

The following is a list of clarifications of policy language and topics added during development of the Public Assistance Program and Policy Guide to address consistent application of policy nationwide. This captures key topics, it is not all inclusive due to the magnitude of documents and language merged together.

Page	Topic added/clarified	Reason
3	For fires initially declared for FMAG and subsequently declared for PA, all of the costs can be captured under the PA Dec.	Process improvement and consistency
5	Provides RA authority to respond to most correspondence.	Process improvement
10	Refined eligibility pyramid to better convey how PNP eligibility is evaluated.	Added graphic
11 (footnote 60)	Custodial care is non-critical with an exemption from the requirement to be open to the general public.	Clarify policy
12-14	Listed PNP services into 3 tables - critical, non-critical, and ineligible.	Clarify policy
13	Added Public Broadcasting services to eligible, non-critical list	Added example
14	Added facility eligibility pyramid with language explaining that emergency work is an exception to the requirement that a facility must be eligible in order for work to be eligible.	Added graphic
14	Systems that qualify as a facility themselves vs those that are part of a facility (items that would not exist without the facility existing).	Clarify policy
16	PNP facilities with mixed-use space must actually use the space for eligible services not just have it available for eligible services.	Clarify policy
17	Diagram conveying how FEMA applies various scenarios/outcomes of the SBA loan requirement for non-critical PNP.	Added graphic
19	Work to protect a facility must be performed within the declared area	44 CFR requirement
20	Section regarding evaluation of Legal Responsibility	Assist with evaluation
21	Listing/refinement of cost eligibility requirements	2 CFR requirements
22	Items to consider when evaluating cost reasonableness	Assist with evaluation

23	Replaced limitation of 16 hours after 2-24 hour shifts with language to evaluate whether number of hours claimed are reasonable.	New labor policy
25	Allowance for Stand-by Time in limited circumstances.	New labor policy
27	Lowest equipment rate determined based on comparison of each piece of equipment unless too burdensome due to amount of equipment used.	Consistency
28	What FEMA does when evaluating whether leasing costs that exceed the purchase price are eligible or not.	Clarify policy
28	Purchased supplies and materials are eligible if the applicant can support that they were justifiably needed for the incident.	Clarify policy - consistent with 2 CFR
29	Disposition requirement for purchased supplies is based on the aggregate total of these items across all PWs.	2 CFR requirement
30	Section added on disposition of Real Property	2 CFR requirement
32	Replaced 70-hour T&M limitation with reasonable language	Consistent with 2 CFR
31	Price analysis required for every procurement action in excess of the simplified acquisition threshold, including contract modifications.	2 CFR requirement
33	Post-incident Mutual Aid agreements must be submitted to FEMA prior to obligation of the related PW.	Process improvement
34	Differentiated between eligible vs ineligible National Guard costs.	Educate on Federally funded vs locally funded
34	FEMA can only provide Direct Federal Assistance for work that is otherwise eligible emergency work.	44 CFR requirement
35	Volunteer agency donating resources are eligible even when within the agencies mission (provided the agency is not federally funded).	Clarify policy
36	Project Management & Design costs - cost curve available online for estimating only. Language added to evaluate reasonableness. Costs must be tracked specifically to an eligible project..	Clarify policy and consistency

37	PDA costs can be allocated to section 324 management cost cap	Consistency
38	Recipients can submit 1 DAC claim per declaration instead of 1 per applicant (must still track to applicant and project level).	Process improvement
38	DAC - various clarifications: must be related to a specific eligible project, blended rates are not eligible, grouped examples into overarching categories, and expanded language for reasonableness.	Clarify policy
40	Language regarding costs for incident related damage with third party liability.	Clarify policy
41	loss of revenue due to event cancellations is not eligible	Added example
42	Loss of useful service life is not eligible	Consistent with 44 CFR
42	Refined standard eligibility pyramid to better convey how emergency work is evaluated.	Added graphic
44	Removal of debris to restore an engineered facility to its pre-disaster capacity is permanent work, not Category A.	Consistent with 44 CFR
46	Alternative Procedures Accelerated Debris Removal incentive start date - adjusted table to appropriately reflect first day of the incident as day 1, not day 0.	Clarify policy
52-53	Debris removal from waterways	Clarify policy
53	A limited timeframe of vehicle and vessel storage is eligible if warranted and necessary.	Consistency
54	Removal of a structure with more than one wall standing is demolition, not debris removal.	Clarify policy
54	Private Property Debris Removal request can be initiated by applicant - removed restriction for state to request first.	Process improvement
56	Listed eligible tipping fee components	Added examples
56	Loss of value of landfill capacity is not eligible.	Consistent with 44 CFR
56	Debris monitoring is only required for contract work.	Clarify policy
58	Listed commonly requested emergency protect measures that are eligible.	Added examples

60	Emergency protective measures conducted by a PNP Volunteer Fire Department are only eligible to be reimbursed to the Fire Dept as an applicant if the entity is an eligible PNP and has a written agreement that designates it as the legally responsible entity.	Consistent with 44 CFR
60	Pre-positioning resources can be eligible under PA.	New labor policy
62	Delivery of commodities to unsheltered "shelter-in-place" residents may be eligible.	Clarify policy and consistency
62	Language regarding the eligibility of meal costs and what is reasonable vs not reasonable in relation to meals.	Consistency
66	Non-congregate sheltering is generally not eligible. If approved, it is an exception to standard policy and requires pre-approval (Any approval needs to be coordinated with FEMA HQ).	Clarify policy
66-68	Enhanced list of eligible costs related to sheltering	Added examples
78	Emergency protective measures conducted outside of the authorized period for snow activities in snow dec are eligible.	Clarify policy
79	Dune grass on emergency berms is generally not eligible. Listed requirements that it would have to meet in addition to being an emergency berm and not a permanent berm.	Consistency
81	Damage caused by snow activities conducted outside of the authorized period in a snow dec are not eligible.	Consistent with 44 CFR
81 and 120	Crops are not eligible	Consistent with 44 CFR
88	If a Tribal or local government consistently implements a code or standard formally adopted by its State and that State has jurisdiction over that particular type of work, then the Tribal or local government meets the requirement of having a code or standard in writing, formally adopted, and implemented.	Consistent with 44 CFR

93	If a permitting agency requires work above and beyond the approved scope of work, then it is subject to specific criteria in order to be eligible. Section added on this topic of permit requirements.	Consistency
95	Hazard mitigation performed separate from the damaged element/facility may be eligible.	Clarify policy
96	Hazard mitigation performed prior to FEMA evaluating the mitigation or after the facility restoration is complete may be eligible.	Clarify policy
97	Refined list of items that will and will not be included in the repair and replacement costs of the "50% rule" calculation.	Consistency
99	Whether PA funding can be provided for replacement and relocation of a facility that is in the floodplain and cannot be rebuilt within the floodplain based on a Part 9 determination, is still dependent upon whether it meets PA eligibility criteria.	Consistent with 44 CFR
103	Projects with improvements are capped regardless of whether applicant attempts to track improvement related costs separately - adjustments only allowed if there was an error or omission in the SOW or cost estimate to restore the facility to its pre-disaster design and function.	Consistent with 44 CFR
114	Fish in fish hatcheries are eligible.	Added example
131	List of circumstances that FEMA generally considers as justification for approving a Change in SOW (dependent upon what specific change is requested).	Consistency
136	List of circumstances that FEMA would generally consider to be beyond the applicant's control and justification for a time extension vs those that FEMA generally considers to be within the applicants control.	Consistency
138	Defines the 180-day deadline for submittal of certification and closeout of each large project.	2 CFR requirement

139	Defines the 180-day deadline for submittal of certification and closeout of all small projects.	2 CFR requirement
139	List of the only circumstances in which FEMA would consider adjusting an individual small project outside of the Net Small Project Overrun process.	Consistency
50 & throughout	U.S. National Grid (USNG) is listed throughout the document in lieu of GPS.	Agency switching from GPS to USNG
Chapter 3	Includes various documentation checklists.	Info to assist applicants with documenting claim
Appendix G	Technical information and documentation requirements for Mosquito Abatement are contained in appendix. Policy language of what is eligible in relation to mosquito abatement is contained in Chapter 2.	Clarify policy
Appendix H	Snow declaration criteria is contained in appendix. Policy language of what is eligible once a declaration is received for snow is contained in Chapter 2.	Clarify policy
Appendix J	This appendix replaces Appendix A of the hazard mitigation policy (list of hazard mitigation measures pre-determined to be cost-effective up to 100% of the project cost).	Content organization
Appendix K	Defines how work should be categorized (2nd column in table).	Consistency