lesson 2 Objectives

Lesson 2 covered collecting current, steady-state documentation prior to an event and updating and maintaining common records/policies necessary for a Public Assistance Grant.

You should now be able to:

- Explain why it is important for an Applicant to have general operating policies and other similar documentation easily accessible before a disaster event
- Identify current, steady-state documentation relevant to the development of a Public Assistance Grant

Lesson 3 Objectives

Lesson 3 covered the process of uploading and organizing documentation in the Public Assistance Grants Portal. The Organization Profile, the Applicant Profile, and the project-specific section of Grants Portal are discussed, including what documents should be uploaded where and who has access to each section of the Portal.

You should now be able to:

- Demonstrate how to properly navigate the Public Assistance Grants Portal to upload required documentation
- Explain how to organize and label documents within the Applicant Profile section of Grants Portal

Lesson 4 Objectives

Lesson 4 covered communication between the Program Delivery Manager and the Applicant regarding documentation, the process of requesting Essential Elements of Information and Requests for Information, and identifying records necessary to substantiate disaster-related work.

You should now be able to:

- Describe FEMA's process for requesting Essential Elements of Information and Requests for Information
- Identify documents necessary to substantiate disaster-related work

Lesson 5 Objectives

Lesson 5 covered the documentation requirements for force account, maintenance, and contracting records.

You should now be able to:

- Identify FEMA documentation requirements for force account labor, equipment, and material costs
- Identify FEMA documentation requirements for contracted labor, equipment, and material costs
- Identify FEMA documentation requirements for facility maintenance to support eligibility

Lesson 6 Objectives

Lesson 6 covered annotated maps, photographic documentation, and other documentation necessary to provide information about the facility and the damages.

You should now be able to:

- Describe an annotated map with all damaged sites and latitude and longitude coordinates
- Discuss best practices in documenting and annotating site photos
- Identify other resources for documenting Disaster Damage and Dimensions, including as-built drawings and other plans

Lesson 7 Objectives

Lesson 7 covered the conditions of the Public Assistance Grant Program and the issue with non-compliance with special considerations.

You should now be able to:

- Discuss compliance requirements specified in the Public Assistance Grant conditions and associated documentation

Course Summary

This course is complete.

The course provided you with an overview on what documentation the Applicant provides FEMA to support their eligibility.

Select this link for a full image description.