Public Assistance Program Delivery Guide

September 2022 (Operational Draft) Version 1.1

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87 CHAPTER 1: INTRODUCTION

88 Purpose

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

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

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

108 • Stage 1: Pre-Declaration Planning and Coordination – Engage with federal and state,
109 local, tribal, and territorial (SLTT) partners to prepare for future recovery operations –
110 includes the beginning of the PA Operational Planning and Response phase.
111 • Stage 2: Scope Recovery Requirements – Develop and refine a mutual understanding of
112 goals, needs, priorities, and resource requirements – includes continuation of the
113 Operational Planning and Response phase and the beginning of phases I: Applicant
114 Coordination and Evaluation and II: Impacts and Eligibility.
115 • Stage 3: Deliver Recovery Support – Identify resources and deliver assistance with unity
116 of effort – includes PA phases III: Scoping and Costing, IV: Final Reviews, and V:
117 Obligation and Recovery Transition.
118 • Stage 4: Grant Administration and Closeout – Monitor financial activities that occur after
119 the initial obligation of disaster assistance – includes phases VI: Project Monitoring and
120 Amendments and VII: Final Reconciliation and Closeout.
121

Recovery Life Cycle Stages

| Stage 1: Pre-Declaration Planning and Coordination | Stage 2: Scope Recovery Requirements | Stage 3: Deliver Recovery Support | Stage 4: Grant Administration and Closeout |

Public Assistance Program Delivery Phases

Operational Planning and Response

Phase I: Applicant Coordination and Evaluation

Phase II: Impacts and Eligibility

Phase III: Scoping and Costing

Phase IV: Final Reviews

Phase V: Obligation and Recovery Transition

Phase VI: Project Monitoring and Amendments

Phase VII: Final Reconciliation and Closeout

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

Scope and Applicability

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

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

138

Organization

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

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

146   •   Roles within the PA Process

147 Chapters 3-10 provide information specific to each phase of the grant lifecycle. Each
148 chapter includes:

149   •   A **process map** indicating the specific steps that comprise that phase.
150   •   High-level **performance targets** for the phase, including targets for Level I, II, and III
151   incidents as available and appropriate. Performance targets are generally based on
152   actual baselines from the Recovery Performance Framework, developed in coordination
153   with the Recovery Reporting and Analytics Division and Branch leadership.
154   •   **Descriptions** of each step of the phase, including interim **deadlines** and **timeliness goals**
155   where available and appropriate. Note that not every regulatory deadline or timeliness
156   metric is included in each chapter. An exhaustive list of regulatory deadlines and
157   timeliness goals can be found in Appendix C and Appendix D, respectively.
158   •   A list of specific **positions** involved in the phase and corresponding **responsibilities.**

159 The Appendixes provide supplementary, detailed information. Appendix A lists the acronyms
160 used throughout this document. Appendix B provides information about authorities,
161 foundational documents, and other referenced resources. Appendix C lists regulatory and
162 policy deadlines, and Appendix D lists detailed timeliness goals. Appendix E provides an
163 overview of each role in the PA grant lifecycle. Appendix F provides considerations for
164 identifying complex and high-risk Applicants and projects.

165 Supersession

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

167 Authorities and Foundational Documents

168 The following documents include foundational guidance for program delivery:

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

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

Document Management and Maintenance

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

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

CHAPTER 2: FOUNDATION OF THE PROGRAM

203

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

FEMA Core Values

210

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

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

218

Table 1: Implementation of FEMA's Core Values

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

Public Assistance Guiding Principles

219

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

Table 2: Guiding Principles for Public Assistance Program Delivery

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

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

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

Lean Management and Continuous Improvement

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

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

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

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

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

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

253   • *Visual management:* Maintain huddle boards as visual, accessible communication and
254   management tools, identifying and coordinating on cross-cutting issues and key
255   deliverables

256   • *Individual support:* Provide one-on-one actionable coaching and mentoring

257   • *Direct evaluation:* Conduct sit-withs, a managerial tool to sit with staff as they perform
258   their duties to identify areas for staff improvement or process efficiency

259   • *Time management:* Leverage "day-in-the-life-of/week-in-the-life-of" (DILO/WILO) time-
260   management tools to ensure timely completion of tasks, identify challenges, and
261   support staff by prioritizing competing deadlines.

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

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

Risk-Based Approach

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

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

285   The risk-based approach balances developing policy, delivering the program, and prioritizing
286   resources to maintain an efficient use of resources. FEMA prioritizes resources and effort
287   where risk and complexity are high. That means ensuring personnel and technical resources

288 are made available, and administrative oversight is more in-depth, where a disaster,
289 Applicant, or project represents a higher risk in one or more of the four risk areas. Appendix
290 F provides additional considerations for identifying complex and high-risk applicants and
291 projects.

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

Program Delivery Performance Goals

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

304
Table 4: PA Program Delivery Performance Goals

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

305

Roles Within the Public Assistance Process

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

Applicant Roles

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

315 and authorities. Applicants are responsible for conducting recovery work and requesting
316 funding for work and costs on time and with complete information. Key Applicant roles
317 include, but are not limited to:

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

Recipient Roles

335 Recipients serve as the PA Program's pass-through entity to Subrecipients and, when
336 capable, lead the delivery of the PA Program in an equitable manner in accordance with
337 applicable provisions of laws and authorities. Recipients request the federal declaration and
338 type(s) of assistance needed. Once a declaration is issued, Recipients communicate
339 incident priorities and needs to FEMA during the response phase. The Recipient works with
340 the respective local government entities year-round. Therefore, its commitment and active
341 participation in the entire PA process is critical. Key Recipient roles[a] include, but are not
342 limited to:
343 • Leading the damage assessment process as outlined in FEMA's *Preliminary Damage*
344   *Assessment Guide*
345 • Requesting federal disaster assistance, including submitting Standard Form (SF) 424,
346   *Application for Federal Assistance*, and SF 424D, *Assurances for Construction Programs*
347 • Ensuring that all potential Applicants are aware of funding available under PA
348 • Conducting Applicant Briefings and educating Applicants on PA program requirements
349 • Determining, and conveying to Applicants, the cost share split between the Recipient
350   and its Subrecipients

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[a] 44 C.F.R. §§ 206.202(b).

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

Non-FEMA Federal Agency Roles

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

FEMA Roles

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

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

391
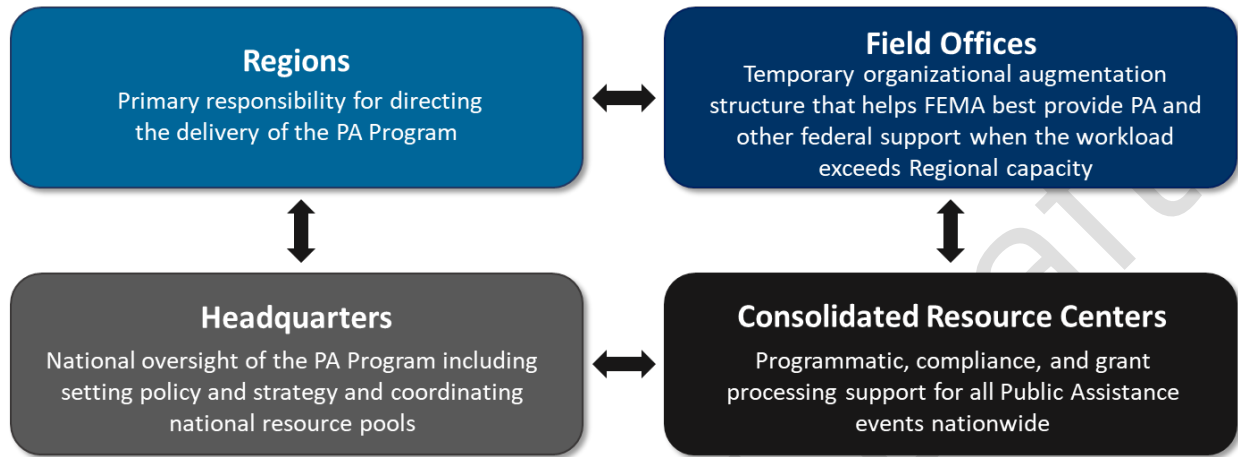
Figure 2: PA Staff Coordination Across Offices

393

Regional Offices

395 Regional offices are the keystone of successful federal support in the delivery of the PA
396 Program. Regional Recovery Divisions have primary responsibility for implementing the PA
397 Program and maintaining relationships with the states, tribes, and territories within the
398 region's area of responsibility. Regional PA responsibilities include the following:

399 • Build Regional and SLTT Government Capacity:
400   o Manage routine incident years and ensure readiness to deliver PA:
401   o Assess and maintain the capacity and capability to perform steady-state functions
402   during an incident
403   o Maintain the capacity and capability to perform all required leadership and staff
404   roles for incidents for a routine incident year
405   o Coordinate with HQ to forecast future work and develop an incident staffing and
406   resource plan
407   o Hire, train, and develop PA professionals
408   o Develop and execute Incident Resource Plans (IRPs) with the national cadre
409   o Participate in policy development, program design, and continuous improvement
410   o Facilitate after-action review of incidents to promote continuous improvement
411   o Coordinate with partners to ensure PA readiness for potential incidents:
412   o Deliver pre-incident training to partners
413   o Assess and help build SLTT government capabilities to manage PA operations

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

455   o Conduct technical site inspections, as necessary and in coordination with the CRC
456   and JFO
457   o With PDMG, prioritize site inspections for underserved or complex applicants,
458   ensuring assigned Site Inspector can provide the appropriate support
459 • Phase III, Scoping and Costing
460   o Develop or validate scopes of work (SOW) and cost estimates for complex or
461   specialized projects in coordination with the CRC
462   o Coordinate with Applicants and Recipients on requests for information (RFI)
463 • Phase VI, Project Monitoring and Amendments:
464   o Respond to PA-related project correspondence such as changes in SOWs and
465   time extensions after an Applicant's Recovery Transition Meeting (RTM)
466   o Enact changes for amendment requests that occur after an Applicant's RTM,
467   including scoping and costing
468   o Coordinate recovery transition from JFO or JRO to the region
469   o Respond to first appeals
470   o Coordinate with Grants Division staff and the Office of Inspector General (OIG) to
471   respond to PA-related audits
472   o Coordinate with Grants Division staff to review Large Project QPRs, tracking work
473   completion and project deadlines
474 • Phase VII, Final Reconciliation and Closeout:
475   o Coordinate with Grants Division staff to reconcile and close projects, Applicants,
476   and Recipient awards

477 ### *Field Offices*

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

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

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493 <div align="center">Table 5: Incident Level Descriptions</div>

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

494 Joint Field Offices

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

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

507 JFO responsibilities include:

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

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

556 Joint Recovery Offices
557 A JRO is a facility that centralizes communication, collaboration, and coordination to achieve
558 recovery outcomes for large, complex, Level I incidents in a post-JFO environment. FEMA

| 559 | establishes JROs, by exception, to address requirements that overwhelm the region's |
| 560 | capacity and are best addressed by a sustained field presence. |

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

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

| 573 | JRO responsibilities include: |

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

597		o	Monitor workload and milestones to support operational and staffing release
598			planning
599		o	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:
  - o Ensure PA program implementation is consistent with FEMA's Core Values, PA Guiding Principles, and the PA Program Delivery Model
  - o Develop, maintain, and adjust regulations, policies, and doctrine for PA, FMAG, and CDL programs
  - o Provide standard processes, tools, systems, and training to ensure consistency in PA operations across FEMA regions and incidents
  - o Develop and improve on PA Grants Portal and Grants Manager and other technology systems
  - o Coordinate with OFAs on the development of Interagency Agreements and Memoranda of Understanding
  - o Coordinate with RSFs
  - o 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
  - o Build and maintain national training and mentorship capacity
  - o Develop and monitor PA program performance measures
  - o 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:

635   o   Collaborate with field and regional stakeholders to collect, synthesize, and
636   validate lessons learned
637   o   Integrate best practices into updated guidance

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

651 • Phase III, Scoping and Costing:
652   o   Provide oversight and national-level coordination for CRCs

653 • Phase VI, Project Monitoring and Amendments:
654   o   Respond to second appeals
655   o   Coordinate with the Government Accountability Office (GAO) and OIG and respond
656   to PA-related audits
657   o   Provide technical assistance on improper payment testing and remediation
658   o   Develop internal controls to prevent fraud
659   o   Make decisions on all policy issues not delegated to regional or field levels
660   o   Apply timeline extensions or other specific policy revisions or waivers

661 • Phase VII, Final Reconciliation and Closeout:
662   o   Provide technical assistance on closeout

663 ### Consolidated Resource Centers

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

667 • Phase II, Impacts and Eligibility:
668   o   Support field and regional offices by providing technical assistance
669 • Phase III, Scoping and Costing
670   o   Develop or validate scopes of work and cost estimates
671   o   Conduct insurance reviews to ensure appropriate reductions
672   o   Coordinate with mitigation staff to identify mitigation opportunities and support
673   hazard mitigation proposals and cost development for eligible projects.

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

CHAPTER 3: OPERATIONAL PLANNING AND RESPONSE

687

688

689 This chapter provides an overview of PA roles and responsibilities during Operational
690 Planning and Response. During this phase, PA staff support immediate response efforts to
691 stabilize lifelines, assess impacts and damage, evaluate declaration requests, develop
692 disaster operating profiles, assess Applicant capacity and complexity, and define operational
693 staffing and resource needs.
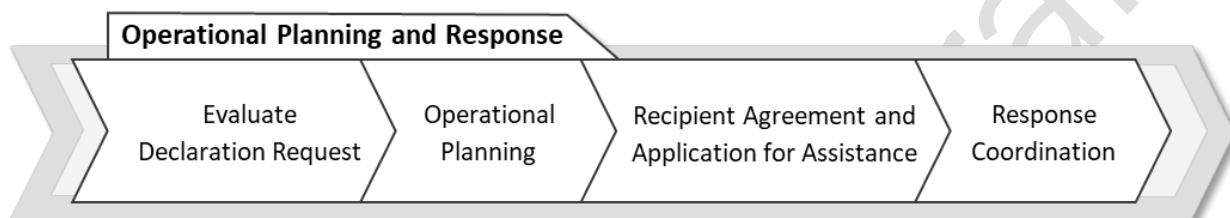
694

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

696

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

697

698 **Table 6: Performance Indicators for Operational Planning and Response**

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

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

699

700

Evaluate Declaration Request

701

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

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

710 FEMA encourages Recipients to lead PA operations when they have the capacity. When
711 Recipients take on roles that FEMA may otherwise perform, this is referred to as state-led
712 PA. State-led PA allows Recipients to:
713 • Drive their recovery
714 • Leverage and enhance existing relationships with Applicants
715 • Build knowledge and capacity
716 • Ensure consistent resourcing and insulate recoveries from FEMA resource shortfalls or
717 reallocation
718 • Ensure understanding of local issues by utilizing staff familiar with the area

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

Assess Damage

723

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

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

735 Operational Planning

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

742 Develop Disaster Operating Profile

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

754 • Ongoing recovery status from other incidents
755 • Impacted counties
756 • Areas with high impacts
757 • Rough cost estimates by type of infrastructure/category of work
758 • Rough number of expected Applicants and projects
759 • Pre-identified environmental or historic preservation considerations
760 • Project threshold
761 • Declaration details, when available
762 • Assessment of climate impacts and hazard mitigation opportunities
763 • Identification of underserved communities and assessment of associated needs
764 • Initial assessment of high-impact and low-capacity applicants

765 • Specific critical infrastructure impacts

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

779 Evaluate Resource Needs and
780 Organization

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

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

798 *Organization Considerations*

799 **Using Existing Organizations:** If the incident is within the region's existing capacity, regions
800 should integrate the new declaration into its existing PA organizational structure. This may

---

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

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

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

803

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

Location Considerations

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

Documenting Organizational Decisions and Resource Needs

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

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

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

831 In addition to FEMA staffing resources, strategic resource requests can include resources
832 from U.S. Army Corps of Engineers (USACE) Reemployed Annuitant Cadre and Bicentennial
833 Volunteers, incorporated under the Tennessee Valley Authority. In accordance with the
834 *ROSM*, for Level I incidents, leadership positions and all other incident staff planning must
835 be jointly approved by the field office, region, and FEMA HQ. For more information, refer to
836 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

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

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

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

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

894

895 **Figure 4: Community Lifelines**

896

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

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

Position	Responsibilities
	Performs other PA operational, planning and response duties as delegated by the Regional Recovery Division Director (RRDD)
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

898

CHAPTER 4: APPLICANT COORDINATION AND EVALUATION

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900

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

911
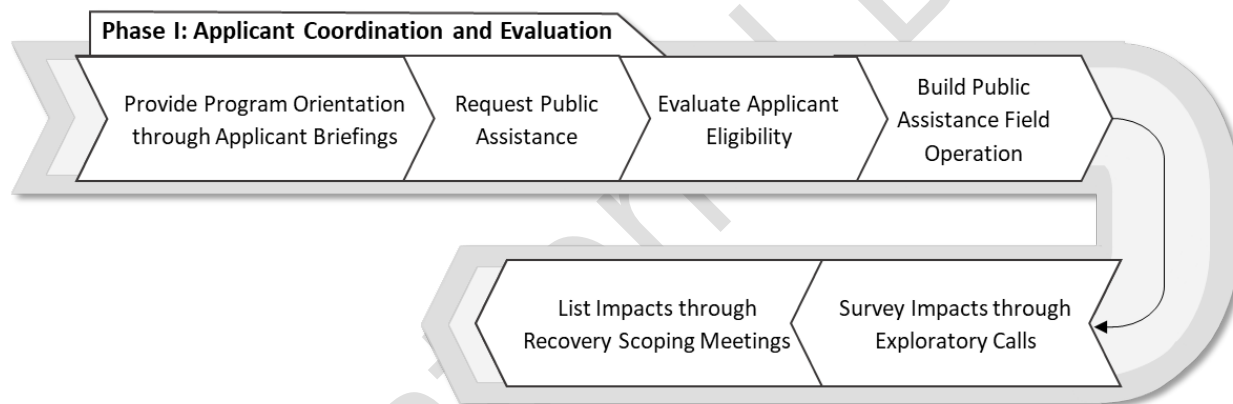
912 **Figure 5: Public Assistance Process Steps During Phase I**

913

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

914
915 **Table 8: Performance Indicators for Applicant Coordination and Evaluation**

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

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

916

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

922 Facilitators from FEMA's Alternative Dispute Resolution Division, within the OCC, can be
923 requested to conduct neutral third-party facilitations within FEMA or with Recipients,
924 Applicants, or other PA stakeholders to resolve conflicts at the earliest opportunity. These
925 facilitations are not used to determine eligibility and cannot conflict with policies or
926 regulations, including determination or appeals procedures. Examples of conflicts that
927 facilitation can address include conflicting working styles between disaster staff,
928 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
931 to prospective applicants. This is typically referred to as an Applicant Briefing. The briefings
932 vary by Recipient and typically include an overview of the PA Program delivery process,
933 deadlines, general PA eligibility criteria, mitigation opportunities, and compliance
934 requirements. FEMA personnel should attend briefings when possible and support the
935 Recipient by clarifying information, encouraging engagement with vulnerable and
936 underserved communities, and answering questions. For more information, refer to the
937 *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

998 Scoping Video provides this information. The RSM or video starts a 60-day regulatory period
999 when the Applicant must identify and report all eligible impacts and damage for FEMA to
1000 review. For more information on application procedures please *refer to 44 C.F.R. § 206.202.*

1001 • *Upon assignment to the Applicant, the PDMG conducts the RSM within 21 days.*

1002 • *The Applicant submits information on incident-related impacts within 60 days of the*
1003 *RSM.*

1004 At the RSM the Applicant, Recipient, and FEMA also
1005 begin a Project Development Plan, which is a work
1006 plan to guide the Applicant through project
1007 development and obligation. The Project Development
1008 Plan establishes a regular meeting schedule and
1009 target timelines for grouping impacts and damage into
1010 projects, scheduling site inspections, and submitting
1011 required documentation.

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

1012

1013 **Table 9: Roles and Responsibilities during Phase I**

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

| Position	Responsibilities
Public Assistance Program Delivery Manager (PDMG)	• Reviews the disaster operating profile and Applicant Impact Survey for assigned Applicant(s) and, as applicable, other feedback on Applicant capacity and complexity, to prepare for the Exploratory Call • Conducts the Exploratory Call • Prepares for the RSM, including assisting Applicant with impact list development • Coordinates with EHP and Hazard Mitigation specialists for support • Conducts the RSM, ensuring completion of the Project Development Plan • Provides Applicants with PA Hazard Mitigation information
Hazards and Performance Analyst 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

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1015

CHAPTER 5: IMPACTS AND ELIGIBILITY

1016

1017 After completion of the RSM, FEMA and the Applicant proceed to Phase II, the Impact and
1018 Eligibility phase, to obtain specific impact and damage details and review facilities for
1019 eligibility under the PA Program. During the Impacts and Eligibility Phase (Phase II), FEMA
1020 works with the Applicant to obtain specific information about impacts and damage to the
1021 Applicant's facilities and logically group the impacts and damage into projects. This chapter
1022 provides an overview of PA roles and responsibilities during Impacts and Eligibility.
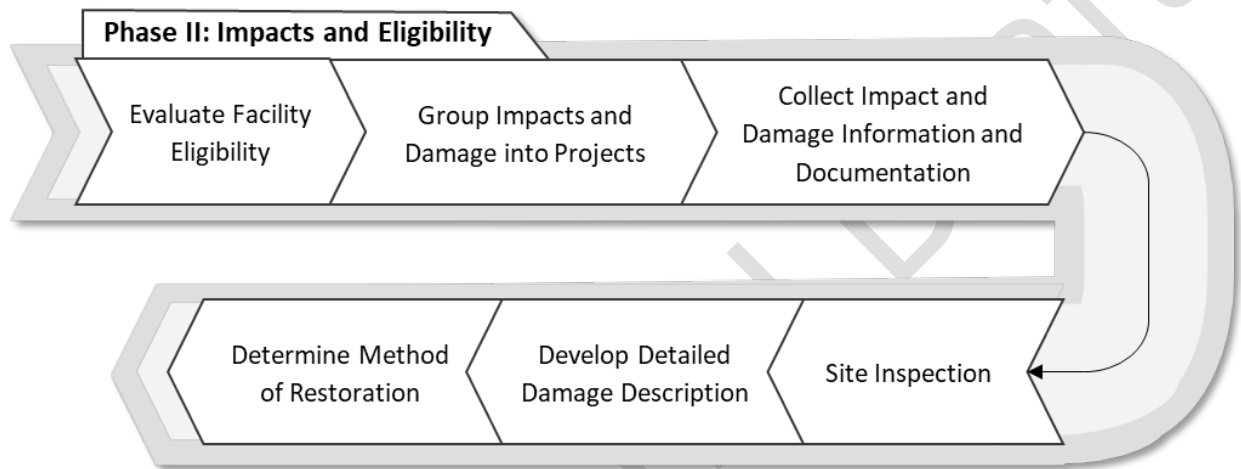
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1024 **Figure 6: PA Process Steps During Phase II**

1025

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

1026

1027 **Table 10: Performance Indicators for Impacts and Eligibility**

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

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

1028

Evaluate Facility Eligibility

1030 Once the Applicant completes its list of impacts, the PDMG works with the PDTL to identify
1031 sites and facilities that are under the authority of another federal agency or were not in use
1032 at the time of the incident. If a PDMG identifies ineligible sites or facilities, they explain to
1033 the Applicant the reason it is ineligible and either work with the Applicant to withdraw them
1034 from its list of impacts or work with the PDTL and PAGS to issue an ineligibility
1035 determination. Other eligibility concerns may be identified at this time or throughout the
1036 grant process.

Group Impacts and Damage into Projects

1038 The PDMG works with the Applicant and PDTL to identify sites and facilities that can be
1039 combined into one project. This is a two-step process: 1) Create groups based on categories
1040 of work and facility types. 2) Identify sites or facilities that logically group together. For more
1041 information refer to the *PAPPG*.

Collect Impact and Damage Information and Documentation

1043 Applicant-provided information and documentation are the core of project development. For
1044 each impact identified, the Applicant provides information and documentation to describe
1045 impacts, damage, and work. Applicants provide information through Grants Portal for each
1046 item in the List of Impacts. Information requirements are based on the specific nature and
1047 extent of each impact.

1048 For more information on specific documentation requirements, refer to the *PAPPG.*

Site Inspections

1050 For some projects, FEMA obtains and validates specific information about the damaged site
1051 or facility through a site inspection. PDMGs schedule the site inspections. When supporting
1052 underserved or complex Applicants, the PDMG works with the SITL to ensure the Site

1053 Inspector can provide the appropriate support. FEMA Site Inspectors (SIs) conduct
1054 inspections using various methods:

1055 • Applicants collect and submit impacts and damage-related information for FEMA review
1056   and validation (for sites with either completed or uncompleted work).
1057 • FEMA guides the Applicant through a virtual site inspection using video conference
1058   technology (for sites with uncompleted work).
1059 • FEMA physically visits the site with the Applicant (for sites with uncompleted work).

1060 FEMA mitigation and EHP specialists participate in site inspections as necessary to collect
1061 damage information and support subsequent mitigation and EHP reviews. For complex sites
1062 or facilities, FEMA Technical Specialists or other staff with technical specialties may conduct
1063 or engage with Applicants during the site inspection step to ensure adequate expertise and
1064 technical support through the project development process.

1065 *The Site Inspector completes Site Inspection within 21 days of a confirmed request*
1066 *for a site inspection.*

Develop Detailed Damage Description

1068 FEMA works with the Applicant to develop detailed damage descriptions and dimensions
1069 (DDD) by developing narrative descriptions, documenting dimensions and quantities,
1070 answering key questions, and obtaining documentation related to the impacts and damage.
1071 FEMA and the Recipient work to ensure the Applicant has submitted all information and
1072 documentation required. As the DDD is the foundation of the project and becomes the basis
1073 for which FEMA determines the amount of funding, it is critical that the DDD is accurate.

1074 *The Site Inspector completes the DDD within seven days of completing the site*
1075 *inspection.*

1076 *The PDMG reviews the DDD within two days of receipt, and the Applicant approves*
1077 *the DDD within seven days of the PDMG's review.*

Determine Method of Restoration

1079 Once FEMA, the Recipient, and the Applicant agree on the DDD, it is the Applicant's
1080 responsibility to define the method of repair, including the incorporation of hazard mitigation
1081 plans and building codes and standards. Some projects may require an engineering analysis
1082 to determine the method of repair. In these cases, FEMA may provide PA funding for
1083 engineering and design services.

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

Table 11: Roles and Responsibilities during Phase II

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

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

1088

1089

CHAPTER 6: SCOPING AND COSTING

1090

1091 During Phase III, the Scoping and Costing phase, FEMA reviews Applicant-provided
1092 information to develop or validate the SOW and cost estimate for each project, develop PA
1093 hazard mitigation proposals, and ensure compliance with applicable requirements. This
1094 chapter provides an overview of PA roles and responsibilities during Scoping and Costing.
1095 For most applicants, the transition from Phase II to Phase III is a simple progression from
1096 information collection to project development. For applicants with complex infrastructure
1097 projects, activities that fall under Phases II and III may not be as clearly segmented as field,
1098 regional, CRC, and Applicant staff work together to reach recovery outcomes. Projects with
1099 uncompleted work transition to Phase III after FEMA has completed the Site Inspection and
1100 DDD. Projects with all work completed transition to Phase III: Scoping and Costing, once
1101 FEMA obtains all information and documentation necessary to substantiate work performed
1102 and associated eligibility.

1103 The transition from Phase II to Phase III is also the transition from Stage 2: Scope Recovery
1104 Requirements to Stage 3: Deliver Recovery Support. Where FEMA has determined that a JRO
1105 is necessary, the transition of most Applicants from Stage 2 to Stage 3 also coincides with
1106 the transition from a JFO structure to a JRO structure.
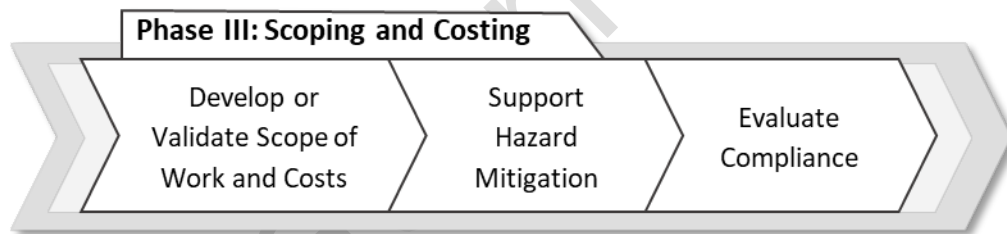
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1108 Figure 7: Public Assistance Process Steps during Phase III

1109

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

1110

1111 Table 12: Performance Indicators for Scoping and Costing

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

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

1112   *Improvements to the calculation of this metric are occurring during the Operational Draft period

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.*

1137 During scoping and costing, FEMA may determine the Applicant did not provide information
1138 to substantiate project eligibility. In these cases, FEMA submits an RFI to the Applicant for
1139 additional project documentation. FEMA may also identify eligibility concerns related to the
1140 work or cost claimed by the applicant. In these cases, CRC staff raise eligibility concerns
1141 through the PDTL to the PAGS to make an eligibility determination.

1142 *The Applicant responds to RFIs within the deadline specified, typically within 15*
1143 *days of receipt of the RFI.*

1144 FEMA may have independent cost estimating experts review project costs. For more
1145 information on Expert Panel Reviews, refer to the *PAPPG*.

Support Hazard Mitigation Efforts

1146

1147 For projects that include mitigation, FEMA works with Applicants to develop hazard
1148 mitigation proposals. Hazard mitigation proposals draw from information collected
1149 throughout the PA process, including the cause of damage, the type of mitigation desired by
1150 the Applicant, and the repair scope of work and cost estimate. FEMA ensures that proposed
1151 mitigation measures meet the cost effectiveness criteria defined in the PAPPG.

1152 Mitigation specialists coordinate with Applicants to address Applicant needs and goals, and
1153 also coordinate with costing specialists as necessary. Once completed, FEMA reviews each
1154 hazard mitigation proposal to ensure it includes a comprehensive scope of work for the
1155 identified mitigation, detailed cost estimates, and documentation of cost-effectiveness.

Evaluate Compliance

1156

1157 Once FEMA validates the SOW and costs for a project, it conducts a series of reviews to
1158 ensure program compliance. FEMA reviews projects for quality assurance, insurance
1159 requirements, PA hazard mitigation eligibility, EHP completeness, and EHP compliance for
1160 projects that do not require a Record of Environmental Consideration.

1161 *Insurance and Quality Assurance reviews are each completed within three days of*
1162 *the specialist receiving the project.*

1163   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

Positions	Responsibilities
Lane Manager	• Peer reviews projects • Assists specialists with any issues or concerns • Works with other Lane Mangers 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

| Positions	Responsibilities
Insurance Specialist	• Identifies any prior "obtain and maintain" requirements placed on the damaged facility or item in previous incidents • Communicates potential insurance issues or RFIs with the PDMG • Conducts final insurance review and makes required reductions • Determines the "obtain and maintain" insurance requirement for the damaged facility or item
Quality Assurance Specialist	• 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

1164

1165

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.
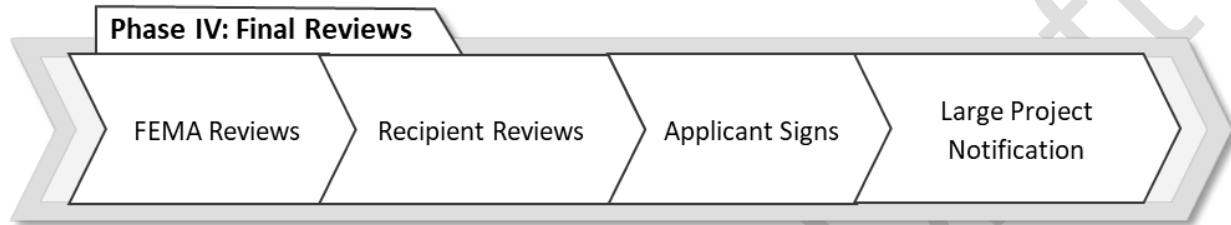
Figure 8: PA Process Steps during Phase IV

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

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Table 14: Performance Indicators for Final Reviews

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

*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

1186 concerns through to the PDMG and the PDTL to the PAGS to make an eligibility
1187 determination. Chapter 9 discusses the applicants right to appeal or arbitration.

1188 Once all compliance reviews are complete, the PDMG reviews the project and the PAGS
1189 conducts the final review to verify eligibility.

1190 ⏰ *The PDMG completes the project review within three days of receipt from the CRC.*
1191 *The PAGS completes FEMA final review within five days of PDMG review.*

1192 If a PDMG identifies eligibility issues, they work with the PDTL and PAGS to explain to the
1193 Applicant the reason it is ineligible and issue an ineligibility determination. Chapter 9
1194 discusses the applicants right to appeal or arbitration.

1195 Recipient Reviews

1196 Once FEMA has approved the project, the Recipient reviews project applications to ensure
1197 that the Applicant properly addressed all incident-related impacts, repair methods, and
1198 costs.

1199 ⏰ *The Recipient completes final project review within five days of FEMA's final*
1200 *review.*

1201 Applicant Signs

1202 Once the Recipient completes its review, the Applicant reviews and signs the project and
1203 acknowledges conditions (including EHP conditions), associated with PA subgrants.

1204 ⏰ *The Applicant completes final Project review within seven days of the Recipient*
1205 *review.*

1206 Large Project Notification

1207 If the federal cost share of a project is greater than $1 million, it must go through the Large
1208 Project Notification (LPN) process following applicant signature, prior to obligation. During
1209 the LPN process, FEMA notifies Congress, the Department of Homeland Security (DHS), and
1210 the Office of Management and Budget (OMB) prior to obligating funds.

1211 <center>**Table 15: Roles and Responsibilities during Phase IV**</center>

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

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

1212

CHAPTER 8: OBLIGATION AND RECOVERY TRANSITION

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1214

1215 Once all final reviews are complete and the Applicant has signed the project application, the
1216 project moves to Phase V. During Phase V, the Obligation and Recovery Transition phase,
1217 FEMA obligates funding to Recipients and transitions recovery roles and responsibilities.
1218 This chapter provides an overview of PA roles and responsibilities during Obligation and
1219 Recovery Transition.

1220

Phase V: Obligation and Recovery Transition — Obligate Funds to Recipient — Recovery Transition Meetings
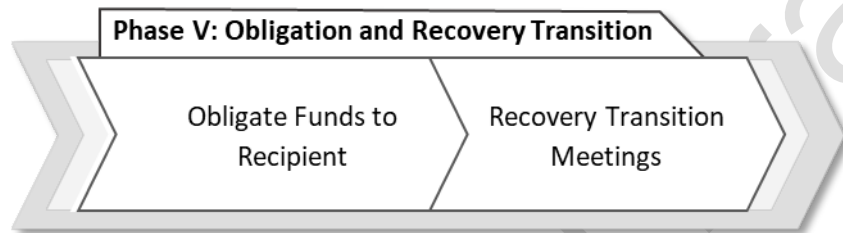
1221 **Figure 9: PA Process Steps During Phase V**

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1223
> **Phase V Objectives:**
> - Obligate funding to Recipient for disbursement to the Applicant
> - Transition Applicant's primary point of contact from FEMA to the Recipient

1224
1225 **Table 16: Performance Indicators for Obligation and Recovery Transition**

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

1226
1227
1228

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

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

CHAPTER 9: PROJECT MONITORING AND AMENDMENTS

1252

1253

1254 Applicants transition from Phase V to Phase VI upon completion of the RTM. Upon
1255 completion of the RTM, applicants transition to the region's responsibility. During Phase VI,
1256 the Project Monitoring and Amendments phase, PA staff monitor the status of PA projects to
1257 ensure Subrecipients spend funds according to the approved SOW, within the approved
1258 deadline, and in accordance with compliance conditions on the project. During this Phase,
1259 PA staff monitor overall progress and respond to requests for changes in scopes of work,
1260 time extensions, appeals, audits, and arbitration.

1261 Transition from Phase V to Phase VI is also the transition from Stage 3: Delivery Recovery
1262 Support to Stage 4: Grant Administration and Closeout. Federal Coordinating Officers
1263 should closely coordinate with the respective Region's Recovery Division Director to
1264 establish metrics for transitioning an event from field office management to the Region
1265 with concurrence from the State Coordinating Officer and approval of the Regional
1266 Administrator. Incidents managed by a JRO are the responsibility of the Region, and
1267 the workload and duties should be allocated based on the capacity of the PA staff to
1268 administer and close the grant activity.
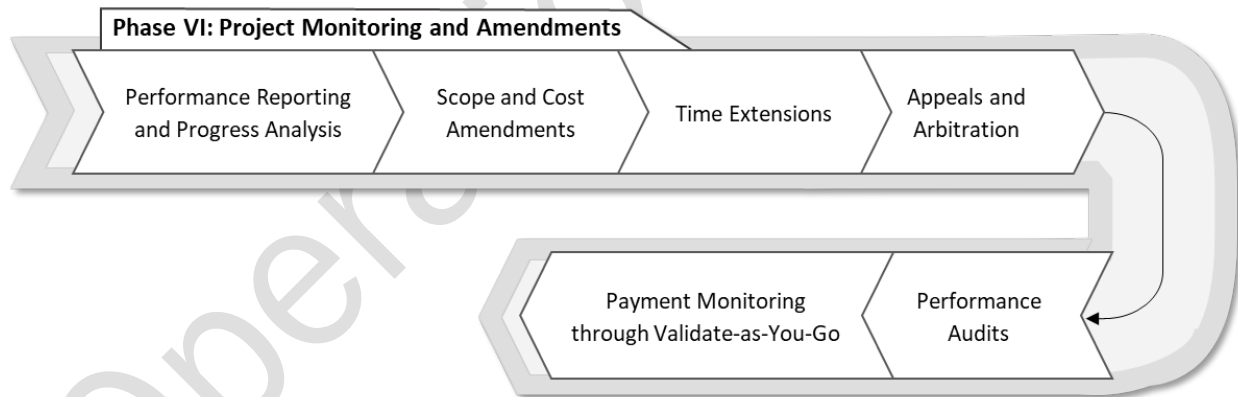
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Figure 10: PA Process Steps During Phase VI

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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

1273

1274

1275

Table 18: Performance Indicators for Project Monitoring and Amendments

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

1276   *excludes partially granted or fully granted appeals.

Performance Reporting and Progress Analysis

1278   Regional FEMA PA and Grants Management staff monitor financial and performance
1279   reporting through quarterly meetings and QPRs. QPRs list all open Large Projects where the
1280   Recipient has not processed the final federal share payment to the Subrecipient and include
1281   the status of work for each project. QPRs are an important tool for managing the progress of
1282   recovery, tracking potential time extension requests, and planning for closeout.

1283   *The Recipient provides Large Project QPRs to the region quarterly until the final*
1284   *Federal share payment is processed to the Subrecipient for the project.*

Scope and Cost Amendments

1286   Some projects require changes to the originally obligated project. If a Subrecipient requires
1287   a change, it requests approval prior to performing the work. PA staff evaluate Subrecipient
1288   amendment requests for compliance and make necessary cost adjustments via a project
1289   amendment.

Time Extensions

1291   If the Subrecipient determines that it needs additional time to complete work, it submits a
1292   written request to extend the work completion deadline to the Recipient. In some instances,
1293   the Recipient has the authority to approve time extension requests. If the time requested
1294   falls within the Recipient's authority, it notifies FEMA when it approves a time extension.
1295   Otherwise, the Recipient forwards the request to FEMA with a recommendation and PA staff
1296   review the request.

1297 In addition, work completion time extensions may not
1298 exceed the Recipient's prime award period of
1299 performance (POP). the initial period of performance
1300 for the prime award starts on the first day of the
1301 disaster incident period and extends four years. The
1302 Recipient must request approval from FEMA for an
1303 extension to the prime award if it anticipates project
1304 work to extend beyond the POP deadline.

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

1305 In considering and responding to project related
1306 extension requests, PA staff follow the procedures in
1307 the Work Completion Deadlines section of the *PAPPG*.
1308 When reviewing extension requests that may affect the
1309 prime award, PA staff coordinate with Grants
1310 Management and Office of the Chief Financial Officer
1311 (OCFO) staff based on the *FEMA Manual 205-0-1*
1312 *Grants Management (GMM)* and FEMA-State/Territory/Tribe Agreements.

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

Appeals and Arbitration

1313

1314 During any phase, FEMA may determine that certain Applicants, facilities, work, or costs are
1315 ineligible. Applicants may appeal such determinations and, in some instances, request
1316 arbitration. FEMA provides two opportunities to appeal an eligibility determination. First, the
1317 Applicant may appeal a decision to the FEMA RA.

1318 Second, if the RA denies all or part of the first appeal, the Applicant may appeal to the
1319 Assistant Administrator of the Recovery Directorate at FEMA HQ.

1320 Note that there are differences in appeals-related regulations and policy for disasters
1321 declared before or after January 1, 2022. For example, for disasters declared after January
1322 1, 2022, Applicants must submit appeals electronically using Grants Portal/Grants
1323 Manager. (Most other appeals may also be submitted electronically in this system.)

1324 Under certain circumstances for disasters declared after January 1, 2016, an Applicant that
1325 disputes a FEMA eligibility determination has a right of arbitration. To request arbitration,
1326 the disputed amount must be at least $500,000 (or $100,000 for rural locations) and
1327 Applicants must submit a timely first appeal. Applicants may not submit both a second
1328 appeal and request arbitration.
1329

1330 *For incidents declared before January 1, 2022, the Applicant may appeal a*
1331 *determination to the Recipient within 60 days of receiving FEMA's written*
1332 *notification of its determination. The Recipient must submit the Applicant's appeal*

1333   *and its recommendation to FEMA within 60 days of receiving the appeal from the*
1334   *Applicant.*

1335   ⏰ *For incidents declared after January 1, 2022, the Applicant may appeal a*
1336   *determination to the Recipient within 60 days of the date FEMA electronically*
1337   *transmitted its determination. The Recipient must submit the Applicant's appeal and*
1338   *its recommendation within 120 days from that same date.*

1339   ⏰ *FEMA Provides Appeal Decision within 90 days of receiving the appeal, or after*
1340   *receiving additional information FEMA requested to adjudicate an appeal, or after*
1341   *submitting for technical review.*

1342   ⏰ *The Applicant must submit a Request for Arbitration to the Civilian Board of Contract*
1343   *Appeals within 60-days of receiving the first appeals decision. If FEMA does not issue*
1344   *a first-level appeal decision within 180 days of receiving the appeal, the Applicant*
1345   *may withdraw the first-level appeal and request arbitration.*

1346   For more information refer to 44 C.F.R. §206.206, 48 C.F.R. 6106.601 - .613, the *PAPPG,*
1347   the *PA Program Appeals Guide*, *Public Assistance Appeals and Arbitration under the*
1348   *Disaster Recovery Reform Act* fact sheet*,* and additional PA Policy, Guidance, and Fact
1349   Sheets available online at [www.fema.gov/assistance/public/policy-guidance-fact-](www.fema.gov/assistance/public/policy-guidance-fact-sheets#pappg)
1350   [sheets#pappg](www.fema.gov/assistance/public/policy-guidance-fact-sheets#pappg).

Performance Audits

1352   Performance audits are examinations of programs to determine effectiveness and suggest
1353   improvements. All PA projects are subject to audits by the U.S. Government Accountability
1354   Office (GAO) and the DHS Office of Inspector General (OIG). When the GAO or OIG conducts a
1355   performance audit of the PA Program or how Recipients or Subrecipients expend federal
1356   funds, it submits a report to the FEMA Audit Liaison Office (ALO) detailing the review and
1357   findings that may also include recommendations for FEMA to develop and implement
1358   corrective actions.

1359   The ALO serves as an internal and external liaison for FEMA and its components to provide
1360   oversight to the audit follow-up process. The ALO supports and coordinates audits at both
1361   HQ and regions. Regions have primary responsibility for responding to audit-related action
1362   items related to specific projects, incidents, Subrecipients, Recipients, and operations within
1363   the region. HQ has primary responsibility for responding to audit-related action items related
1364   to overall or national-level program implementation and audit-related action items that
1365   address operations across multiple regions. FEMA PA and Grants Management staff
1366   contribute to the preparation of a Management Response Letter (prior to the publication of a
1367   Final Report by the GAO or OIG) and a Corrective Action Plan (CAP) (after the publication of a
1368   Final Report by the GAO or OIG). PA and Grants Management staff prepare content for

1369 inclusion within the CAP that contains corrective actions for each recommendation for which
1370 FEMA concurs and an explanation of nonconcurrence when FEMA does not concur. For
1371 incident-specific audits, FEMA also notifies the Recipient, providing reference to any
1372 associated projects. Subrecipients may appeal when FEMA de-obligates funding in response
1373 to an audit. For more information refer to the Audit Liaison Office's SharePoint site.

1374 Payment Monitoring through Validate-as-You-Go

1375 As required by the Payment Integrity Information Act of 2019 (PIIA 2019), FEMA's OCFO
1376 oversees periodic validation of project payments to identify and correct questioned costs
1377 through the Validate as You Go (VAYGo) initiative. Under VAYGo, FEMA ensures consistent
1378 monitoring of payments across the agency by reviewing a random sample of Recipient
1379 drawdowns. FEMA requests documentation of the selected drawdowns from the Recipient
1380 and reviews it to confirm PA funding is properly paid from drawdown, to disbursement, to
1381 payment to the entity that executes eligible project work as identified in an obligated
1382 subaward. VAYGo applies to all disasters declared in Fiscal Year 2020 and beyond.

1383 In a memorandum dated April 18, 2022, the OCFO memorialized the Administrator's intent
1384 to pause and evaluate opportunities to streamline and reduce the complexity of VAYGO
1385 processes if they are restarted following the pause.

1386 **Table 19: Roles and Responsibilities during Phase VI**

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

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

1387

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
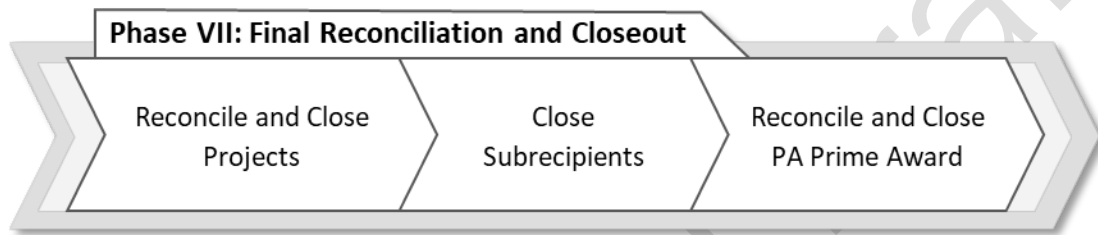
Figure 11: PA Process Steps During Phase VII

Phase VII Objectives:
• Close out all projects, Subrecipients, Recipients, and PA awards within regulatory timelines and budgets

Table 20: Performance Indicators for Closeout

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

Reconcile and Close Projects

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

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.*

1446 Once FEMA receives a Small Project Completion Certification from the Recipient and
1447 completes the necessary review, FEMA approves closeout of the respective Small Projects
1448 and notifies the Recipient in writing.

Close Subrecipients

1449

1450 The Recipient requests that FEMA close a Subrecipient once all its respective projects have
1451 been completed and closed for the incident. The Recipient may either request this in the
1452 same submittal as the Subrecipient's last project closeout request or may submit a separate
1453 request. The request includes a Project Completion Certification Report listing all the
1454 Subrecipient's projects.

1455 *The Recipient must request that FEMA close each Subrecipient within 180 days of*
1456 *the work completion date or the project deadline, whichever occurs first.*

1457 If all the Subrecipient's projects are closed and there are no outstanding audits, FEMA
1458 closes the Subrecipient and notifies the Recipient in writing. If a Subrecipient does have
1459 outstanding audits, PA staff should refer to the *GMM* and contact Grants Management staff
1460 for additional assistance.

1461 For more information refer to the *PAPPG* and the *GMM*.

Reconcile and Close PA Prime Award

1462

1463 The Recipient initiates the PA Prime Award closeout process once FEMA has closed all
1464 projects and Subrecipients. The Recipient must submit its final Federal Financial Report (SF-
1465 425) with a written request to close the PA Prime award. FEMA PA and Grants Management
1466 staff coordinate with the Recipient certify that all work was completed and all eligible costs
1467 have been reimbursed and financially reconciled.

1468 *For incidents declared before November 12, 2020, the Recipient must liquidate all*
1469 *obligations within 90 days of the end of the prime award period of performance.*

1470 *For incidents declared after November 12, 2020, the Recipient must liquidate all*
1471 *obligations within 120 days of the end of the prime award period of performance.*

1472 When the FEMA region receives the closeout request, PA and Grants Management staff
1473 work together to initiate the closeout process and complete a reconciliation of the PA Prime
1474 Award, as explained in the *GMM*. Grants Management staff then submit the reconciliation
1475 report to the FEMA Finance Center (FFC) for verification and final reconciliation. Upon final
1476 reconciliation by the FCC, FEMA closes the Recipient's PA Prime Award.

1477

Table 21: Roles and Responsibilities during Phase VII

Roles	Responsibilities
Regional PA Closeout Branch Chief	• Reviews and concurs 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

1478

1479 *If you suspect corruption, waste, fraud, abuse, mismanagement or misconduct contact the*
1480 *Department of Homeland Security Office of Inspector General hotline or submit a concern*
1481 *online.*

APPENDIX A: LIST OF ACRONYMS

1482

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

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

1539	ORR	Office of Response and Recovery
1540	Ops Chief	Operations Section Chief
1541	OS	Operations Support
1542	OSTL	Operations Support Task Force Leader
1543	PA	Public Assistance
1544	PAGS	PA Group Supervisor
1545	PDTL	Program Delivery Task Force Leader
1546	PDA	Preliminary Damage Assessment
1547	PDMG	Program Delivery Manager
1548	PIAA	Payment Integrity Information Act
1549	PNP	Private Non-Profit
1550	POP	Period of Performance
1551	QDSR	Quarterly Drawdown Sample Report
1552	QPR	Quarterly Progress Report
1553	RA	Regional Administrator
1554	REC	Record of Environmental Consideration
1555	RFI	Request for Information
1556	ROSM	Recovery Operations Support Manual
1557	RPA	Request for Public Assistance
1558	RRCC	Regional Response Coordination Center
1559	RRDD	Regional Recovery Division Director
1560	RSF	Recovery Support Function
1561	RSM	Recovery Scoping Meeting
1562	RTM	Recovery Transition Meeting
1563	SF	Standard Form
1564	SFM	Strategic Funds Management
1565	SI	Site Inspector
1566	SITL	Site Inspector Task Force Leader

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

1577

APPENDIX B: AUTHORITIES, DOCUMENTS, AND RESOURCES

Authorities

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

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.

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

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.

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

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

1609 Management Assistance Grants. The SRIA authorizes the most significant changes to the
1610 way that FEMA may deliver federal disaster assistance to SLTT governments, as well as
1611 disaster survivors since the passage of the Stafford Act.

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

1613 These reforms acknowledge the shared responsibility for disaster response and recovery,
1614 aim to reduce the complexity of FEMA, and build the Nation's capacity for the next
1615 catastrophic event. Some of the reforms include amending the Stafford Act to improve PA
1616 programs, authorize state-administered housing, and expand individuals and household
1617 assistance.

Regulations

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

1621 The CFR is a codification of the general and permanent rules and regulations published in
1622 the Federal Register that contain basic policies and procedures. Title 44 is titled,
1623 "Emergency Management and Assistance," and Chapter 1 of Title 44 contains the
1624 regulations issued by FEMA, including those related to implementing the Stafford Act.

Title 48 of the CFR, Federal Acquisition Regulations System

1626 The *Federal Acquisition Regulations System* codifies uniform policies and procedures for
1627 acquisition by all executive agencies. The Federal Acquisition Regulation System consists of
1628 the Federal Acquisition Regulations (FAR) and FEMA acquisition regulations that implement
1629 or supplement the FAR. The intent of the Federal Acquisition System is to deliver the best
1630 value product or service to the customer on a timely basis while maintaining the public's
1631 trust and fulfilling public policy objectives.

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

1634 This document provides guidance for non-federal entity recipients and subrecipients of
1635 federal financial assistance awarded by FEMA when using that assistance to finance
1636 procurements of property and services. The guidance provided by this document only
1637 applies to federal financial assistance (e.g., grants and cooperative agreements) subject to
1638 the procurement standards of the government-wide uniform administrative requirements,
1639 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 Incident Management Handbook, November 2017

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 Incident Management Manual, September 2015

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*.

FEMA Incident Stabilization Guide (Operational Draft), November 2019

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 Joint Recovery Office Guide, June 2021

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.

1699 FEMA's *Joint Recovery Office Guide* can be found in the [*ORR Doctrine, Policy and Directives*](#)
1700 [*Library*](#)

FEMA National Incident Support Manual (NISM), January 2013

1701

1702 The *National Incident Support Manual (NISM)* describes how the FEMA national staff
1703 supports FEMA incident operations and discusses steady-state activities pertinent to
1704 incident operations. The manual defines the activities of Federal assistance—across the
1705 nation and within FEMA's statutory authority—supporting citizens and first responders in
1706 responding to, recovering from, and mitigating all hazards. It includes definitions and
1707 descriptions of roles and responsibilities, functions, and organizational structures for those
1708 conducting FEMA incident support duties.

1709 FEMA's *NISM* can be found in the Office of Response and Recovery (ORR) [*Doctrine, Policy*](#)
1710 [*and Directives Library*](#)

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

1711
1712

1713 FEMA's *Public Assistance Program and Policy Guide (PAPPG)* defines FEMA's policy and
1714 procedural requirements for the PA Program and is intended to guide decision making and
1715 ensure consistent implementation of the PA Program.

1716 The *PAPPG* can be found at: www.fema.gov/assistance/public/policy-guidance-fact-sheets

FEMA Preliminary Damage Assessment Guide, August 2021

1717

1718 The *Preliminary Damage Assessment Guide* defines a standard national-level framework for
1719 how SLTT government officials and FEMA staff collect, validate, quantify, and document the
1720 cause, location, and details of damage following a disaster. The guide outlines a common
1721 concept of operations, defines major roles and responsibilities, recommends methodologies,
1722 and establishes national-level damage assessment standards and procedures.

1723 The *Preliminary Damage Assessment Guide* can be found at: [www.fema.gov/disaster/how-](http://www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide)
1724 [declared/preliminary-damage-assessments/guide](http://www.fema.gov/disaster/how-declared/preliminary-damage-assessments/guide)

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

1725
1726

1727 This fact explains how certain applicants for FEMA Public Assistance may request arbitration
1728 with the Civilian Board of Contract Appeals (CBCA).

1729 The fact sheet can be accessed directly at: www.fema.gov/sites/default/files/2020-
1730 07/fema_DRRA-1219-public-assistance-arbitration-right_fact-sheet.pdf

1731 FEMA Public Assistance Program Appeals Guide, November 2019

1732 The *FEMA Public Assistance Program Appeals Guide* identifies the policies, provides the
1733 procedures, and sets forth the responsibilities related to the FEMA PA Program appeals
1734 process. The guide outlines roles and responsibilities related to processing PA appeals;
1735 provides guidance on appeal and arbitration rights and requirements; establishes uniform
1736 appeals-related processes and procedures for FEMA regional and headquarters (HQ) staff;
1737 defines terms related to the appeals process; and includes resources for researching,
1738 drafting, and publishing appeals.

1739 FEMA's *Public Assistance Program Appeals Guide* can be found in the *ORR Doctrine, Policy*
1740 *and Directives Library*

1741 FEMA Public Assistance SOP 9570.24, Strategic Funds Management,
1742 December 2012

1743 This Standard Operating Procedure (SOP) establishes the process for implementing
1744 Strategic Funds Management (SFM) in the PA Program.

1745 *FEMA SOP 9570.24: Strategic Funds Management – Implementation Procedures for the*
1746 *Public Assistance Program* can be found with other PA SOPs and operations manuals at:
1747 www.fema.gov/assistance/public/policy-guidance-fact-sheets/sops-operations-manuals

1748 FEMA Infrastructure Branch Director and Public Assistance Group Supervisor
1749 Position Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations

1750 This position assist addendum provides interim guidance for Infrastructure Branch Directors
1751 (IBDs) and Public Assistance Group Supervisors (PAGS) and supplements the IBD/PAGS
1752 Position Assist. This addendum provides guidance for equitable assignment of Program
1753 Delivery Managers, considerations for virtual and in-person support, and considerations for
1754 tribal nations.

1755 The *FEMA Infrastructure Branch Director and Public Assistance Group Supervisor Position*
1756 *Assist Addendum: Equitable Assignment of PDMGs, Virtual Operations* can be found with
1757 other PA position assist addenda at the
1758 https://usfema.sharepoint.com/sites/ORR/recovery/pad/NewPA/Pages/Delivery-
1759 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 State-Led Public Assistance Guide, February 2019

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

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

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,

1822   opportunities, and feedback related to the PA Program via the "Feedback" feature in PA
1823   Grants Portal.

1824   The *Change Control Tool* can be accessed via SharePoint at:
1825   https://usfema.sharepoint.com/teams/ORRApps/NewPA/Pages/SubmitRequest-CCT-
1826   P3.aspx

1827   FEMA Public Assistance Grants Manager and Grants Portal Tool

1828   The *Grants Manager* and *Grants Portal* tool is a two-part, online platform that is used to
1829   formulate and track award packages. Grants Manager is the internal platform used by FEMA
1830   specialists, while the Grants Portal is the external platform used by Applicants, Recipients,
1831   and Subrecipients to manage their projects.

1832   The *Grants Manager* Tool can be accessed at:
1833   https://pagrants.fema.gov/Account/Login?ReturnUrl=%2f

1834   The *Grants Portal Tool* can be accessed at: https://grantee.fema.gov

1835   FEMA Public Assistance Grants Portal and Grants Manager Training, YouTube
1836   Channel

1837   Previously-recorded Recipient and Applicant Webinars are available on FEMA's *Grants*
1838   *Manager/Grants* Portal YouTube channel or the Support Center in Grants Manager and
1839   Grants Portal. FEMA also offers regular Grants Manager/Grants Portal training to internal
1840   and external stakeholders. Schedules for internal FEMA employee and contractor micro-
1841   trainings (webinars) are distributed by FEMA staff on a regular basis.

1842   FEMA's training YouTube channel for *Grants Manager* and *Grants Portal* can be accessed at:
1843   www.youtube.com/channel/UCIJp91Ds2IaVlR1t8uXcEKg

1844   FEMA Public Assistance Recovery Performance Framework Dashboard

1845   FEMA's *Recovery Performance Framework Dashboard* is a fully automated and interactive
1846   dashboard based on the PA program's standardized, cascading performance goals and
1847   indicators.

1848   The *Recovery Performance Framework Dashboard* can be accessed at:
1849   https://analytics.fema.net/t/RAB/views/PARecoveryPerformanceFramework/RPF?iframeSiz
1850   edToWindow=true&%3Aembed=y#1

APPENDIX C: PUBLIC ASSISTANCE DEADLINES

1851

1852 This table provides a list of regulatory and policy deadlines for tasks in applicable phase of
1853 PA program delivery.

1854

Table 22: Regulatory and Policy Deadlines

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

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

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

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

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

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

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APPENDIX D: TIMELINESS GOALS

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1858 This table provides a list of timeliness expectations for tasks in the first five phases of PA
1859 program delivery. The metrics referenced in this appendix, and throughout the guide, were
1860 compiled from the Recovery Performance Framework, PA doctrine guidance, and in
1861 coordination with other Agency partners, including the Federal Insurance and Mitigation
1862 Administration (FIMA). Throughout the Operational Draft period, PA staff will compile
1863 feedback from users and work with Recovery Reporting and Analytics Division to further
1864 refine the metrics.

1865

Table 23: Timeliness Goals

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

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

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APPENDIX E: PUBLIC ASSISTANCE PROGRAM POSITIONS AND FUNCTIONS

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1869 Further guidance for PA Program positions and functions can be found in the [Delivery
1870 Toolbox](#) and on the [Grants Manager Resources](#) page.

Field Positions

1871

Federal Coordinating Officer

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1873 The Federal Coordinating Officer (FCO) is responsible for the leadership and overall
1874 management of the federal response to and recovery from Presidentially declared incidents.
1875 FCOs execute DRM authority, delegated from the RA, to manage all disaster staff and
1876 offices, including PA. As such, the FCO has the influence to set priorities for PA program
1877 delivery, oversee PA staff and disaster deployments, work with state, tribal, or territorial
1878 officials, and even work directly with some applicants. FCOs often re-delegate certain
1879 authorities, including project obligation, to the IBD/PAGS. The FCO may choose to establish
1880 financial controls to manage fiduciary risks, such as limiting delegated approvals to certain
1881 dollar thresholds.

Infrastructure Branch Director

1882

1883 The Infrastructure Branch Director (IBD) reports to the Operations (Ops) Section Chief and is
1884 responsible for coordination of infrastructure-related activities performed by staff assigned
1885 to the Infrastructure Branch, and field leadership of the PA Program. The IBD oversees the
1886 infrastructure ESFs during response. In coordination with the Recipient and the PAGS, the
1887 IBD also assesses Applicant needs for assistance and ensures appropriate support for
1888 underserved communities. The IBD position is determined as Type 1 or Type 2 to correspond
1889 to the appropriate incident level. In Level I incidents, Deputy Infrastructure Branch Chiefs
1890 may support the Branch Chief.

Public Assistance Group Supervisor

1891

1892 The Public Assistance Group Supervisor (PAGS) has a variety of responsibilities across PA
1893 Program delivery. Acting in mostly an oversight role, the PAGS sets and manages goals for
1894 each phase, monitors interactions with Applicants and Recipients, and coordinates with
1895 other offices or individuals as necessary. In coordination with the Recipient and the IBD, the
1896 PAGS also assesses Applicant needs for assistance and ensures appropriate support for
1897 underserved communities. The PAGS is also involved in the eligibility determination process
1898 and is responsible for determining accuracy of eligibility determinations and development of
1899 a DM. The PAGS supports the IBD in Level I and II incidents and manages Level III incidents.

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

1936   in the field impeding delivery of the program and service to Applicants by their assigned
1937   PDMGs. This is all done to ensure timely, accurate delivery of the PA program throughout all
1938   phases of program delivery.

Program Delivery Manager

1939

1940   The PDMG provides customer service to assigned Applicants throughout the PA grant
1941   delivery process. When supporting underserved or complex Applicants, the PDMG works to
1942   understand their unique needs and ensure appropriate support. The PDMG facilitates and
1943   coordinates the effective, efficient, and accurate delivery of project funding while
1944   coordinating the Applicant's recovery priorities, understanding capacity to develop projects
1945   and participate in site inspections, and provides customer services.

Region-Specific Positions

1946

Regional Administrator

1947

1948   The Regional Administrator (RA) is the primary FEMA representative to state governors,
1949   OFAs, and local, tribal, and territorial authorities during day-to-day operations within their
1950   region. The RA reviews and recommends approval/denial of declaration requests. In the
1951   event of a Stafford Act declaration, the RA has control of FEMA resources within the region
1952   and is designated as the DRM. The RA executes DRM authority, including activating and
1953   tasking support functions, selecting field leadership from within the FEMA region, or
1954   recommending leadership for Level I incidents, approving MAs, approving incident staffing
1955   plan for Level I incidents, engaging with policy as necessary, and supporting development of
1956   regional All-Hazards plans and other relevant pre-disaster recovery plans. The RA delegates
1957   DRM authority to field leadership, usually the FCO, once they have established operational
1958   capability, or to regional program leadership, as needed.

Regional Recovery Division Director

1959

1960   The Regional Recovery Division Director (RRDD) oversees all PA-related functions in the
1961   region, and supports joint PDAs, emergency declarations, and MAs, as applicable. The RRDD
1962   recommends approval/denial of declaration requests to the RA and makes formal
1963   recommendations to the RA on appeals. The RRDD also analyzes quarterly JFO data to
1964   identify field offices ready for transition to the region, conducts final reviews at closeout for
1965   incidents that have been transitioned back to the region, and delegates day-to-day
1966   responsibility for their branch chiefs.

Regional PA Operations Branch Chief

1967

1968   Regional PA Operations Branch Chiefs report to the Regional Recovery Division Director and
1969   are responsible for providing direction, oversight, and coordination of activities performed by

1970 regional PA staff to deliver the PA Program in the field; and coordinating with SLTT
1971 governments and OFA to deliver the PA Program during the response phase.

1972 ### Regional PA Closeout Branch Chief
1973 Regional PA Closeout Branch Chiefs report to the Regional Recovery Division Director and
1974 are responsible for providing direction, oversight, and coordination of project monitoring and
1975 closeout activities performed by regional PA staff; and coordinating with state, tribal, and
1976 territorial governments on project monitoring and compliance.

1977 ### Public Assistance State/Tribal Liaison
1978 The PA State/Tribal liaison provides customer service to assigned states, tribes, and
1979 territories throughout the project monitoring and closeout process. While not all regions
1980 have a Tribal Liaison, this is a best practice as the Tribal Liaison serves as the primary point
1981 of contact for tribes.

1982 # Headquarters-Specific Positions

1983 ### Assistant Administrator for Recovery
1984 The Assistant Administrator for Recovery oversees all FEMA Recovery programs, including
1985 PA. The Assistant Administrator, or their designee, has the sole authority to modify or waive
1986 PA Policy, and issue specific deadline extensions or exemptions. They may delegate these
1987 authorities to the PA Division Director. In order to establish a JRO, the RA must work with the
1988 Assistant Administrator and gain their concurrence. Alongside the Chief Component Human
1989 Capital Officer (CCHCO), the Assistant Administrator for Recovery approves the Incident
1990 Resource Plan (IRP) for Level I disasters and for all other disasters for which the FEMA
1991 region plans to set up a JRO,

1992 ### Public Assistance Division Director and Deputies
1993 The PA Division Director reports to the Assistant Administrator for Recovery and oversees PA
1994 program development and delivery across the recovery enterprise. The Deputy Director for
1995 Operations oversees program implementation and controls and provides national-level
1996 support for incidents that exceed regional routine incident years. The deputy manages the
1997 CRCs, Contracts Management, Field Resources, and Training and Development Branches.
1998 The Deputy Director for Policy oversees the development and design of the program and
1999 manages the Appeals, Audits, and Arbitration; Policy; Program Design; and Program Support
2000 and Monitoring Branches.

2001 ### Consolidated Resource Center Director and Deputies
2002 The CRC Director manages a CRC and ensures exceptional support to field and region led
2003 program delivery. The CRC Deputy Directors manage the staff within their assigned lanes.
2004 Operations Lane Deputy Director manages lane staff conducting quality assurance, DM

2005   drafting, EHP completeness reviews, insurance compliance reviews, and document integrity
2006   management. The Standard Lane Deputy Director manages Standard Lane staff, and the
2007   Completed and Specialized Lane Deputy Director manages the Completed and Specialized
2008   Lane staff.

Executive Officer

2009

2010   The CRC Executive Officer reports to the CRC Director and is responsible for leading the day-
2011   to-day operations, resource management, and human resources coordination. They serve as
2012   senior office administrator, providing advice and recommendations on all matters related to
2013   the coordination, integration, and synchronization of staff actions and activities affecting the
2014   CRC. They analyze and evaluate operations and the management of administrative
2015   processes; managing critical support functions such as scheduling, budget monitoring,
2016   supplies, space utilization, training and coordinating with human resources and other
2017   internal partners to post job announcements, recruit candidates, and select candidates.

Consolidated Resource Center Lane Manager

2018

2019   The CRC Lane Manager oversees consolidated resources using a standardized approach to
2020   project development in all categories of work. Lane Managers should have situational
2021   awareness of Incident and Applicant profiles to forecast resource requirements and prepare
2022   for efficient work processing. Lane Managers are responsible for managing work of specific
2023   teams of specialists within CRCs, including assigning work, conducting peer reviews, and
2024   ensuring production goals are met. Lane Managers oversee costing specialists (i.e.,
2025   Standard Lane), Determination Analysts, Document Integrity Unit Specialists, EHP
2026   Specialists, Insurance Specialists, Technical Specialists, and Quality Assurance Specialists.

Cross-Enterprise Public Assistance Positions

2027

Operations Branch Director

2028

2029   The Operations Branch Director oversees activities for a modular unit. Branch Directors
2030   operate in a geographical or functional capacity, directing operations for either a
2031   geographical subset of incident operations (i.e., at a Branch or AFO), or for a functional
2032   branch (i.e., Emergency Services, Air Operations, Infrastructure, Individual Assistance).
2033   During an incident, the Operations Branch Director for Critical Infrastructure (OBD-I) will
2034   transition roles and responsibilities over to the PA IBD as the incident stabilizes.

Operations Section Chief

2035

2036   The Operations Section Chief is responsible for coordinating tactical activities focused on
2037   reducing immediate hazards, saving lives and property, establishing situational control, and
2038   restoring normal operations after an event or incident. They lead and manage the conduct of
2039   incident operations including advising the FCO, provide key input for IAPs, and lead and

2040 supervise Operations Section staff, including Operations Branch Directors. As response
2041 activities transition to recovery, the PA IBD or PA Group Supervisor maintains situational
2042 awareness with the Ops Section Chief, who liaises with the FCO.

2043 Operations Support Specialist

2044 The Operations Support Specialist assists with deployment coordination and obtaining staff
2045 needed for the workload. Also helps in overseeing and aiding staff, including check-in,
2046 check-out, staff reporting, accountability, and any administrative requirements. In addition,
2047 the Operations Support Specialist prepares PA input for the IAP and situational report and
2048 tracks correspondence.

2049 Costing Specialist

2050 The Costing Specialist contributes to the timeliness, quality, and reliability of program
2051 delivery in providing project funding based on a codified, detailed DDD. Cost Specialists
2052 work on projects in the Standard Lane and validate Scope of Work (SOW) and Cost
2053 Estimates for uncompleted work. For work completed, the Costing Specialist reviews
2054 applicant-provided documents to develop the SOW and validate the costs. Costing
2055 Specialists may support the CRC or regional office.

2056 Validation Specialist

2057 The Validation Specialist reviews documentation and ensures the completeness, accuracy,
2058 and eligibility of SOW and costs associated with work that is 100% completed and
2059 documented. Validation Specialists work on projects where the work is 100% completed and
2060 documented and develops the entire project or amendment consisting of the detailed DDD,
2061 SOW, and costs. The Validation Specialist may support the CRC or regional office.

2062 Environmental Planning and Historic Preservation Specialist

2063 The Environmental Planning and Historic Preservation (EHP) Specialist provides technical
2064 assistance to PA staff, Recipients and Applicants to identify EHP compliance considerations
2065 that may be applicable to an Applicant's recovery actions. The EHP Specialist integrates the
2066 protection and enhancement of environmental, historic, and cultural resources into the
2067 FEMA PA Program by ensuring that FEMA actions comply with federal EHP laws and
2068 Executive Orders. The EHP Specialist may support the Field, CRC, regional office, or HQ.

2069 Environmental Planning and Historic Preservation Advisor

2070 The Environmental Planning and Historic Preservation Advisor (EHAD) oversees all
2071 consultation and coordination activity and National Environmental Policy Act (NEPA)
2072 document preparation. The EHAD is typically the disaster Environmental Officer and is the
2073 final reviewer for Records of Environmental Consideration (RECs) submitted by EHP staff.
2074 The EHAD is responsible for tracking EHP productivity and staffing needs and participates in

2075 consultation with regulatory agencies. The EHAD operates outside the Operations chain of
2076 command and reports to the FCO or Chief of Staff (COS).

IMAT Team Lead

2078 Incident Management Assistance Teams (IMAT) exist at the regional and national level. They
2079 deploy first when an incident strikes to provide immediate response, gain situational
2080 awareness, and establish FEMA's staffing framework for response and recovery. The IMAT
2081 Team Lead works closely with regional leadership and SLTT organizations to ensure
2082 immediate hazards are identified and FEMA's response is coordinated expeditiously. Once a
2083 framework for remaining response and recovery has been established at the incident level,
2084 the IMAT Team Lead transitions duties to the FCO and Operations Section Chief.

Insurance Specialist

2086 The Insurance Specialist supports PA Program delivery to Recipients and Subrecipients by
2087 applying statutory and regulatory insurance requirements during the PDA, project
2088 formulation, and compliance review. before determining the amount of net eligible PA
2089 funding for eligible but insured elements. The Insurance Specialist may support the CRC or
2090 regional office.

Interagency Recovery Coordination Staff

2092 PA is responsible for seeking opportunities to leverage post-incident funding and technical
2093 assistance of federal interagency partners, including by working with IRC staff, who help
2094 coordinate interagency recovery support for problems, issues, and needs that are not
2095 covered by PA. While the IRC itself does not control funding or resources, its job is to act as a
2096 hub of information and contacts, assisting stakeholders to narrow down their need or
2097 request, then finding information or a point of contact (often a federal partner) who can offer
2098 support. IRC staff provide HQ and Field support.

Hazards and Performance Analysis Task Force Leader (TFL)

2100 The Hazard and Performance Analyst Task Force Leader (TFL) is the first-level supervisor for
2101 the Mitigation Specialists and communicates the JFO operational priorities to the Mitigation
2102 Specialists to accomplish operational objectives. The HPATFL manages Mitigation Specialist
2103 workflow and reviews Mitigation Specialist deliverables. The HPATFL resolves any
2104 operational issues arising in the field impeding delivery of the program and service to
2105 Applicants by their assigned Mitigation Specialists.

Mitigation Specialist

2107 The Mitigation Specialist focuses on providing technical assistance to PA staff, Recipients
2108 and Applicants to identify PA hazard mitigation actions that enhance an eligible facility's
2109 ability to resist damage in future incidents. Mitigation Specialists work closely with PDMGs,

2110 and their counterparts in the CRC and region and may support the CRC, field, or regional
2111 office.

Reports Specialist

2113 The Reports Specialist is responsible for extracting data from grant management systems
2114 and associated tools used by the PA Program; conducting quantitative data analysis with
2115 varied data sets; developing reports and other analytical products; and identifying
2116 opportunities to evaluate project development effectiveness and performance.

Technical Specialist

2118 The Technical Specialist contributes to the timeliness, quality, and reliability of program
2119 delivery in providing project funding based on a codified, detailed DDD. Technical Specialists
2120 work on projects in the Specialized Lane, conducting site inspections or completing
2121 assessments for complex/specialized damages, validating SOW and Cost Estimates for
2122 complex/specialized projects, and/or reviewing Applicant-provided documents to develop
2123 the SOW and costs. Technical Specialists may support the Field Office, CRC or region.

Quality Assurance Specialist

2125 The Quality Assurance (QA) Specialist reviews the detailed DDD, SOW, and Cost Estimate for
2126 accuracy and proper documentation, prior to a project submittal to Program Compliance
2127 Review for Insurance, PA Hazard Mitigation, and EHP. The QA Specialist's reviews ensure
2128 consistency in program delivery and development of a quality project. The QA Specialist
2129 works with Costing, Document Validation, and Technical Specialists for clarity and accuracy
2130 in projects. This role is integral to ensuring Applicant-provided documentation is complete in
2131 support of project development and may support the CRC or regional office.

Determination Analyst

2133 The Determination Analyst drafts DMs based on Eligibility Reviews. Determination Analysts
2134 may support the CRC or regional office.

Policy Analyst

2136 The Policy Analyst focuses on reviewing the laws and regulations that govern the PA Program
2137 and developing policy, guidance, fact sheets, and other documents that articulate FEMA's
2138 intent and direction for administering PA grants to external stakeholders. Policy Analysts
2139 work on policy related to program administration, emergency work, permanent work, and
2140 costs and grant awards. The Policy Analyst may support HQ, field operations, or the regional
2141 office.

PA Audit Liaison

2142

2143 The PA Audit Liaison reviews audit findings, draft versions of Management Response Letters
2144 and contribute to the timely resolution of audit recommendations. The Audit Liaison may
2145 support the regional office or FEMA HQ.

Appeal Analyst

2146

2147 The Appeal Analyst performs the completeness review, preparing analysis for each appeal
2148 and presenting it to leadership, researching and drafting all first appeal decisions within the
2149 prescribed regulatory timeframes. Appeal Analysts must be certified by the HQ PA Appeals
2150 and Audits Branch. Appeal Analysts may support first appeals in the regional office or
2151 second appeals at 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

2184 **High-Risk Applicants**

2185 The following criteria may indicate that an Applicant is high-risk:

2186 • Applicant has potentially non-compliant or complex contract costs

2187 • Applicant has been the subject of a Congressional Inquiry

2188 • Significant representation of vulnerable or underserved communities in the Applicant's

2189   population.

2190 • High-profile (attracting political interest or media attention)

2191 • Fiduciary concerns or financial constraints

2192 • Impacts to all categories of work; impacts to numerous facilities

Projects

2193 **Projects**

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

Complex Projects

2195 **Complex Projects**

2196 The following criteria may be useful in identifying complex projects:

2197 • Project requires architectural and engineering (A&E) drawings before cost estimates

2198 • Project requires significant codes and standards upgrades (e.g., adding a tornado

2199   shelter)

2200 • Projects with changes to pre-disaster size, function, or capacity of facilities, such as:

2201   o Major hazard mitigation measures (e.g., floodproofing)

2202   o Replacement project

2203   o Relocation project

2204   o Improved or Alternate projects involving facilities

2205 • Significant impacts to a facility or utilities that have complex structural elements such

2206   as:

2207   o Major mechanical systems that are inoperable (e.g., electrical, plumbing, heating,

2208   ventilation, air conditioning, etc.)

2209   o Nuclear power generating station

2210   o Water and wastewater treatment facilities

2211   o Rail systems

2212 • Structures with impacts to underwater components (e.g., bridges, dams, piers, and

2213   breakwaters)

2214 • Slope or embankment failure on major or highly trafficked transportation route

2215 • Beaches due to eligibility requirements

2216 • Unique geographic conditions (e.g., volcanic areas or structures built into a mountain or

2217   cliff)

High-Risk Projects

2218 **High-Risk Projects**

2219 The following criteria may be useful in identifying high-risk projects:

2220 • Project triggers complex Environmental and Historic Preservation (EHP) concern, such as

2221   an Environmental Assessment (EA) or an Environmental Impact Statement.

2222	• Projects with potential duplication of benefits requiring Intra/Interagency coordination,
2223	such as:
2224	o The project may be eligible for multiple FEMA funding sources
2225	o Another federal agency may have overlapping authorities
2226	• Floodplain Management or Environmental and Historic Preservation concerns, including
2227	the following:
2228	o Ground disturbance, such as when increasing the size of the preexisting footprint
2229	o Work in or near a historic district or building/structure/object over 45 years old
2230	o Work on or near archaeological resources
2231	o Work near threatened or endangered species or critical habitat
2232	o Work in floodplains or within 200 feet of a waterway, body of water, or wetland
2233	• Impacts vulnerable or underserved communities
2234	• Project cost equal to or greater than $1 billion in federal share
2235	• Fiduciary concerns or financial constraints
2236	• Projects requiring 50% rule determinations and with a Federal cost share equal to or
2237	greater than $1 million
2238	• Nuclear power generating station
2239	• Relocation of facilities
2240	• Impacts causing inaccessibility to populated areas or critical service facilities
2241	• Project with a non-competitively bid contract equal to or greater than $1 million
2242	• Significant impacts to facilities or utilities that serve a large amount of the population
2243	such as:
2244	o Medical
2245	o Transportation systems
2246	o Water and wastewater treatment facilities
2247	o Transmission and distribution power lines
2248	o Water control infrastructure (e.g., levees and dams)
2249	• Leads to significant cascading impacts such as:
2250	o Water control infrastructure (e.g., levees and dams)
2251	o Transmission and distribution power lines
2252	o Transportation systems

APPENDIX G: FEMA PUBLIC ASSISTANCE NATIONAL WORKFLOW

2254
2255

FEMA Public Assistance National Workflow

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

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

Operational Planning and Response

Incident occurs

- Evaluate Declaration Request — R F
- Operational Planning — R F
- Recipient Agreement and Application for Assistance — A R F
- Response Coordination — F

Phase I: Applicant Coordination and Evaluation

- Provide Program Orientation through Applicant Briefings — R
- Request Public Assistance — A
- Evaluate Applicant Eligibility — R F

Phase II: Impacts and Eligibility

- Collect Impact and Damage Information and Documentation — A F
- Group Impacts and Damage into Projects — A F
- Evaluate Facility Eligibility — F
- List Impacts Through Recovery Scoping Meetings — A R F
- Survey Impacts Through Exploratory Calls — A R F
- Build Public Assistance Field Operation — F

Phase III: Scoping and Costing

- Site Inspection — A F
- Develop Detailed Damage Description — A R F
- Determine Method of Restoration — A
- Develop or Validate Scope of Work and Costs — A F
- Support Hazard Mitigation — A F
- Evaluate Compliance — F

Phase IV: Final Reviews

- FEMA Reviews — F
- Recipient Reviews — R

Phase VI: Project Monitoring and Amendments

- Scope and Cost Amendments — A F
- Performance Reporting and Progress Analysis — R F

Phase V: Obligation and Recovery Transition

- Recovery Transition Meetings — A R F
- Obligate Funds to Recipient — A R F
- Large Project Notification — F
- Applicant Signs — A

Phase VII: Final Reconciliation and Closeout

- Time Extensions — A R F
- Appeals and Arbitration — A R F
- Performance Audits — F
- Payment Monitoring Through Validate-as-You-Go — R F
- Reconcile and Close Projects — A R F
- Close Subrecipients — A R F
- Reconcile and Close PA Prime Award — R F

Key:

Applicant	Recipient	FEMA
A	R	F

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