Public Assistance Program Delivery Guide

August 2022 (Operational Draft)



Table of Contents

2	Table of Contents
3	Chapter 1: Introduction
4	Purpose1
5	Scope and Applicability2
6	Organization2
7	Supersession
8	Authorities and Foundational Documents
9	Document Management and Maintenance
LO	Chapter 2: Foundation of the Program5
L1	FEMA Core Values5
L2	Public Assistance Guiding Principles5
13	Program Delivery Model7
L4	Lean Management and Continuous Improvement7
15	Risk-Based Approach
L6	Program Delivery Performance Goals
L7	Roles Within the Public Assistance Process
18	Applicant Roles
L9	Recipient Roles10
20	Non-FEMA Federal Agency Roles11
21	FEMA Roles11
22	Chapter 3: Operational Planning and Response21
23	Evaluate Declaration Request22
24	Assess Damage22
25	Operational Planning23
26	Develop Disaster Operating Profile23
27	Evaluate Resource Needs and Organization24
28	Delegate Authorities26
29	Develop Initial Projection26
30	Develop Spend Plan26
31	Recipient Agreement and Application for Assistance26
32	Response Coordination26

33	Chapter 4: Applicant Coordination and Evaluation	29
34	Provide Program Orientation Through Applicant Briefings	30
35	Request Public Assistance	31
36	Evaluate Applicant Eligibility	31
37	Build Public Assistance Field Operation	32
38	Survey Impacts Through Exploratory Calls	32
39	List Impacts Through Recovery Scoping Meetings	
40	Chapter 5: Impacts and Eligibility	
41	Evaluate Facility Eligibility	
42	Group Impacts and Damage into Projects	36
43	Collect Impact and Damage Information and Documentation	36
44	Site Inspections	36
45	Develop Detailed Damage Description	37
46	Determine Method of Restoration	37
47	Chapter 6: Scoping and Costing	40
48	Develop or Validate Scope of Work and Costs	41
49	Support Hazard Mitigation Efforts	42
50	Evaluate Compliance	
51	Chapter 7: Final Reviews	
52	FEMA Reviews	
53	Recipient Reviews	46
54	Applicant Signs	46
55	Large Project Notification	46
56	Chapter 8: Obligation and Recovery Transition	48
57	Obligate Funds to Recipient	49
58	Strategic Funds Management	49
59	Recovery Transition Meetings	49
60	Chapter 9: Project Monitoring and Amendments	50
31	Performance Reporting and Progress Analysis	51
62	Scope and Cost Amendments	51
20	Time Extensions	E4

64	Appeals and Arbitration	52
65	Performance Audits	53
66	Payment Monitoring through Validate-as-You-Go	54
67	Chapter 10: Final Reconciliation and Closeout	56
68	Reconcile and Close Projects	56
69	Large Projects	57
70	Small Projects	57
71	Close Subrecipients	58
72	Reconcile and Close PA Prime Award	
73	Appendix A: List of Acronyms	A-1
74	Appendix B: Authorities, Documents, and Resources	
75	Appendix C: Public Assistance Deadlines	
76	Appendix D: Timeliness Goals	D-1
77	Appendix E: Public Assistance Program Positions and Functions	
78	Field Positions	
79	Region-Specific Positions	E-3
80	Headquarters-Specific Positions	E-4
81	Cross-Enterprise Public Assistance Positions	E-5
82	Appendix F: Identifying Complex and High-Risk Applicants and Projects	F-1
83	Applicants	F-1
84	Projects	F-2
85	Appendix G: FEMA Public Assistance National Workflow	G-1

CHAPTER 1: INTRODUCTION

Purpose

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

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

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

Terminology: Recipients, Subrecipients, and Applicants

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

Recovery Life Cycle Stages



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

Scope and Applicability

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

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

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Organization

- 140 The PA Program Delivery Guide includes an overview of how PA operates as well as
- descriptions of each phase of the PA grant lifecycle. Chapter 2 provides the foundation of
- the program, including:
- 143 Core Values
- Guiding Principles
- The PA Program Delivery Model

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

165 Supersession

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

Authorities and Foundational Documents

- 168 The following documents include foundational guidance for program delivery:
- Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)
- Title 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Title 44 C.F.R., Emergency Management and Assistance
- Public Assistance Program and Policy Guide, FP 104- 009-2 (PAPPG)
- National Incident Management System (NIMS)
- National Response Framework (NRF)
- National Disaster Recovery Framework (NDRF)
- National Mitigation Framework (NMF)
- 178 FEMA Publication 1
- Incident Management Support Keystone (IMSK)
- Recovery Operations Support Manual (ROSM)
- FEMA Manual 205-0-1 Grants Management (GMM)

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

Document Management and Maintenance

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

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

203 CHAPTER 2: FOUNDATION OF THE PROGRAM

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

FEMA Core Values

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

Customer

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

Table 1: Implementation of FEMA's Core Values

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

219 Public Assistance Guiding Principles

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

Table 2: Guiding Principles for Public Assistance Program Delivery

Guiding Principle	Public Assistance Program Implementation
Recovery is strongest when State-led and locally driven	Enable Applicants to better recover by empowering them to directly request assistance; directly provide information to support eligible funding; and, when appropriate, transparently view the status of projects. Enable state, tribal, and territorial Recipients greater control over their recoveries, leverage existing Recipient-Applicant relationships, insulate recoveries from national resource shortfalls, and enhance mutual understanding of local issues by empowering SLTT organizations to lead the delivery of PA.
Standard operations support flexible and integrated recovery outcomes	Establish standard roles and processes to achieve progress without delay, support equitable delivery of assistance, and provide flexibility for Applicants, Recipients, and federal leadership to integrate with other federal and Whole of Government partners. These roles and processes provide a starting point for Recipient and federal leadership to innovate and develop solutions to meet unique needs in complex environments.
Build resilience to mitigate increasing incident impacts	Build stronger communities that are less vulnerable to future incidents by working with communities before incidents to develop continuity plans and plans for emergency response and debris removal activities; plan for quick financial recovery; and identify hazard mitigation opportunities. After incidents, hold or promote early resilience discussions to educate Applicants on potential hazard mitigation measures, transferring risk to insurance, minimizing adverse impacts, and code compliance requirements.
Invest in the PA team to build and maintain capacity and manage resources strategically	Foster Recipient and Applicant capacity by ensuring equitable access, investing in regional relationships, not supplanting Recipient roles, and maximizing the availability of management costs in order to optimize PA staff workload. Invest in the FEMA PA team and strategically manage resources by improving doctrine with a focus on clear roles; building regional capacity to handle routine incident years and national capacity to supplement; strategically identifying, adjudicating and meeting emerging resource needs; and, developing professionals with a focus on training, mentoring, and employee retention.
Ensure program delivery leads to equitable outcomes for underserved communities	Foster consistently and systematically fair, just, and impartial treatment of all individuals. Recognizes that not all Public Assistance Applicants have the same access to resources nor experience to navigate them successfully. Provide FEMA PA Applicants, Recipients, and staff with the tools and resources to consider the unique needs of underserved communities and conduct response and recovery efforts in an equitable manner.
Take a risk-based approach to designing the program and delivering assistance	Prioritize time, resources, and administrative oversight where mission impact is greatest, including significant response and infrastructure operations and supporting historically underserved communities; and limit the resources, level of effort, and administrative requirements necessary to deliver assistance where the risks of unmet needs are low and compliance rates are high.
Continuously improve through lean management	Use an integrated leadership and management philosophy and systems necessary for controlled improvement as a guide for building a stable national delivery model that constantly evolves. Ensure this structure engages employees and partners to understand customer needs and identify and resolve identified problems.

222 Program Delivery Model

- 223 FEMA implements the PA program nationwide using a national program delivery model,
- 224 through a combination of key workflow features, goals, philosophies, and techniques. FEMA
- leadership continues to review and improve the PA program delivery model and build on its
- core features described in Table 3. Leadership evaluates performance against standard,
- 227 cascading performance goals and indicators.

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Table 3: Features of the Program Delivery Model

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

Lean Management and Continuous Improvement

- Lean management is a philosophy and technique that minimizes process waste and maximizes the value of products and services to the customer. It is integral to the delivery of PA. Using lean management ensures PA's approach is centered on:
 - Ensuring staff at all levels understand strategy, goals, and vision, and translate it into action, with a sense of common purpose across the enterprise.
 - **Discovering new and better ways of working** to deliver PA with minimal waste and in the shortest possible time without over-burdening employees or partners.
 - Meeting customer needs as efficiently as possible while viewing problems as opportunities.
 - Enabling staff to lead and contribute to their fullest potential to create a culture of continuous improvement.
- 241 The PA Program incorporates lean management into standard PA processes through:
 - Performance metrics to connect strategy and goals to day-to-day work
 - Demand and capacity reports and stakeholder feedback
 - PA Grants Portal (GP) and Grants Manager (GM) to efficiently deliver the PA Program
- Standard work templates (e.g., time management tools, evaluation forms or work product review checklists)
 - Skills matrices enabling staff to contribute to their fullest potential. They outline skills required to successfully do the job, areas where skills improvements are needed, and can help inform work assignments.

- 250 To deliver PA, FEMA uses the following lean management mechanisms:
- Regular coordination: Conduct huddles and coordination meetings consistent with operational tempo
- Visual management: Maintain huddle boards as visual, accessible communication and
 management tools, identifying and coordinating on cross-cutting issues and key
 deliverables
- Individual support: Provide one-on-one actionable coaching and mentoring
- Direct evaluation: Conduct sit-withs, a managerial tool to sit with staff as they perform their duties to identify areas for staff improvement or process efficiency
- Time management: Leverage "day-in-the-life-of/week-in-the-life-of" (DILO/WILO) time-260 management tools to ensure timely completion of tasks, identify challenges, and 261 support staff by prioritizing competing deadlines.
- 262 FEMA uses the lean management concept to facilitate continual improvement of products,
- services, and processes. FEMA manages changes to the PA Program in a deliberate manner
- by ensuring the change is necessary, obtaining stakeholder feedback, and considering the
- 265 customer experience.
- 266 FEMA partners may submit issues, opportunities, and feedback related to the PA Program,
- including on this document, as a part of continuous improvement efforts via the "Feedback"
- 268 feature in PA Grants Portal or by working with their FEMA Regional PA officer to for a Change
- 269 Control Tool submission. FEMA staff may submit issues, opportunities, and feedback via the
- 270 Change Control Tool on FEMA's intranet site. FEMA's Change Control Unit reviews and
- responds to requests through the Change Control Tool.

272 Risk-Based Approach

- 273 PA is designed to reimburse everything from an hour of overtime to the replacement of an
- 274 entire wastewater treatment facility. It is designed to be flexible and support the range of
- 275 recovery needs. The program delivery model, built on standard roles and processes, enables
- FEMA to employ a risk-based approach that recognizes that not all Applicants or projects
- 277 require the same level of resources, documentation, or oversight. FEMA adjusts its approach
- 278 based on risks to:
- Mission: Achieving effective recovery in a timely manner
- Finances: Fulfilling our responsibilities as stewards of federal funds
- *Program*: Effectively delivering the PA program to meet community needs according to law, regulation, and policy
- Reputation: Maintaining the American public's confidence in government organizations partnering to deliver the program
- 285 The risk-based approach balances developing policy, delivering the program, and prioritizing
- 286 resources to maintain an efficient use of resources. FEMA prioritizes resources and effort
- 287 where risk and complexity are high. That means ensuring personnel and technical resources

- are made available, and administrative oversight is more in-depth, where a disaster,
- 289 Applicant, or project represents a higher risk in one or more of the four risk areas. Appendix
- 290 F provides additional considerations for identifying complex and high-risk applicants and
- 291 projects.
- 292 By contrast, FEMA limits level of effort, resources, and administrative oversight where risk is
- 293 low. That means assigning fewer personnel or technical resources and decreasing
- 294 requirements and level of review where an applicant or project does not pose a significant
- 295 risk in one or more of the four risk areas.

Program Delivery Performance Goals

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

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Table 4: PA Program Delivery Performance Goals

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

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Roles Within the Public Assistance Process

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

Applicant Roles

Applicants drive recovery and ensure that PA funding helps the community achieve its recovery goals in an equitable manner and in accordance with applicable provisions of laws

- 315 and authorities. Applicants are responsible for conducting recovery work and requesting
- 316 funding for work and costs on time and with complete information. Key Applicant roles
- 317 include, but are not limited to:
- Planning for emergencies and disasters, including resiliency planning
- Conducting initial damage assessments and participating in joint damage assessments
 as outlined in FEMA's *Preliminary Damage Assessment Guide*
- Removing debris and conducting emergency protective measures to address incidentcaused threats
- Requesting public assistance
- Identifying and reporting impacts and damage
- Providing information and documentation to substantiate claims
- Determining methods of restoration to address community recovery needs
- Conducting work to restore facilities in accordance with required codes and standards
- Identifying and understanding hazard mitigation opportunities
- Maintaining and providing documentation to support claimed work and costs
- Complying with all applicable laws, regulations, policies, and project conditions,
 including those prohibiting discrimination
- Prioritizing the use of PA funding to ensure equity
- Adhering to all applicable deadlines

334 Recipient Roles

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

- Leading the damage assessment process as outlined in FEMA's Preliminary Damage Assessment Guide
- Requesting federal disaster assistance, including submitting Standard Form (SF) 424, Application for Federal Assistance, and SF 424D, Assurances for Construction Programs
- Ensuring that all potential Applicants are aware of funding available under PA
 - Conducting Applicant Briefings and educating Applicants on PA program requirements
- Determining, and conveying to Applicants, the cost share split between the Recipient and its Subrecipients

a 44 C.F.R. §§ 206.202(b).

- Reviewing Requests for Public Assistance (RPA), providing Applicant eligibility recommendations, and ensuring submission to the Regional Administrator (RA) within the deadline
- Providing technical advice and assistance to eligible Applicants
- Promoting and implementing PA Hazard Mitigation opportunities
- Reviewing Applicant-submitted claims
- Providing state support for project-related activities to include small and large project
 formulation and the validation of small projects
- Reviewing all correspondence and forwarding to FEMA with a recommendation
- Submitting documents necessary for the funding award
- Disbursing funds to Applicants
- Monitoring financial actions and work progress and completing Large Project Quarterly
 Progress Reports (QPR)
- Collecting and submitting closeout requests for additional information, documentation, and reports
- Using PA funds to ensure equitable disaster relief activities including, prioritizing the use
 of PA funding for underserved communities
- Adhering to all deadlines

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Non-FEMA Federal Agency Roles

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

382 FEMA Roles

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

Management staff to ensure compliance with *FEMA Manual 205-0-1 Grants Management (GMM)*.

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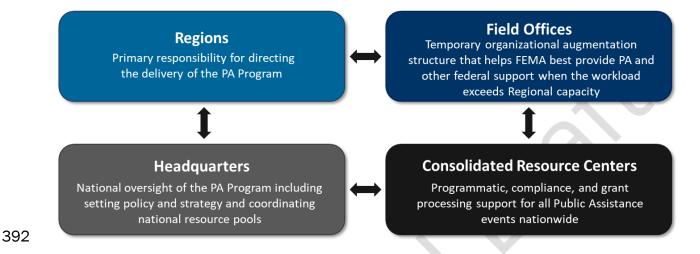


Figure 2: PA Staff Coordination Across Offices

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Regional Offices

- Regional offices are the keystone of successful federal support in the delivery of the PA Program. Regional Recovery Divisions have primary responsibility for implementing the PA Program and maintaining relationships with the states, tribes, and territories within the region's area of responsibility. Regional PA responsibilities include the following:
- Build Regional and SLTT Government Capacity:
 - Manage routine incident years and ensure readiness to deliver PA:
 - Assess and maintain the capacity and capability to perform steady-state functions during an incident
 - Maintain the capacity and capability to perform all required leadership and staff roles for incidents for a routine incident year
 - Coordinate with HQ to forecast future work and develop an incident staffing and resource plan
 - Hire, train, and develop PA professionals
 - Develop and execute Incident Resource Plans (IRPs) with the national cadre
 - o Participate in policy development, program design, and continuous improvement
 - Facilitate after-action review of incidents to promote continuous improvement
 - o Coordinate with partners to ensure PA readiness for potential incidents:
 - Deliver pre-incident training to partners
 - Assess and help build SLTT government capabilities to manage PA operations

414 Provide technical assistance support to partners on equitable delivery of the PA 415 Program 416 Provide technical assistance and support to partners on the development of 417 hazard mitigation plans, environmental planning and historic preservation issues, 418 debris management plans, and climate adaptation plans 419 Operational Planning and Response Phase: 420 Review Recipient Administrative Plans and SLTT hazard mitigation plans 421 Lead initial operational planning activities to lay a strong recovery foundation: 422 Conduct joint Preliminary Damage Assessments (PDA) with the Recipient 423 Provide recommendations for PA declaration requests 424 In coordination with Regional and Field leadership, determine need for a 425 426 Coordinates with Field and Grants Management partners to ensure Recipient 427 completes all administrative requirements 428 Oversee development of initial disaster operating profile and Strategic Resource 429 Plan (SRP) 430 Ensure Recipient prioritizes PA funding for underserved communities 431 With Recipient, assess Applicant needs for assistance during the PA grant 432 development process 433 Support incident management operations: 434 Staff infrastructure roles in the Regional Response Coordination Center 435 (RRCC) 436 Phase I, Applicant Coordination and Evaluation: 437 Lead PA operations: 438 Execute Disaster Recovery Manager (DRM) authority, or delegate to field 439 leadership 440 Fill PA leadership roles as detailed in incident staffing and resource plans 441 Where field offices are not used, assume field office responsibilities detailed 442 below through a virtual recovery office 443 Provide program leadership for all disasters and staff all required operational 444 roles 445 For all incidents, prioritize and fill Program Delivery Manager (PDMG) roles for key 446 high impact, underserved, or complex applicants, ensuring assigned PDMGs can 447 provide the appropriate support based on experience and skillset in accordance 448 with the Infrastructure Branch Director and Public Assistance Group Supervisor 449 Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations, 450 and Tribal Support located in the FEMA Program Delivery Branch's Delivery 451 Toolbox. 452 Support field offices with resolution of complex policy and operational issues 453 Monitor performance of the field office against program delivery goals 454 Phase II, Impacts and Eligibility:

455 Conduct technical site inspections, as necessary and in coordination with the CRC 456 and JFO 457 With PDMG, prioritize site inspections for underserved or complex applicants, 458 ensuring assigned Site Inspector can provide the appropriate support 459 Phase III, Scoping and Costing 460 Develop or validate scopes of work (SOW) and cost estimates for complex or 461 specialized projects in coordination with the CRC 462 Coordinate with Applicants and Recipients on requests for information (RFI) 463 Phase VI. Project Monitoring and Amendments: 464 o Respond to PA-related project correspondence such as changes in SOWs and 465 time extensions after an Applicant's Recovery Transition Meeting (RTM) 466 Enact changes for amendment requests that occur after an Applicant's RTM, 467 including scoping and costing 468 Coordinate recovery transition from JFO or JRO to the region 469 Respond to first appeals 470 o Coordinate with Grants Division staff and the Office of Inspector General (OIG) to 471 respond to PA-related audits 472 Coordinate with Grants Division staff to review Large Project QPRs, tracking work 473 completion and project deadlines 474 Phase VII, Final Reconciliation and Closeout: 475 Coordinate with Grants Division staff to reconcile and close projects, Applicants, and Recipient awards 476 477 Field Offices 478 Field offices are temporary organizational structures established to provide support when an 479 incident generates workload that cannot be met using existing regional organizations. They 480 augment regional capacity and provide a coordination point for incident oversight and 481 direction. In large incidents (i.e., Level I and II incidents), field offices are central to ensuring 482 FEMA can quickly expand to provide support to all Applicants in need of PA. Field offices are 483 established at the direction and under the delegated authority of the regional office and are 484 an extension of regional authorities and operations. 485 Three incident levels are used to categorize an incident based on its actual or anticipated 486 impact, size, and complexity, as well as the federal assistance required. FEMA continues to

evaluate incident level determination processes, with the intent of introducing a new incident

leveling framework in the near future. Historically, FEMA leadership has designated incident

levels and adjusted designations as the magnitude and complexity of the incident changes,

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

494 Joint Field Offices

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

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

JFO responsibilities include:

- Operational Planning and Response Phase:
 - Coordinate with the regional office to ensure Recipient completes all administrative requirements
 - Coordinate with the regional office to evaluate PA declaration add-on requests
 - Review existing SLTT mitigation plans to assess potential mitigation planning priorities and strategies
 - o Refine initial disaster operating profile and incident staffing and resource plans
 - Manage ongoing staffing and resource needs, in accordance with the Strategic Resource Management SOP, prioritizing resource needs for underserved or complex Applicants
 - Assume management of infrastructure-related response coordination from the Incident Management Assistance Team (IMAT)

520 Phase I. Applicant Coordination and Evaluation: 521 Assist Recipient with Applicant Briefings and educate Applicants on PA Program 522 requirements, including through the early delivery of targeted webinars and 523 trainings for underserved communities 524 Review all RPAs and make PNP eligibility determinations in coordination with 525 FEMA's Office of Chief Counsel (OCC) 526 Conduct Exploratory Calls and Recovery Scoping Meetings (RSM) 527 o Provide PA hazard mitigation information and guidance to Applicants 528 Work with Applicants to complete lists of impacts 529 Phase II, Impacts and Eligibility: Conduct initial eligibility evaluation 530 Obtain impact and damage information and documentation 531 532 Coordinate with Applicants and Recipients on RFIs 533 Conduct site inspections, as necessary 534 Help Applicants identify and understand mitigation opportunities 535 Develop or validate detailed damage descriptions with dimensions 536 Develop RFIs as necessary for missing information 537 Coordinate with OFA partners to determine federal authorities 538 Issue eligibility determinations 539 Phase III, Scoping and Costing: o Coordinate with CRCs to plan and share priorities and address project-specific 540 541 issues 542 o Support the development, costing, and analysis of hazard mitigation proposals for 543 eligible projects 544 Coordinate with Applicants and Recipients on RFIs 545 Make scope and cost eligibility determinations 546 Coordinate with OFA partners to support Applicant's desired recovery outcomes 547 Phase IV. Final Reviews: 548 Conduct final project reviews 549 Phase V, Obligation and Recovery Transition: 550 Obligate funds to Recipient Conduct RTMs 551 552 Phase VI, Project Monitoring and Amendments: 553 Respond to PA-related project correspondence such as changes in SOWs and 554 time extensions requested prior to an Applicant's RTM 555 Coordinate recovery transition to the region 556 Joint Recovery Offices 557 A JRO is a facility that centralizes communication, collaboration, and coordination to achieve 558 recovery outcomes for large, complex, Level I incidents in a post-JFO environment. FEMA

559 establishes JROs, by exception, to address requirements that overwhelm the region's 560 capacity and are best addressed by a sustained field presence. 561 Initial JRO transition planning is managed by the Federal Coordinating Officer (FCO) or their 562 delegated official. Once established, JROs are managed by a JRO Director who reports to the 563 regional office. JROs are temporary facilities that execute functions normally transitioned to 564 a regional office, and the JRO Director is responsible for managing and transitioning back to 565 the regional office using data-driven decision-making with clear objectives defined by 566 timelines and plans. More information on the role of the FCO is located in Appendix E. 567 Due to the significant resource requirements and extended lifespan of JROs, establishing a 568 JRO requires a unique decision-making process between the RA and the Assistant 569 Administrator for Recovery and additional reporting requirements which are not necessary 570 for smaller recovery operations. The RA and the Assistant Administrator for Recovery must 571 complete the decision-making process to establish a JRO within three months of the disaster 572 declaration. For more information, see the Joint Recovery Office Guide. 573 JRO responsibilities include: 574 Phase III, Scoping and Costing: 575 o Engage state, tribal, and territorial partners and OFAs to collaboratively define 576 and support achieving recovery outcomes and objectives 577 Support building SLTT partner capability and capacity 578 Promote SLTT resiliency, mitigation, and preparedness 579 Deliver recovery-related technical assistance to impacted communities and 580 survivors 581 Facilitate whole-community solutions to meet SLTT government recovery goals 582 Coordinate with CRCs to plan and share priorities and address project-specific 583 issues 584 Coordinate with Applicants and Recipients on RFIs 585 Make scope and cost eligibility determinations 586 Phase IV, Final Reviews: 587 Conduct final project reviews 588 Phase V, Obligation and Recovery Transition: 589 Obligate funds to Recipient 590 Conduct RTMs 591 Phase VI, Project Monitoring and Amendments: 592 Assist SLTT governments in developing the capability to plan for, manage, and 593 execute long-term recovery solutions 594 Track program delivery to ensure that recovery goals are met

time extensions requested prior to an Applicant's RTM

Respond to PA-related project correspondence such as changes in SOWs and

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59 <i>7</i> 598 599	 Monitor workload and milestones to support operational and staffing release planning Coordinate recovery transition to the region 		
600	Headquarters		
601 602 603 604 605 606 607 608 609	The Recovery Directorate at FEMA headquarters maintains national oversight of the PA Program, Fire Management Assistance Grant (FMAG) Program, and Community Disaster Loan (CDL) Program. The primary headquarters responsibilities of the PA program are performed by the PA Division. HQ's responsibilities are to maintain national-level situational awareness and actively manage risk and resources across the PA enterprise. The division accomplishes this by (1) issuing policies and developing doctrine (process guidance and tools) to support regions and drive consistent implementation of the PA Program; (2) maintaining resource augmentation pools and adjudicating enterprise-wide resource		
610 611 612 613 614 615 616 617 618 619 620 621	 Lead the PA enterprise: Ensure PA program implementation is consistent with FEMA's Core Values, PA Guiding Principles, and the PA Program Delivery Model Develop, maintain, and adjust regulations, policies, and doctrine for PA, FMAG, and CDL programs Provide standard processes, tools, systems, and training to ensure consistency in PA operations across FEMA regions and incidents Develop and improve on PA Grants Portal and Grants Manager and other technology systems Coordinate with OFAs on the development of Interagency Agreements and Memoranda of Understanding Coordinate with RSFs 		
622 623 624 625 626 627 628 629 630 631 632 633	 Strategically plan to meet long-term resource needs through hiring, contracting, and other augmentation structures, in accordance with the Strategic Resource Management (SRM) SOP and other procedures Build and maintain national training and mentorship capacity Develop and monitor PA program performance measures Support regional and field operations: Provide technical assistance for complex policy and operational challenges Provide Applicant, Recipient, and FEMA staff support Support development of SRP, including review and approval of plans and staffing requests Monitor use of contract resources Provide training and mentors 		
634	Lead program's continuous improvement:		

635	 Collaborate with field and regional stakeholders to collect, synthesize, and
636	validate lessons learned
637	 Integrate best practices into updated guidance
638	Operational Planning and Response Phase:
639	 Provide recommendations on PA declaration requests
640	 Review PA-related Mission Assignments (MA), as applicable
641	 Augment regional and field office capacity with national cadre staff, OFAs,
642	contract support and local hires
643	 Approve Level I incident staffing and resource plans, in coordination with the FCO
644	 Fill PA leadership roles for catastrophic incidents as detailed in incident staffing
645	and resource plans
646	 Fill infrastructure roles in the National Response Coordination Center (NRCC)
647	 Support development of, and approve, Enterprise Resource Management (ERM)
648	guidance for PA program, including staffing requirements for expected workload
649	 Maintain national PA cadre positions
650	 Coordinate with FEMA regions to proactively assess PA readiness
651	Phase III, Scoping and Costing:
652	 Provide oversight and national-level coordination for CRCs
653	Phase VI, Project Monitoring and Amendments:
654	 Respond to second appeals
655	 Coordinate with the Government Accountability Office (GAO) and OIG and respond
656	to PA-related audits
657	 Provide technical assistance on improper payment testing and remediation
658	 Develop internal controls to prevent fraud
659	 Make decisions on all policy issues not delegated to regional or field levels
660	 Apply timeline extensions or other specific policy revisions or waivers
661	Phase VII, Final Reconciliation and Closeout:
662	Provide technical assistance on closeout
000	Consolidate d. Bookston Contains
663	Consolidated Resource Centers
664	CRCs are permanent FEMA offices where specialized resources provide support to all PA
665	field operations to help ensure consistency. CRC responsibilities on the initial versions of all
666	projects as well as all projects before an Applicant's transition to the region, include:
667	Phase II, Impacts and Eligibility:
668	 Support field and regional offices by providing technical assistance
669	Phase III, Scoping and Costing
670	 Develop or validate scopes of work and cost estimates
671	 Conduct insurance reviews to ensure appropriate reductions
672	 Coordinate with mitigation staff to identify mitigation opportunities and support
673	hazard mitigation proposals and cost development for eligible projects.

674		0	Conduct Environmental Planning and Historic Preservation (EHP) completeness
675			reviews and streamlined compliance reviews on projects that the Office of
676			Environmental Planning and Historic Preservation agrees do not require the
677			preparation of a Record of Environmental Consideration (REC) by EHP
678		0	Coordinate with field and regional EHP staff to ensure projects will meet EHP
679			compliance requirements
680		0	Develop project requests for information as necessary based on project reviews
681		0	Add compliance conditions to the project
682		0	Draft ineligibility determinations (if requested by the Infrastructure Branch
683			Director [IBD] or Public Assistance Group Supervisor [PAGS])
684	•	Phase	VI, Project Monitoring and Amendments:
685		0	Perform scoping and costing on amendment requests that occur prior to an
686			Applicant's RTM.

CHAPTER 3: OPERATIONAL PLANNING AND

RESPONSE

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

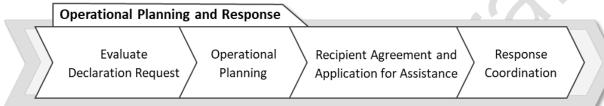


Figure 3: Public Assistance Process Steps during Operational Planning and Response

Operational Planning and Response Objectives:

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

Table 6: Performance Indicators for Operational Planning and Response

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

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

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Evaluate Declaration Request

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

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

- 710 FEMA encourages Recipients to lead PA operations when they have the capacity. When
- 711 Recipients take on roles that FEMA may otherwise perform, this is referred to as state-led
- 712 PA. State-led PA allows Recipients to:
- 713 Drive their recovery
- Leverage and enhance existing relationships with Applicants
- 715 Build knowledge and capacity
- Ensure consistent resourcing and insulate recoveries from FEMA resource shortfalls or reallocation
- Ensure understanding of local issues by utilizing staff familiar with the area
- 719 State-led operations are scalable. Recipients may perform any one or more of the following
- key functions: customer service, site inspections, or scoping and costing. RAs have the
- authority to approve Recipient requests to lead PA operations. For more information refer to
- 722 FEMA's State-Led Public Assistance Guide.

723 Assess Damage

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

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

Operational Planning

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- 736 Operational Planning is critical to the success of PA Program Delivery and enables FEMA and
- 737 the Recipient to set priorities and ensure that program delivery meets communities' unique
- 738 needs. During Operational Planning, the Recipient and FEMA PA leadership develop a plan
- 739 for consistent, accessible communication and coordination, operational staffing, and
- 740 resources, and engage with EHP and mitigation leadership to strategize ways to maximize
- 741 resiliency and EHP compliance.

742 Develop Disaster Operating Profile

- 743 While FEMA is evaluating the declaration request, or in anticipation of a forecasted incident,
- 744 the region, with input from HQ PA Field Resource Branch, develops an initial Disaster
- 745 Operating Profile (DOP), which captures incident impacts and key information that is
- continuously updated throughout the recovery life cycle. The regional PA Operations Branch
- 747 Chief oversees development of the initial profile in conjunction with the Recipient, OFAs.
- 748 regional EHP staff, and PA Hazard Mitigation staff to capture all known information that may
- 749 impact PA operations, including incident forecasts. The regional PA Operations Branch Chief
- should request the Recipient's risk assessment from the regional Grants Division to help
- inform necessary controls. The profile is input into PA Grants Manager to keep Recipient,
- 752 field, regional, and headquarters organizations aligned. The profile is the foundation for
- 753 resourcing and incident processing decisions and includes:
- Ongoing recovery status from other incidents
- 755 Impacted counties
- 756 Areas with high impacts
- Rough cost estimates by type of infrastructure/category of work
- 758 Rough number of expected Applicants and projects
- Pre-identified environmental or historic preservation considerations
- 760 Project threshold
- 761 Declaration details, when available
- Assessment of climate impacts and hazard mitigation opportunities
- Identification of underserved communities and assessment of associated needs
- Initial assessment of high-impact and low-capacity applicants

Specific critical infrastructure impacts

766 This information enables leadership to

767 determine initial staffing and training

768 requirements, organizational structure, and

769 logistical needs. Additionally, it enables

shared awareness on critical priorities,

potential policy issues, and other operational

772 aspects. The IBD/PAGS use the disaster

773 operating profile to make initial decisions,

and the Operations Support Task Force

775 Leader (OSTL) updates and refines the

776 disaster operating profile based on PDAs,

declaration data, and information included in

778 RPAs and Applicant Impact Surveys.

Evaluate Resource Needs and

780 Organization

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781 While a declaration request is being

782 evaluated or in anticipation of a forecasted

783 incident, regional leadership uses the disaster

784 operating profile to decide the appropriate

785 organizational structure (regional office,

786 existing JFO/JRO, or new JFO) and location

787 (virtual or on-site) to deliver PA. Regional and

788 field leadership coordinate with the CRC

789 Director to determine whether CRC staff,

790 regional staff, or field staff will write

791 determination memoranda and hazard

792 mitigation proposals. Staff must use standard PA delivery roles and processes regardless of

793 the organizational structure or location of work.

794 Strategic Resource Management (SRM) provides a comprehensive process for the

795 management and deployment of PA staff to disaster operations. SRM offers a streamlined,

796 planned, and nationally coordinated process utilizing all types of staffing resources and in

797 accordance with the ROSM.

Organization Considerations

799 **Using Existing Organizations:** If the incident is within the region's existing capacity, regions

should integrate the new declaration into its existing PA organizational structure. This may

Virtual or In-Person: Hybrids are Best

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

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

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

801 802	include leveraging an existing field office to take on the new declaration or using regional PA staff to conduct operations within existing organizations.
803 804 805 806 807 808 809 810 811 812 813	Creating New Field Offices: A field office is appropriate where the incident warrants dedicated resources beyond the capacity of a region's standing operations. Regional leadership should consider the challenges commensurate with new and temporary organizations when creating a new field office. In addition, regional leadership should delegate PA authorities to the field when field offices are active and empower field staff to resolve issues and make eligibility determinations. Field offices can take the form of virtual recovery offices (optimal for small, low-complexity Level III incidents), JFOs (typically necessary in Level I and II incidents), or JROs (necessary in catastrophic recovery incidents). For specific criteria on when a field office is necessary, see Chapter 5 of the ROSM. For information on JROs, refer to the <i>Joint Recovery Office Guide</i> .
814	Location Considerations
815 816 817 818 819	Regional and field leadership leverage virtual support and just-in-time deployments to minimize staff downtime and maximize use of field resources. Field leadership should use regional PA staff for high-impact, underserved, or complex Applicants where FEMA expects PA Phases I-V to require more than a year to complete. This ensures continuous engagement with regional staff and enables efficient management of long-term recovery.
820	Documenting Organizational Decisions and Resource Needs
821 822 823	Regional leadership must identify a PA leadership team including PAGS and, if necessary, an IBD. The region must document this and other organizational and location decisions and resourcing needs in incident staffing and resourcing plans.
824 825 826	If an incident is expected to exceed a region's routine incident year, regional leadership must coordinate with the Field Resource Branch to develop an approved SRP and request additional resources through SRM processes.
827 828 829 830	The PA Strategic Resource Plan (SRP) is developed in part based on the impacts identified in the DOP. It provides estimates for the number of PA staff that will be necessary to support PA delivery throughout the length of the operation, outlines the DOP, and identifies mentoring and training needs.
831 832 833 834 835 836	In addition to FEMA staffing resources, strategic resource requests can include resources from U.S. Army Corps of Engineers (USACE) Reemployed Annuitant Cadre and Bicentennial Volunteers, incorporated under the Tennessee Valley Authority. In accordance with the <i>ROSM</i> , for Level I incidents, leadership positions and all other incident staff planning must be jointly approved by the field office, region, and FEMA HQ. For more information, refer to the <i>SRM SOP</i> .

837	Delegate Authorities
838 839 840 841 842	The RA may delegate DRM authority to the FCO, IBD, PAGS, or regional PA Operations Branch Chief depending on the size, scale, and makeup of the operation. The FCO, with support from regional OCC and Grants Program staff, determines obligation and approval authorities. When DRM Authority is delegated to incident staff, the formal notification of the delegation is uploaded to Grants Manager.
843	Develop Initial Projection
844 845 846 847 848 849	The initial projection is part of the strategic planning for the incident which also encompasses spend plan projections and strategic milestones. The projection is an overall assessment of the costs for the life of the incident PA staff update the projections as necessary to maintain accuracy. Strategic milestones are benchmarks that track specific items leadership is working towards, including activity and phase completion targets. These milestones are entered and updated in Grants Manager.
850	Develop Spend Plan
851 852 853 854 855	The spend plan tool is used to estimate month-to-month incident costs and project monthly obligations. The spend plan helps ensure that FEMA has enough funds in the Disaster Relief Fund (DRF) to award projects for all declared emergencies and major disasters. PA staff must continually update projected projects and costs in Grants Manager to maintain spend plan accuracy.
856	Recipient Agreement and Application for Assistance
857 858 859 860 861	FEMA implements PA when the declaration authorizes assistance to SLTT governments and eligible PNP organizations. The Recipient signs a FEMA-State/Tribe/Territory Agreement, submits an application for federal assistance (SF-424), and ensures it has an updated and approved PA Administrative Plan and Hazard Mitigation Plan. Refer to the <i>PAPPG</i> for plan requirements.
862	Response Coordination
863 864 865 866 867 868 869 870 871	When warranted, FEMA activates its RRCC and NRCC to facilitate multi-agency coordination to prepare for and respond to the immediate needs of an incident. FEMA regional staff fill the RRCC Infrastructure Branch Director (IBD) position and HQ PA staff fill the NRCC Infrastructure Assets Group Supervisor (INGS) position to coordinate debris removal and critical infrastructure activities across the various federal agencies. This includes ESFs #1 (Transportation), #3 (USACE), #10 (U.S. Environmental Protection Agency), and #12 (Energy). The INGS also facilitates responses to PA policy questions and coordinates with the Operations Section Chief and the MA Manager to ensure MAs are only issued for work that is otherwise eligible as Emergency Work and is not already covered under another federal

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

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

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

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















Figure 4: Community Lifelines

Table 7: Roles and Responsibilities for Operational Planning and Response

Position	Responsibilities				
Regional PA Operations Branch Chief	Oversees development of initial disaster operating profile and incident staffing and resource plans, in coordination with field leadership, the Field Resource Branch, and the Recipient For Level 2 and 3 incidents, designates PA leadership; for Level 1 incidents, coordinates with HQ PA to identify PA leadership Reviews and approves Recipient application and administrative plan				

Position	Responsibilities				
	Performs other PA operational, planning and response duties as				
	delegated by the Regional Recovery Division Director (RRDD)				
	If the RA activates the RRCC, the INGS:				
	Coordinates debris removal and critical infrastructure activities across				
Infrastructure Group	the various federal agencies				
Supervisor (INGS)	Facilitates responses to PA policy questions				
	Coordinates with the MA Manager				
	Coordinates with the NRCC if activated at HQ				
	Coordinates directly with the Operations Section Chief and Branch				
	Directors				
	Coordinates debris removal and critical infrastructure activities across				
	the various federal agencies				
	Facilitates responses to PA policy questions during response phase				
Infractructure Dranch	Coordinates with the MA Manager				
Infrastructure Branch	Coordinates with regional PA leadership and PA HQ Field Resources				
Director (IBD)	Branch to develop initial disaster operating profile and incident staffing				
	and resource plans, including the SRP				
	In coordination with the Recipient and PAGS, assesses Applicant needs				
	for assistance during the PA grant development process				
	Performs other operational, planning and response duties as delegated				
	by the Operations Section Chief or FCO				
	Serves as deputies to the IBD in Level I and II incidents				
	Facilitates responses to PA policy questions				
	Coordinates with regional PA leadership and PA HQ Field Resources				
	Branch to develop initial disaster operating profile and incident staffing				
Public Assistance Group	and resource plans on level III incidents				
Supervisor (PAGS)	In coordination with the Recipient and IBD, assesses Applicant needs for				
Supervisor (171do)	assistance during the PA grant development process				
	Updates "Event Profile" to establish proper project routing and workflow				
	Refines and maintains the disaster operating profile				
	Performs other operational, planning and response duties as delegated				
	by the IBD on Level I and II incidents, or by the FCO on Level III incidents				
	Coordinates deployments of PA staff as directed by the IBD/PAGS				
	Oversees check in and check out process for PA staff				
	Develops and maintains PA organizational chart and daily accountability				
	Compiles PA input in the Incident Action Plan (IAP) and situational report				
Operations Support Task	Coordinates with Planning section on reports				
Force Leader (OSTL)	Supports PAGS in refining and maintaining the disaster operating profile				
	Confirms the Recipient has submitted all administrative				
	requirements				
	Oversees spend plan and coordinates with finance staff on the				
	spend plan				

CHAPTER 4: APPLICANT COORDINATION AND

EVALUATION

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

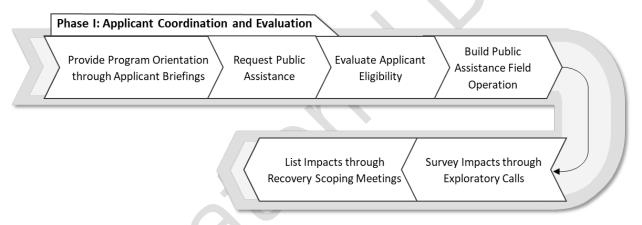


Figure 5: Public Assistance Process Steps During Phase I

Phase I Objectives:

- Develop an understanding of all incident impacts and Recipient and Applicant priorities
- Collect and process RPAs
- Conduct exploratory calls and RSMs
- Develop draft lists of impacts for each Applicant

Table 8: Performance Indicators for Applicant Coordination and Evaluation

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

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

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

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

Provide Program Orientation Through Applicant Briefings

Following a Presidential declaration, the Recipient presents an overview of the PA Program to prospective applicants. This is typically referred to as an Applicant Briefing. The briefings vary by Recipient and typically include an overview of the PA Program delivery process, deadlines, general PA eligibility criteria, mitigation opportunities, and compliance requirements. FEMA personnel should attend briefings when possible and support the Recipient by clarifying information, encouraging engagement with vulnerable and underserved communities, and answering questions. For more information, refer to the *PAPPG*.

Request Public Assistance

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



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

Evaluate Applicant Eligibility

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



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

- 955 If needed, the PAGS consults with FEMA OCC in evaluating Applicant eligibility. If FEMA
- 956 determines that an Applicant is ineligible, PA staff develop an eligibility determination,
- 957 explaining the rationale.
- 958 If an Applicant's RPA is approved, the PAGS assigns an appropriate PDMG, if needed, to
- 959 engage with the Applicant, provide customer service, and guide the Applicant through the PA
- 960 process. Experienced Applicants with the capacity to navigate independently through the
- grant process, or with limited impacts, may complete Phases I and II via direct application,
- 962 without a PDMG.

Direct Application

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

Build Public Assistance Field Operation 963 In parallel to reviewing and adjudicating RPAs, the IBD/PAGS builds out a PA field operation 964 965 capable of managing the initial phases of the delivery of PA. Specifically, the IBD/PAGS 966 continues to update and distribute the DOP and uses the information to support staffing and 967 resources plans coordinated with HO PA Field Resource Branch and other PA stakeholders 968 in line with the SRM SOP. 969 The IBD/PAGS ensures that staff assigned to the operation are trained and oriented to 970 ensure they understand the PA project development process and the incident's unique 971 environment, including awareness of vulnerable or underserved communities. For certain 972 underserved or complex applicants, the IBD/PAGS, or their delegate, will consider staff 973 skillsets (such as language or other technical skills) and experience when filling roles. The 974 IBD/PAGS requests trainings through the Field Training Office or PA Training liaison for 975 Recipients, potential Applicants, and other federal staff. FEMA also offers regular Grants 976 Manager/Grants Portal training to internal and external stakeholders. Past Recipient and 977 Applicant Webinars are available on FEMA's Grants Portal and Grants Manager Training 978 YouTube Channel or the Support Center in Grants Manager and Grants Portal. Schedules for 979 internal FEMA employee and contractor micro-trainings (webinars) are distributed by FEMA 980 staff on a regular basis. **Survey Impacts Through Exploratory Calls** 981 982 The Applicant completes an Applicant Impact Survey after submitting its RPA. This is a short 983 questionnaire that expands on the type and extent of impacts listed in the RPA, identifies 984 critical needs, and provides information to the recipient and FEMA on potential needs for 985 technical assistance. The Exploratory Call is a 15 to 30-minute introductory phone 986 discussion between the PDMG and Applicant. This is meant to establish a relationship with 987 the Applicant, review or complete the survey, and schedule the RSM. Upon assignment to the Applicant, the PDMG conducts the Exploratory Call within 989 seven days. 990 Following an Exploratory Call, the Applicant begins developing its impact list, which is an 991 inventory of all damaged facilities, debris removal activities, and emergency protective 992 measures for which the applicant intends to claim costs for reimbursement. List Impacts Through Recovery Scoping Meetings 993 994 The Applicant, Recipient, and FEMA conduct an RSM to review and refine the list of impacts.

historic preservation considerations. For Applicants pursuing direct application, the Recovery

The PDMG, if assigned, facilitates discussion of the PA delivery process, hazard mitigation

opportunities and eligibility requirements, including insurance and environmental and

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Scoping Video provides this information. The RSM or video starts a 60-day regulatory period when the Applicant must identify and report all eligible impacts and damage for FEMA to review. For more information on application procedures please *refer to 44 C.F.R.* § 206.202.

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

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

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

Project Development Plan

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

Table 9: Roles and Responsibilities during Phase I

Position	Responsibilities
Infrastructure Branch Director (IBD)	 Discusses program delivery options with Recipient Supports applicant briefings Monitors operational progress and strategic milestones and maintains disaster operating profile and incident staffing and resource plans, including the SRP In coordination with the Recipient and PAGS, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments
Public Assistance Group Supervisor (PAGS)	 Reviews and determines PNP applicant eligibility, in coordination with OCC Approves eligible RPAs If FEMA determines an Applicant is ineligible, develops a Determination Memo (DM) in coordination with OCC to explain the reason for the determination In coordination with the Recipient and IBD, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments Works with the Program Delivery Task Force Lead (PDTL) to assign appropriate PDMG to the Applicant based on Applicant need and PDMG experience/skill
Program Delivery Task Force Leader (PDTL)	 Works with PDMG to prepare for Exploratory Calls and RSM Works with PAGS to assign the Applicant to an appropriate PDMG, prioritizing support for underserved or complex Applicants

Position	Responsibilities
Public Assistance Program Delivery Manager (PDMG)	 Reviews the disaster operating profile and Applicant Impact Survey for assigned Applicant(s) and, as applicable, other feedback on Applicant capacity and complexity, to prepare for the Exploratory Call Conducts the Exploratory Call Prepares for the RSM, including assisting Applicant with impact list development Coordinates with EHP and Hazard Mitigation specialists for support Conducts the RSM, ensuring completion of the Project Development Plan Provides Applicants with PA Hazard Mitigation information
Hazards and Performance Analyst	Works with Mitigation (406) Specialist to prepare for
Task Force Leader (TFL)	Exploratory Calls and RSM
Mitigation (406) Specialist	 Provides technical support and hazard mitigation information to PDMGs and supports Applicant Briefings Attends RSMs when necessary, based on RPA or Applicant Impact Survey information Provides technical support and hazard mitigation information to PDMGs and Applicants to help Applicants understand potential mitigation opportunities
Environmental Planning and Historic Preservation Advisor (EHAD)	 Advises the IBD and FCO on any potential EHP considerations based on preliminary damage information Coordinates with other regulatory agencies by initial consultation and notifications When no EHP Manager is present, the EHAD assigns field EHP Specialists to RSMs Creation and distribution of the initial Public Notice
Environmental Planning and Historic Preservation (EHP) Specialist	 Provides PDMGs with EHP information to ensure Applicants understand EHP laws, regulations, and Executive Orders Provides technical support to PDMGs and Applicants Attends RSMs, when necessary, based on RPA or Applicant Impact Survey information

1016 CHAPTER 5: IMPACTS AND ELIGIBILITY

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

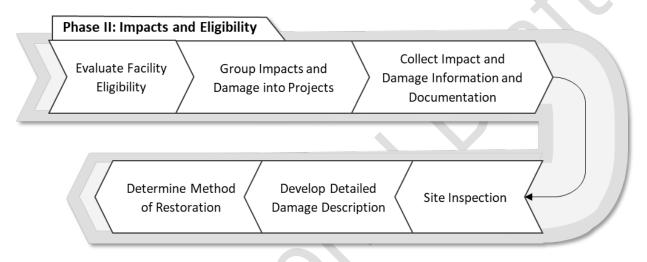


Figure 6: PA Process Steps During Phase II

Phase II Objectives:

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

Table 10: Performance Indicators for Impacts and Eligibility

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

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Simplicity	Weekly average % of Applicants calling the PA	20%	10%	20%	25%
	Hotline	2070	10%	20%	25%
Accuracy	% projects sent to Phase III without rework	80%	85%	80%	75%
Accuracy	% of site inspections completed without rework	80%	85%	80%	75%
Effectiveness	% of permanent work damage line items with identified mitigation opportunity	75%	70%	75%	80%
Customer Experience	% of Applicants working with a single PDMG throughout Phase II	80%	85%	80%	75%

Evaluate Facility Eligibility

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

Group Impacts and Damage into Projects

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

Collect Impact and Damage Information and Documentation

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

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

Site Inspections

For some projects, FEMA obtains and validates specific information about the damaged site or facility through a site inspection. PDMGs schedule the site inspections. When supporting underserved or complex Applicants, the PDMG works with the SITL to ensure the Site

- 1053 Inspector can provide the appropriate support. FEMA Site Inspectors (SIs) conduct 1054 inspections using various methods:
- Applicants collect and submit impacts and damage-related information for FEMA review
 and validation (for sites with either completed or uncompleted work).
- FEMA guides the Applicant through a virtual site inspection using video conference technology (for sites with uncompleted work).
- FEMA physically visits the site with the Applicant (for sites with uncompleted work).
- FEMA mitigation and EHP specialists participate in site inspections as necessary to collect damage information and support subsequent mitigation and EHP reviews. For complex sites or facilities, FEMA Technical Specialists or other staff with technical specialties may conduct or engage with Applicants during the site inspection step to ensure adequate expertise and technical support through the project development process.
 - The Site Inspector completes Site Inspection within 21 days of a confirmed request for a site inspection.

Develop Detailed Damage Description

- 1068 FEMA works with the Applicant to develop detailed damage descriptions and dimensions
- 1069 (DDD) by developing narrative descriptions, documenting dimensions and quantities,
- answering key questions, and obtaining documentation related to the impacts and damage.
- 1071 FEMA and the Recipient work to ensure the Applicant has submitted all information and
- documentation required. As the DDD is the foundation of the project and becomes the basis
- for which FEMA determines the amount of funding, it is critical that the DDD is accurate.
 - The Site Inspector completes the DDD within seven days of completing the site inspection.
 - The PDMG reviews the DDD within two days of receipt, and the Applicant approves the DDD within seven days of the PDMG's review.

Determine Method of Restoration

- 1079 Once FEMA, the Recipient, and the Applicant agree on the DDD, it is the Applicant's
- 1080 responsibility to define the method of repair, including the incorporation of hazard mitigation
- plans and building codes and standards. Some projects may require an engineering analysis
- 1082 to determine the method of repair. In these cases, FEMA may provide PA funding for
- 1083 engineering and design services.

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- 1084 While Permanent Work funding is always based on pre-disaster size, capacity, and function,
- 1085 FEMA allows Applicants to accept funding at a fixed amount and use the funds in a more
- 1086 flexible manner to drive their own recovery.

Table 11: Roles and Responsibilities during Phase II

Position	Responsibilities
Public Assistance Group Supervisor (PAGS)	 Identifies and monitors complex and priority projects Determines need for SIs, crew leads, and task force leads, and initiates deployments Sets and manages goals and targets for program delivery Determines eligibility of sites and facilities Monitors operational progress and strategic milestones and informs maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
Operations Support Task Force Leader (OSTL)	 Continue Phase I activities, including coordinating staff deployment requests and onboarding, coordinating training and supply/equipment requests, maintenance of all org charts, dissemination of All-Hands guidance/notifications, creation and distribution of reports, and processing Grants Manager access requests Oversees tracking of RTMs and Large Project Notifications (LPN) Generate monthly and Life of Disaster spend plan projections in coordination with Planning Specialist(s), PDTL and PAGS Facilitates PTB progression and performance reviews/evaluations for deployed staff Ensures maintenance of accurate Deployment Tracking System (DTS) and Grants Manager deployment statuses, titles, and roles
Program Delivery Task Force Leader (PDTL)	 Coordinates with the PAGS to address eligibility issues Tracks progress of staff and projects Assists the PDMG as necessary Reviews ineligibility recommendations
Site Inspector Task Force Lead (SITL)	 Coordinates with PDTL to identify and schedule site inspections Reviews detailed DDD and Site Inspection Reports for completeness and accuracy
Program Delivery Manager	 Works with Recipient and Applicant to reach agreement on incident-related impacts Generates site inspection work orders Reviews detailed DDD and Site Inspection Report for completeness and accuracy Raises eligibility concerns to PDTL Works with the Applicant and PDTL to group sites and facilities into projects Works with the Applicant to determine the method of restoration Works with the Applicant to group sites and facilities into projects Confirm logical grouping with EHP when there are sites with significant EHP concerns
Site Inspector	 Conducts site inspection of impacts and damage claimed by Applicants or validates Applicant-provided site inspection information

Position	Responsibilities
	 Develops or validates Site Inspection Reports and writes the detailed DDD for projects with uncompleted work Ensures correct formulation of projects based on site inspection results and documents collected
Hazards and Performance Analyst Task Force Leader (TFL)	 Coordinates with the PAGS to address eligibility issues Tracks progress of staff and projects Assists the Mitigation Specialist as necessary Reviews ineligibility recommendations
Mitigation Specialist	 Provides information on PA hazard mitigation opportunities to PDMG and/or Applicant Attends Site Inspections as necessary to support development and evaluation of hazard mitigation SOW
Field Environmental and Historic Preservation Specialist	 Attends Site Inspections as assigned Documents site conditions and begins early identification of potential EHP concerns
Technical Specialist	Conducts site inspections and engages with Applicants on complex sites and projects

1090 CHAPTER 6: SCOPING AND COSTING

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

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

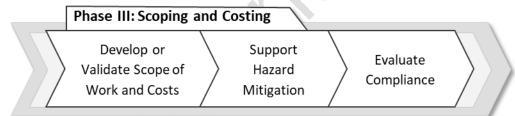


Figure 7: Public Assistance Process Steps during Phase III

Phase III Objectives:

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

Table 12: Performance Indicators for Scoping and Costing

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

Public Assistance Program Delivery Guide (Draft)

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

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

Develop or Validate Scope of Work and Costs

- 1114 The Applicant either submits the SOW and cost for FEMA review and validation, or it defines
- the method of repair generally and FEMA develops the SOW and cost. For Emergency Work,
- the SOW includes work required to address immediate threats and to remove debris and must
- include quantitative information. For Permanent Work, the SOW includes a description of how
- the Applicant plans to repair, or has repaired, the damage, including repair dimensions and
- 1119 hazard mitigation description and dimensions.
- 1120 For projects where work is complete, validation specialists review Applicant-provided
- information to develop the detailed DDD and validate that the work was necessary to
- address impacts and damage claimed, and associated costs were reasonable and
- 1123 necessary to perform the work.

- The Validation Specialist completes the DDD and validation of documentation for Completed Lane projects within 14 days of the PDMG routing the project to the CRC.
- 1126 For projects where work is incomplete, costing or technical specialists either, a) develop a
- 1127 SOW and cost estimate based on the detailed DDD and Applicant-provided information; or,
- b) validate SOWs and cost estimates provided by the Applicant.
 - The Costing Specialist completes project development for Standard Lane projects within 14 days of the PDMG routing the project to the CRC.
- 1131 For certain complex projects, engagement with the Applicant may continue through Phase III
- to develop or validate a SOW and cost estimate. Regional or CRC technical specialists may
- work through the field office and directly with Applicants to ensure mutual understanding of
- the intended method of repair, eligibility considerations, SOW, and cost estimate.
 - The Technical Specialist completes project development for Specialized Lane projects within 24 days of the PDMG routing the project to the CRC.

- During scoping and costing, FEMA may determine the Applicant did not provide information to substantiate project eligibility. In these cases, FEMA submits an RFI to the Applicant for additional project documentation. FEMA may also identify eligibility concerns related to the work or cost claimed by the applicant. In these cases, CRC staff raise eligibility concerns through the PDTL to the PAGS to make an eligibility determination.
 - The Applicant responds to RFIs within the deadline specified, typically within 15 days of receipt of the RFI.
- 1144 FEMA may have independent cost estimating experts review project costs. For more information on Expert Panel Reviews, refer to the *PAPPG*.

Support Hazard Mitigation Efforts

- For projects that include mitigation, FEMA works with Applicants to develop hazard mitigation proposals. Hazard mitigation proposals draw from information collected
- throughout the PA process, including the cause of damage, the type of mitigation desired by
- the Applicant, and the repair scope of work and cost estimate. FEMA ensures that proposed
- mitigation measures meet the cost effectiveness criteria defined in the PAPPG.
- 1152 Mitigation specialists coordinate with Applicants to address Applicant needs and goals, and
- also coordinate with costing specialists as necessary. Once completed, FEMA reviews each
- hazard mitigation proposal to ensure it includes a comprehensive scope of work for the
- identified mitigation, detailed cost estimates, and documentation of cost-effectiveness.

Evaluate Compliance

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- Once FEMA validates the SOW and costs for a project, it conducts a series of reviews to
- ensure program compliance. FEMA reviews projects for quality assurance, insurance
- 1159 requirements, PA hazard mitigation eligibility, EHP completeness, and EHP compliance for
- 1160 projects that do not require a Record of Environmental Consideration.

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

Table 13: Roles and Responsibilities during Phase III

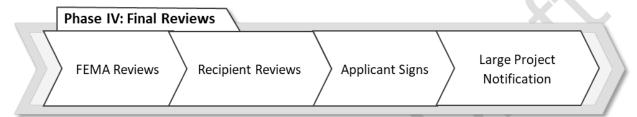
Positions	Responsibilities
Public Assistance Group Supervisor (PAGS)	 Coordinates with the CRC to communicate priorities, including underserved or complex Applicants, and address eligibility considerations Monitors operational progress and strategic milestones and supports maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
CRC Director/Deputy Director	Manages CRC staffCoordinates with PAGS on priorities and eligibility considerations

Positions	Responsibilities
	Peer reviews projects
Lane Manager	Assists specialists with any issues or concerns
	Works with other Lane Mangers on compliance with policy
	Reviews RFI
Program Delivery Manager	Sends RFIs to Applicants for response
(PDMG)	Reviews Applicant responses to RFIs
Document Validation Specialist	 Validates detailed DDD, SOW, and cost for completed projects based upon information and documents included with the project Reviews completed projects for potential eligibility concerns Initiates an RFI for documentation or information needed to complete projects
	 Writes SOW for projects with uncompleted work based upon the provided detailed DDD, Site Inspection Report, and other documents included with the project Estimates costs for projects with uncompleted work, based upon the cow
Costing Specialist	 Support development of hazard mitigation SOW and estimates costs for projects with uncompleted work, based on input from the Applicant and Mitigation specialist Contacts Hazard Mitigation Specialist for technical assistance as needed to ensure mitigation is maximized
	 Evaluates cost effectiveness of proposed hazard mitigation measures based on criteria for mitigation costs within 15% of repair costs and for measures listed in the PAPPG Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures Reviews projects with uncompleted work for potential eligibility concerns. Initiates an RFI for documentation or information needed to complete projects
	 Writes SOW for complex/specialized projects based upon the provided DDD, Site Inspection Report, and other documents included with the project Estimates costs for complex/specialized projects, based upon the SOW
Technical Specialist	 Writes hazard mitigation SOW and estimates costs for complex/specialized projects, based on input from the Applicant and Mitigation Specialist Evaluates cost effectiveness of proposed hazard mitigation measures based on cost criteria for mitigation costs within 15% of repair costs and for measures listed in the PAPPG Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures Reviews complex/specialized projects for potential eligibility concerns. Initiates an RFI for documentation or information needed to complete complex/specialized projects

Positions	Responsibilities
Insurance Specialist	 Identifies any prior "obtain and maintain" requirements placed on the damaged facility or item in previous incidents Communicates potential insurance issues or RFIs with the PDMG Conducts final insurance review and makes required reductions Determines the "obtain and maintain" insurance requirement for the damaged facility or item
Quality Assurance Specialist	 damaged facility or item Reviews projects for compliance with policies, regulations, and laws Works with Costing, Document Validation, and Technical Specialists for clarity and accuracy in projects
CRC EHP Specialist	 Conducts EHP Completeness Review to ensure projects contain all EHP required information When necessary, serves as a liaison to field EHP Specialists to ensure SOW effectively incorporates EHP considerations Completes a streamlined EHP compliance review for certain emergency protective measures
Mitigation Specialist	 Reviews Applicant submitted hazard mitigation SOW and cost estimates for projects with uncompleted work, and provides input to aid in the development of hazard mitigation SOW, based upon the provided detailed DDD, Site Inspection Report, input from the Applicant and other documents included with the project and ensures eligibility Develops Benefit Cost Analysis Reviews projects for cost-effectiveness

1166 CHAPTER 7: FINAL REVIEWS

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



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Figure 8: PA Process Steps during Phase IV

Phase IV Objectives:

FEMA, the Recipient, and the Applicant sign off on projects

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Table 14: Performance Indicators for Final Reviews

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

*excludes partially granted or fully granted appeals.

FEMA Reviews

- 1178 For projects that require a REC, EHP staff in the field or region conduct a review of the SOW
- to ensure compliance with all applicable laws, regulations, and policies. and document the
- 1180 EHP requirements as a condition of the award.

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

- 1182 If an EHP Specialist determines the project application is missing information to support
- compliance, the EHP Specialist submits an RFI to Applicant via the PDMG to submit to the
- 1184 Applicant for additional project documentation. The EHP Specialist may also identify
- 1185 eligibility concerns related to compliance. In these cases, EHP Specialists raise eligibility

- concerns through to the PDMG and the PDTL to the PAGS to make an eligibility determination. Chapter 9 discusses the applicants right to appeal or arbitration.
- Once all compliance reviews are complete, the PDMG reviews the project and the PAGS conducts the final review to verify eligibility.
 - The PDMG completes the project review within three days of receipt from the CRC.

 The PAGS completes FEMA final review within five days of PDMG review.
- 1192 If a PDMG identifies eligibility issues, they work with the PDTL and PAGS to explain to the 1193 Applicant the reason it is ineligible and issue an ineligibility determination. Chapter 9
- discusses the applicants right to appeal or arbitration.

1195 Recipient Reviews

- 1196 Once FEMA has approved the project, the Recipient reviews project applications to ensure
- that the Applicant properly addressed all incident-related impacts, repair methods, and
- 1198 costs.

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

1201 Applicant Signs

- Once the Recipient completes its review, the Applicant reviews and signs the project and acknowledges conditions (including EHP conditions), associated with PA subgrants.
 - 1204 The Applicant completes final Project review within seven days of the Recipient 1205 review.

Large Project Notification

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

Table 15: Roles and Responsibilities during Phase IV

Roles	Responsibilities			
	 Performs final review to verify the project application is eligible before obligating funds 			
Public Assistance Group	Signs determination memorandums			
Supervisor (PAGS)	Compiles required LPN information and submits to the PA HQ			
	Executive Office			
	Obligates project funding			

Roles	Responsibilities
	 Monitors operational progress and strategic milestones and informs maintenance of disaster operating profile and incident staffing and resource plans, including the SRP
Program Delivery Manger (PDMG)	 Conducts a review of the project for eligibility following compliance reviews
Environmental and Historic Preservation Advisor (EHAD)	 Conducts the Environmental Officer (EO) review of the project and approves the Recommendation of Environmental Consideration (REC) Provide advisement to EHP Specialist navigating projects with tiered EHP considerations
Field Environmental and Historic Preservation (EHP) Specialist	 Ensure project complies with all applicable EHP laws, regulations, and Executive Orders Documents project compliance and identifies conditions that an Applicant must adhere to in PA Grants Manager Draft consultation letters to other agencies, as necessary
PA Headquarters LPN Team	 Reviews the LPN information for completeness Submits the LPN to the Office of Chief Financial Officer (OCFO) Notifies the PAGS when FEMA HQ approves a project in the LPN queue
Office of the Chief Financial Officer (OCFO)	 Processes LPN requests from PA Submits projects to FEMA Office of External Affairs (EA) for review and coordination
Office of External Affairs (EA)	Coordinates notifications and reviews with DHS, OMB, and Congress

CHAPTER 8: OBLIGATION AND RECOVERY

TRANSITION

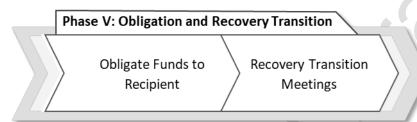
1215 Once all final reviews are complete and the Applicant has signed the project application, the

project moves to Phase V. During Phase V, the Obligation and Recovery Transition phase,

1217 FEMA obligates funding to Recipients and transitions recovery roles and responsibilities.

This chapter provides an overview of PA roles and responsibilities during Obligation and

1219 Recovery Transition.



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Phase V Objectives:

Figure 9: PA Process Steps During Phase V

- Obligate funding to Recipient for disbursement to the Applicant
- Transition Applicant's primary point of contact from FEMA to the Recipient

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Table 16: Performance Indicators for Obligation and Recovery Transition

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

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1229 Obligate Funds to Recipient

- 1230 Following final reviews, FEMA obligates funding to Recipients for disbursement to
- 1231 Applicants. After FEMA obligates funds, the Recipient notifies the Subrecipient that funds
- are available and disburses funds based on the Administrative Plan.



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

1235 Strategic Funds Management

- 1236 When a Permanent Work project has a federal cost share greater than \$1 million and the
- 1237 Applicant does not require funding within 180 days after the project is ready for obligation,
- 1238 FEMA obligates the funds based on the project completion schedule. FEMA refers to this as
- 1239 Strategic Funds Management (SFM). For more information refer to FEMA SOP 9570.24
- 1240 Strategic Funds Management Implementation Procedures for the Public Assistance
- 1241 Program.

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Recovery Transition Meetings

- 1243 In general, the PDMG conducts an RTM once the Applicant has signed all of its projects. The
- 1244 RTM transitions the primary point of contact for the Applicant from FEMA personnel to the
- 1245 Recipient. FEMA, the Recipient, and the Applicant attend the RTM. In cases where the
- 1246 Applicant has projects that require lengthy assessments prior to finalizing a SOW, the PDMG
- conducts the RTM once the Applicant has obligated its other projects. Upon completion of
- the assessments, the Recipient and FEMA regional staff coordinate with the Applicant and
- the CRC to finalize any remaining project reviews.

Table 17: Roles and Responsibilities during Phase V

Roles	Responsibilities			
Infrastructure Branch Director	 Readies PA operation for transition to steady-state operations (region) Monitors operational progress and strategic milestones as well as incident staffing and resource plans, including the SRP 			
Public Assistance Group Supervisor	 Process obligations and de-obligations for Public Assistance projects, as delegated Monitors unliquidated obligations for each project Executes staffing releases and transitions as needed, prioritizing national-level assets for release 			
Program Delivery Manager	 Coordinates with the Recipient to schedule a Recovery Transition Meeting (RTM) Facilitates the RTM 			

CHAPTER 9: PROJECT MONITORING AND

AMENDMENTS

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

Transition from Phase V to Phase VI is also the transition from Stage 3: Delivery Recovery Support to Stage 4: Grant Administration and Closeout. If a field office is managing the incident, this transition indicates the transition of the operation from the field office to the region. Incidents transition to the region when at least 90% of RTMs are complete and/or at least 75% of projects are obligated, based on the capacity of the region to absorb the remaining workload. If the incident is managed through a JRO, incidents remain within the responsibility of the JRO rather than transitioning to the region.

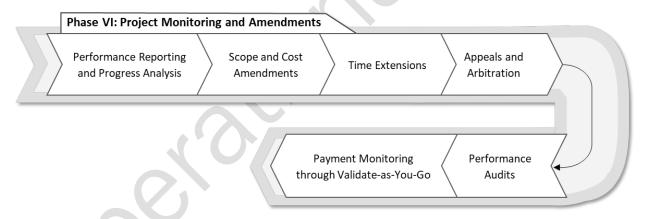


Figure 10: PA Process Steps During Phase VI

Phase VI Objectives:

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

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Table 18: Performance Indicators for Project Monitoring and Amendments

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

^{*}excludes partially granted or fully granted appeals.

Performance Reporting and Progress Analysis

- Regional FEMA PA and Grants Management staff monitor financial and performance reporting through quarterly meetings and QPRs. QPRs list all open Large Projects where the Recipient has not processed the final federal share payment to the Subrecipient and include the status of work for each project. QPRs are an important tool for managing the progress of
- the status of work for each project. QPRs are an important tool for managing the progress of recovery, tracking potential time extension requests, and planning for closeout.
 - 1283

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

1285 Scope and Cost Amendments

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

Time Extensions

- 1291 If the Subrecipient determines that it needs additional time to complete work, it submits a written request to extend the work completion deadline to the Recipient. In some instances,
- 1293 the Recipient has the authority to approve time extension requests. If the time requested
- falls within the Recipient's authority, it notifies FEMA when it approves a time extension.
- 1295 Otherwise, the Recipient forwards the request to FEMA with a recommendation and PA staff
- 1296 review the request.

1297 1298 1299 1300 1301 1302 1303 1304	In addition, work completion time extensions may not exceed the Recipient's prime award period of performance (POP). the initial period of performance for the prime award starts on the first day of the disaster incident period and extends four years. The Recipient must request approval from FEMA for an extension to the prime award if it anticipates project work to extend beyond the POP deadline. Terminology: Prime Award The "prime award" is the disaster grant that FEMA provides to the Recipient upon approving the SF-424. The prime award accounts for all program funding associated with the federally declared disaster.
1305 1306	In considering and responding to project related extension requests, PA staff follow the procedures in Each project FEMA approves for
1307 1308 1309 1310	the Work Completion Deadlines section of the <i>PAPPG</i> . When reviewing extension requests that may affect the prime award, PA staff coordinate with Grants Management and Office of the Chief Financial Officer Applicants is a "subaward" to the prime award and carries the same legal and administrative requirements.
1311 1312	(OCFO) staff based on the FEMA Manual 205-0-1 Grants Management (GMM) and FEMA-State/Territory/Tribe Agreements.
1313	Appeals and Arbitration
1314 1315 1316 1317	During any phase, FEMA may determine that certain Applicants, facilities, work, or costs are ineligible. Applicants may appeal such determinations and, in some instances, request arbitration. FEMA provides two opportunities to appeal an eligibility determination. First, the Applicant may appeal a decision to the FEMA RA.
1318 1319	Second, if the RA denies all or part of the first appeal, the Applicant may appeal to the Assistant Administrator of the Recovery Directorate at FEMA HQ.
1320 1321 1322 1323	Note that there are differences in appeals-related regulations and policy for disasters declared before or after January 1, 2022. For example, for disasters declared after January 1, 2022, Applicants must submit appeals electronically using Grants Portal/Grants Manager. (Most other appeals may also be submitted electronically in this system.)
1324 1325 1326 1327 1328	Under certain circumstances for disasters declared after January 1, 2016, an Applicant that disputes a FEMA eligibility determination has a right of arbitration. To request arbitration, the disputed amount must be at least \$500,000 (or \$100,000 for rural locations) and Applicants must submit a timely first appeal. Applicants may not submit both a second appeal and request arbitration.
1329	13 <mark>39.</mark> For incidents declared before January 1, 2022, the Applicant may appeal a



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

1333 1334		and its recommendation to FEMA within 60 days of receiving the appeal from the Applicant.		
1337 1338	13 35 1336	For incidents declared after January 1, 2022, the Applicant may appeal a determination to the Recipient within 60 days of the date FEMA electronically transmitted its determination. The Recipient must submit the Applicant's appeal and its recommendation within 120 days from that same date.		
1341	13 39 1340	FEMA Provides Appeal Decision within 90 days of receiving the appeal, or after receiving additional information FEMA requested to adjudicate an appeal, or after submitting for technical review.		
1344 1345	1348 1343	The Applicant must submit a Request for Arbitration to the Civilian Board of Contract Appeals within 60-days of receiving the first appeals decision. If FEMA does not issue a first-level appeal decision within 180 days of receiving the appeal, the Applicant may withdraw the first-level appeal and request arbitration.		
1346 1347 1348 1349 1350	the PA Program Appeals Guide, Public Assistance Appeals and Arbitration under the Disaster Recovery Reform Act fact sheet, and additional PA Policy, Guidance, and Fact Sheets available online at www.fema.gov/assistance/public/policy-guidance-fact-			
1351	Perf	ormance Audits		
1352 1353 1354 1355 1356 1357 1358	improvements. All PA projects are subject to audits by the U.S. Government Accountability Office (GAO) and the DHS Office of Inspector General (OIG). When the GAO or OIG conducts a performance audit of the PA Program or how Recipients or Subrecipients expend federal funds, it submits a report to the FEMA Audit Liaison Office (ALO) detailing the review and findings that may also include recommendations for FEMA to develop and implement			
1359 1360 1361 1362 1363 1364 1365 1366 1367 1368	oversi HQ an items the re to ove addres contril Final F	LO serves as an internal and external liaison for FEMA and its components to provide ght to the audit follow-up process. The ALO supports and coordinates audits at both d regions. Regions have primary responsibility for responding to audit-related action related to specific projects, incidents, Subrecipients, Recipients, and operations within gion. HQ has primary responsibility for responding to audit-related action items related rall or national-level program implementation and audit-related action items that as operations across multiple regions. FEMA PA and Grants Management staff pute to the preparation of a Management Response Letter (prior to the publication of a Report by the GAO or OIG) and a Corrective Action Plan (CAP) (after the publication of a Report by the GAO or OIG). PA and Grants Management staff prepare content for		

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

Payment Monitoring through Validate-as-You-Go

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

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

Table 19: Roles and Responsibilities during Phase VI

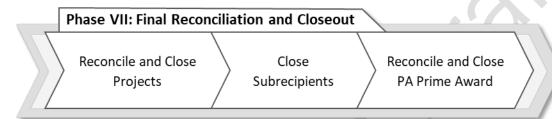
Roles	Responsibilities
PA Division Director	Approves and signs second appeal decisions
Regional PA Closeout	Reviews and concurs on time extension responses
Branch Chief	 Coordinates with Grants Management Division on prime award extensions
	Reviews and concurs on PA-related correspondence
	 Makes eligibility determinations on project amendments
	Oversees QPR review
	Conducts Final Reviews on amendments processed by regional staff
	Conducts quarterly meetings with assigned states
	 Reviews QPR for assigned states
	 Evaluates and draft responses to time extension requests
PA State Liaison	 Serves as the intermediary between the OCFO and the Recipient, confirming Quarterly Drawdown Sample Report (QDSR) data and alerting the Recipient when FEMA has selected a drawdown for testing or validation
	 Processes project withdrawal requests
	 Conducts Initial Review for amendments processed by regional staff for projects within assigned state(s)
Operations Cuppert	Tracks PA-related correspondence
Operations Support	Maintains spend plan
Specialist	Supports PA state liaisons

Roles	Responsibilities
Validation Consistint	Reviews and reconciles Category Z management costs quarterly as
Validation Specialist	necessary
	Reviews change in SOW requests and processes related amendments
Costing Specialist	Evaluates proposed use of excess funds on Alternative Procedure
Costing Specialist	projects
	Sends RFIs to Recipients, as necessary
	Reviews change in SOW requests and processes related amendments
	for complex projects. for Applicants transitioned to region
Technical Specialist	Reviews requests for Alternative Procedures, Alternate or Improved
	Projects and process amendments
	Sends RFIs to Recipients, as necessary
Insurance Specialist	Reviews changes for impacts to insurance deduction
Field EHP Specialist	 Reviews SOW amendments for compliance with EHP laws,
Tield Lift Opecialist	regulations, and Executive Orders (EOs)
Hazards and Performance	 Tracks progress of Mitigation Specialists projects
Analyst Task Force Leader	Assists the Mitigation Specialist as necessary
(TFL)	Reviews ineligibility recommendations on amendment requests
Mitigation (406) Specialist	Reviews and reconciles amendment requests related to hazard
Willigation (400) Specialist	mitigation for eligibility and cost effectiveness
Appeals Unit Lead	Assigns appeals to analysts
Appeals offic Lead	Reviews and concurs on draft responses
	 Evaluates first appeals and drafts responses
First Appeal Analyst	Coordinates with regional Technical Specialists when necessary
That Appear Analyst	 Processes versions and other actions triggered by second appeal
	decisions
Second Appeal Analyst	 Evaluates second appeals and drafts responses
	Oversees daily activities associated with GAO or OIG audits
	Reviews audit-related products and documentation
PA Audit Coordinator	Works with relevant PA staff to prepare audit-related responses and
TA Addit Coordinator	deliverables
	Support PA personnel with completion of audit-related action items
	Prepare for and facilitate audit-related meetings
Office of the Chief	Provides technical and oversight assistance for PIIA 2019 and VAYGo
Financial Officer	activities

CHAPTER 10: FINAL RECONCILIATION AND

CLOSEOUT

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



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Figure 11: PA Process Steps During Phase VII

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Phase VII Objectives:

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

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Table 20: Performance Indicators for Closeout

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

Reconcile and Close Projects

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

1409 Large Projects

- 1410 FEMA approves closeout of Large Projects individually, as each is completed.
- Prior to closing Large Projects, FEMA:
- Verifies there are no outstanding appeals or arbitration cases that warrant leaving the project open (for more information, see the *GMM* and 2 C.F.R. 200.345)
- Reviews the invoices and other documentation related to the work performed to validate it was consistent with the approved SOW, including completion of any approved PA mitigation
- Determines whether the Subrecipient completed the work within the approved deadline
 (FEMA limits reimbursement to costs incurred within the deadline)
- Ensures no duplication of funding exists (e.g., with insurance or costs in any other related projects)
- Validates compliance with 2 C.F.R. cost principles
- Validates compliance with all terms and conditions of the award
- FEMA reviews and verifies the accuracy of the actual costs and evaluates and reconciles any cost overruns or underruns. For projects with funding changes, FEMA prepares a project amendment and obligates additional funds or reduces funding based on actual costs to complete the eligible SOW.
 - The Subrecipient must provide documentation to support actual project costs within 90 days of work completion.
- Once FEMA completes its review and funding adjustments, FEMA approves closeout of the project and notifies the Recipient in writing.

1431 Small Projects

- To close Small Projects, the Recipient submits a Small Project Completion Certification and certifies that:
- The Subrecipient completed the approved SOW for all of its Small Projects in accordance with the FEMA-State/Territory/Tribe Agreement
- It made all payments in accordance with the FEMA-State/Territory/Tribe agreement 1437
 - The Applicant submits the Small Project Completion Certification to the Recipient and the Recipient must submit it to FEMA within 90 days of work completion or the latest approved deadline of its last Small Project, whichever is sooner.
- 1441 If the total actual cost of all a Subrecipient's Small Projects combined exceeds the total amount obligated for all its Small Projects, the Subrecipient may request additional funding.
 - The Subrecipient must request the additional funding as a Net Small Project Overrun through the appeal process, within 60 days of work completion on its last Small Project.

1446 1447 1448	Once FEMA receives a Small Project Completion Certification from the Recipient and completes the necessary review, FEMA approves closeout of the respective Small Projects and notifies the Recipient in writing.	i	
1449	Close Subrecipients		
1450 1451 1452 1453 1454	been completed and closed for the incident. The Recipient may either request this in the same submittal as the Subrecipient's last project closeout request or may submit a separate request. The request includes a Project Completion Certification Report listing all the		
	The Recipient must request that FEMA close each Subrecipient within 180 days of the work completion date or the project deadline, whichever occurs first.	ε	
1457 1458 1459 1460	If all the Subrecipient's projects are closed and there are no outstanding audits, FEMA closes the Subrecipient and notifies the Recipient in writing. If a Subrecipient does have outstanding audits, PA staff should refer to the <i>GMM</i> and contact Grants Management stafor additional assistance.	ıff	
1461	For more information refer to the <i>PAPPG</i> and the <i>GMM</i> .		
1462	Reconcile and Close PA Prime Award		
1463 1464 1465 1466 1467	The Recipient initiates the PA Prime Award closeout process once FEMA has closed all projects and Subrecipients. The Recipient must submit its final Federal Financial Report (\$425) with a written request to close the PA Prime award. FEMA PA and Grants Manageme staff coordinate with the Recipient certify that all work was completed and all eligible cost have been reimbursed and financially reconciled.	nt	
	For incidents declared before November 12, 2020, the Recipient must liquidate at obligations within 90 days of the end of the prime award period of performance.	1	
	For incidents declared after November 12, 2020, the Recipient must liquidate all obligations within 120 days of the end of the prime award period of performance.		
1472 1473 1474 1475	When the FEMA region receives the closeout request, PA and Grants Management staff work together to initiate the closeout process and complete a reconciliation of the PA Prim Award, as explained in the <i>GMM</i> . Grants Management staff then submit the reconciliation report to the FEMA Finance Center (FFC) for verification and final reconciliation. Upon final		

reconciliation by the FCC, FEMA closes the Recipient's PA Prime Award.

Table 21: Roles and Responsibilities during Phase VII

Roles	Responsibilities
Regional PA Closeout	Reviews and concurs on PA-related correspondence.
Branch Chief	Conducts Final Reviews on amendments
	Coordinates with the Grants Division on PA Program closure
PA State Liaison	 Conducts Initial Review for amendments on projects within assigned state(s)
Operations	Tracks PA-related correspondence
Support Specialist	Assists PA State Liaison with PA Program closure
Validation	 Reviews Large Project closeout requests and process necessary amendments Processes small project closeout requests and process necessary amendments Confirms appropriate use of funds based on the approved SOW
Specialist	Sends RFIs to Recipients, as necessary
	Identifies debts and initiates debt collection
	Reviews and reconciles Cat Z management costs
	Reviews and process requests to close Subrecipients
Insurance Specialist	Reviews and makes final insurance proceeds adjustments
Field EHP Specialist	Reviews final work completed for compliance with EHP conditions
	Review the submittal of quarterly SF-425
	 Monitor grant conditions as outlined in the SF-424
	 Monitor Recipient compliance with cash management requirements in the Payment Management System Review QPRs
Grants Management Staff	Forward PA Program disaster Closeout Packages to the FEMA Finance Center (FFC)
	Prepare Prime Award disaster grant Closeout Packages
	Track disaster grant closeout projections
	 Periodic compliance testing on Recipient transactions and internal controls

 If you suspect corruption, waste, fraud, abuse, mismanagement or misconduct contact the <u>Department of Homeland Security Office of Inspector General</u> hotline or submit a concern online.

1482	APPEN	DIX A: LIST OF ACRONYMS
1483	AFO	Area Field Office
1484	ALO	Audit Liaison Office
1485	BVI	Bicentennial Volunteers, Inc.
1486	CDL	Community Disaster Loan
1487	CAP	Corrective Action Plan
1488	COS	Chief of Staff
1489	CCHCO	Chief Component Human Capital Officer
1490	CRC	Consolidated Resource Center
1491	DDD	Damage Description and Dimensions
1492	DFA	Direct Federal Assistance
1493	DHS	Department of Homeland Security
1494	DM	Determination Memo
1495	DOP	Disaster Operating Profile
1496	DRF	Disaster Relief Fund
1497	DRM	Disaster Recovery Manager
1498	DTS	Deployment Tracking System
1499	EA	Office of External Affairs
1500	ECO	Emergency Operations Center
1501	EHAD	Environmental Planning and Historic Preservation Advisor
1502	EHP	Environmental Planning and Historic Preservation
1503	EO	Environmental Officer
1504	ERM	Enterprise Resource Management
1505	ESF	Emergency Support Function
1506	FCO	Federal Coordinating Officer
1507	FEMA	Federal Emergency Management Agency
1508	FFC	FEMA Finance Center
1509	FFR	Federal Financial Report
1510	FIMA	Federal Insurance and Mitigation Administration

1511	FMAG	Fire Management Assistance Grant
1512	GAO	Government Accountability Office
1513	GM	Grants Manager
1514	HQ	Headquarters
1515	IA	Individual Assistance
1516	IAP	Incident Action Plan
1517	IBD	Infrastructure Branch Director
1518	IMAT	Incident Management Assistance Team
1519	IMSK	Incident Management and Support Keystone
1520	INGS	Infrastructure Assets Group Supervisor
1521	IPERA	Improper Payments Elimination and Recovery Act
1522	IPERIA	Improper Payments Elimination and Recovery Improvement Act
1523	IRC	Interagency Recovery Coordination
1524	IRP	Incident Resource Plan
1525	JFO	Joint Field Office
1526	JRO	Joint Recovery Office
1527	LPN	Large Project Notification
1528	MA	Mission Assignment
1529	NDRF	National Disaster Recovery Framework
1530	NIMS	National Incident Management System
1531	NMF	National Mitigation Framework
1532	NRCC	National Response Coordination Center
1533	OBD-I	Operations Branch Director for Critical Infrastructure
1534	occ	Office of Chief Counsel
1535	OCFO	Office of the Chief Financial Officer
1536	OFA	Other Federal Agencies
1537	OIG	Office of Inspector General
1538	OMB	Office of Management and Budget

1539	ORR	Office of Response and Recovery
1540	Ops Chief	Operations Section Chief
1541	OS	Operations Support
1542	OSTL	Operations Support Task Force Leader
1543	PA	Public Assistance
1544	PAGS	PA Group Supervisor
1545	PDTL	Program Delivery Task Force Leader
1546	PDA	Preliminary Damage Assessment
1547	PDMG	Program Delivery Manager
1548	PIAA	Payment Integrity Information Act
1549	PNP	Private Non-Profit
1550	POP	Period of Performance
1551	QDSR	Quarterly Drawdown Sample Report
1552	QPR	Quarterly Progress Report
1553	RA	Regional Administrator
1554	REC	Record of Environmental Consideration
1555	RFI	Request for Information
1556	ROSM	Recovery Operations Support Manual
1557	RPA	Request for Public Assistance
1558	RRCC	Regional Response Coordination Center
1559	RRDD	Regional Recovery Division Director
1560	RSF	Recovery Support Function
1561	RSM	Recovery Scoping Meeting
1562	RTM	Recovery Transition Meeting
1563	SF	Standard Form
	•	
1564	SFM	Strategic Funds Management
1564 1565		Strategic Funds Management Site Inspector

1567	SLTT	State, Local, Tribal, and Territorial
1568	SME	Subject Matter Expert
1569	SRM	Strategic Resource Management
1570	SRP	Strategic Resource Plan
1571	SOP	Standard Operating Procedure
1572	SOW	Scope of Work
1573	SVI	Social Vulnerability Index
1574	TFL	Task Force Leader
1575	USACE	U.S. Army Corps of Engineers
1576	VAYGo	Validate as You Go
1577		

1578	APPENDIX B: AUTHORITIES, DOCUMENTS, AND
1579	RESOURCES
1580	Authorities
1581 1582 1583	Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) (Public Law 93-288, as amended, 42 United States Code [U.S.C.] 5121-5207), 2018
1584 1585 1586 1587 1588	The Stafford Act authorizes the programs and processes by which the Federal Government provides disaster and emergency assistance to state, local, tribal, and territorial (SLTT) governments, eligible PNP organizations, households, and individuals affected by a declared major disaster or emergency. The Stafford Act covers all hazards, including natural disasters and terrorist incidents.
1589 1590	Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et seq.), 2002
1591 1592 1593 1594 1595	The Homeland Security Act of 2002 created the DHS as an executive department of the Federal Government. The Homeland Security Act consolidated component agencies, including FEMA, into DHS. The Secretary of Homeland Security is the head of DHS and has direction, authority, and control over it. All functions of all officers, employees, and organizational units of DHS are vested in the Secretary of Homeland Security.
1596 1597	Post-Katrina Emergency Management Reform Act (PKEMRA) (Public Law 109-295), 2006
1598 1599 1600 1601 1602 1603 1604	PKEMRA clarified and modified the Homeland Security Act with respect to the organizational structure, authorities, and responsibilities of FEMA and the FEMA Administrator. Additionally, PKEMRA also modified the Stafford Act. Per PKEMRA, FEMA is to lead and support the Nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation. Under the PKEMRA, the FEMA Administrator reports directly to the Secretary of Homeland Security for all matters relating to emergency management in the United States.
1605	Sandy Recovery Improvement Act (SRIA) (Public Law 113-2), 2013
1606 1607 1608	The SRIA, signed into law on January 29, 2013, amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 100-707) to allow Indian tribal governments to directly request emergency and major disaster declarations and Fire

1609 1610 1611	Management Assistance Grants. The SRIA authorizes the most significant changes to the way that FEMA may deliver federal disaster assistance to SLTT governments, as well as disaster survivors since the passage of the Stafford Act.
1612	Disaster Recovery Reform Act (DRRA) (Public Law 115-254), 2018
1613 1614 1615 1616 1617	These reforms acknowledge the shared responsibility for disaster response and recovery, aim to reduce the complexity of FEMA, and build the Nation's capacity for the next catastrophic event. Some of the reforms include amending the Stafford Act to improve PA programs, authorize state-administered housing, and expand individuals and household assistance.
1618	Regulations
1619 1620	Title 44 of the Code of Federal Regulations (CFR), Emergency Management and Assistance
1621 1622 1623 1624	The CFR is a codification of the general and permanent rules and regulations published in the Federal Register that contain basic policies and procedures. Title 44 is titled, "Emergency Management and Assistance," and Chapter 1 of Title 44 contains the regulations issued by FEMA, including those related to implementing the Stafford Act.
1625	Title 48 of the CFR, Federal Acquisition Regulations System
1626 1627 1628 1629 1630 1631	The Federal Acquisition Regulations System codifies uniform policies and procedures for acquisition by all executive agencies. The Federal Acquisition Regulation System consists of the Federal Acquisition Regulations (FAR) and FEMA acquisition regulations that implement or supplement the FAR. The intent of the Federal Acquisition System is to deliver the best value product or service to the customer on a timely basis while maintaining the public's trust and fulfilling public policy objectives.
1632 1633	Title 2 of the CFR, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
1634 1635 1636 1637 1638 1639	This document provides guidance for non-federal entity recipients and subrecipients of federal financial assistance awarded by FEMA when using that assistance to finance procurements of property and services. The guidance provided by this document only applies to federal financial assistance (e.g., grants and cooperative agreements) subject to the procurement standards of the government-wide uniform administrative requirements, cost principles, and audit requirements for federal awards.

1640	Policy, Manuals, and Instructions
1641	National Disaster Recovery Framework (NDRF), June 2016
1642 1643 1644 1645 1646 1647	The Department of Homeland Security's <i>National Disaster Recovery Framework (NDRF)</i> enables effective recovery support to disaster-impacted states, tribes, territorial governments and local jurisdictions. The NDRF provides a flexible structure that enables disaster recovery managers to operate in a unified and collaborative manner. The NDRF also focuses on how best to restore, redevelop, and revitalize the health, social, economic, natural, and environmental fabric of the community and build a more resilient Nation.
1648 1649	The NDRF can be found at: https://www.fema.gov/emergency-managers/national-preparedness/frameworks/recovery
1650	National Response Framework (NRF), October 2019
1651 1652 1653 1654 1655 1656 1657 1658	The Department of Homeland Security's <i>National Response Framework (NRF)</i> provides foundational emergency management doctrine for how the Nation responds to all types of incidents. The NRF is built on scalable, flexible, and adaptable concepts identified in NIMS to align key roles and responsibilities across the Nation. Since publication of the third edition of the NRF in 2016, disaster response operations have underscored the paramount importance of sustaining essential community lifelines. The NRF defines community lifelines as those services that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security.
1659 1660	The NRF can be found at: www.fema.gov/emergency-managers/national-preparedness/frameworks/response
1661	FEMA Incident Management and Support Keystone (IMSK), January 2011
1662 1663 1664 1665	The <i>Incident Management and Support Keystone (IMSK)</i> is the primary document from which all other FEMA disaster response directives and policies are derived. The IMSK describes how the response doctrine, articulated in the NRF, is implemented in FEMA disaster response operations.
1666 1667	FEMA's <i>IMSK</i> can be found in the <u>ORR Doctrine</u> , <u>Policy and Directives Library</u> or may be accessed directly at <u>www.fema.gov/sites/default/files/2020-</u>

07/fema incident management and support keystone-Jan2011.pdf

1669	FEMA Incident Management Handbook, November 2017
1670 1671 1672 1673 1674 1675	FEMA's <i>Incident Management Handbook</i> is a tool to assist FEMA emergency management personnel in conducting their assigned missions in the field. The handbook provides information on FEMA's incident-level operating concepts, organizational structures, functions, position descriptions, and key assets and teams. It supplements the FEMA Incident Management Manual by providing additional detail on how FEMA personnel plan and execute their assigned missions in the field.
1676 1677	FEMA's Incident Management Handbook can be found in the <u>ORR Doctrine</u> , <u>Policy and Directives Library</u> .
1678	FEMA Incident Management Manual, September 2015
1679 1680 1681 1682 1683	FEMA's <i>Incident Management Manual</i> describes how FEMA organizes and conducts incident management when responding to, recovering from, and mitigating disasters. The manual bridges the gap between the IMSK, which provides overarching guidance for all of FEMA, and the tactical-level descriptions of how FEMA conducts incident management, found in the Incident Management Handbook.
1684 1685	FEMA's <i>Incident Management Manual</i> can be found in the <u>ORR Doctrine</u> , <u>Policy and Directives Library</u> .
1686	FEMA Incident Stabilization Guide (Operational Draft), November 2019
1687 1688 1689 1690 1691	The FEMA Incident Stabilization Guide describes how FEMA implements lifelines and guides how FEMA applies these concepts to disaster operations. It provides guidance to all FEMA employees who plan for and who conduct disaster operations in accordance with the NRF, 4th Edition, and serves as a resource for partners on how FEMA approaches and conducts response operations.
1692 1693	FEMA's Incident Stabilization Guide (Operational Draft) can be found in the <u>ORR Doctrine</u> , <u>Policy and Directives Library</u>
1694	FEMA Joint Recovery Office Guide, June 2021
1695 1696 1697 1698	FEMA's <i>Joint Recovery Office Guide</i> defines a standard operational framework for establishing, transitioning to, operating, and closing a JRO. The JRO Guide is applicable solely to incidents with extraordinary recovery and coordination requirements where a JRO may be necessary.

1699 1700	FEMA's Joint Recovery Office Guide can be found in the <u>ORR Doctrine</u> , <u>Policy and Directives</u> <u>Library</u>
1701	FEMA National Incident Support Manual (NISM), January 2013
1702 1703 1704 1705 1706 1707 1708	The National Incident Support Manual (NISM) describes how the FEMA national staff supports FEMA incident operations and discusses steady-state activities pertinent to incident operations. The manual defines the activities of Federal assistance—across the nation and within FEMA's statutory authority—supporting citizens and first responders in responding to, recovering from, and mitigating all hazards. It includes definitions and descriptions of roles and responsibilities, functions, and organizational structures for those conducting FEMA incident support duties.
1709 1710	FEMA's NISM can be found in the Office of Response and Recovery (ORR) <u>Doctrine, Policy</u> and <u>Directives Library</u>
1711 1712	FEMA Policy 104-009-02, Public Assistance Program and Policy Guide (PAPPG), June 2020
1713 1714 1715	FEMA's <i>Public Assistance Program and Policy Guide (PAPPG)</i> defines FEMA's policy and procedural requirements for the PA Program and is intended to guide decision making and ensure consistent implementation of the PA Program.
1716	The PAPPG can be found at: www.fema.gov/assistance/public/policy-guidance-fact-sheets
1717	FEMA Preliminary Damage Assessment Guide, August 2021
1718 1719 1720 1721 1722	The <i>Preliminary Damage</i> Assessment Guide defines a standard national-level framework for how SLTT government officials and FEMA staff collect, validate, quantify, and document the cause, location, and details of damage following a disaster. The guide outlines a common concept of operations, defines major roles and responsibilities, recommends methodologies and establishes national-level damage assessment standards and procedures.
1723 1724	The Preliminary Damage Assessment Guide can be found at: www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide
1725 1726	FEMA Public Assistance Appeals and Arbitration under the Disaster Recovery Reform Act, Fact Sheet
1727 1728	This fact explains how certain applicants for FEMA Public Assistance may request arbitration with the Civilian Board of Contract Appeals (CBCA).

1729	The fact sheet can be accessed directly at: www.fema.gov/sites/default/files/2020-
1730	07/fema DRRA-1219-public-assistance-arbitration-right fact-sheet.pdf
1731	FEMA Public Assistance Program Appeals Guide, November 2019
1732 1733 1734 1735 1736 1737 1738	The FEMA Public Assistance Program Appeals Guide identifies the policies, provides the procedures, and sets forth the responsibilities related to the FEMA PA Program appeals process. The guide outlines roles and responsibilities related to processing PA appeals; provides guidance on appeal and arbitration rights and requirements; establishes uniform appeals-related processes and procedures for FEMA regional and headquarters (HQ) staff; defines terms related to the appeals process; and includes resources for researching, drafting, and publishing appeals.
1739 1740	FEMA's <i>Public Assistance Program Appeals Guide</i> can be found in the <u>ORR Doctrine, Policy</u> <u>and Directives Library</u>
1741 1742	FEMA Public Assistance SOP 9570.24, Strategic Funds Management, December 2012
1743 1744	This Standard Operating Procedure (SOP) establishes the process for implementing Strategic Funds Management (SFM) in the PA Program.
1745 1746 1747	FEMA SOP 9570.24: Strategic Funds Management – Implementation Procedures for the Public Assistance Program can be found with other PA SOPs and operations manuals at: www.fema.gov/assistance/public/policy-guidance-fact-sheets/sops-operations-manuals
1748 1749	FEMA Infrastructure Branch Director and Public Assistance Group Supervisor Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations
1750 1751 1752 1753 1754	This position assist addendum provides interim guidance for Infrastructure Branch Directors (IBDs) and Public Assistance Group Supervisors (PAGS) and supplements the IBD/PAGS Position Assist. This addendum provides guidance for equitable assignment of Program Delivery Managers, considerations for virtual and in-person support, and considerations for tribal nations.
1755 1756 1757 1758	The FEMA Infrastructure Branch Director and Public Assistance Group Supervisor Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations can be found with other PA position assist addenda at the https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-
1759	<u>Toolbox.aspx</u>

1760 1761	FEMA Public Assistance Strategic Resource Management Standard Operating Procedure (Operational Draft), July 2021
1762 1763 1764 1765	The Strategic Resource Management (SRM) provides a comprehensive process for the management and deployment of PA staff to disaster operations. SRM offers a streamlined, planned, and nationally coordinated process utilizing all types of staffing resources and in accordance with the Recovery Operations Support Manual (ROSM).
1766 1767 1768 1769	FEMA's Strategic Resource Management Standard Operating Procedure (Operational Draft) can be found in the Program Delivery Branch's Delivery Toolbox on SharePoint at: https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx in the "FEMA Process" section
1770	FEMA Publication 1, November 2019
1771 1772 1773 1774	Publication 1 (Pub 1) is FEMA's capstone doctrine. Pub 1 describes FEMA's ethos and identifies FEMA's core values of compassion, fairness, integrity, and respect. Pub 1 also delineates nine guiding principles that provide overarching direction to FEMA employees for the performance of their duties.
1775	FEMA's Publication 1 can be found at: www.fema.gov/about/pub-1
1776	FEMA Recovery Operations Support Manual (ROSM), March 2021
1777 1778 1779 1780 1781 1782	FEMA's Recovery Operations Support Manual (ROSM) describes how FEMA executes its recovery mission. It establishes a framework for enterprise-wide management of recovery operations and provides a foundation for risk-based decision making at all operational levels. The ROSM defines the full scope of FEMA's capabilities and responsibilities, and communicates how the Agency executes its recovery responsibilities in an integrated way with the full spectrum of FEMA's recovery partners.
1783	FEMA's ROSM can be found in the ORR Doctrine, Policy and Directives Library
1784	FEMA State-Led Public Assistance Guide, February 2019
1785 1786 1787 1788	FEMA's State-Led Public Assistance Guide provides clear and streamlined guidance on the processes, resources, and capabilities required for Recipients to lead PA operations. This guidance outlines the process for Recipients and FEMA to determine if and under what conditions Recipients may elect to perform certain PA disaster grant functions.
1789 1790	FEMA's State-Led Public Assistance Guide can be found with other FEMA PA Policies and Guidance at: www.fema.gov/assistance/public/policy-guidance-fact-sheets/other

1791	FEMA Manual 205-0-1 Grants Management, January 2018
1792 1793 1794 1795 1796 1797	The FEMA Grants Management Manual (GMM) provides FEMA officials with an overview of the policies and procedures that govern FEMA's grant awards, cooperative agreements, and other federal financial assistance. GMM also serves as a basic reference and framework for FEMA staff involved in the various aspects of administering FEMA financial assistance programs and is intended to function as a supplement to applicable statutes, federal regulations, policies, and other requirements.
1798 1799 1800	The <i>GMM</i> can be found with other Grants Management and closeout related guidance at: https://usfema.sharepoint.com/teams/RESGPD/collab/EGS/CloseoutCoordination/Forms/Subject.aspx
1801	Additional Resources
1802	FEMA Audit Liaison Office SharePoint site
1803 1804 1805 1806	FEMA's Audit Liaison Office (ALO) serves as an internal and external liaison for FEMA and its components relating to performance audits and provides agency oversite to the audit follow-up process. The ALO SharePoint site contains dashboards, templates, infographics, and other resources.
1807 1808	The ALO SharePoint site can be accessed at: https://usfema.sharepoint.com/sites/OPPA/Pages/GAOOIGAuditLiaisonOffice.aspx .
1809	FEMA Program Design Branch, Delivery Toolbox
1810 1811 1812	FEMA's Program Design Branch <i>Delivery Toolbox</i> contains all resources that FEMA PA staff may need during the grant writing process. Please use the Change Control Tool to submit feedback and comments on documents.
1813 1814 1815	The Delivery Toolbox can be accessed on SharePoint at: https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx
1816	FEMA Public Assistance Change Control Tool
1817 1818 1819 1820 1821	FEMA staff use the PA <i>Change Control Tool</i> to participate in continuous improvement. FEMA staff submit issues, opportunities, and feedback using the Change Control Tool. Submissions are categorized, prioritized, and reviewed by PA Subject Matter Experts and adjudicated as appropriate. FEMA strives to continuously improve the PA Program and encourages feedback on all aspects of the program. FEMA partners may submit issues,

1822 1823	opportunities, and feedback related to the PA Program via the "Feedback" feature in PA Grants Portal.
1824 1825 1826	The Change Control Tool can be accessed via SharePoint at: https://usfema.sharepoint.com/teams/ORRApps/NewPA/Pages/SubmitRequest-CCT-P3.aspx
1827	FEMA Public Assistance Grants Manager and Grants Portal Tool
1828 1829 1830 1831	The Grants Manager and Grants Portal tool is a two-part, online platform that is used to formulate and track award packages. Grants Manager is the internal platform used by FEMA specialists, while the Grants Portal is the external platform used by Applicants, Recipients, and Subrecipients to manage their projects.
1832 1833	The Grants Manager Tool can be accessed at: https://pagrants.fema.gov/Account/Login?ReturnUrl=%2f
1834	The Grants Portal Tool can be accessed at: https://grantee.fema.gov
1835 1836	FEMA Public Assistance Grants Portal and Grants Manager Training, YouTube Channel
1837 1838 1839 1840 1841	Previously-recorded Recipient and Applicant Webinars are available on FEMA's <i>Grants Manager/Grants</i> Portal YouTube channel or the Support Center in Grants Manager and Grants Portal. FEMA also offers regular Grants Manager/Grants Portal training to internal and external stakeholders. Schedules for internal FEMA employee and contractor microtrainings (webinars) are distributed by FEMA staff on a regular basis.
1842 1843	FEMA's training YouTube channel for <i>Grants Manager</i> and <i>Grants Portal</i> can be accessed at: www.youtube.com/channel/UCIJp91Ds2laVIR1t8uXcEKg
1844	FEMA Public Assistance Recovery Performance Framework Dashboard
1845 1846 1847	FEMA's Recovery Performance Framework Dashboard is a fully automated and interactive dashboard based on the PA program's standardized, cascading performance goals and indicators.
1848 1849 1850	The Recovery Performance Framework Dashboard can be accessed at: https://analytics.fema.net/t/RAB/views/PARecoveryPerformanceFramework/RPF?iframeSizedToWindow=true&%3Aembed=y#1

APPENDIX C: PUBLIC ASSISTANCE DEADLINES

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

Table 22: Regulatory and Policy Deadlines

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

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

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

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

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

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

APPENDIX D: TIMELINESS GOALS

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

Table 23: Timeliness Goals

Phase	Outcome	Goal	Responsible Role
	Review Request for Public Assistance (RPA)	Within 3 days of receiving RPA	PAGS
Phase 1	Conduct Exploratory Call	Within 7 days of Applicant assignment	PDMG
	Conduct Recovery Scoping Meeting	Within 21 days of Applicant assignment	PDMG
	Schedule Site Inspection	Within 3 days of RSM	PDMG
	Complete Site Inspections	Within 21 days of a confirmed request for a site inspection	Site Inspector
5 2	Complete damage documentation	Within 21 days of RSM, damage documentation is complete	PDMG
Phase 3	Complete DDD	Within 7 days of completing the site inspection	Site Inspector
	Review DDD	Within 2 days after receipt of the site inspection	PDMG
	Approve DDD	Within 7 days after receiving it from the PDMG	Applicant
	Complete the DDD and validation of documentation for Completed Lane Projects	14 days after the PDMG routes the project to the CRC	Validation Specialist
Phase 3	Complete project development for Standard Lane projects	14 days after the PDMG routes the project to the CRC	Costing Specialist
Ph	Complete project development for Specialized Lane projects	24 days after the PDMG routes the project to the CRC	Technical Specialist

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

APPENDIX E: PUBLIC ASSISTANCE PROGRAM 1867 **POSITIONS AND FUNCTIONS** 1868 1869 Further guidance for PA Program positions and functions can be found in the Delivery 1870 Toolbox and on the Grants Manager Resources page. Field Positions 1871 Federal Coordinating Officer 1872 1873 The Federal Coordinating Officer (FCO) is responsible for the leadership and overall 1874 management of the federal response to and recovery from Presidentially declared incidents. 1875 FCOs execute DRM authority, delegated from the RA, to manage all disaster staff and 1876 offices, including PA. As such, the FCO has the influence to set priorities for PA program 1877 delivery, oversee PA staff and disaster deployments, work with state, tribal, or territorial 1878 officials, and even work directly with some applicants. FCOs often re-delegate certain 1879 authorities, including project obligation, to the IBD/PAGS. The FCO may choose to establish 1880 financial controls to manage fiduciary risks, such as limiting delegated approvals to certain 1881 dollar thresholds. 1882 Infrastructure Branch Director 1883 The Infrastructure Branch Director (IBD) reports to the Operations (Ops) Section Chief and is 1884 responsible for coordination of infrastructure-related activities performed by staff assigned 1885 to the Infrastructure Branch, and field leadership of the PA Program. The IBD oversees the 1886 infrastructure ESFs during response. In coordination with the Recipient and the PAGS, the 1887 IBD also assesses Applicant needs for assistance and ensures appropriate support for 1888 underserved communities. The IBD position is determined as Type 1 or Type 2 to correspond 1889 to the appropriate incident level. In Level I incidents, Deputy Infrastructure Branch Chiefs 1890 may support the Branch Chief. **Public Assistance Group Supervisor** 1891 1892 The Public Assistance Group Supervisor (PAGS) has a variety of responsibilities across PA 1893 Program delivery. Acting in mostly an oversight role, the PAGS sets and manages goals for 1894 each phase, monitors interactions with Applicants and Recipients, and coordinates with 1895 other offices or individuals as necessary. In coordination with the Recipient and the IBD, the 1896 PAGS also assesses Applicant needs for assistance and ensures appropriate support for 1897 underserved communities. The PAGS is also involved in the eligibility determination process 1898 and is responsible for determining accuracy of eligibility determinations and development of 1899 a DM. The PAGS supports the IBD in Level I and II incidents and manages Level III incidents.

1900	Site Inspector Task Force Leader
1901	Site Inspector Task Force Leaders (SITLs) are responsible for overseeing the site inspection
1902	process, ensuring SI successfully complete site inspections and develop accurate DDD.
1903	SITLs are engaged as early as Phase I, where they use the Disaster Operating Profile to
1904	assist in gauging staffing resource requirements; and during RSM, where they begin
1905	scheduling physical and virtual inspections alongside the Applicant and PDMG. SITLs assign
1906	Site Inspection Work Orders to SI, ensuring SI coordinate with Environmental and Historic
1907	Preservation and Mitigation prior to the site inspection as necessary, and ensuring assigned
1908	Site Inspectors have the information and resources necessary to complete their duties.
1909	Subject Matter Experts may have SI Crew Leaders to assist with the management of SI staff.
1910	Site Inspector Crew Leader
1911	The Site Inspector Crew Leader provides oversight regarding personnel, administrative, and
1912	resource needs. The SI Crew Leader manages SI Site Inspector Specialists to ensure the
1913	entire site inspection work order cycle is complete, including preparing and performing
1914	quality and timely site inspections and developing accurate, detailed DDD with supporting
1915	photos, sketches, and calculations.
1916	Site Inspector
1917	The Site Inspector (SI) collects and validates information about Applicants' damage claims.
1918	The SI prepares for and performs timely site inspections and develops detailed DDDs with
1919	supporting photos, sketches, and calculations. The SI role is critical as it is one of the only
1920	PA roles that sees claimed impacts and damage in person.
1921	Operations Support Task Force Lead
1922	Operations Support Task Force Leaders (OSTLs) are responsible for providing support to the
1923	PAGS to ensure overall operational efficiency, including managing required administrative,
1924	reporting, planning and staffing tasks of the PA section. The OSTLs, at the request of the
1925	PAGS or a PAGS designee, communicate the JFO operational priorities to staff as they relate
1926	to Operations Support. OSTLs also ensure that the day-to-day administrative operations are
1927	efficiently and effectively conducted to provide optimal support to the PAGS and JFO staff.
1928	The OSTL manages and mentors the Operations Support staff in the JFO.
1929	Program Delivery Task Force Leader
1930	The Program Delivery Task Force Leader (PDTL) is the first-level supervisor for the PDMG
1931	and serves as a conduit between the PAGS and the Program Delivery Manager (PDMG),
1932	communicates the JFO operational priorities to the PDMGs, and ensures that an appropriate
1933	program delivery strategy is developed by the PDMGs to accomplish operational objectives,
1934	including appropriate support for underserved communities. The PDTL manages PDMG
1935	workflow and reviews PDMG deliverables. The PDTL resolves any operational issues arising

1936 1937 1938	in the field impeding delivery of the program and service to Applicants by their assigned PDMGs. This is all done to ensure timely, accurate delivery of the PA program throughout all phases of program delivery.
1939 1940 1941 1942 1943 1944 1945	Program Delivery Manager The PDMG provides customer service to assigned Applicants throughout the PA grant delivery process. When supporting underserved or complex Applicants, the PDMG works to understand their unique needs and ensure appropriate support. The PDMG facilitates and coordinates the effective, efficient, and accurate delivery of project funding while coordinating the Applicant's recovery priorities, understanding capacity to develop projects and participate in site inspections, and provides customer services.
1946	Region-Specific Positions
1947 1948 1949 1950 1951 1952 1953 1954 1955 1956 1957 1958	Regional Administrator The Regional Administrator (RA) is the primary FEMA representative to state governors, OFAs, and local, tribal, and territorial authorities during day-to-day operations within their region. The RA reviews and recommends approval/denial of declaration requests. In the event of a Stafford Act declaration, the RA has control of FEMA resources within the region and is designated as the DRM. The RA executes DRM authority, including activating and tasking support functions, selecting field leadership from within the FEMA region, or recommending leadership for Level I incidents, approving MAs, approving incident staffing plan for Level I incidents, engaging with policy as necessary, and supporting development of regional All-Hazards plans and other relevant pre-disaster recovery plans. The RA delegates DRM authority to field leadership, usually the FCO, once they have established operational capability, or to regional program leadership, as needed.
1959 1960 1961 1962 1963 1964 1965 1966	Regional Recovery Division Director The Regional Recovery Division Director (RRDD) oversees all PA-related functions in the region, and supports joint PDAs, emergency declarations, and MAs, as applicable. The RRDD recommends approval/denial of declaration requests to the RA and makes formal recommendations to the RA on appeals. The RRDD also analyzes quarterly JFO data to identify field offices ready for transition to the region, conducts final reviews at closeout for incidents that have been transitioned back to the region, and delegates day-to-day responsibility for their branch chiefs.
1967	Regional PA Operations Branch Chief

Regional PA Operations Branch Chiefs report to the Regional Recovery Division Director and

are responsible for providing direction, oversight, and coordination of activities performed by

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1970 1971	regional PA staff to deliver the PA Program in the field; and coordinating with SLTT governments and OFA to deliver the PA Program during the response phase.
1972 1973 1974 1975 1976	Regional PA Closeout Branch Chief Regional PA Closeout Branch Chiefs report to the Regional Recovery Division Director and are responsible for providing direction, oversight, and coordination of project monitoring and closeout activities performed by regional PA staff; and coordinating with state, tribal, and territorial governments on project monitoring and compliance.
1977 1978 1979 1980 1981	Public Assistance State/Tribal Liaison The PA State/Tribal liaison provides customer service to assigned states, tribes, and territories throughout the project monitoring and closeout process. While not all regions have a Tribal Liaison, this is a best practice as the Tribal Liaison serves as the primary point of contact for tribes.
1982	Headquarters-Specific Positions
1983 1984 1985 1986 1987 1988 1989 1990	Assistant Administrator for Recovery The Assistant Administrator for Recovery oversees all FEMA Recovery programs, including PA. The Assistant Administrator, or their designee, has the sole authority to modify or waive PA Policy, and issue specific deadline extensions or exemptions. They may delegate these authorities to the PA Division Director. In order to establish a JRO, the RA must work with the Assistant Administrator and gain their concurrence. Alongside the Chief Component Human Capital Officer (CCHCO), the Assistant Administrator for Recovery approves the Incident Resource Plan (IRP) for Level I disasters and for all other disasters for which the FEMA region plans to set up a JRO,
1992 1993 1994 1995 1996 1997 1998 1999 2000	Public Assistance Division Director and Deputies The PA Division Director reports to the Assistant Administrator for Recovery and oversees PA program development and delivery across the recovery enterprise. The Deputy Director for Operations oversees program implementation and controls and provides national-level support for incidents that exceed regional routine incident years. The deputy manages the CRCs, Contracts Management, Field Resources, and Training and Development Branches. The Deputy Director for Policy oversees the development and design of the program and manages the Appeals, Audits, and Arbitration; Policy; Program Design; and Program Support and Monitoring Branches.
2001 2002 2003	Consolidated Resource Center Director and Deputies The CRC Director manages a CRC and ensures exceptional support to field and region led program delivery. The CRC Deputy Directors manage the staff within their assigned lanes. Operations Lang Deputy Director manages lang staff conducting quality assurance. DM

2005 2006 2007 2008	drafting, EHP completeness reviews, insurance compliance reviews, and document integrity management. The Standard Lane Deputy Director manages Standard Lane staff, and the Completed and Specialized Lane Deputy Director manages the Completed and Specialized Lane staff.
2009 2010 2011 2012 2013 2014 2015 2016 2017	Executive Officer The CRC Executive Officer reports to the CRC Director and is responsible for leading the day-to-day operations, resource management, and human resources coordination. They serve as senior office administrator, providing advice and recommendations on all matters related to the coordination, integration, and synchronization of staff actions and activities affecting the CRC. They analyze and evaluate operations and the management of administrative processes; managing critical support functions such as scheduling, budget monitoring, supplies, space utilization, training and coordinating with human resources and other internal partners to post job announcements, recruit candidates, and select candidates.
2018 2019 2020 2021 2022 2023 2024 2025 2026	Consolidated Resource Center Lane Manager The CRC Lane Manager oversees consolidated resources using a standardized approach to project development in all categories of work. Lane Managers should have situational awareness of Incident and Applicant profiles to forecast resource requirements and prepare for efficient work processing. Lane Managers are responsible for managing work of specific teams of specialists within CRCs, including assigning work, conducting peer reviews, and ensuring production goals are met. Lane Managers oversee costing specialists (i.e., Standard Lane), Determination Analysts, Document Integrity Unit Specialists, EHP Specialists, Insurance Specialists, Technical Specialists, and Quality Assurance Specialists.
2027	Cross-Enterprise Public Assistance Positions
2028 2029 2030 2031 2032 2033 2034	Operations Branch Director The Operations Branch Director oversees activities for a modular unit. Branch Directors operate in a geographical or functional capacity, directing operations for either a geographical subset of incident operations (i.e., at a Branch or AFO), or for a functional branch (i.e., Emergency Services, Air Operations, Infrastructure, Individual Assistance). During an incident, the Operations Branch Director for Critical Infrastructure (OBD-I) will transition roles and responsibilities over to the PA IBD as the incident stabilizes.
2035 2036 2037 2038	Operations Section Chief The Operations Section Chief is responsible for coordinating tactical activities focused on reducing immediate hazards, saving lives and property, establishing situational control, and restoring normal operations after an event or incident. They lead and manage the conduct of

incident operations including advising the FCO, provide key input for IAPs, and lead and

204020412042	supervise Operations Section staff, including Operations Branch Directors. As response activities transition to recovery, the PA IBD or PA Group Supervisor maintains situational awareness with the Ops Section Chief, who liaises with the FCO.
2043 2044 2045 2046 2047 2048	Operations Support Specialist The Operations Support Specialist assists with deployment coordination and obtaining staff needed for the workload. Also helps in overseeing and aiding staff, including check-in, check-out, staff reporting, accountability, and any administrative requirements. In addition, the Operations Support Specialist prepares PA input for the IAP and situational report and tracks correspondence.
2049 2050 2051 2052 2053 2054 2055	Costing Specialist The Costing Specialist contributes to the timeliness, quality, and reliability of program delivery in providing project funding based on a codified, detailed DDD. Cost Specialists work on projects in the Standard Lane and validate Scope of Work (SOW) and Cost Estimates for uncompleted work. For work completed, the Costing Specialist reviews applicant-provided documents to develop the SOW and validate the costs. Costing Specialists may support the CRC or regional office.
2056 2057 2058 2059 2060 2061	Validation Specialist The Validation Specialist reviews documentation and ensures the completeness, accuracy, and eligibility of SOW and costs associated with work that is 100% completed and documented. Validation Specialists work on projects where the work is 100% completed and documented and develops the entire project or amendment consisting of the detailed DDD, SOW, and costs. The Validation Specialist may support the CRC or regional office.
2062 2063 2064 2065 2066 2067 2068	Environmental Planning and Historic Preservation Specialist The Environmental Planning and Historic Preservation (EHP) Specialist provides technical assistance to PA staff, Recipients and Applicants to identify EHP compliance considerations that may be applicable to an Applicant's recovery actions. The EHP Specialist integrates the protection and enhancement of environmental, historic, and cultural resources into the FEMA PA Program by ensuring that FEMA actions comply with federal EHP laws and Executive Orders. The EHP Specialist may support the Field, CRC, regional office, or HQ.
2069 2070 2071 2072 2073 2074	Environmental Planning and Historic Preservation Advisor The Environmental Planning and Historic Preservation Advisor (EHAD) oversees all consultation and coordination activity and National Environmental Policy Act (NEPA) document preparation. The EHAD is typically the disaster Environmental Officer and is the final reviewer for Records of Environmental Consideration (RECs) submitted by EHP staff. The EHAD is responsible for tracking EHP productivity and staffing needs and participates in

2075 2076	consultation with regulatory agencies. The EHAD operates outside the Operations chain of command and reports to the FCO or Chief of Staff (COS).
2077	IMAT Team Lead
2078 2079 2080 2081 2082 2083 2084	Incident Management Assistance Teams (IMAT) exist at the regional and national level. They deploy first when an incident strikes to provide immediate response, gain situational awareness, and establish FEMA's staffing framework for response and recovery. The IMAT Team Lead works closely with regional leadership and SLTT organizations to ensure immediate hazards are identified and FEMA's response is coordinated expeditiously. Once a framework for remaining response and recovery has been established at the incident level, the IMAT Team Lead transitions duties to the FCO and Operations Section Chief.
2085 2086 2087 2088 2089 2090	Insurance Specialist The Insurance Specialist supports PA Program delivery to Recipients and Subrecipients by applying statutory and regulatory insurance requirements during the PDA, project formulation, and compliance review. before determining the amount of net eligible PA funding for eligible but insured elements. The Insurance Specialist may support the CRC or regional office.
2091 2092 2093 2094 2095 2096 2097 2098	Interagency Recovery Coordination Staff PA is responsible for seeking opportunities to leverage post-incident funding and technical assistance of federal interagency partners, including by working with IRC staff, who help coordinate interagency recovery support for problems, issues, and needs that are not covered by PA. While the IRC itself does not control funding or resources, its job is to act as a hub of information and contacts, assisting stakeholders to narrow down their need or request, then finding information or a point of contact (often a federal partner) who can offer support. IRC staff provide HQ and Field support.
2099 2100 2101 2102 2103 2104 2105	Hazards and Performance Analysis Task Force Leader (TFL) The Hazard and Performance Analyst Task Force Leader (TFL) is the first-level supervisor for the Mitigation Specialists and communicates the JFO operational priorities to the Mitigation Specialists to accomplish operational objectives. The HPATFL manages Mitigation Specialist workflow and reviews Mitigation Specialist deliverables. The HPATFL resolves any operational issues arising in the field impeding delivery of the program and service to Applicants by their assigned Mitigation Specialists.
2106 2107 2108 2109	Mitigation Specialist The Mitigation Specialist focuses on providing technical assistance to PA staff, Recipients and Applicants to identify PA hazard mitigation actions that enhance an eligible facility's ability to resist damage in future incidents. Mitigation Specialists work closely with PDMGs,

2110 2111	and their counterparts in the CRC and region and may support the CRC, field, or regional office.
2112	Reports Specialist
2113 2114 2115 2116	The Reports Specialist is responsible for extracting data from grant management systems and associated tools used by the PA Program; conducting quantitative data analysis with varied data sets; developing reports and other analytical products; and identifying opportunities to evaluate project development effectiveness and performance.
2117 2118 2119 2120 2121 2122 2123	Technical Specialist The Technical Specialist contributes to the timeliness, quality, and reliability of program delivery in providing project funding based on a codified, detailed DDD. Technical Specialists work on projects in the Specialized Lane, conducting site inspections or completing assessments for complex/specialized damages, validating SOW and Cost Estimates for complex/specialized projects, and/or reviewing Applicant-provided documents to develop the SOW and costs. Technical Specialists may support the Field Office, CRC or region.
2124 2125 2126 2127 2128 2129 2130 2131	Quality Assurance Specialist The Quality Assurance (QA) Specialist reviews the detailed DDD, SOW, and Cost Estimate for accuracy and proper documentation, prior to a project submittal to Program Compliance Review for Insurance, PA Hazard Mitigation, and EHP. The QA Specialist's reviews ensure consistency in program delivery and development of a quality project. The QA Specialist works with Costing, Document Validation, and Technical Specialists for clarity and accuracy in projects. This role is integral to ensuring Applicant-provided documentation is complete in support of project development and may support the CRC or regional office.
213221332134	Determination Analyst The Determination Analyst drafts DMs based on Eligibility Reviews. Determination Analysts may support the CRC or regional office.
2135 2136 2137 2138 2139 2140 2141	Policy Analyst The Policy Analyst focuses on reviewing the laws and regulations that govern the PA Program and developing policy, guidance, fact sheets, and other documents that articulate FEMA's intent and direction for administering PA grants to external stakeholders. Policy Analysts work on policy related to program administration, emergency work, permanent work, and costs and grant awards. The Policy Analyst may support HQ, field operations, or the regional office.

2142	PA Audit Liaison
2143	The PA Audit Liaison reviews audit findings, draft versions of Management Response Letters
2144	and contribute to the timely resolution of audit recommendations. The Audit Liaison may
2145	support the regional office or FEMA HQ.
2146	Appeal Analyst
2147	The Appeal Analyst performs the completeness review, preparing analysis for each appeal
2148	and presenting it to leadership, researching and drafting all first appeal decisions within the
2149	prescribed regulatory timeframes. Appeal Analysts must be certified by the HQ PA Appeals
2150	and Audits Branch. Appeal Analysts may support first appeals in the regional office or
2151	second appeals at FFMA HO

APPENDIX F: IDENTIFYING COMPLEX AND HIGH-2152 **RISK APPLICANTS AND PROJECTS** 2153 2154 This appendix provides considerations for identifying complex and high-risk Applicants and 2155 projects to prioritize resources against competing needs and enable effective and timely 2156 recovery outcomes. 2157 Complex PA Applicants and projects are those that: have interconnecting parts, elements, or 2158 sites; are difficult to analyze, understand, or explain; require specialized technical 2159 knowledge, or have a high probability of difficult eligibility criteria to navigate. 2160 High-risk PA Applicants and projects are those that: have cascading impacts that will either 2161 trigger a chain of events that exponentially increase the incident's impacts or may be 2162 prevented if caught and resolved early; have impacts to interdependent facilities such that 2163 one facility must be addressed to continue operations at another facility; involve 2164 communities that have been underserved, marginalized, and adversely affected by 2165 persistent poverty and inequality; entail fiduciary risk of federal funds (e.g., risk of funds not 2166 being used for intended purpose or not achieving value for money); program risk of not

2170 Applicants

2171 These criteria are useful in identifying complex and high-risk applicants.

2172 Complex Applicants

the PA program.

- 2173 The following criteria may indicate that an Applicant is complex:
- Applicant is interested in restoring the community in a manner that is different from how
 it was prior to the incident occurring.

effectively meeting community needs; legal risk of not complying with law, regulation, or

policy; or reputational risk of harm to the American public's confidence in FEMA's delivery of

- Applicant represents large metropolitan or densely populated areas such as the City of Houston.
- Interstate interests, such as the Port Authority of New York and New Jersey.
- Tribal governments.
- PNP organizations, that have additional eligibility requirements including the need to demonstrate that they own or operate a facility that provides an eligible service.
- Applicant has significant impacts to critical infrastructure.

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2184 High-Risk Applicants

- 2185 The following criteria may indicate that an Applicant is high-risk:
- Applicant has potentially non-compliant or complex contract costs
- Applicant has been the subject of a Congressional Inquiry
- Significant representation of vulnerable or underserved communities in the Applicant's population.
- High-profile (attracting political interest or media attention)
- Fiduciary concerns or financial constraints
- Impacts to all categories of work; impacts to numerous facilities

2193 **Projects**

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2194 These criteria are useful in identifying complex and high-risk projects.

2195 Complex Projects

- 2196 The following criteria may be useful in identifying complex projects:
- Project requires architectural and engineering (A&E) drawings before cost estimates
- Project requires significant codes and standards upgrades (e.g., adding a tornado shelter)
- Projects with changes to pre-disaster size, function, or capacity of facilities, such as:
 - Major hazard mitigation measures (e.g., floodproofing)
 - Replacement project
 - Relocation project
 - Improved or Alternate projects involving facilities
- Significant impacts to a facility or utilities that have complex structural elements such as:
 - Major mechanical systems that are inoperable (e.g., electrical, plumbing, heating, ventilation, air conditioning, etc.)
 - Nuclear power generating station
 - Water and wastewater treatment facilities
- 2211 o Rail systems
- Structures with impacts to underwater components (e.g., bridges, dams, piers, and breakwaters)
- Slope or embankment failure on major or highly trafficked transportation route
- Beaches due to eligibility requirements
- Unique geographic conditions (e.g., volcanic areas or structures built into a mountain or cliff)

2218 High-Risk Projects

- 2219 The following criteria may be useful in identifying high-risk projects:
- Project triggers complex Environmental and Historic Preservation (EHP) concern, such as an Environmental Assessment (EA) or an Environmental Impact Statement.

- Projects with potential duplication of benefits requiring Intra/Interagency coordination,
 such as:
 - The project may be eligible for multiple FEMA funding sources
 - o Another federal agency may have overlapping authorities
- Floodplain Management or Environmental and Historic Preservation concerns, including the following:
 - o Ground disturbance, such as when increasing the size of the preexisting footprint
 - Work in or near a historic district or building/structure/object over 45 years old
 - Work on or near archaeological resources
 - Work near threatened or endangered species or critical habitat
 - o Work in floodplains or within 200 feet of a waterway, body of water, or wetland
- Impacts vulnerable or underserved communities
- Project cost equal to or greater than \$1 billion in federal share
- Fiduciary concerns or financial constraints
- Projects requiring 50% rule determinations and with a Federal cost share equal to or greater than \$1 million
- Nuclear power generating station
- Relocation of facilities

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- Impacts causing inaccessibility to populated areas or critical service facilities
- Project with a non-competitively bid contract equal to or greater than \$1 million
- Significant impacts to facilities or utilities that serve a large amount of the population such as:
- o Medical
 - Transportation systems
 - Water and wastewater treatment facilities
 - Transmission and distribution power lines
- 2248 Water control infrastructure (e.g., levees and dams)
- Leads to significant cascading impacts such as:
- 2250 Water control infrastructure (e.g., levees and dams)
- 2251 o Transmission and distribution power lines
- 2252 o Transportation systems

APPENDIX G: FEMA PUBLIC ASSISTANCE NATIONAL WORKFLOW

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