Public Assistance Program Delivery Guide

August 2022 (Operational Draft)
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CHAPTER 1: INTRODUCTION

Purpose

The Public Assistance Program Delivery Guide (Operational Draft) describes how the Federal Emergency Management Agency (FEMA) implements the Public Assistance (PA) Program. The guide builds on the principles in the Incident Management and Support Keystone (IMSK) and the Recovery Operations Support Manual (ROSM), and this guide establishes the framework for Applicant-driven, state-led, and federally supported delivery of PA. The PA Program Delivery Guide defines objectives and indicators of successful program delivery, along with Applicant, Recipient, and FEMA roles and responsibilities. This guide is an operational 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.
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).

Organization

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:

- Core Values
- Guiding Principles
- The PA Program Delivery Model
Chapters 3-10 provide information specific to each phase of the grant lifecycle. Each 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**.

The Appendixes provide supplementary, detailed information. Appendix A lists the acronyms used throughout this document. Appendix B provides information about authorities, 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.

**Supersession**

This document supersedes the *Public Assistance Operations Manual*.

**Authorities and Foundational Documents**

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
- National Incident Management System (NIMS)
- National Response Framework (NRF)
- National Disaster Recovery Framework (NDRF)
- National Mitigation Framework (NMF)
- 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**

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 draft period.

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.
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.

Table 1: Implementation of FEMA’s Core Values

<table>
<thead>
<tr>
<th>FEMA Core Value</th>
<th>Public Assistance Program Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compassion</td>
<td>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.</td>
</tr>
<tr>
<td>Fairness</td>
<td>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.</td>
</tr>
<tr>
<td>Integrity</td>
<td>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.</td>
</tr>
<tr>
<td>Respect</td>
<td>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.</td>
</tr>
</tbody>
</table>

Public Assistance Guiding Principles

FEMA follows seven guiding principles when delivering the PA Program, defined in Table 2.
<table>
<thead>
<tr>
<th>Guiding Principle</th>
<th>Public Assistance Program Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recovery is strongest when State-led and locally driven</td>
<td>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.</td>
</tr>
<tr>
<td>Standard operations support flexible and integrated recovery outcomes</td>
<td>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.</td>
</tr>
<tr>
<td>Build resilience to mitigate increasing incident impacts</td>
<td>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.</td>
</tr>
<tr>
<td>Invest in the PA team to build and maintain capacity and manage resources strategically</td>
<td>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.</td>
</tr>
<tr>
<td>Ensure program delivery leads to equitable outcomes for underserved communities</td>
<td>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.</td>
</tr>
<tr>
<td>Take a risk-based approach to designing the program and delivering assistance</td>
<td>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.</td>
</tr>
<tr>
<td>Continuously improve through lean management</td>
<td>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.</td>
</tr>
</tbody>
</table>
**Program Delivery Model**

FEMA implements the PA program nationwide using a national program delivery model, 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, cascading performance goals and indicators.

Table 3: Features of the Program Delivery Model

<table>
<thead>
<tr>
<th>Delivery Model Features</th>
<th>Public Assistance Program Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specialized Roles</td>
<td>Assign the right skill sets, at the right time, to effectively support recovery.</td>
</tr>
<tr>
<td>Segmented Processes</td>
<td>Advance projects through defined phases and workflows based on work status and complexity to ensure recovery progresses and customers receive necessary support.</td>
</tr>
<tr>
<td>Standardization through Technology</td>
<td>Consistently and transparently manage projects through PA Grants Portal and Grants Manager using standardized policy, process, and tools, and implement improvements through change control.</td>
</tr>
<tr>
<td>Consolidated Resources</td>
<td>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.</td>
</tr>
</tbody>
</table>

** 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.

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.
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-management tools to ensure timely completion of tasks, identify challenges, and support staff by prioritizing competing deadlines.

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 customer experience.

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” feature in PA Grants Portal or by working with their FEMA Regional PA officer to for a Change Control Tool submission. FEMA staff may submit issues, opportunities, and feedback via the Change Control Tool on FEMA’s intranet site. FEMA’s Change Control Unit reviews and responds to requests through the Change Control Tool.

**Risk-Based Approach**

PA is designed to reimburse everything from an hour of overtime to the replacement of an entire wastewater treatment facility. It is designed to be flexible and support the range of 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 require the same level of resources, documentation, or oversight. FEMA adjusts its approach 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

The risk-based approach balances developing policy, delivering the program, and prioritizing resources to maintain an efficient use of resources. FEMA prioritizes resources and effort 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,
Applicant, or project represents a higher risk in one or more of the four risk areas. Appendix
F provides additional considerations for identifying complex and high-risk applicants and
projects.

By contrast, FEMA limits level of effort, resources, and administrative oversight where risk is
low. That means assigning fewer personnel or technical resources and decreasing
requirements and level of review where an applicant or project does not pose a significant
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).

Table 4: PA Program Delivery Performance Goals

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

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
and authorities. Applicants are responsible for conducting recovery work and requesting funding for work and costs on time and with complete information. Key Applicant roles 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 incident-caused 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

Recipient Roles

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 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

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*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.

Non-FEMA Federal Agency Roles

FEMA is one of many partners that support SLTT governments and PNPs in recovery, infrastructure restoration, and reliance. OFAs, organized into Emergency Support Functions (ESF) and Recovery Support Functions (RSF), may provide significant capabilities to FEMA staff and Applicants to improve the project development process, prevent duplication of benefits and efforts, and support local recovery outcomes. OFAs may connect eligible PNPs 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 projects, codes and standards, environmental and historic preservation review and permitting, and best practices. FEMA Interagency Recovery Coordination (IRC) staff help ensure that appropriate interagency partners are available to the Joint Field Office (JFO)/Joint Recovery Office (JRO). FEMA Zone Leads coordinate requests for other federal partners to support program delivery.

FEMA Roles

FEMA provides support through statutory authorities and coordinates resources and the support of federal and non-federal partners to achieve recovery outcomes. FEMA roles in delivering the PA Program are scalable based on incident size and complexity. FEMA conducts PA roles across four offices: regional offices, field offices, headquarters (HQ), and CRC, as shown in Figure 2. Staff should refer to position-specific instructions and specific 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).

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
  - Participate in policy development, program design, and continuous improvement
  - Facilitate after-action review of incidents to promote continuous improvement
  - 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
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- Provide technical assistance support to partners on equitable delivery of the PA Program
- Provide technical assistance and support to partners on the development of hazard mitigation plans, environmental planning and historic preservation issues, debris management plans, and climate adaptation plans

- Operational Planning and Response Phase:
  - Review Recipient Administrative Plans and SLTT hazard mitigation plans
  - Lead initial operational planning activities to lay a strong recovery foundation:
  - Conduct joint Preliminary Damage Assessments (PDA) with the Recipient
  - Provide recommendations for PA declaration requests
    - In coordination with Regional and Field leadership, determine need for a JFO
  - Coordinates with Field and Grants Management partners to ensure Recipient completes all administrative requirements
  - Oversee development of initial disaster operating profile and Strategic Resource Plan (SRP)
  - Ensure Recipient prioritizes PA funding for underserved communities
  - With Recipient, assess Applicant needs for assistance during the PA grant development process
  - Support incident management operations:
    - Staff infrastructure roles in the Regional Response Coordination Center (RRCC)

- Phase I, Applicant Coordination and Evaluation:
  - Lead PA operations:
    - Execute Disaster Recovery Manager (DRM) authority, or delegate to field leadership
    - Fill PA leadership roles as detailed in incident staffing and resource plans
    - Where field offices are not used, assume field office responsibilities detailed below through a virtual recovery office
    - Provide program leadership for all disasters and staff all required operational roles
    - For all incidents, prioritize and fill Program Delivery Manager (PDMG) roles for key high impact, underserved, or complex applicants, ensuring assigned PDMGs can provide the appropriate support based on experience and skillset in accordance with the Infrastructure Branch Director and Public Assistance Group Supervisor Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations, and Tribal Support located in the FEMA Program Delivery Branch’s Delivery Toolbox.
  - Support field offices with resolution of complex policy and operational issues
  - Monitor performance of the field office against program delivery goals

- Phase II, Impacts and Eligibility:
Conduct technical site inspections, as necessary and in coordination with the CRC and JFO.

With PDMG, prioritize site inspections for underserved or complex applicants, ensuring assigned Site Inspector can provide the appropriate support.

- Phase III, Scoping and Costing:
  - Develop or validate scopes of work (SOW) and cost estimates for complex or specialized projects in coordination with the CRC.
  - Coordinate with Applicants and Recipients on requests for information (RFI).

- Phase VI, Project Monitoring and Amendments:
  - Respond to PA-related project correspondence such as changes in SOWs and time extensions after an Applicant’s Recovery Transition Meeting (RTM).
  - Enact changes for amendment requests that occur after an Applicant’s RTM, including scoping and costing.
  - Coordinate recovery transition from JFO or JRO to the region.
  - Respond to first appeals.
  - Coordinate with Grants Division staff and the Office of Inspector General (OIG) to respond to PA-related audits.
  - Coordinate with Grants Division staff to review Large Project QPRs, tracking work completion and project deadlines.

- Phase VII, Final Reconciliation and Closeout:
  - Coordinate with Grants Division staff to reconcile and close projects, Applicants, and Recipient awards.

Field Offices

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

Three incident levels are used to categorize an incident based on its actual or anticipated 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, as follows:
### Table 5: Incident Level Descriptions

<table>
<thead>
<tr>
<th>Incident Level</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>Incident Level I</td>
<td>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</td>
</tr>
<tr>
<td>Incident Level II</td>
<td>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</td>
</tr>
<tr>
<td>Incident Level III</td>
<td>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</td>
</tr>
</tbody>
</table>

**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
  - 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)
• Phase I, Applicant Coordination and Evaluation:
  o Assist Recipient with Applicant Briefings and educate Applicants on PA Program requirements, including through the early delivery of targeted webinars and trainings for underserved communities
  o Review all RPAs and make PNP eligibility determinations in coordination with FEMA's Office of Chief Counsel (OCC)
  o Conduct Exploratory Calls and Recovery Scoping Meetings (RSM)
  o Provide PA hazard mitigation information and guidance to Applicants
  o Work with Applicants to complete lists of impacts
• Phase II, Impacts and Eligibility:
  o Conduct initial eligibility evaluation
  o Obtain impact and damage information and documentation
  o Coordinate with Applicants and Recipients on RFIs
  o Conduct site inspections, as necessary
  o Help Applicants identify and understand mitigation opportunities
  o Develop or validate detailed damage descriptions with dimensions
  o Develop RFIs as necessary for missing information
  o Coordinate with OFA partners to determine federal authorities
  o Issue eligibility determinations
• Phase III, Scoping and Costing:
  o Coordinate with CRCs to plan and share priorities and address project-specific issues
  o Support the development, costing, and analysis of hazard mitigation proposals for eligible projects
  o Coordinate with Applicants and Recipients on RFIs
  o Make scope and cost eligibility determinations
  o Coordinate with OFA partners to support Applicant's desired recovery outcomes
• Phase IV, Final Reviews:
  o Conduct final project reviews
• Phase V, Obligation and Recovery Transition:
  o Obligate funds to Recipient
  o Conduct RTMs
• Phase VI, Project Monitoring and Amendments:
  o Respond to PA-related project correspondence such as changes in SOWs and time extensions requested prior to an Applicant’s RTM
  o Coordinate recovery transition to the region

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

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

Due to the significant resource requirements and extended lifespan of JROs, establishing a JRO requires a unique decision-making process between the RA and the Assistant Administrator for Recovery and additional reporting requirements which are not necessary for smaller recovery operations. The RA and the Assistant Administrator for Recovery must complete the decision-making process to establish a JRO within three months of the disaster declaration. For more information, see the Joint Recovery Office Guide.

JRO responsibilities include:

- Phase III, Scoping and Costing:
  - Engage state, tribal, and territorial partners and OFAs to collaboratively define and support achieving recovery outcomes and objectives
  - Support building SLTT partner capability and capacity
  - Promote SLTT resiliency, mitigation, and preparedness
  - Deliver recovery-related technical assistance to impacted communities and survivors
  - Facilitate whole-community solutions to meet SLTT government recovery goals
  - Coordinate with CRCs to plan and share priorities and address project-specific issues
  - Coordinate with Applicants and Recipients on RFIs
  - Make scope and cost eligibility determinations

- Phase IV, Final Reviews:
  - Conduct final project reviews

- Phase V, Obligation and Recovery Transition:
  - Obligate funds to Recipient
  - Conduct RTMs

- Phase VI, Project Monitoring and Amendments:
  - Assist SLTT governments in developing the capability to plan for, manage, and execute long-term recovery solutions
  - Track program delivery to ensure that recovery goals are met
  - Respond to PA-related project correspondence such as changes in SOWs and time extensions requested prior to an Applicant’s RTM
Monitor workload and milestones to support operational and staffing release planning

Coordinate recovery transition to the region

**Headquarters**

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 requirements; and (3) training and mentoring the PA enterprise. Responsibilities include:

- **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
  - 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

- **Lead program’s continuous improvement:**
Collaborate with field and regional stakeholders to collect, synthesize, and validate lessons learned
Integrate best practices into updated guidance

Operational Planning and Response Phase:
- Provide recommendations on PA declaration requests
- Review PA-related Mission Assignments (MA), as applicable
- Augment regional and field office capacity with national cadre staff, OFAs, contract support and local hires
- Approve Level I incident staffing and resource plans, in coordination with the FCO
- Fill PA leadership roles for catastrophic incidents as detailed in incident staffing and resource plans
- Fill infrastructure roles in the National Response Coordination Center (NRCC)
- Support development of, and approve, Enterprise Resource Management (ERM) guidance for PA program, including staffing requirements for expected workload
- Maintain national PA cadre positions
- Coordinate with FEMA regions to proactively assess PA readiness

Operational Planning and Response Phase: Volume II, Impacts and Eligibility:
- Support field and regional offices by providing technical assistance

Operational Planning and Response Phase: Volume III, Scoping and Costing:
- Develop or validate scopes of work and cost estimates
- Conduct insurance reviews to ensure appropriate reductions
- Coordinate with mitigation staff to identify mitigation opportunities and support hazard mitigation proposals and cost development for eligible projects.

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

- Phase II, Impacts and Eligibility:
  - Support field and regional offices by providing technical assistance

- Phase III, Scoping and Costing:
  - Develop or validate scopes of work and cost estimates
  - Conduct insurance reviews to ensure appropriate reductions
  - Coordinate with mitigation staff to identify mitigation opportunities and support hazard mitigation proposals and cost development for eligible projects.
Conduct Environmental Planning and Historic Preservation (EHP) completeness reviews and streamlined compliance reviews on projects that the Office of Environmental Planning and Historic Preservation agrees do not require the preparation of a Record of Environmental Consideration (REC) by EHP.

Coordinate with field and regional EHP staff to ensure projects will meet EHP compliance requirements.

Develop project requests for information as necessary based on project reviews.

Add compliance conditions to the project.

Draft ineligibility determinations (if requested by the Infrastructure Branch Director [IBD] or Public Assistance Group Supervisor [PAGS]).

Phase VI, Project Monitoring and Amendments:

Perform scoping and costing on amendment requests that occur prior to an Applicant’s RTM.
CHAPTER 3: OPERATIONAL PLANNING AND RESPONSE

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.

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

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>National Goal (% of Disasters)</th>
<th>Level III Incident</th>
<th>Level II Incident</th>
<th>Level I Incident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accuracy</td>
<td>Obligations confirm the PDA determination that a federal disaster declaration was warranted.</td>
<td>98%</td>
<td>95%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>FEMA and the Recipient identify and document recovery goals and outcomes through strategic milestones.</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>The Recipient assumes some or all customer service, site inspection, and scoping and costing functions.</td>
<td>20%</td>
<td>30%</td>
<td>20%</td>
<td>15%</td>
</tr>
<tr>
<td>Customer Experience</td>
<td>PDMG resource needs are prioritized for communities with Social Vulnerability Index (SVI) scores above .7</td>
<td>Metric to be determined.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
<td>-------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Customer Experience</td>
<td>Technical assistance is tailored based on communities impacted and disaster-specific needs.</td>
<td>Metric to be determined.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## 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](http://www.fema.gov/disasters/how-declared) or refer to the [PAPPG](https://www.fema.gov/disasters/how-declared).

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

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

- Drive their recovery
- Leverage and enhance existing relationships with Applicants
- 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

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 FEMA’s [State-Led Public Assistance Guide](https://www.fema.gov/disasters/how-declared).

## Assess Damage

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 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
organization officials work together to estimate and document the impact and magnitude of the incident. Joint PDAs provide an opportunity for other internal FEMA partners, such as 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 similar damage. FEMA’s Preliminary Damage Assessment Guide contains detailed information on how SLTT government officials and FEMA staff conduct PDAs and includes position-specific roles and responsibilities.

**Operational Planning**

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

**Develop Disaster Operating Profile**

While FEMA is evaluating the declaration request, or in anticipation of a forecasted incident, the region, with input from HQ PA Field Resource Branch, develops an initial Disaster Operating Profile (DOP), which captures incident impacts and key information that is continuously updated throughout the recovery life cycle. The regional PA Operations Branch Chief oversees development of the initial profile in conjunction with the Recipient, OFAs, regional EHP staff, and PA Hazard Mitigation staff to capture all known information that may 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, field, regional, and headquarters organizations aligned. The profile is the foundation for resourcing and incident processing decisions and includes:

- Ongoing recovery status from other incidents
- Impacted counties
- Areas with high impacts
- Rough cost estimates by type of infrastructure/category of work
- Rough number of expected Applicants and projects
- Pre-identified environmental or historic preservation considerations
- Project threshold
- 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

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

Virtual or In-Person: Hybrids are Best

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

Evaluate Resource Needs and Organization

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

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.

Organization Considerations

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
include leveraging an existing field office to take on the new declaration or using regional PA staff to conduct operations within existing organizations.

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 Joint Recovery Office Guide.

Location Considerations

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.

Documenting Organizational Decisions and Resource Needs

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.

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.

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.

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 ROSM, 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 SRM SOP.
Delegate Authorities

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.

Develop Initial Projection

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.

Develop Spend Plan

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.

Recipient Agreement and Application for Assistance

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 PAPPG for plan requirements.

Response Coordination

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](image)

<table>
<thead>
<tr>
<th>Table 7: Roles and Responsibilities for Operational Planning and Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Position</strong></td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Regional PA Operations Branch Chief</td>
</tr>
<tr>
<td>Position</td>
</tr>
<tr>
<td>----------------------------------------------</td>
</tr>
</tbody>
</table>
| Infrastructure Group Supervisor (INGS)       | If the RA activates the RRCC, the INGS:  
- Coordinates debris removal and critical infrastructure activities across the various federal agencies  
- Facilitates responses to PA policy questions  
- Coordinates with the MA Manager  
- Coordinates with the NRCC if activated at HQ  

| Infrastructure Branch Director (IBD)          | Coordinates directly with the Operations Section Chief and Branch Directors  
- Coordinates debris removal and critical infrastructure activities across the various federal agencies  
- Facilitates responses to PA policy questions during response phase  
- Coordinates with the MA Manager  
- Coordinates with regional PA leadership and PA HQ Field Resources Branch to develop initial disaster operating profile and incident staffing and resource plans, including the SRP  
- In coordination with the Recipient and PAGS, assesses Applicant needs for assistance during the PA grant development process  
- Performs other operational, planning and response duties as delegated by the Operations Section Chief or FCO  

| Public Assistance Group Supervisor (PAGS)     | Serves as deputies to the IBD in Level I and II incidents  
- Facilitates responses to PA policy questions  
- Coordinates with regional PA leadership and PA HQ Field Resources Branch to develop initial disaster operating profile and incident staffing and resource plans on level III incidents  
- In coordination with the Recipient and IBD, assesses Applicant needs for assistance during the PA grant development process  
- Updates “Event Profile” to establish proper project routing and workflow  
- Refines and maintains the disaster operating profile  
- Performs other operational, planning and response duties as delegated by the IBD on Level I and II incidents, or by the FCO on Level III incidents  

| Operations Support Task Force Leader (OSTL)   | Coordinates deployments of PA staff as directed by the IBD/PAGS  
- Oversees check in and check out process for PA staff  
- Develops and maintains PA organizational chart and daily accountability  
- Compiles PA input in the Incident Action Plan (IAP) and situational report  
- Coordinates with Planning section on reports  
- Supports PAGS in refining and maintaining the disaster operating profile  
- Confirms the Recipient has submitted all administrative requirements  
- Oversees spend plan and coordinates with finance staff on the spend plan  

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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.

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

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>National Goal</th>
<th>Level III Incident</th>
<th>Level II Incident</th>
<th>Level I Incident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timeliness</td>
<td>Phase I completed within 56 days of declaration (% of Applicants)</td>
<td>75%</td>
<td>85%</td>
<td>75%</td>
<td>50%</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>% of Applicants with EHP concerns identified at RSMs when needed</td>
<td>60%</td>
<td>70%</td>
<td>60%</td>
<td>50%</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------------------------------------------------------</td>
<td>------</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td>Effectiveness</td>
<td>% of Applicants with insurance issues identified at RSMs when needed</td>
<td>75%</td>
<td>80%</td>
<td>75%</td>
<td>70%</td>
</tr>
<tr>
<td>Customer Experience</td>
<td>% of Applicants satisfied with their interactions with FEMA staff during the RSM</td>
<td>90%</td>
<td>90%</td>
<td>90%</td>
<td>90%</td>
</tr>
<tr>
<td>Customer Experience</td>
<td>% of Applicants satisfied with their understanding of the FEMA Public Assistance process</td>
<td>85%</td>
<td>85%</td>
<td>85%</td>
<td>85%</td>
</tr>
<tr>
<td>Customer Experience</td>
<td>% of Applicants with SVI scores above .7 assigned appropriate PDMGs</td>
<td>Metric to be determined.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Efficiency</td>
<td>% of FEMA staff whose assigned roles align with their qualifications, training</td>
<td>80%</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
</tr>
</tbody>
</table>

916 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.

922 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.

929 Provide Program Orientation Through Applicant Briefings

930 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 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 information about their organizations and affected facilities. Applicants submit RPAs via PA Grants Portal. In coordination with Field leadership and the region, FEMA may approve Applicant RPA time extensions based on extenuating circumstances. 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 recommendation to FEMA regarding the Applicant’s eligibility. The Recipient also evaluates 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 C.F.R. §200.332.

The PAGS reviews the RPA and determines Applicant eligibility within three days of receiving from Recipient. If needed, the PAGS consults with FEMA OCC in evaluating Applicant eligibility. If FEMA determines that an Applicant is ineligible, PA staff develop an eligibility determination, explaining the rationale.

If an Applicant’s RPA is approved, the PAGS assigns an appropriate PDMG, if needed, to engage with the Applicant, provide customer service, and guide the Applicant through the PA 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, 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

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

The IBD/PAGS ensures that staff assigned to the operation are trained and oriented to ensure they understand the PA project development process and the incident’s unique environment, including awareness of vulnerable or underserved communities. For certain underserved or complex applicants, the IBD/PAGS, or their delegate, will consider staff skillsets (such as language or other technical skills) and experience when filling roles. The IBD/PAGS requests trainings through the Field Training Office or PA Training liaison for Recipients, potential Applicants, and other federal staff. FEMA also offers regular Grants Manager/Grants Portal training to internal and external stakeholders. Past Recipient and Applicant Webinars are available on FEMA’s Grants Portal and Grants Manager Training YouTube Channel or the Support Center in Grants Manager and Grants Portal. Schedules for internal FEMA employee and contractor micro-trainings (webinars) are distributed by FEMA staff on a regular basis.

Survey Impacts Through Exploratory Calls

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

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

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

List Impacts Through Recovery Scoping Meetings

The Applicant, Recipient, and FEMA conduct an RSM to review and refine the list of impacts. The PDMG, if assigned, facilitates discussion of the PA delivery process, hazard mitigation opportunities and eligibility requirements, including insurance and environmental and historic preservation considerations. For Applicants pursuing direct application, the Recovery
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.

### Table 9: Roles and Responsibilities during Phase I

<table>
<thead>
<tr>
<th>Position</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Infrastructure Branch Director (IBD)</td>
<td>• Discusses program delivery options with Recipient</td>
</tr>
<tr>
<td></td>
<td>• Supports applicant briefings</td>
</tr>
<tr>
<td></td>
<td>• Monitors operational progress and strategic milestones and maintains disaster operating profile and incident staffing and resource plans, including the SRP</td>
</tr>
<tr>
<td></td>
<td>• In coordination with the Recipient and PAGS, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments</td>
</tr>
<tr>
<td>Public Assistance Group Supervisor (PAGS)</td>
<td>• Reviews and determines PNP applicant eligibility, in coordination with OCC</td>
</tr>
<tr>
<td></td>
<td>• Approves eligible RPAs</td>
</tr>
<tr>
<td></td>
<td>• If FEMA determines an Applicant is ineligible, develops a Determination Memo (DM) in coordination with OCC to explain the reason for the determination</td>
</tr>
<tr>
<td></td>
<td>• In coordination with the Recipient and IBD, uses assessment of Applicant capacity and complexity to inform appropriate PDMG assignments</td>
</tr>
<tr>
<td></td>
<td>• Works with the Program Delivery Task Force Lead (PDTL) to assign appropriate PDMG to the Applicant based on Applicant need and PDMG experience/skill</td>
</tr>
<tr>
<td>Program Delivery Task Force Leader (PDTL)</td>
<td>• Works with PDMG to prepare for Exploratory Calls and RSM</td>
</tr>
<tr>
<td></td>
<td>• Works with PAGS to assign the Applicant to an appropriate PDMG, prioritizing support for underserved or complex Applicants</td>
</tr>
<tr>
<td>Position</td>
<td>Responsibilities</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| 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 Task Force Leader (TFL) | • Works with Mitigation (406) Specialist to prepare for 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 |
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.

**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**

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>National Goal</th>
<th>Acceptable Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Level III Incident</td>
</tr>
<tr>
<td>Timeliness</td>
<td>Phase II completed within 100 days of completing Phase 1</td>
<td>75%</td>
<td>85%</td>
</tr>
<tr>
<td>Simplicity</td>
<td>% of Applicants satisfied with the Grants Portal</td>
<td>90%</td>
<td>90%</td>
</tr>
<tr>
<td></td>
<td>Weekly average % of Applicants calling the PA Hotline</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>-----------------------------------------------------------------</td>
<td>-----------------------------------------------------</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td><strong>Simplicity</strong></td>
<td>% projects sent to Phase III without rework</td>
<td>80%</td>
<td>85%</td>
</tr>
<tr>
<td><strong>Accuracy</strong></td>
<td>% of site inspections completed without rework</td>
<td>80%</td>
<td>85%</td>
</tr>
<tr>
<td><strong>Effectiveness</strong></td>
<td>% of permanent work damage line items with identified mitigation opportunity</td>
<td>75%</td>
<td>70%</td>
</tr>
<tr>
<td><strong>Customer Experience</strong></td>
<td>% of Applicants working with a single PDMG throughout Phase II</td>
<td>80%</td>
<td>85%</td>
</tr>
</tbody>
</table>

**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
Inspector can provide the appropriate support. FEMA Site Inspectors (SIs) conduct 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

FEMA works with the Applicant to develop detailed damage descriptions and dimensions (DDD) by developing narrative descriptions, documenting dimensions and quantities, answering key questions, and obtaining documentation related to the impacts and damage. 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

Once FEMA, the Recipient, and the Applicant agree on the DDD, it is the Applicant’s 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 to determine the method of repair. In these cases, FEMA may provide PA funding for engineering and design services.

While Permanent Work funding is always based on pre-disaster size, capacity, and function, FEMA allows Applicants to accept funding at a fixed amount and use the funds in a more flexible manner to drive their own recovery.
### Table 11: Roles and Responsibilities during Phase II

<table>
<thead>
<tr>
<th>Position</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| 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 |
<p>| Site Inspector |  - Conducts site inspection of impacts and damage claimed by Applicants or validates Applicant-provided site inspection information |</p>
<table>
<thead>
<tr>
<th>Position</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| 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 |
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**

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>National Goal</th>
<th>Acceptable Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>% of completed work and standard projects developed within 30 days of project entering Phase III</td>
<td>90%</td>
<td>Level III Incident</td>
</tr>
<tr>
<td>Timeliness</td>
<td>% of specialized projects developed within 45 days of project entering Phase III</td>
<td>90%</td>
<td>95%</td>
</tr>
</tbody>
</table>
**Develop or Validate Scope of Work and Costs**

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 hazard mitigation description and dimensions.

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 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.

For projects where work is incomplete, costing or technical specialists either, a) develop a 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.

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.

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.

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**

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

Figure 8: PA Process Steps during Phase IV

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

Table 14: Performance Indicators for Final Reviews

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

*excludes partially granted or fully granted appeals.

FEMA Reviews

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 EHP requirements as a condition of the award.

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

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 Applicant for additional project documentation. The EHP Specialist may also identify 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.

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

Recipient Reviews

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
costs.

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

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.

The Applicant completes final Project review within seven days of the Recipient
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

<table>
<thead>
<tr>
<th>Roles</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Assistance Group Supervisor (PAGS)</td>
<td>• Performs final review to verify the project application is eligible before obligating funds</td>
</tr>
<tr>
<td></td>
<td>• Signs determination memorandums</td>
</tr>
<tr>
<td></td>
<td>• Compiles required LPN information and submits to the PA HQ Executive Office</td>
</tr>
<tr>
<td></td>
<td>• Obligates project funding</td>
</tr>
<tr>
<td>Roles</td>
<td>Responsibilities</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Program Delivery Manager (PDMG)</td>
<td>• Monitors operational progress and strategic milestones and informs maintenance of disaster operating profile and incident staffing and resource plans, including the SRP</td>
</tr>
<tr>
<td>Environmental and Historic Preservation Advisor (EHAD)</td>
<td>• Conducts a review of the project for eligibility following compliance reviews</td>
</tr>
<tr>
<td>Field Environmental and Historic Preservation (EHP) Specialist</td>
<td>• Conducts the Environmental Officer (EO) review of the project and approves the Recommendation of Environmental Consideration (REC)</td>
</tr>
<tr>
<td>Field Environmental and Historic Preservation (EHP) Specialist</td>
<td>• Provide advisement to EHP Specialist navigating projects with tiered EHP considerations</td>
</tr>
<tr>
<td>PA Headquarters LPN Team</td>
<td>• Ensure project complies with all applicable EHP laws, regulations, and Executive Orders</td>
</tr>
<tr>
<td>PA Headquarters LPN Team</td>
<td>• Documents project compliance and identifies conditions that an Applicant must adhere to in PA Grants Manager</td>
</tr>
<tr>
<td>PA Headquarters LPN Team</td>
<td>• Draft consultation letters to other agencies, as necessary</td>
</tr>
<tr>
<td>Office of the Chief Financial Officer (OCFO)</td>
<td>• Reviews the LPN information for completeness</td>
</tr>
<tr>
<td>Office of the Chief Financial Officer (OCFO)</td>
<td>• Submits the LPN to the Office of Chief Financial Officer (OCFO)</td>
</tr>
<tr>
<td>Office of the Chief Financial Officer (OCFO)</td>
<td>• Notifies the PAGS when FEMA HQ approves a project in the LPN queue</td>
</tr>
<tr>
<td>Office of External Affairs (EA)</td>
<td>• Processes LPN requests from PA</td>
</tr>
<tr>
<td>Office of External Affairs (EA)</td>
<td>• Submits projects to FEMA Office of External Affairs (EA) for review and coordination</td>
</tr>
<tr>
<td>Office of External Affairs (EA)</td>
<td>• Coordinates notifications and reviews with DHS, OMB, and Congress</td>
</tr>
</tbody>
</table>
CHAPTER 8: OBLIGATION AND RECOVERY TRANSITION

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

Figure 9: PA Process Steps During Phase V

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

Table 16: Performance Indicators for Obligation and Recovery Transition

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>Acceptable Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>National Goal</td>
</tr>
<tr>
<td>Timeliness</td>
<td>% of projects are obligated within three days of Applicant signature or completion of LPN process</td>
<td>75%</td>
</tr>
<tr>
<td>Timeliness</td>
<td>% of RTMs are completed within seven days of the obligation of its last project</td>
<td>95%</td>
</tr>
<tr>
<td>Customer Experience</td>
<td>% of Applicants overall satisfied with FEMA’s Public Assistance program</td>
<td>90%</td>
</tr>
</tbody>
</table>
Obligate Funds to Recipient

Following final reviews, FEMA obligates funding to Recipients for disbursement to 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.

Strategic Funds Management

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

Recovery Transition Meetings

In general, the PDMG conducts an RTM once the Applicant has signed all of its projects. The RTM transitions the primary point of contact for the Applicant from FEMA personnel to the Recipient. FEMA, the Recipient, and the Applicant attend the RTM. In cases where the 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

<table>
<thead>
<tr>
<th>Roles</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Infrastructure Branch Director</td>
<td>• Readies PA operation for transition to steady-state operations (region)</td>
</tr>
<tr>
<td></td>
<td>• Monitors operational progress and strategic milestones as well as incident staffing and resource plans, including the SRP</td>
</tr>
<tr>
<td>Public Assistance Group Supervisor</td>
<td>• Process obligations and de-obligations for Public Assistance projects, as delegated</td>
</tr>
<tr>
<td></td>
<td>• Monitors unliquidated obligations for each project</td>
</tr>
<tr>
<td></td>
<td>• Executes staffing releases and transitions as needed, prioritizing national-level assets for release</td>
</tr>
<tr>
<td>Program Delivery Manager</td>
<td>• Coordinates with the Recipient to schedule a Recovery Transition Meeting (RTM)</td>
</tr>
<tr>
<td></td>
<td>• Facilitates the RTM</td>
</tr>
</tbody>
</table>
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
Table 18: Performance Indicators for Project Monitoring and Amendments

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

*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 recovery, tracking potential time extension requests, and planning for closeout.

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

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

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, 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. Otherwise, the Recipient forwards the request to FEMA with a recommendation and PA staff review the request.
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.

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

**Appeals and Arbitration**

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. 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.

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.)

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.

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

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.

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.

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.


Performance Audits

Performance audits are examinations of programs to determine effectiveness and suggest 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 corrective actions.

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

<table>
<thead>
<tr>
<th>Roles</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>PA Division Director</td>
<td>Approves and signs second appeal decisions</td>
</tr>
<tr>
<td>Regional PA Closeout Branch Chief</td>
<td>Reviews and concurs on time extension responses</td>
</tr>
<tr>
<td></td>
<td>Coordinates with Grants Management Division on prime award extensions</td>
</tr>
<tr>
<td></td>
<td>Reviews and concurs on PA-related correspondence</td>
</tr>
<tr>
<td></td>
<td>Makes eligibility determinations on project amendments</td>
</tr>
<tr>
<td></td>
<td>Oversees QPR review</td>
</tr>
<tr>
<td></td>
<td>Conducts Final Reviews on amendments processed by regional staff</td>
</tr>
<tr>
<td>PA State Liaison</td>
<td>Conducts quarterly meetings with assigned states</td>
</tr>
<tr>
<td></td>
<td>Reviews QPR for assigned states</td>
</tr>
<tr>
<td></td>
<td>Evaluates and draft responses to time extension requests</td>
</tr>
<tr>
<td></td>
<td>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</td>
</tr>
<tr>
<td></td>
<td>Processes project withdrawal requests</td>
</tr>
<tr>
<td></td>
<td>Conducts Initial Review for amendments processed by regional staff for projects within assigned state(s)</td>
</tr>
<tr>
<td>Operations Support Specialist</td>
<td>Tracks PA-related correspondence</td>
</tr>
<tr>
<td></td>
<td>Maintains spend plan</td>
</tr>
<tr>
<td></td>
<td>Supports PA state liaisons</td>
</tr>
<tr>
<td>Roles</td>
<td>Responsibilities</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Validation Specialist</td>
<td>• Reviews and reconciles Category Z management costs quarterly as necessary</td>
</tr>
<tr>
<td>Costing Specialist</td>
<td>• Reviews change in SOW requests and processes related amendments</td>
</tr>
<tr>
<td></td>
<td>• Evaluates proposed use of excess funds on Alternative Procedure projects</td>
</tr>
<tr>
<td></td>
<td>• Sends RFIs to Recipients, as necessary</td>
</tr>
<tr>
<td>Technical Specialist</td>
<td>• Reviews change in SOW requests and processes related amendments for complex projects, for Applicants transitioned to region</td>
</tr>
<tr>
<td></td>
<td>• Reviews requests for Alternative Procedures, Alternate or Improved Projects and process amendments</td>
</tr>
<tr>
<td></td>
<td>• Sends RFIs to Recipients, as necessary</td>
</tr>
<tr>
<td>Insurance Specialist</td>
<td>• Reviews changes for impacts to insurance deduction</td>
</tr>
<tr>
<td>Field EHP Specialist</td>
<td>• Reviews SOW amendments for compliance with EHP laws, regulations, and Executive Orders (EOs)</td>
</tr>
<tr>
<td>Hazards and Performance Analyst Task Force Leader (TFL)</td>
<td>• Tracks progress of Mitigation Specialists projects</td>
</tr>
<tr>
<td></td>
<td>• Assists the Mitigation Specialist as necessary</td>
</tr>
<tr>
<td></td>
<td>• Reviews ineligibility recommendations on amendment requests</td>
</tr>
<tr>
<td>Mitigation (406) Specialist</td>
<td>• Reviews and reconciles amendment requests related to hazard mitigation for eligibility and cost effectiveness</td>
</tr>
<tr>
<td>Appeals Unit Lead</td>
<td>• Assigns appeals to analysts</td>
</tr>
<tr>
<td></td>
<td>• Reviews and concurs on draft responses</td>
</tr>
<tr>
<td>First Appeal Analyst</td>
<td>• Evaluates first appeals and drafts responses</td>
</tr>
<tr>
<td></td>
<td>• Coordinates with regional Technical Specialists when necessary</td>
</tr>
<tr>
<td></td>
<td>• Processes versions and other actions triggered by second appeal decisions</td>
</tr>
<tr>
<td>Second Appeal Analyst</td>
<td>• Evaluates second appeals and drafts responses</td>
</tr>
<tr>
<td>PA Audit Coordinator</td>
<td>• Oversees daily activities associated with GAO or OIG audits</td>
</tr>
<tr>
<td></td>
<td>• Reviews audit-related products and documentation</td>
</tr>
<tr>
<td></td>
<td>• Works with relevant PA staff to prepare audit-related responses and deliverables</td>
</tr>
<tr>
<td></td>
<td>• Support PA personnel with completion of audit-related action items</td>
</tr>
<tr>
<td></td>
<td>• Prepare for and facilitate audit-related meetings</td>
</tr>
<tr>
<td>Office of the Chief Financial Officer</td>
<td>• Provides technical and oversight assistance for PIIA 2019 and VAYGo activities</td>
</tr>
</tbody>
</table>
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.

Phase VII: Final Reconciliation and Closeout

Reconcile and Close Projects

Close Subrecipients

Reconcile and Close PA Prime Award

Figure 11: PA Process Steps During Phase VII

Phase VII Objectives:

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

Table 20: Performance Indicators for Closeout

<table>
<thead>
<tr>
<th>Goal Area</th>
<th>Metric</th>
<th>National Goal</th>
<th>Acceptable Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>% of closeout certifications submitted within 120 days of work completion</td>
<td>90%</td>
<td>TBD</td>
</tr>
</tbody>
</table>

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.
Large Projects

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.

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

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.

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.
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.

**Close Subrecipients**

The Recipient requests that FEMA close a Subrecipient once all its respective projects have 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 Subrecipient’s projects.

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

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 GMM and contact Grants Management staff for additional assistance.

For more information refer to the PAPPG and the GMM.

**Reconcile and Close PA Prime Award**

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 (SF-425) with a written request to close the PA Prime award. FEMA PA and Grants Management staff coordinate with the Recipient certify that all work was completed and all eligible costs have been reimbursed and financially reconciled.

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

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.

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 Prime Award, as explained in the GMM. 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

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

If you suspect corruption, waste, fraud, abuse, mismanagement or misconduct contact the Department of Homeland Security Office of Inspector General hotline or submit a concern online.
APPENDIX A: LIST OF ACRONYMS

AFO Area Field Office
ALO Audit Liaison Office
BVI Bicentennial Volunteers, Inc.
CDL Community Disaster Loan
CAP Corrective Action Plan
COS Chief of Staff
CCHCO Chief Component Human Capital Officer
CRC Consolidated Resource Center
DDD Damage Description and Dimensions
DFA Direct Federal Assistance
DHS Department of Homeland Security
DM Determination Memo
DOP Disaster Operating Profile
DRF Disaster Relief Fund
DRM Disaster Recovery Manager
DTS Deployment Tracking System
EA Office of External Affairs
ECO Emergency Operations Center
EHAD Environmental Planning and Historic Preservation Advisor
EHP Environmental Planning and Historic Preservation
EO Environmental Officer
ERM Enterprise Resource Management
ESF Emergency Support Function
FCO Federal Coordinating Officer
FEMA Federal Emergency Management Agency
FFC FEMA Finance Center
FFR Federal Financial Report
FIMA Federal Insurance and Mitigation Administration
<table>
<thead>
<tr>
<th>Code</th>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>1539</td>
<td>ORR</td>
<td>Office of Response and Recovery</td>
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<tr>
<td>1540</td>
<td>Ops Chief</td>
<td>Operations Section Chief</td>
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<tr>
<td>1541</td>
<td>OS</td>
<td>Operations Support</td>
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<td>1542</td>
<td>OSTL</td>
<td>Operations Support Task Force Leader</td>
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<td>1543</td>
<td>PA</td>
<td>Public Assistance</td>
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<td>1544</td>
<td>PAGS</td>
<td>PA Group Supervisor</td>
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<td>1545</td>
<td>PDTL</td>
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<td>PDA</td>
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<td>Quarterly Drawdown Sample Report</td>
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<td>1552</td>
<td>QPR</td>
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<td>RA</td>
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<td>REC</td>
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<td>1555</td>
<td>RFI</td>
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<td>ROSM</td>
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<td>RSM</td>
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<td>1562</td>
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Public Assistance Program Delivery Guide (Draft)
A-4
APPENDIX B: AUTHORITIES, DOCUMENTS, AND RESOURCES

Authorities


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.


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.


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.

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

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
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.

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

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.

Regulations

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

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.

Title 48 of the CFR, Federal Acquisition Regulations System

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.

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

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.
Policy, Manuals, and Instructions

National Disaster Recovery Framework (NDRF), June 2016

The Department of Homeland Security’s National Disaster Recovery Framework (NDRF) 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.

The NDRF can be found at: https://www.fema.gov/emergency-managers/national-preparedness/frameworks/recovery

National Response Framework (NRF), October 2019

The Department of Homeland Security’s National Response Framework (NRF) 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.

The NRF can be found at: www.fema.gov/emergency-managers/national-preparedness/frameworks/response

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

The Incident Management and Support Keystone (IMSK) 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.

FEMA’s IMSK can be found in the ORR Doctrine, Policy and Directives Library or may be accessed directly at www.fema.gov/sites/default/files/2020-07/fema_incident_management_and_support_keystone-Jan2011.pdf
FEMA’s Incident Management Handbook 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.

FEMA’s Incident Management Handbook can be found in the ORR Doctrine, Policy and Directives Library.

FEMA’s Incident Management Manual 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.

FEMA’s Incident Management Manual can be found in the ORR Doctrine, Policy and Directives Library.

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.

FEMA’s Incident Stabilization Guide (Operational Draft) can be found in the ORR Doctrine, Policy and Directives Library.

FEMA’s Joint Recovery Office Guide 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.
FEMA’s Joint Recovery Office Guide can be found in the ORR Doctrine, Policy and Directives Library.

FEMA National Incident Support Manual (NISM), January 2013

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.

FEMA’s NISM can be found in the Office of Response and Recovery (ORR) Doctrine, Policy and Directives Library.

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

FEMA’s Public Assistance Program and Policy Guide (PAPPG) 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.

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

FEMA Preliminary Damage Assessment Guide, August 2021

The Preliminary Damage 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.

The Preliminary Damage Assessment Guide can be found at: www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide

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

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

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

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.

FEMA’s *Public Assistance Program Appeals Guide* can be found in the [ORR Doctrine, Policy and Directives Library](https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx)

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

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

**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

**FEMA Infrastructure Branch Director and Public Assistance Group Supervisor Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations**

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.

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-Toolbox.aspx](https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx)
FEMA Public Assistance Strategic Resource Management Standard Operating Procedure (Operational Draft), July 2021

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).

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.

FEMA Publication 1, November 2019

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.

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

FEMA Recovery Operations Support Manual (ROSM), March 2021

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.

FEMA’s ROSM can be found in the ORR Doctrine, Policy and Directives Library.


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.

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
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.

The GMM can be found with other Grants Management and closeout related guidance at: https://usfema.sharepoint.com/teams/RESGPD/collab/EGS/CloseoutCoordination/Forms/Subject.aspx

Additional Resources

FEMA Audit Liaison Office SharePoint site

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.

The ALO SharePoint site can be accessed at: https://usfema.sharepoint.com/sites/OPPA/Pages/GAOOIGAuditLiaisonOffice.aspx.

FEMA Program Design Branch, Delivery Toolbox

FEMA’s Program Design Branch Delivery Toolbox 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.

The Delivery Toolbox can be accessed on SharePoint at: https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-Toolbox.aspx

FEMA Public Assistance Change Control Tool

FEMA staff use the PA Change Control Tool 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,
opportunities, and feedback related to the PA Program via the “Feedback” feature in PA Grants Portal.

The Change Control Tool can be accessed via SharePoint at:
https://usfema.sharepoint.com/teams/ORRAapps/NewPA/Pages/SubmitRequest-CCT-P3.aspx

FEMA Public Assistance Grants Manager and Grants Portal Tool

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.

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

The Grants Portal Tool can be accessed at: https://grantee.fema.gov

FEMA Public Assistance Grants Portal and Grants Manager Training, YouTube Channel

Previously-recorded Recipient and Applicant Webinars are available on FEMA’s Grants Manager/Grants 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 micro-trainings (webinars) are distributed by FEMA staff on a regular basis.

FEMA’s training YouTube channel for Grants Manager and Grants Portal can be accessed at: www.youtube.com/channel/UCIJp91Ds2laVlR1t8uXcEKg

FEMA Public Assistance Recovery Performance Framework Dashboard

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.

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

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

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<tr>
<th>Task</th>
<th>Deadline</th>
<th>Deadline Driver</th>
<th>Responsible Entity</th>
<th>Approving Official</th>
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<td><strong>Operational Planning and Response</strong></td>
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<tr>
<td>Declaration Request</td>
<td>Within 30 days after the incident</td>
<td>Regulatory 44 C.F.R. § 206.36(A)</td>
<td>Governor and/or Tribal Chief Executive</td>
<td>The President</td>
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<td>Policy PAPPG, Chapter 1, Sec. 2</td>
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<td>Request for Time Extension to submit declaration request.</td>
<td>Within 30 days after the incident</td>
<td>Regulatory 44 C.F.R., § 206.36(A)</td>
<td>Governor and/or Tribal Chief Executive</td>
<td>Assistant Administrator for Recovery</td>
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<td>Additional Designated Areas</td>
<td>Within 30 days after the declaration date or the end of the incident period, whichever is later</td>
<td>Regulatory 44 C.F.R., § 206.40(C)</td>
<td>Governor and/or Tribal Chief Executive</td>
<td>Assistant Administrator for Recovery</td>
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<td>Policy PAPPG, Chapter 1, Sec. 4C</td>
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<td>Additional Types of Assistance</td>
<td>Within 30 days after the declaration date or the end of the incident period, whichever is later</td>
<td>Regulatory 44 C.F.R., § 206.40(4)</td>
<td>Governor and/or Tribal Chief Executive</td>
<td>Assistant Administrator for the Disaster Assistance Directorate</td>
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<td>Policy PAPPG, Chapter 1, Sec. 4D</td>
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<td><strong>Phase I: Applicant Coordination and Evaluation</strong></td>
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<td>Request for Public Assistance (RPA)</td>
<td>Within 30 days after area is designated within the declaration</td>
<td>Regulatory 44 C.F.R., § 206.202(C)</td>
<td>Applicant</td>
<td>Regional Administrator</td>
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<td>Policy PAPPG, Chapter 3, Sec. 3</td>
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<td>Submit Request for Expedited Projects</td>
<td>Within 60 days of the Recovery Scoping Meeting</td>
<td>Regulatory 44 C.F.R., § 206.202(D)(II)</td>
<td>Applicant</td>
<td>Regional Administrator</td>
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<td>Task</td>
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<td>Responsible Entity</td>
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</table>
| 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  
PAPPG, Chapter 9, Sec. 2B | Applicant          | Regional Administrator          |

**Phase III: Scoping and Costing**

<table>
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<tr>
<th>Task</th>
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<th>Responsible Entity</th>
<th>Approving Official</th>
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</table>
| 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**

<table>
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<th>Task</th>
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<th>Responsible Entity</th>
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<td>Obligate funding for Expedited Projects</td>
<td>Within 90 days of receipt of Request</td>
<td>Regulatory 44 C.F.R. § 206.205(a)</td>
<td>Public Assistance</td>
<td>Disaster Recovery Manager</td>
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<td>Deadline Driver</td>
<td>Responsible Entity</td>
<td>Approving Official</td>
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<td>for Expedited Projects</td>
<td></td>
<td>Statutory</td>
<td>Group Supervisor</td>
<td></td>
</tr>
<tr>
<td>Statutory 31 U.S.C. § 1501</td>
<td></td>
<td>Policy PAPPG, Chapter 3, Sec. VC1 (pg. 184)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phase VI: Project Monitoring and Amendments</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Submit Large Project Quarterly Progress Reports</td>
<td>Submitted quarterly by:</td>
<td>Regulatory 44 C.F.R § 206.204(f)</td>
<td>Recipient</td>
<td>PA Closeout Branch Chief</td>
</tr>
<tr>
<td>January 30; April 30; July 30; and October 30</td>
<td></td>
<td>Policy PAPPG, Chapter 11, Sec. I</td>
<td></td>
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</tr>
<tr>
<td>Quarterly, or as required by the terms and conditions of the PA award</td>
<td></td>
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</tr>
<tr>
<td>Submit Federal Financial Status Reports (FFRs) (SF-425) to the Regional Office</td>
<td>Quarterly, or as required by the terms and conditions of the PA award</td>
<td>Regulatory 2 C.F.R. § 200.328</td>
<td>Recipient</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>For incidents before January 1, 2022, within 60 days of receiving FEMA’s written notification of its determination.</td>
<td></td>
<td>Policy PAPPG, Chapter 11, Sec. II</td>
<td></td>
<td></td>
</tr>
<tr>
<td>For incidents after January 2022, within 60 days of FEMA electronically transmitting its determination.</td>
<td></td>
<td>Regulatory 44 C.F.R. § 206.206(c)(1)</td>
<td>Applicant</td>
<td>Recipient forward recommendation</td>
</tr>
<tr>
<td>For incidents after January 2022, within 60 days of FEMA electronically transmitting its determination.</td>
<td></td>
<td>Policy PAPPG, Chapter 3, Sec. IV.C.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Submit Applicant Appeal of Determination and Recommendation</td>
<td>Within 120 days of FEMA’s notification of its determination.</td>
<td>Regulatory 44 C.F.R. § 206.206(c)(2)</td>
<td>Recipient</td>
<td>First Appeals Analyst</td>
</tr>
<tr>
<td>FEMA Provides Appeal Decision</td>
<td>Within 90 days of receiving the appeal, or after receiving additional information FEMA</td>
<td>Regulatory 44 C.F.R. § 206.206(c)(3)(d)</td>
<td>FEMA</td>
<td>Regional Administrator (1st Appeals) HQ PA Division Director (2nd Appeals)</td>
</tr>
<tr>
<td>Task</td>
<td>Deadline</td>
<td>Deadline Driver</td>
<td>Responsible Entity</td>
<td>Approving Official</td>
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<tr>
<td>Request for Arbitration</td>
<td>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.</td>
<td>Regulatory: 48 C.F.R. § 206.206(c) Policy: Public Assistance Appeals and Arbitration under the Disaster Recovery Reform Act Fact Sheet</td>
<td>Applicants</td>
<td>Civilian Board of Contract Appeals</td>
</tr>
<tr>
<td>Completion of Debris Removal activities</td>
<td>6 months from the declaration date</td>
<td>Regulatory: 44 C.F.R. § 206.204(c)(1) Policy: PAPPG, Chapter 11, Sec. V</td>
<td>Applicant</td>
<td></td>
</tr>
<tr>
<td>Completion of Emergency Protective Measure activities</td>
<td>6 months from the declaration date</td>
<td>Regulatory: 44 C.F.R. § 206.204(c)(1) Policy: PAPPG, Chapter 11, Sec. V</td>
<td>Applicant</td>
<td></td>
</tr>
<tr>
<td>Completion of Permanent Work</td>
<td>18 months from the declaration date</td>
<td>Regulatory: 44 C.F.R. § 206.204(c)(1) Policy: PAPPG, Chapter 11, Sec. V</td>
<td>Applicant</td>
<td></td>
</tr>
</tbody>
</table>

**Phase VII: Final Reconciliation and Closeout**

<table>
<thead>
<tr>
<th>Task</th>
<th>Deadline</th>
<th>Deadline Driver</th>
<th>Responsible Entity</th>
<th>Approving Official</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Small Project Overrun Appeal</td>
<td>Within 60 days of work completion on Subrecipient’s last Small Project</td>
<td>Regulatory: 44 C.F.R. § 206.204(e)(2). Policy: PAPPG, Chapter 3, Sec. VC1 (pg. 39)</td>
<td>Subrecipient</td>
<td>Regional Administrator (First Appeal) Assistant Administrator of Recovery Directorate at FEMA Headquarters (Second Appeal)</td>
</tr>
<tr>
<td>Task</td>
<td>Deadline</td>
<td>Deadline Driver</td>
<td>Responsible Entity</td>
<td>Approving Official</td>
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<td>-------------------------------------------</td>
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</tr>
<tr>
<td>Small Project Certification (Subrecipient)</td>
<td>Within 90 days of work completion or the latest approved deadline of its last Small Projects, whichever is sooner</td>
<td>Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1A (pg. 200)</td>
<td>Subrecipient projects to Recipient/Recipient projects to FEMA</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Small Project Certification (Recipient)</td>
<td>Within 120 days of work completion or the latest approved deadline of the Subrecipient’s Small Projects, whichever is sooner</td>
<td>Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1A (pg. 200)</td>
<td>Recipient forwards subrecipient projects to FEMA</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Large Project Certification (Subrecipient)</td>
<td>Within 90 days of the work completion date or the Project deadline, whichever occurs first.</td>
<td>Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1B (pg. 200)</td>
<td>Subrecipient projects to Recipient/Recipient projects to FEMA</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Large Project Certification (Recipient)</td>
<td>Within 120 days of the work completion date or the Project deadline, whichever occurs first.</td>
<td>Regulatory 2 C.F.R. § 200.344 (a) Policy PAPPG, Chapter 12, Sec. 1B (pg. 200)</td>
<td>Recipient forwards subrecipient projects to FEMA</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Request for Use of Excess Funds on Permanent Work Pilot Projects</td>
<td>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.</td>
<td>Policy PAPPG, Chapter 8, Sec. VIB1 (pg. 165)</td>
<td>Applicant</td>
<td>Recipient Recommendation to FEMA</td>
</tr>
<tr>
<td>Forward Request for Use of Excess Funds on Permanent Work Pilot Projects</td>
<td>Forward the request to FEMA within 180 days of date the last Alternative Procedures Project was completed.</td>
<td>Policy PAPPG, Chapter 8, Sec. VIB1 (pg. 165)</td>
<td>Recipient</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Task</td>
<td>Deadline</td>
<td>Deadline Driver</td>
<td>Responsible Entity</td>
<td>Approving Official</td>
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</tr>
<tr>
<td>Liquidate all obligations incurred under award</td>
<td>For incidents before November 12, 2020, within 90 days of the end of the prime award period of performance.</td>
<td>Regulatory 2 C.F.R. § 200 Policy PAPPG, Chapter 12, Sec. III (pg. 203)</td>
<td>Recipient</td>
<td>Regional Administrator</td>
</tr>
<tr>
<td>Liquidate all obligations incurred under award</td>
<td>For incidents after November 12, 2020, within 120 days of the end of the prime award period of performance.</td>
<td>Regulatory 2 C.F.R. § 200</td>
<td>Recipient</td>
<td>Regional Administrator</td>
</tr>
</tbody>
</table>
### 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>
<thead>
<tr>
<th>Phase</th>
<th>Outcome</th>
<th>Goal</th>
<th>Responsible Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1</td>
<td>Review Request for Public Assistance (RPA)</td>
<td>Within 3 days of receiving RPA</td>
<td>PAGS</td>
</tr>
<tr>
<td></td>
<td>Conduct Exploratory Call</td>
<td>Within 7 days of Applicant assignment</td>
<td>PDMG</td>
</tr>
<tr>
<td></td>
<td>Conduct Recovery Scoping Meeting</td>
<td>Within 21 days of Applicant assignment</td>
<td>PDMG</td>
</tr>
<tr>
<td>Phase 2</td>
<td>Schedule Site Inspection</td>
<td>Within 3 days of RSM</td>
<td>PDMG</td>
</tr>
<tr>
<td></td>
<td>Complete Site Inspections</td>
<td>Within 21 days of a confirmed request for a site inspection</td>
<td>Site Inspector</td>
</tr>
<tr>
<td></td>
<td>Complete damage documentation</td>
<td>Within 21 days of RSM, damage documentation is complete</td>
<td>PDMG</td>
</tr>
<tr>
<td></td>
<td>Complete DDD</td>
<td>Within 7 days of completing the site inspection</td>
<td>Site Inspector</td>
</tr>
<tr>
<td></td>
<td>Review DDD</td>
<td>Within 2 days after receipt of the site inspection</td>
<td>PDMG</td>
</tr>
<tr>
<td></td>
<td>Approve DDD</td>
<td>Within 7 days after receiving it from the PDMG</td>
<td>Applicant</td>
</tr>
<tr>
<td>Phase 3</td>
<td>Complete the DDD and validation of documentation for Completed Lane Projects</td>
<td>14 days after the PDMG routes the project to the CRC</td>
<td>Validation Specialist</td>
</tr>
<tr>
<td></td>
<td>Complete project development for Standard Lane projects</td>
<td>14 days after the PDMG routes the project to the CRC</td>
<td>Costing Specialist</td>
</tr>
<tr>
<td></td>
<td>Complete project development for Specialized Lane projects</td>
<td>24 days after the PDMG routes the project to the CRC</td>
<td>Technical Specialist</td>
</tr>
<tr>
<td>Phase</td>
<td>Outcome</td>
<td>Goal</td>
<td>Responsible Role</td>
</tr>
<tr>
<td>---------</td>
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</tr>
<tr>
<td></td>
<td>Complete Insurance Review</td>
<td>3 days after the Specialist receives the project</td>
<td>Insurance Specialist</td>
</tr>
<tr>
<td></td>
<td>Complete Quality Assurance (QA) review</td>
<td>Within 3 days after the Specialist receives the project</td>
<td>Quality Assurance Specialist</td>
</tr>
<tr>
<td>Phase 4</td>
<td>Complete EHP Compliance Reviews</td>
<td>Within 14 days of receipt from the CRC</td>
<td>Environmental Planning and Historic Preservation Specialist</td>
</tr>
<tr>
<td></td>
<td>Complete Final Project Review</td>
<td>5 days after receipt from FEMA</td>
<td>Recipient</td>
</tr>
<tr>
<td></td>
<td>Complete Final Project Review</td>
<td>7 days after receipt from Recipient</td>
<td>Applicant</td>
</tr>
<tr>
<td>Phase 5</td>
<td>Obligate Project</td>
<td>% of RTMs are completed within 7 days of the obligation of its last project.</td>
<td>PDMG</td>
</tr>
<tr>
<td></td>
<td>Obligate Project</td>
<td>Within four days of applicant signature or once Congress, DHS, and OMB have approved the LPN</td>
<td>PAGS</td>
</tr>
</tbody>
</table>
APPENDIX E: PUBLIC ASSISTANCE PROGRAM

POSITIONS AND FUNCTIONS

Further guidance for PA Program positions and functions can be found in the Delivery Toolbox and on the Grants Manager Resources page.

Field Positions

Federal Coordinating Officer

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

Infrastructure Branch Director

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

Public Assistance Group Supervisor

The Public Assistance Group Supervisor (PAGS) has a variety of responsibilities across PA Program delivery. Acting in mostly an oversight role, the PAGS sets and manages goals for each phase, monitors interactions with Applicants and Recipients, and coordinates with other offices or individuals as necessary. In coordination with the Recipient and the IBD, the PAGS also assesses Applicant needs for assistance and ensures appropriate support for underserved communities. The PAGS is also involved in the eligibility determination process and is responsible for determining accuracy of eligibility determinations and development of a DM. The PAGS supports the IBD in Level I and II incidents and manages Level III incidents.
Site Inspector Task Force Leader
Site Inspector Task Force Leaders (SITLs) are responsible for overseeing the site inspection process, ensuring SI successfully complete site inspections and develop accurate DDD. SITLs are engaged as early as Phase I, where they use the Disaster Operating Profile to assist in gauging staffing resource requirements; and during RSM, where they begin scheduling physical and virtual inspections alongside the Applicant and PDMG. SITLs assign Site Inspection Work Orders to SI, ensuring SI coordinate with Environmental and Historic Preservation and Mitigation prior to the site inspection as necessary, and ensuring assigned Site Inspectors have the information and resources necessary to complete their duties. Subject Matter Experts may have SI Crew Leaders to assist with the management of SI staff.

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

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

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

Program Delivery Task Force Leader
The Program Delivery Task Force Leader (PDTL) is the first-level supervisor for the PDMG and serves as a conduit between the PAGS and the Program Delivery Manager (PDMG), communicates the JFO operational priorities to the PDMGs, and ensures that an appropriate program delivery strategy is developed by the PDMGs to accomplish operational objectives, including appropriate support for underserved communities. The PDTL manages PDMG workflow and reviews PDMG deliverables. The PDTL resolves any operational issues arising.
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.

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.

Region-Specific Positions

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.

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.

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
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.

**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.

**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.

**Headquarters-Specific Positions**

**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.

**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.

**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 Lane Deputy Director manages lane staff conducting quality assurance, DM
Public Assistance Program Delivery Guide (Draft)

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.

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.

Cross-Enterprise Public Assistance Positions

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.

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
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.

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.

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.

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.

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.

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
consultation with regulatory agencies. The EHAD operates outside the Operations chain of command and reports to the FCO or Chief of Staff (COS).

**IMAT Team Lead**

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.

**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.

**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.

**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.

**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,
and their counterparts in the CRC and region and may support the CRC, field, or regional office.

**Reports Specialist**

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.

**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.

**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.

**Determination Analyst**

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

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

Appeal Analyst
The Appeal Analyst performs the completeness review, preparing analysis for each appeal and presenting it to leadership, researching and drafting all first appeal decisions within the prescribed regulatory timeframes. Appeal Analysts must be certified by the HQ PA Appeals and Audits Branch. Appeal Analysts may support first appeals in the regional office or second appeals at FEMA HQ.
APPENDIX F: IDENTIFYING COMPLEX AND HIGH-RISK APPLICANTS AND PROJECTS

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

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

High-risk PA Applicants and projects are those that: have cascading impacts that will either trigger a chain of events that exponentially increase the incident’s impacts or may be prevented if caught and resolved early; have impacts to interdependent facilities such that one facility must be addressed to continue operations at another facility; involve communities that have been underserved, marginalized, and adversely affected by persistent poverty and inequality; entail fiduciary risk of federal funds (e.g., risk of funds not being used for intended purpose or not achieving value for money); program risk of not 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 the PA program.

Applicants

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

Complex Applicants

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.
- 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.
High-Risk Applicants

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

Projects

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

Complex Projects

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
  - 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)

High-Risk Projects

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
  - Another federal agency may have overlapping authorities

Floodplain Management or Environmental and Historic Preservation concerns, including the following:
  - 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
  - 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

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:
  - Medical
  - Transportation systems
  - Water and wastewater treatment facilities
  - Transmission and distribution power lines
  - Water control infrastructure (e.g., levees and dams)

Leads to significant cascading impacts such as:
  - Water control infrastructure (e.g., levees and dams)
  - Transmission and distribution power lines
  - Transportation systems
APPENDIX G: FEMA PUBLIC ASSISTANCE NATIONAL WORKFLOW

PROGRAM DELIVERY PROCESS STEPS

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Pre-Award Activities
Phase 1
Phase 2
Phase 3
Phase 4
Phase 5
Phase 6
Phase 7

Incident occurs
Operational Planning and Response
Evaluate Declaration Request
Operational Planning
Recipient Agreement and Application for Assistance
Response Coordination
Phase I: Applicant Coordination and Evaluation
Provide Program Orientation through Applicant Briefings
Request Public Assistance
Evaluate Applicant Eligibility

Phase II: Impacts and Eligibility
Collect Impact and Damage Information and Documentation
Group Impacts and Damage into Projects
Evaluate Facility Eligibility
List Impacts Through Recovery Scoping Meetings
Survey Impacts Through Exploratory Calls
Build Public Assistance Field Operation

Phase III: Scoping and Costing
Site Inspection
Develop Detailed Damage Description
Determine Method of Restoration
Develop or Validate Scope of Work and Costs
Support Hazard Mitigation
Evaluate Compliance

Phase IV: Final Reviews
FEMA Reviews
Recipient Reviews

Phase V: Obligation and Recovery Transition
Recovery Transition Meetings
Obligate Funds to Recipient
Large Project Notification
Applicant Signs

Phase VI: Project Monitoring and Amendments
Scope and Cost Amendments
Performance Reporting and Progress Analysis

Phase VII: Final Reconciliation and Closeout
Time Extensions
Appeals and Arbitration
Performance Audits
Payment Monitoring Through Validate-as-You-Go
Reconcile and Close Projects
Close Subrecipients
Reconcile and Close PA Prime Award

Key:
Applicant
Recipient
FEMA

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