



State-Led Public Assistance Guide

February 2019



FEMA

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CHAPTER 1: INTRODUCTION

Purpose

The Federal Emergency Management Agency's (FEMA) *State-Led Public Assistance Guide* provides clear and streamlined guidance on the processes, resources, and capabilities required for Recipients to lead Public Assistance (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. While FEMA will always retain some functions for presidential disaster declarations in accordance with federal regulations and laws, Recipients may elect to take responsibility for executing one or more options for state-led PA functions, as defined in Chapter 4: State-Led Public Assistance Operating Concept. Such a division of responsibility between Recipients and FEMA seeks to optimize the use of resources across all levels of government.

Audience

Recipients, FEMA regions, and field leadership are the primary intended audience of the *State-Led Public Assistance Guide*, which provides Recipients with clear direction on the processes, requirements, and capabilities necessary to manage PA operations within their state, territory, or tribe. The *State-Led Public Assistance Guide* also informs FEMA headquarters (HQ), regional, and incident-level staff about how to coordinate and support a state-led PA operation.

Use of Terms

State-Led Public Assistance (PA): The *State-Led Public Assistance Guide* will use the term state-led PA to denote when states, territories, or federally recognized tribes ("tribes") lead PA operations.

Recipient: A non-federal entity, typically a state, territory, or tribe that receives a federal award directly from a federal awarding agency to carry out an activity under a federal program.

Subrecipient: A non-federal entity that has been awarded funds under the Recipient's federal award. When submitting an application to the Recipient for assistance, the **Subrecipient** is known as the **Applicant**. The *State-Led Public Assistance Guide* will use the term **Subrecipient** to encompass both **Applicant** and **Subrecipient**.

Level III Incident: A disaster, which because of its severity, size, location and actual or potential impact on public health, welfare, and infrastructure, requires a moderate amount of direct federal assistance. A Level III disaster requires coordination among involved federal, state, tribal, and local entities because of minor-to-average levels and breadth of damage.

Scope and Applicability

The *State-Led Public Assistance Guide* establishes a common terminology to clarify the roles and responsibilities Recipients and FEMA may lead or share throughout the PA grant life cycle. At this time, FEMA intends state-led PA operations to be undertaken primarily for Level III incidents. The *State-Led Public Assistance Guide* is not intended to prescribe Recipient operations during state-led PA but, instead, offers broad guidance that can be adapted to fit the needs of each Recipient's emergency management resources at the time of the disaster. While tribal governments retain the decision to lead PA operations, tribes are primarily new Recipients at this time. FEMA acknowledges the need to provide additional resources to support tribes in developing and sustaining PA Program capability prior to leading a PA operation. Tribal governments that wish to pursue a path toward leading PA operations should reach out to their respective FEMA regional office.

Supersession

This document is consistent with existing authorities, policy, and doctrine. It does not supersede any existing doctrine, policies, or regulations governing the PA Program or the presidential disaster declaration process.

Authorities and Foundational Documents

- Public Law 93-288, as amended, Sections 5121-5207, 42 U.S.C., *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)*, 2018.
- Title 2 of the Code of Federal Regulations (CFR), Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.
- Title 44 CFR, *Emergency Management and Assistance*.
- Federal Register Notice (FRN), Volume 66, Number 135, FR Doc No. 01-17533, Documentation Citation 66 FR 36783, *Notice of the State Management of Public Assistance Operations in Small Disasters*, 2001.
- FP 104-009-2, *Public Assistance Program and Policy Guide (PAPPG)*.
- *National Incident Management System (NIMS)*, Third Edition, October 2017.
- *National Response Framework (NRF)*, Third Edition, June 2016.
- *National Disaster Recovery Framework (NDRF)*, Second Edition, June 2016.
- *National Mitigation Framework*, Second Edition, June 2016.
- FEMA, *Incident Management and Support Keystone (IMSK)*, January 2011.
- FEMA, *Regional Incident Support Manual (RISM)*, January 2013.
- FEMA, *National Incident Management System Guideline for the National Qualification System*, November 2017.

- FEMA Directive 108-1, *Environmental Planning and Historic Preservation (EHP) Responsibilities and Program Requirements* and Companion Instruction, August 2016.

Figure 1 depicts how the *State-Led Public Assistance Guide* maps to directly related FEMA doctrine.

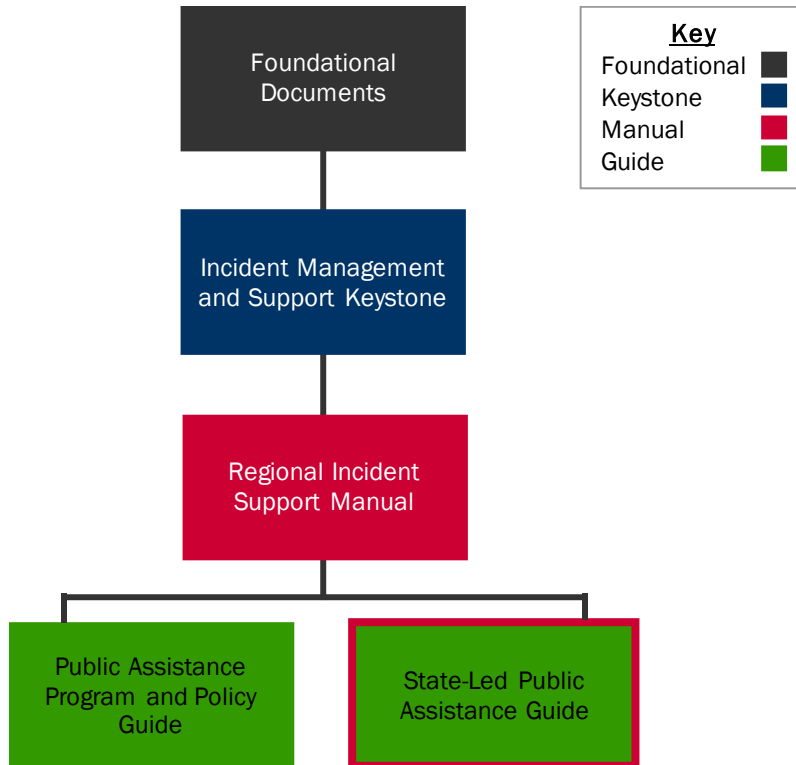


Figure 1: FEMA Doctrine Hierarchy

Document Management and Maintenance

The FEMA Office of Response and Recovery (ORR), Doctrine and Policy Office is responsible for the management and maintenance of this document. Comments and feedback from FEMA personnel and stakeholders regarding this document should be directed to the ORR, Doctrine and Policy Office at FEMA HQ.

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CHAPTER 2: DEFINING STATE-LED PUBLIC ASSISTANCE

FEMA's PA Program provides federal grant funding to governments and eligible private nonprofit (PNP) organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President.

Through the PA Program, FEMA provides federal disaster grant assistance for debris removal, life-saving emergency protective measures, and the repair, replacement, or restoration of disaster-damaged, publicly owned infrastructure and the facilities of eligible PNP organizations. The PA Program also encourages protection of damaged infrastructure from future events by providing assistance for hazard mitigation measures during the recovery process. FEMA currently shares many aspects of the PA grant life cycle with the Recipient, such as the Joint Preliminary Damage Assessment (PDA). The Recipient currently takes an active leadership role for other responsibilities, including the Applicant Briefing.

In 2001, FRN 66 FR 36783 authorized Recipients to lead PA delivery for Level III, small-sized presidential disaster declarations. State-led PA refers to the delivery of PA to Subrecipients when the Recipient leads some responsibilities instead of FEMA. The concept of state-led PA provides structured flexibility for Recipients to manage PA delivery functions that fit their capacity at the time of disaster. The PA delivery model provides a framework that facilitates performance monitoring and continuous improvement while also affording a consistent and tailored customer service experience for Subrecipients. Recipients leading PA operations must adhere to the requirements outlined in the PAPPG and FEMA's PA delivery model. However, Recipients are not required to fill the positions FEMA uses to deliver the PA Program, such as Site Inspector or Program Delivery Manager. Recipients may choose to staff a PA operation consistent with the National Qualification System (NQS) guidelines in ways that meet the Recipient's resource levels.

State-led PA Program Background

In 2001, FEMA began allowing states to help lead PA operations for small disasters. Since then, several states have demonstrated the ability to lead PA delivery operations with varying levels of federal oversight. Experience from these participating states helped to inform the creation of the *State-Led Public Assistance Guide*.

Following a Recipient's request for a presidential disaster declaration of a Level III incident, FEMA and the Recipient will jointly decide whether a state-led PA operation is appropriate given the Recipient's current capacity. If the Recipient chooses to lead the PA operation, FEMA and the Recipient will enter into an Operational Agreement, an addendum to the FEMA-State Agreement (FSA) that delineates the roles and responsibilities of the Recipient

and FEMA. Appendix D: Operational Agreement Template includes the template that Recipients and FEMA will sign for each state-led PA operation.

For all PA operations, FEMA will do the following:

- Maintain oversight for state-led PA operations;
- Retain final eligibility determination and obligation authority;
- Participate in quality control reviews with the Recipient;
- Provide support, as requested by the Recipient;
- Ensure compliance with all federal Environmental Planning and Historic Preservation (EHP) laws, regulations, and Executive orders (EO);
- Issue final eligibility determinations; and
- Issue ineligibility determination memorandums and letters, as necessary.

Purpose of State-Led Public Assistance

State-led PA maximizes the cooperative delivery features of the PA delivery model in a way that enhances the capacity of Recipients to satisfy their communities' immediate and long-term recovery goals. This approach enhances the PA delivery model, allowing Recipients to lead recovery efforts in their communities with support from FEMA.

State-led PA operations for Level III incidents will help preserve federal resources to respond to and recover from large-scale or catastrophic events. Such operations also build national recovery capacity and strengthen the emergency management enterprise to one that is federally supported, state managed, and locally executed.

Recipient Benefits

For Recipients that elect to conduct state-led PA operations, the decision offers multiple benefits, including tailored customer service and increased Recipient-level capability for future events and operational readiness. State-led PA also allows Recipients to play a greater role in focusing attention on and achieving their desired recovery outcomes.

Capacity and Capability Building

State-led PA operations build Recipients' internal capacity and capability to respond to and recover from disasters of all sizes, thus enhancing the readiness of the Recipient and Subrecipient for catastrophic events. Through increased training and disaster experience, which may be acquired internally or through a mutual aid compact(s) with other partners, Recipient personnel may enhance their capacity and capability along the continuum of PA grant management responsibilities.

Tailored Customer Service

The principal advantage to a state-led PA operation, as identified by Recipients with experience conducting such operations, is the ability to ensure a tailored customer experience for Subrecipients throughout the PA grant life cycle. Recipients can develop and maintain stronger relationships with Subrecipients by achieving continuity in points of contact and interactions with the Subrecipient over extended periods of time.

This continuity in contact (during disaster and steady-state periods) and familiarity with geographic areas and eligible facilities may lead to more efficient delivery of assistance to communities by reducing the time it takes to properly document disaster-specific damages and other eligibility requirements. In turn, stronger relationships and prior experiences between the Recipient and Subrecipients can lead to improved efficiencies in identifying and understanding Subrecipient needs.

With increased capacity and capability and more experience working closely with Subrecipients during disaster and steady-state periods, Recipient staff may have a more complete understanding of Subrecipient needs. This understanding can reduce the amount of appeals or audits, potentially result in fewer funds requiring de-obligation later in the process, and provide Recipients with a greater role in identifying requirements to right-size the recovery operation, including the federal staff presence in field offices.

Variation in Assessing Incident Complexity

A Level III incident is not defined by a dollar threshold. A disaster with a large per capita damage amount may be relatively simple with a few Subrecipients, making it a likely candidate for state-led PA. Conversely, a disaster with a smaller per capita damage amount may be complex with a significant number of applicants, specialized projects, or other complicating factors that may impact the viability of a state-led option. Diversity in the size and population of states also means that incident complexity can vary from state to state.

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CHAPTER 3: PUBLIC ASSISTANCE OPERATION OVERVIEW

This chapter introduces the PA grant life cycle, key functions required for PA grant management, and the associated roles and responsibilities in a state-led PA operation. If a Recipient elects to pursue one or more state-led PA options, Recipient personnel may lead many of these functions or share responsibility with FEMA personnel. Chapter 4: State-Led Public Assistance Operating Concept defines state-led PA options. Appendix E: Public Assistance Grant Life Cycle provides more detailed information about the PA grant life cycle. Recipients can use Appendix E: Public Assistance Grant Life Cycle to customize their own implementation of state-led PA operations.

Public Assistance Grant Life Cycle Overview

Figure 2 shows an overview of the PA grant life cycle. Table 1 describes each stage of the PA grant life cycle.

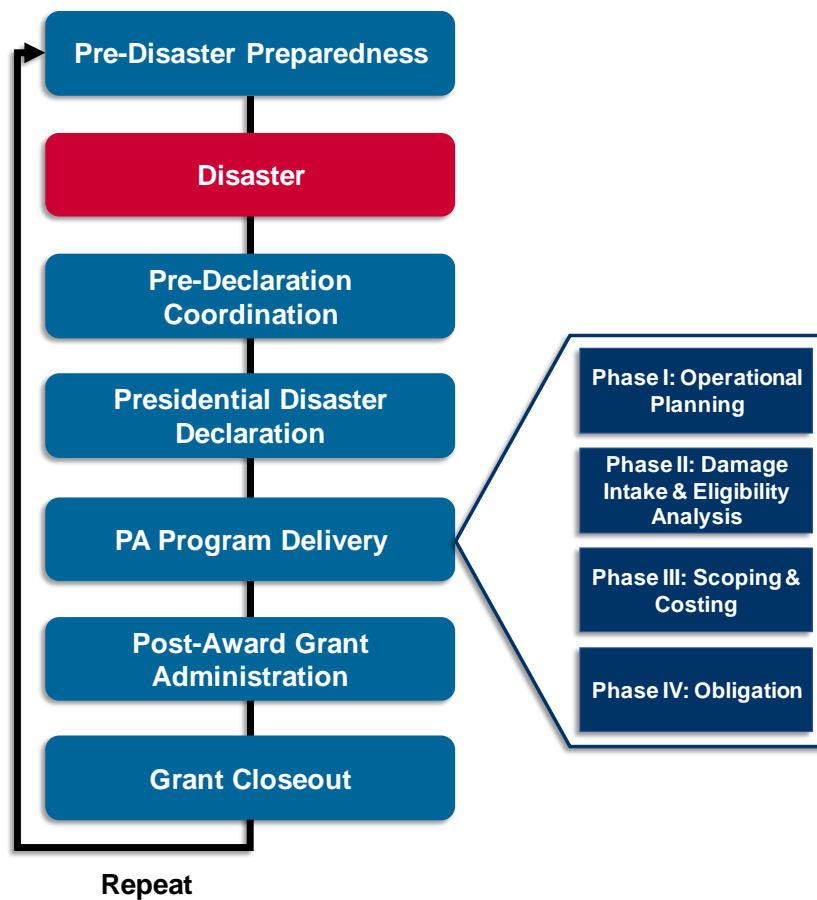


Figure 2: PA Grant Life Cycle

Table 1: Stages of the PA Grant Life Cycle

| Stage of the PA Grant Life Cycle | Description of Stage |
|---|---|
| Pre-Disaster Preparedness | Recipients can self-assess their capability to lead the PA grant program’s key functions and train necessary PA personnel. |
| Pre-Declaration Coordination | After a disaster, the Recipient requests a presidential disaster declaration and coordinates with FEMA to conduct a joint Preliminary Damage Assessment (PDA). |
| Presidential Disaster Declaration | The President will issue a disaster declaration that establishes the incident period, designated eligible areas, and types of assistance authorized. Once a presidential disaster declaration has been issued, the Recipient and FEMA engage in a discussion on whether a state-led PA operation is feasible and, if so, which key functions the Recipient will lead. |
| Public Assistance Program Delivery | PA grant funding is delivered through a phased process that includes operational planning, intake and evaluation of damage, scoping and costing disaster-related damage, and project reviews, including EHP compliance, before FEMA obligates funds. |
| Post-Award Grant Administration | After FEMA obligates the grant award, the Recipient monitors all work performed for scoping or cost changes and works with FEMA on audits or appeals. |
| Grant Closeout | After all work has been completed, the Recipient and FEMA begin project closeout and de-obligate remaining funds, eventually resulting in disaster closeout. For more information about PA Program delivery, refer to the <i>Public Assistance Program and Policy Guide (PAPPG)</i> . |

Key Functions

Throughout the delivery of PA grants, FEMA and the Recipient coordinate to each perform one or more key functions (customer service, site inspections, and scoping and costing) to formulate each subgrant or project. While each of these functions corresponds to FEMA PA position titles, such as the Program Delivery Manager (PDMG) or the Site Inspector (SI), Recipients have flexibility in deciding how to execute these key functions in accordance with the PA delivery model. Personnel performing these key functions coordinate with one another to ensure quality assurance.

Through the NQS, FEMA is developing position task books and position descriptions to help Recipients build capabilities required to perform these key functions. For current tools and position titles, see <https://www.fema.gov/national-qualification-system>. NQS positions are not meant to be prescriptive but, instead, represent effective service models that allow Recipients to participate in cross-cutting functional tasks or activities at levels commensurate with capabilities. The following sections describe the key functions of PA Program delivery as they relate to a state-led PA operation.

Customer Service

A key aspect of the customer service function is walking assigned Subrecipients through subgrant formulation to ensure they understand the eligibility requirements, documentation requirements, and conditions of the subgrant. Customer service representatives are assigned to serve as the single point of contact for Subrecipients, providing consistent customer service and programmatic guidance throughout the PA grant life cycle. Customer service responsibilities include the following:

- Facilitating and coordinating communication with assigned Subrecipients to ensure continuity and alignment with the Subrecipients' recovery priorities,
- Understanding the Subrecipients' capacity and capability to develop projects, and
- Participating in site inspections, as necessary.

Electronic Systems

The key functions described in this section are performed within FEMA's designated electronic systems, the Grants Manager and Grants Portal. The Recipient must use these systems in conducting state-led PA operations.

Grants Manager establishes a collaborative workspace for management personnel to interact with Subrecipients and review, adjudicate, and approve PA projects.

Grants Portal streamlines the PA process and facilitates collaboration among FEMA, the Recipient, and the Subrecipient. The Grants Portal affords full project transparency for the Subrecipient by allowing all parties to upload work and documentation.

Customer service representatives are responsible for facilitating all activities for assigned Subrecipients following the Recovery Scoping Meeting (RSM), including Essential Elements of Information (EEI) and Requests for Information (RFI), communication, and documentation review. As a result, the customer service function is generally a longer-term commitment performed throughout the entire PA grant. Skills important for performing customer service activities may include a strong understanding of PA grant eligibility and the PA delivery model, communications skills, and project management experience.

Site Inspections

The site inspection function includes conducting site visits to assess damage and document if damage descriptions are accurate and disaster related. Personnel performing these tasks also develop the Damage Description and Dimensions (DDD) based on photographs, site sketches or drawings, and measurements taken during site visits for inclusion in the project files. As compared to customer service, site inspection functions are generally a shorter-term commitment and completed earlier in the process.

The nature of the incident and the category of work may determine the type and level of expertise, including specialized or technical expertise, required to conduct each site inspection. Furthermore, Recipients are encouraged to explore the potential to assign employees from other state agencies or departments, such as transportation or public works, to perform site inspection responsibilities, if feasible.

Scoping and Costing

Scoping and costing includes developing the Scope of Work (SOW) and cost estimate for each subgrant or project under the PA award. The SOW is connected to the codified damages in the DDD and describes what work the Subrecipient will undertake to address eligible damages. The cost estimate is the anticipated amount of money required to complete requirements identified in the SOW. Recipients or Subrecipients may elect to develop the SOW and cost estimate themselves and submit to FEMA for review. Recipients with advanced capabilities in this key function may develop cost estimates for complex or highly technical projects or develop and maintain spend plans, with FEMA's final approval.

Special Considerations

In performing each of these key functions, FEMA and the Recipient maintain a responsibility to uphold federal regulations around special considerations, including environmental planning and historic preservation (EHP), insurance, and mitigation. This may include identifying issues as they arise, notifying appropriate subject matter experts, and collecting or preparing required documentation to ensure work performed under the grant complies with federal regulations.

State-Led Public Assistance Roles and Responsibilities

State-led PA allows for the seamless integration of Recipient personnel into key PA functions with flexibility that best suits the Recipient's capacity. Recipients can decide to perform responsibilities associated with one or more key functions and have the flexibility to organize their resources to focus on what they have the capacity to address and focus FEMA support on areas that require supplemental assistance. This flexibility allows for Recipients to implement a fully state-led PA operation or perform some of the key functions and orient their state-led operations along geographic, sector, or functional lines. FEMA must, by law and regulation, retain certain inherently federal responsibilities, such as obligating funds, making eligibility determinations, adjudicating appeals, and ensuring compliance with all applicable federal regulations and statutes, such as EHP. For more information about state-led PA, see Chapter 4: State-Led Public Assistance Operating Concept.

Governor and Governor's Authorized Representative (GAR)

The governor of a state initiates the declaration process by requesting the presidential disaster declaration within 30 days of the occurrence of the incident if it exceeds Recipient and local government capabilities to respond.¹ The governor or the GAR can also request to add additional jurisdictional areas or categories of assistance to the presidential disaster declaration. The governor or GAR engages in early and ongoing discussions with the FEMA Regional Administrator (RA) to determine whether state-led PA is appropriate and, if so, signs the Operational Agreement documenting the state's planned responsibilities for the PA operation within 72 hours of signing the FSA. A state's request to lead a PA operation and its subsequent submission of the Operational Agreement beyond the 72-hour timeframe may be approved at the RA's discretion.

State Coordinating Officer (SCO)

The SCO, as appointed by the governor, represents the Recipient and acts in cooperation with the Federal Coordinating Officer (FCO) to administer incident management efforts, including the PA Program. If the Recipient or FEMA identifies the need to amend the Operational Agreement or the PA Management Plan, the SCO will engage with the FCO on the proper course of action to do so. The SCO typically holds the authority to commit state resources and make obligations on behalf of the Recipient.

State Emergency Management Agency or Recipient Staff

Specific roles and responsibilities for state emergency management agency or Recipient staff during a state-led PA operation would be determined after the Recipient chooses to

¹ The 30-day deadline may be extended upon request per 44 CFR 206.35 and 206.36.

pursue a state-led operation and selects a state-led PA option(s) for the specific presidential disaster declaration.

To build capability for state-led operations, the Recipient or the state emergency management agency staff may also focus on pre-disaster preparedness activities, such as training, augmenting its disaster workforce (e.g., developing a disaster reservist or an augmentee program and establishing contracts), conducting assessments, and building organizational profiles in the Grants Portal electronic system before a disaster strikes. Staff may also revise plans, policies, and procedures that would help facilitate state-led PA following a presidential disaster declaration.

FEMA HQ

FEMA HQ is responsible for national monitoring and oversight, data collection, and policy and guidance related to the PA Program. FEMA HQ staff will work with regions to standardize a method to capture state-led PA data and monitor progress.

The Recovery Analytics Division (RAD) will collect and analyze data on the state-led PA Program, and the Office of Policy and Program Analysis (OPPA) will use that data to ensure the program meets FEMA strategic objectives. Data requirements need to be clearly articulated and agreed upon with the Recipient, preferably in the PA Management Plan.

Regional Administrator (RA)

The RA of the impacted region serves as the federal decision-making authority for the declared disaster until an FCO is appointed. The FEMA RA or his/her designee engages in early and ongoing discussions with the governor or GAR to determine whether state-led PA is appropriate and what state-led PA option(s) the state would like to undertake. The authority to obligate federal funding (i.e., Disaster Recovery Manager [DRM] authority) originates with the FEMA Administrator and is typically delegated to the RA. This authority is then usually further delegated to the FCO.

Federal Coordinating Officer (FCO)

The FCO, as identified by the presidential disaster declaration, works in conjunction with the GAR and SCO to coordinate federal resources and obligate PA Program funds for eligible activities. The FCO, in coordination with the RA, will coordinate with Recipients on which state-led PA option(s) is most suited for the Recipient's current capacity.

Regional Public Assistance Leadership

Regional PA Leadership, including the Regional PA Branch Chief, serve as the Recipients' main points of contact for PA at FEMA. Depending on the size and extent of FEMA's field presence, the Recipient may also coordinate directly with incident-level PA staff, such as the PA Group Supervisor. Recipients can contact Regional PA Leadership with questions related

to eligibility, staff organization, and federal grant compliance requirements. Recipients should reach out to the Regional PA Branch Chief for training resources or to request in-person training. Regional PA Leadership should be reaching out to potential Recipients during pre-disaster preparedness to discuss the Recipients' capability to participate in state-led PA and which key functions they would be interested in managing. Regional PA Leadership will consult with FEMA's Office of Chief Counsel, as needed, when providing management and oversight of state-led PA operations.

Regional Environmental Officer

The Regional Environmental Officer (REO) serves as the Recipient's main point of contact for EHP compliance at FEMA. In a state-led PA operation, the ultimate responsibility for all EHP compliance and Agency decisions remains with FEMA. Recipients can contact the REO with questions related to compliance with EHP laws and EOs. If an EHP advisor has deployed to support a presidentially declared disaster, Recipients may contact him/her for assistance with EHP considerations.

Reimbursement for Management and Administrative Costs

FEMA provides PA funding to reimburse Recipients for management and administrative costs related to managing the PA Program and PA projects. Recipients should contact their respective FEMA regional office for relevant resources and information on the latest policies and procedures for claiming and documenting eligible management and administrative costs.

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CHAPTER 4: STATE-LED PUBLIC ASSISTANCE

OPERATING CONCEPT

This chapter introduces the six potential options that FEMA has identified to ensure consistent application of the state-led PA Program. These options align with the key functions of the PA process: customer service, site inspections, and scoping and costing. The chapter later addresses the Operational Agreement and PA Management Plan, which document the Recipient’s intent to lead parts of the PA operation and outline details of how the state-led PA operation will be implemented, respectively.

State-Led Public Assistance Options

The six state-led PA options offer Recipients a flexible mechanism to progressively build their capability and capacity. Each key function has two levels: shared and plus. For shared options, Recipients will lead all responsibilities for some projects, and for plus options, they will lead all responsibilities for all projects. In the plus options, Recipients may also take on other advanced responsibilities. This approach may be scaled up or down and may vary by disaster, depending on the Recipient’s capacity at that time. Table 2 lists the potential options of key functions for state-led PA operations.

Table 2: Options for State-Led PA

| Option | Description |
|-----------------------------------|--|
| Customer Service Shared | Recipient performs the customer service responsibilities for some Subrecipients, while FEMA performs these responsibilities for the rest. Recipients can distribute the responsibilities for Subrecipients with FEMA based on disaster-specific considerations. |
| Customer Service Plus | Recipient performs all customer service responsibilities for all Subrecipients. Recipients capable of performing these responsibilities have demonstrated a working knowledge of the process and an ability to accurately assess eligibility. |
| Site Inspections Shared | Recipient performs the site inspection responsibilities for some projects. For example, Recipients may choose to conduct site inspections for all projects in the “Standard Lane” because they require less specialized or technical expertise, assigning the remaining “Specialized Lane” projects to FEMA. |
| Site Inspections Plus | Recipient performs all site inspection responsibilities, including providing specialized and technical expertise, for all projects. |
| Scoping and Costing Shared | Recipient performs all scoping and costing functions for some projects. This includes advanced responsibilities, such as developing the Scope of Work (SOW) and cost estimates, and drafting Hazard Mitigation proposals. |
| Scoping and Costing Plus | Recipient performs all scoping and costing functions for all projects. This option would be reserved for select Recipients that have the necessary internal capabilities to perform functions requiring technical expertise and other specialized knowledge, including Environmental Planning and Historic Preservation (EHP). Recipients may choose to develop and maintain spending plans with approval by FEMA. |

All Shared options may include on-the-ground FEMA support and distribution of responsibilities between the Recipient and FEMA, based on agreed-upon criteria (e.g., geographic boundaries, categories of work, and complexity).

All Plus options may include the Recipient assuming responsibility for all aspects of the key function (customer service, site inspections, or scoping and costing) and support from FEMA, which may be a physical Joint Field Office (JFO), virtual JFO, or regional support, depending on the needs of the disaster and at no additional cost to the Recipient.

For all options, FEMA retains decision-making authority for final eligibility determinations, as required by law. FEMA will issue the Determination Memorandum and Letter, but the Recipient may draft the Determination Memorandum and Letter for FEMA to review, approve, and send to the Applicant if performing customer service functions. If decisions over project eligibility cannot be agreed upon, FEMA and the Recipient will engage in the standard appeals process.

FEMA has final review and approval authority on the environmental impact of proposed federal action or undertaking; however, Recipients may assist FEMA with the preparation for environmental review, including providing background information for assessing the environmental impact of the federal action on historic properties, endangered and threatened species, critical habitats, wetlands, floodplains, and on low-income and minority populations. Recipients should work with their Subrecipients to evaluate and document environmental and cultural resource information involved with the proposed projects to consider alternatives to avoid, minimize, and/or mitigate potential adverse impacts to the human environment and to integrate sustainable practices as early as possible in project formulation. Finally, Recipients must coordinate with FEMA Regional EHP staff to receive EHP clearance.

Table 3 identifies which steps in the PA grant life cycle are always performed by FEMA, the Recipient, or shared. Additionally, Table 3 identifies the steps corresponding to each key function which the Recipient can choose to perform in a state-led PA operation. FEMA written approval will still be required in all instances where FEMA written approval would otherwise be required. More detailed information about the key functions can be found in Chapter 3: Public Assistance Operation Overview and information on the PA grant life cycle in Appendix E: Public Assistance Grant Life Cycle.

Table 3: PA Grant Life Cycle Overview of Responsibilities and Corresponding Options

| | | KEY | | |
|---|---|-----------------------|-------------------|------------------------|
| Always FEMA, Recipient, or Applicant | Always Shared | Site Inspections | Customer Service | Scoping and Costing |
| Step | | Owner or Key Function | | |
| Pre-Disaster Preparedness | | | | |
| a. | Recipient Public Assistance Program Self-Assessment | | Recipient | |
| b. | Hazard Mitigation Plan | | Recipient | |
| c. | Recipient to Obtain System Access to Grants Manager | | Shared | |
| d. | Pre-Load Applicant Profiles into Grants Portal/Manager | | Shared | |
| e. | Training | | Shared | |
| Pre-Declaration Coordination | | | | |
| a. | Payment Management System Account | | Recipient | |
| b. | Joint Preliminary Damage Assessment (PDA) | | Shared | |
| c. | Request for Presidential Disaster Declaration | | Recipient | |
| d. | Prepare Application for Federal Assistance (SF-424,424D) | | Recipient | |
| Phase I: Operational Planning | | | | |
| a. | Presidential Disaster Declaration | | FEMA | |
| b. | FEMA-State Agreement (FSA) | | Shared | |
| c. | Structured Dialogue for State-Led PA | | Shared | |
| d. | State Administrative Plan Amendment | | Recipient | |
| e. | Submit Application for Federal Assistance (SF-424,424D) | | Recipient | |
| f. | Disaster Operating Profile and Overview Briefing | | Customer Service | |
| g. | State-Led PA Operational Agreement | | Shared | |
| h. | PA Management Plan | | FEMA or Recipient | |
| i. | Applicant Briefing | | Recipient | |
| j. | Assess Applicant Eligibility* | | Customer Service | |
| k. | Assignment of Program Delivery Managers (PDMG) to Applicants | | Customer Service | |
| l. | Exploratory Call | | Customer Service | |
| m. | Initial Damage Inventory | | Customer Service | |
| n. | Recovery Scoping Meeting (RSM) | | Customer Service | |
| Phase II: Damage Intake and Eligibility Analysis | | | | |
| a. | Assess Facility Eligibility (Recommendation) | | Customer Service | |
| b. | Group Damage into Projects | | Customer Service | |
| c. | Request Documentation | | Customer Service | |
| d. | Submit Site Inspection Work Order Request(s) | | Customer Service | |
| e. | Assign Site Inspector | | Site Inspections | |
| f. | Conduct Site Inspection | | Site Inspections | |
| g. | Review Site Inspection Report (SIR) and Damage Description and Dimensions (DDD) | | Customer Service | |

| KEY | | | | |
|---|---------------|------------------|-----------------------|------------------------|
| Always FEMA, Recipient, or Applicant | Always Shared | Site Inspections | Customer Service | Scoping and Costing |
| Step | | | Owner or Key Function | |
| h. Review Applicant Request for Documentation Responses | | | Customer Service | |
| i. Assess Work Eligibility (Recommendation) | | | Customer Service | |
| j. Applicant Reviews and Signs DDD | | | Customer Service | |
| k. Complete Development Guide Questions | | | Customer Service | |
| l. Submit Project to Consolidated Resource Center (CRC) | | | Customer Service | |
| Phase III: Scoping and Costing | | | | |
| a. Assign CRC Specialists | | | FEMA | |
| b. Develop or Validate Scope of Work (SOW) and Cost | | | Scoping and Costing | |
| c. Draft 406 Hazard Mitigation Proposal | | | Scoping and Costing | |
| d. Environmental Planning and Historic Preservation (EHP), Insurance, and Mitigation | | | Scoping and Costing | |
| e. Peer Review | | | FEMA | |
| f. Determine Work and Cost for Eligibility | | | FEMA | |
| g. Program Compliance Evaluations | | | FEMA | |
| Phase IV: Obligation | | | | |
| a. PDMG Review | | | Customer Service | |
| b. FEMA Final Review | | | FEMA | |
| c. Recipient Review | | | Recipient | |
| d. Applicant Review | | | Applicant | |
| e. FEMA Obligates Funding to Recipient | | | Shared | |
| f. Pass-through Funds to Subrecipient | | | Recipient | |
| g. Recovery Transition Meeting | | | Customer Service | |
| Post-Award Grant Administration | | | | |
| a. Monitoring Work Performed Under the SOW | | | Recipient | |
| b. Quarterly Progress Reports and Financial Status Reports | | | Recipient | |
| c. Appeals | | | Shared | |
| d. Audits | | | Shared | |
| Grant Closeout | | | | |
| a. Initiate Project Closeout | | | Recipient | |
| b. Initiate Subrecipient Closeout | | | Recipient | |
| c. Project and Subrecipient Closeout | | | Shared | |
| d. Disaster Closeout | | | FEMA | |
| *FEMA must assess and review the eligibility of all private nonprofit (PNP) Applicants. | | | | |

Operational Agreement

When FEMA and the Recipient agree that state-led PA is appropriate, the Recipient will then choose, in consultation with FEMA, which state-led PA option(s) the Recipient intends to lead, as previously described. This decision will be based on an assessment of the Recipient's current capacity, disaster characteristics, and other relevant disaster-specific circumstances, as further described in Chapter 5: Decision-Making Considerations.

The Recipient will submit an Operational Agreement that documents its intent to lead PA operations, identifies which state-led PA option(s) the Recipient and FEMA agreed is appropriate, and acknowledges the Recipient's understanding of the requirements they are responsible for based on the option(s) selected. The Recipient should submit this Operational Agreement as an addendum to the FSA no later than 72 hours after the FSA has been executed. A Recipient's request to lead a PA operation and its subsequent submission of the Operational Agreement beyond the 72-hour timeframe may be approved at the RA's discretion. An Operational Agreement Template is available in Appendix D: Operational Agreement Template.

State Administrative Plan: A deliberate plan that describes how the Recipient intends to administer the PA Program. Recipients must submit their Administrative Plans to the FEMA Regional Office on an annual basis and submit an amendment for each incident that occurs within the year to address specifics of the new incident.

Operational Agreement: A signed agreement that denotes the Recipient's intent to pursue a state-led PA operation and the division of key functions as a result of FEMA-Recipient dialogue. The agreement is submitted 72 hours after the FEMA-State Agreement (FSA) is signed as an addendum to the FSA.

PA Management Plan: An incident-specific plan that provides details of the PA operation including points of contact, distinct functions the Recipient and FEMA are performing based on the state-led PA option(s), staffing plan, and progress in relation to established milestones.

Public Assistance Management Plan

The PA Management Plan is the primary framework that a Recipient uses to guide its state-led PA operation. Once FEMA and the Recipient have agreed upon which state-led PA option(s) the Recipient will lead, the management details of the state-led PA operation will be described in the PA Management Plan. The initial version of the plan is due 30 days after the Operational Agreement but is intended to be a living document that is updated throughout the PA grant life cycle. This plan will encompass the distribution of responsibilities, the staffing plan, the reporting requirements, the timeline for completion, and the metrics to assess program performance.

Table 4 provides a summary of the sections in the PA Management Plan. The template for the plan can be found in the Grants Manager.

Table 4: Summary of PA Management Plan

| Section | Description |
|---|--|
| Record Management | Provides a change log to help track version history of the PA Management Plan for a given disaster. |
| Situation | Provides basic information of the event and its background information. It also provides specific information about the declaration and the results of the Preliminary Damage Assessment (PDA). |
| Program Administration | Describes the components and processes of the state-led PA operation. |
| Staff Management | Discusses organizing resources, training, overtime and holidays, management of travel costs, performance evaluations, and personnel issues. |
| Recovery Process | Describes the function of the PA Program from initiation through closeout and identifies goals that define success for program operation and completion. |
| Special Considerations | Describes special consideration issues applicable to the disaster (e.g., insurance, mitigation, Environmental Planning and Historic Preservation [EHP]). Special issues may exist depending on the disaster-specific damages and the location and conditions of the disaster area. |
| Key Issues and Resolution | Describes key issues specific to the disaster and identifies procedures for reaching resolution. Some of the most common key issues involve disaster-specific eligibility, debris removal, flood control facilities, private nonprofit eligibility, and cost estimating. |
| Transition and Closeout | Provides the procedures for the transition of the state-led PA Operation from the field to the Recipient or region office. Coordination of this transition should occur with the region. |
| Remedial Action Management Program | Describes requirements for preparing the Remedial Action Management Program (RAMP) report. The RAMP Report serves as a tool for the Regional Office to evaluate the success of the state-led PA Operation and to improve future operations. |
| Attachments | Includes attachments to the plan, such as Applicant-required documentation, organization charts, PDAs, etc. |
| Approval and Distribution | Signatures from FEMA Regional PA Leadership and State Public Assistance Officer (PAO). |

CHAPTER 5: DECISION-MAKING CONSIDERATIONS

This chapter highlights some of the key decision-making factors for a Recipient and FEMA to consider when determining whether and how to pursue a state-led PA operation. This decision is unique for each presidential disaster declaration but will follow a structured process based on the Recipient's assessment of key considerations of disaster complexity and Recipient capacity. A Recipient's decision to pursue a state-led PA operation, including a specific option(s) selected, will affect neither federal funding levels nor the decision to issue a presidential disaster declaration.

Successful Recipient Characteristics

As stated in FRN 66 FR 36783, Recipients that display the following characteristics are the best candidates for state-led PA operations:

- Recent disaster experience;
- Adequate Recipient staff or staff augmentation mechanism;
- A fiscal accounting system that can track specific projects, withstand audit, and be used to evaluate appeals; and
- Established record of meeting deadlines for grant management activities, including PA grants.

FEMA will provide oversight throughout the PA grant life cycle as the accountable federal agency for PA grant funding. FEMA or the Recipient may adjust the planned distribution of responsibilities, as needed, to account for changing requirements.

Joint Decision-Making Timeline

The FEMA RA or his/her designee and the Recipient will begin a joint decision-making dialogue on the state-led PA option(s) after the Recipient requests a presidential disaster declaration. FEMA and the Recipient will discuss whether a state-led PA operation is appropriate given the Recipient's current capacity. These discussions can also begin before a disaster when the Recipient is assessing its capability to lead a future PA operation.

As described in Chapter 4: State-Led Public Assistance Operating Concept, if FEMA and the Recipient agree that a state-led PA operation is appropriate, the Recipient will then decide which state-led PA option(s) it intends to lead. This decision will be based on the Recipient's assessment of its current capacity, disaster characteristics, and other relevant disaster-specific circumstances. The Recipient should document the selected state-led PA option(s) in the Operational Agreement as an addendum to the FSA. Details for how the state-led PA operation will be implemented will be expanded upon in the PA Management Plan, which is due 30 days after the Operational Agreement.

Figure 3 provides a general guideline of milestones, a timeline, and necessary tasks for the Recipient to initiate state-led PA operations.

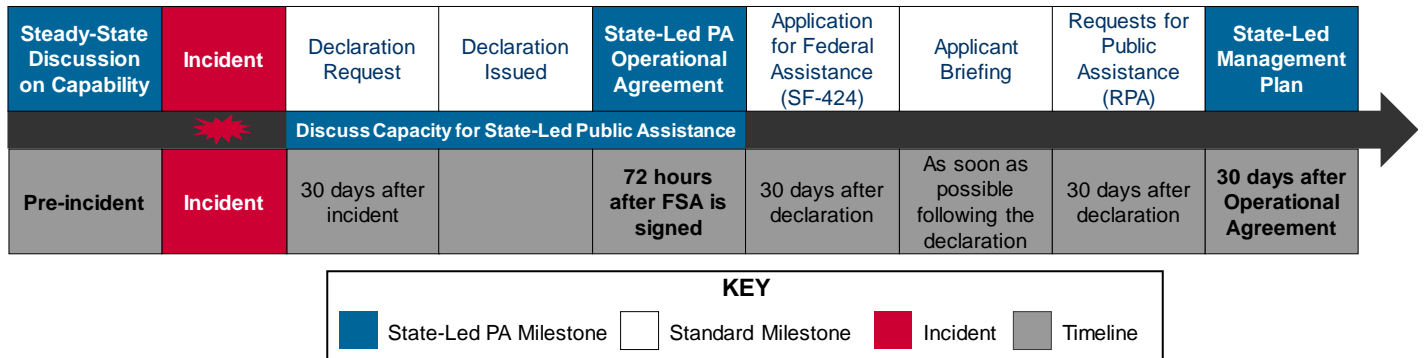


Figure 3: Timeline for Initial Decision Making

Considerations for Selecting State-Led Public Assistance

The Recipient and FEMA will examine key considerations about the feasibility of implementing state-led PA. These considerations fall into two categories: the Recipient’s capacity at the time of the disaster and disaster-specific characteristics. These considerations may help the Recipient and FEMA determine the appropriate option(s) the Recipient will select and how that option(s) should be implemented for a specific disaster.

Recipient Capacity

A Recipient’s ability to lead PA grant administration and management activities at the time of a specific disaster is likely the most important decision-making factor. Because of the disaster-specific nature of the potential variables that could affect Recipient capacity, FEMA and the Recipient should use a common basis of considerations to help structure their dialogue. A structured approach to these discussions will establish consistency in how FEMA and Recipients discuss the potential decision to pursue a state-led PA operation across different FEMA regions.

Table 5 identifies common Recipient capacity considerations. These questions provide a common structure to the discussion between a Recipient and FEMA on the feasibility of state-led PA for a given incident and to assist with selecting the appropriate state-led option(s). They are not meant to be prerequisites to state-led PA.

Table 5: Current Recipient Post-Disaster Capacity Considerations

| Key Questions |
|---|
| Viable Staffing Plan and Current Staffing Level |
| Are the current levels of staffing adequate? |
| Is there a staffing plan identified to handle an increased workload? |
| How will the Recipient train new staff or augmentees while initiating program delivery? |

| Key Questions |
|--|
| Experience with Public Assistance (PA) |
| Is there a state-funded Public Assistance (PA) program or equivalent? |
| Has there been previous participation in a state-led PA operation? |
| Is there experience partnering with FEMA to provide state personnel for roles such as the Program Delivery Manager or Site Inspector? |
| Is there a demonstrated commitment to or history of PA training? |
| Is there history using alternative procedures for permanent work? |
| Environmental Planning and Historic Preservation (EHP) Experience |
| Does the Recipient have experience integrating EHP into project development? |
| Has the Recipient appointed an EHP point of contact who will collaborate with the FEMA Regional Environmental Officer and/or FEMA EHP staff? |

Disaster Characteristics

Characteristics for the specific disaster will also inform Recipient and FEMA decision making. Many of these characteristics will have already been identified during the PDA process, making PDAs an important resource for Recipients and FEMA to incorporate into the broader dialogue and decision-making process to pursue a state-led PA operation. As such, accurate PDA information is critical to generating an informed decision between the Recipient and FEMA.

Table 6 identifies disaster characteristics and key questions to help guide the dialogue between a Recipient and FEMA on the potential for state-led PA.

Table 6: Disaster Characteristic Considerations

| Key Questions |
|---|
| Applicant Characteristics |
| According to the Preliminary Damage Assessment (PDA), how many Applicants are there? |
| What type of Applicant(s)? |
| Categories of Work |
| According to the PDA, which categories of work (e.g., C to G or A and B) will need to be completed? |
| Size of Disaster |
| According to the PDA, where is the highest concentration of damage? |
| How many damaged sites are there? |
| Geographical Context (State-Specific) |
| Is the disaster spread over a large area of the state? |
| Are there remote access issues or long travel requirements that may complicate logistical coordination? |
| Does the impacted area(s) affect a large percentage of the population? |
| Considerations for Recipient Staffing Capacity at the Time of a Disaster |
| Are there other incident operations currently ongoing? |
| Are there presidentially declared disasters pending closeout? |
| Can Recipient staff handle an increased workload at this time? If not, is the Recipient able to augment staffing? |
| Are key personnel expected to be unavailable during this disaster? |

| Key Questions |
|--|
| Does the Recipient have additional staffing that will be available post-declaration to perform program delivery roles and responsibilities, and, if so, when will they be available? |
| Disaster Complexity |
| What is the nature and type of the disaster? |
| Do the characteristics of the debris (quantity, type, and location) require specialized assistance or expertise? |
| Are there rural electric cooperatives that will be involved? |
| What is the extent of the damage to the power grid, and what special issues may arise in the repair and restoration of electricity in the disaster area? |
| What other federal agencies are involved in disaster operations, and what is their role? |
| Will projects require a complex Environmental Planning and Historic Preservation (EHP) compliance project (e.g., endangered species, essential fish habitat, historic resources, work in water and/or the coastal zone, and coastal barrier area)? |
| Will projects require the specialized lane at the Consolidated Resource Center (CRC)? If so, how many, what type, and what are the technical requirements needed to assess or evaluate these projects? |
| Are damaged facilities of high importance or significance to the community? |
| What are the political considerations? |

Modifying Implementation of State-Led Public Assistance

If a Recipient or FEMA determines there is a need for increased FEMA involvement in an ongoing state-led PA operation, both parties will coordinate to determine how to fill identified needs. This adjustment can be because of many factors, including subsequent events/disasters, unforeseen complexities, or a change in circumstances that hinder the Recipient’s capacity. Such modifications will be documented in the FSA as an amendment to the Operational Agreement or the PA Management Plan.

The PA Management Plan will clearly state the timeline and metrics for successful completion of a state-led PA operation, consistent with the same measures FEMA takes to monitor PA operations nationwide. If the FCO or other FEMA official determines that the Recipient is no longer able to perform the duties as outlined, FEMA reserves the authority to step in and manage some or all aspects of the PA operation. Conversely, the Recipient can request to assume responsibility of additional tasks or increase its role in shared tasks or request FEMA increase its support if conditions warrant such a change.

The Recipient and FEMA will clearly document modifications in updated Operational Agreements and in state-led PA Management Plan amendments (if needed). FEMA’s Office of Chief Counsel (OCC) will determine when the modification is significant enough to warrant an amendment to the FSA or Operational Agreement. The PA Management Plan is a living document and should evolve with the state-led PA operation, documenting all adjustments to the planned approach as they arise.

CHAPTER 6: PLANNING FOR STATE-LED PUBLIC ASSISTANCE

This chapter presents general guidance for Recipients to prepare, train, and plan for leading state-led PA operations. Recipients who opt into state-led PA may benefit from resources and support from experienced personnel in efforts to build capacity and capability. FEMA and mutual aid partners in other states can share resources and training opportunities to build and improve Recipient capability to support a state-led PA operation. Guidance in this chapter includes the following:

- Pre-disaster preparedness,
- Staffing augmentation mechanisms,
- Training and assistance, and
- Accountability.

Pre-Disaster Preparedness

When conducting pre-disaster preparedness activities in steady-state, RAs and Regional Recovery Directors reach out to their respective potential Recipients to discuss their interest in potentially pursuing one or more state-led PA options. This discussion can help the Recipient and FEMA regions think through when a state-led PA operation might be appropriate and how to operationalize the concepts laid out in this guidance. Table 7 provides a list of potential topics to cover during pre-disaster preparedness discussions.

Table 7: Potential Topics for Pre-Disaster Preparedness Discussions

| Topic | Outcome |
|-------------------------------|---|
| Mutual Understanding | General shared understanding between the FEMA region and the Recipient on what roles or option(s) the Recipient has the capability and interest to potentially perform during a future state-led PA operation. This understanding should also include the types of incidents in which the Recipient would be more receptive to pursuing a state-led PA operation. |
| Training | Recipient understands what training is required for the roles it might perform during a state-led PA operation, as well as how to access related training resources. |
| Systems Access | Recipient has identified staff that would likely require systems access during a state-led PA operation. FEMA coordinates internally to initiate the process (i.e., background investigation) needed to approve systems access. |
| Notional Staffing Plan | Recipient and the FEMA region collaboratively identify the resources and staffing mechanisms the Recipient would mobilize to support the option(s) it has expressed an interest in. Additionally, the Recipient, with support from the FEMA region, may begin developing a notional staffing plan. |

| Topic | Outcome |
|-------------------|--|
| Mitigation | Recipient and FEMA discuss previous experience integrating 404 funding with 406 funding. Discussions should include potential approaches to combine funding from PA and Hazard Mitigation grants to meet Recipient objectives to mitigate losses in future disasters. The Recipient should evaluate whether it has an enhanced mitigation plan or the feasibility of creating one. |

Staffing Augmentation Mechanisms

Developing and maintaining qualified staff has historically been one of the principal challenges in conducting state-led PA operations. This section relies on state-level experiences to identify examples of staff augmentation methods and best practices to help Recipients conduct a state-led PA operation. Each Recipient has its own disaster requirements and state legal authorities; therefore, the following information offers potential examples Recipients may adapt to meet their own needs and circumstances.

Reservist Program

Some Recipients have developed disaster reservist programs to support PA grant implementation activities. These reservists specialize in PA, are employees of the Recipient, and are typically classified as part-time, on-call as needed and do not have a guarantee or cap on hours. This allows the Recipient to have a trained workforce at hand with flexibility to surge staffing, as needed, scaling support to match the needs of applicable presidential disaster declarations while minimizing risks and additional costs of maintaining a larger permanent workforce. To keep reservists up to date on current practices, Recipients can provide them with training courses and other resources offered by FEMA (see Appendix F: Resource Toolkit).

Emergency Management Assistance Compact (EMAC)

EMAC is another avenue for temporarily augmenting staff. Recipients can use EMAC to request PA-specific expertise from other states or loan out their own staff to sharpen their skills and gain experience in administering PA grants. Through EMAC, state agents can gain experience when other states need assistance with site inspections, project development, or other aspects of the PA Program. Assisting states benefit from fulfilling EMAC requests by providing their staff with more opportunities and experience in state-led PA operations. The requesting state benefits from EMAC deployments by conserving resources to support a smaller cadre of on-call personnel while relying on mutual aid to surge adequate staffing when needed.

Requesting and assisting states will follow the standard EMAC processes for requesting and offering assistance; mobilizing, deploying, or demobilizing personnel; and applying for reimbursement. The requesting state is generally eligible for FEMA reimbursement,

assuming it has the proper documentation. For more information about EMAC, please refer to Public Law 104-321.

Contract Support

Recipients may choose to hire contractors to assist with various aspects of a state-led PA operation. One example of contract support is through pre-bid contracts that may supplement or perform similar functions to a Recipient-level reservist program. Recipients may procure other contract support to help manage and operate the electronic systems used in the PA grant delivery process, such as Grants Manager and Grants Portal.

Training and Assistance

FEMA is available to offer advice and resources to help Recipients as they lead PA grant delivery, including training delivery and mentorship. FEMA may mobilize its resources and staff to augment Recipient needs for each disaster or in coordinating pre-disaster preparedness activities.

Training Availability

FEMA offers a range of training resources and guidance documents to help Recipients gain the knowledge and skills necessary to lead and conduct PA operations, including EHP training. Appendix F: Resource Toolkit identifies a more detailed list of resources available to support Recipients in implementing or building capacity for a state-led PA operation. Many of these resources are also accessible via the Grants Manager or Grants Portal.

Requesting Training and Assistance

Recipients may request in-person training and assistance to better understand and perform their potential roles and responsibilities under state-led PA operations. Recipients may request training and assistance during pre-disaster preparedness or once a presidential disaster declaration has been issued. Recipients should contact their Regional PA Branch Chief or designated PA official with questions related to training or FEMA resources. FEMA is also available to assist with eligibility, staff organization, and federal grant compliance requirements.

Mentorship

Recipients may consider adopting a formal or informal mentorship program that pairs seasoned staff with incoming staff, encouraging veteran employees to train and share their experience with those less familiar with the PA Program and processes. The mentor can observe mentees in the field and report progress to supervisors to measure and improve job performance. Recipients could identify mentors within their emergency management agency or request mentors from FEMA or other states.

Accountability

Ultimately, FEMA, the Recipient, and the Subrecipient are accountable to uphold federal regulations and report to oversight authorities. The Recipient and FEMA should regularly share information regarding the implementation of state-led PA throughout the full grant life cycle using the Grants Manager electronic system and other required reporting mechanisms.

Transparency

Electronic systems such as the Grants Portal and Grants Manager provide transparency across all levels of government (Subrecipients, Recipients, and FEMA) to help ensure Subrecipients have a consistent customer service experience, receive the PA grant funding for which they are eligible, and have access to the resources they need to recover from disasters. FEMA is working to increase the functionality and access to the Grants Portal and Grants Manager to improve the ease of use for these systems to support state-led PA operations.

Procurement

In a state-led PA operation, Recipients must comply with the procurement standards of the government-wide *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“Uniform Rules”) of 2 CFR, Part 200, as adopted by the Department of Homeland Security at 2 CFR, Part 3002. As the federal awarding agency, FEMA is responsible for monitoring financial assistance execution and ensuring proper performance under the FEMA award, including compliance with procurement standards. FEMA may, in exercising this responsibility, conduct pre- and post-procurement reviews of the Recipient’s procurements consistent with the terms of 2 CFR, § 200.317-200.326.

APPENDIX A: ACRONYM LIST

| | |
|------|--|
| CFR | Code of Federal Regulations |
| CRC | Consolidated Resource Center |
| DDD | Damage Description and Dimensions |
| DRM | Disaster Recovery Manager |
| EI | Essential Element of Information |
| EHP | Environmental Planning and Historic Preservation |
| EMAC | Emergency Management Assistance Compact |
| EO | Executive Order |
| FCO | Federal Coordinating Officer |
| FEMA | Federal Emergency Management Agency |
| FRN | Federal Register Notice |
| FSA | FEMA-State Agreement |
| GAR | Governor's Authorized Representative |
| HQ | Headquarters |
| IMSK | Incident Management and Support Keystone |
| JFO | Joint Field Office |
| NDRF | National Disaster Recovery Framework |
| NIMS | National Incident Management System |
| NISM | National Incident Support Manual |
| NQS | National Qualification System |
| NRF | National Response Framework |
| OCC | Office of Chief Counsel |
| OPPA | Office of Policy and Program Analysis |

| | |
|--------|--|
| ORR | Office of Response and Recovery |
| PA | Public Assistance |
| PAGS | Public Assistance Group Supervisor |
| PAO | Public Assistance Officer |
| PAPPG | Public Assistance Program and Policy Guide |
| PD TFL | Program Delivery Task Force Leader |
| PDA | Preliminary Damage Assessment |
| PDMG | Program Delivery Manager |
| PNP | Private Nonprofit |
| RA | Regional Administrator |
| RAD | Recovery Analytics Division |
| RAMP | Remedial Action Management Program |
| REO | Regional Environmental Officer |
| RFI | Request for Information |
| RISM | Regional Incident Support Manual |
| RPA | Request for Public Assistance |
| RRCS | Regional Response Coordination Staff |
| RSM | Recovery Scoping Meeting |
| SCO | State Coordinating Officer |
| SF | Standard Form |
| SI | Site Inspector |
| SI TFL | Site Inspector Task Force Leader |
| SIR | Site Inspection Report |
| SOW | Scope of Work |
| TFL | Task Force Lead |

| | |
|--------|----------------------------|
| UCG | Unified Coordination Group |
| U.S.C. | United States Code |

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APPENDIX B: GLOSSARY

Applicant. A non-federal entity submitting an application for assistance under the Recipient's federal award.

Environmental Planning and Historic Preservation (EHP) Staff. Provides technical assistance to the state, tribe, and local programs to ensure compliance with EHP laws, regulations, statutes, and Executive orders and, when necessary, in submitting or preparing documentation to demonstrate EHP compliance.

Federal Coordinating Officer (FCO). The FCO is responsible for the overall management of the federal response, short-term and intermediate recovery, and mitigation activities for the incident. The President signs a letter assigning the FCO. The Regional Administrator (RA) then delegates Disaster Recovery Manager (DRM) authority and responsibilities to the FCO. When the FCO is the only federal member of the Unified Coordination Group (UCG), the FCO has directive authority over all federal resources assigned. In situations when other federal UCG members are present, they retain directive authority over their assigned resources.

Grant Closeout. The status of a grant for which FEMA has determined that the Recipient and Subrecipient(s) have completed all required grant work and FEMA has completed all applicable administrative actions related to the PA Program.

Grants Manager. The Grants Manager is one of the FEMA electronic systems used to manage PA grants. The system establishes a collaborative workspace for management personnel to interact with Subrecipients and review, adjudicate, and approve Public Assistance (PA) projects.

Grants Portal. The Grants Portal is another FEMA electronic system used for grant management and delivery. The Grants Portal streamlines the PA process and facilitates collaboration among FEMA, the Recipient, and the Subrecipient. The Grants Portal affords full project transparency for the Subrecipient by allowing all parties to upload work and documentation.

Joint Field Office (JFO). The primary federal incident management field facility. The JFO is a temporary federal facility that provides a central location for the coordination of federal, state, tribal, and local governments and private-sector and nongovernmental organizations with primary responsibility for response and recovery. When not physically present at the disaster site, virtual JFO staff offer guidance and coordination assistance to personnel on the ground assisting with the PA operation as recovery efforts.

Mitigation. Activities providing a critical foundation in the effort to reduce the loss of life and property from natural and man-made disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities. Mitigation seeks to

fix the cycle of disaster damage, reconstruction, and repeated damage. These activities or actions, in most cases, will have a long-term, sustained effect.

Operational Agreement. This document denotes the Recipient's intent to pursue a state-led PA operation and the division of key functions as a result of FEMA-Recipient dialogue. The document is submitted 72 hours after the FEMA-State Agreement (FSA) is signed as an addendum to the FSA.

Preliminary Damage Assessment (PDA). A survey conducted by a team of state and federal officials with the Applicant to estimate the extent of the disaster and its impact on individuals and public facilities. The team's work begins with reviewing the types of damage or emergency costs incurred by the units of government and the impact to critical facilities, such as public utilities, individuals, and businesses. This assessment includes the number of damaged facilities, the number of people displaced, and the threat to health and safety caused by the storm event.

Public Assistance (PA). PA provides federal disaster grants from the President's Disaster Relief Fund to eligible state, tribal, and local governments, as well as certain nonprofit organizations, for the repair, replacement, or restoration of publicly owned facilities and infrastructure damaged by the disaster.

Public Assistance (PA) Management Plan. The PA Management Plan describes the management details of the state-led PA operation and selected options. This plan will encompass the distribution of responsibilities, as well as the reporting structure, timeline for completion, and metrics the Recipient will be assessed on for program performance.

Recipient. The Recipient is the state, tribal, or territorial government to which the grant is awarded. The Recipient is accountable for the use of funds provided by FEMA and is responsible for disbursing those funds to the Subrecipient (Applicant). State and local governments are closest to those impacted by incidents and have always had the lead in response and recovery. During response, Recipients play a key role coordinating resources and capabilities throughout the state, territory, or tribal land and obtaining resources and capabilities from other states. States are sovereign entities, and the governor has responsibility for public safety and welfare. While U.S. territories, possessions, freely associated states, and tribal governments also have sovereign rights, there are unique factors involved in working with these entities.

Regional Administrator (RA). Primary FEMA representative to state governors, other federal departments and agencies, and local, tribal, and territorial authorities during day-to-day operations within the RA's region. In the event of a Stafford Act declaration, the RA of the affected region has control of FEMA resources within the region. The RA delegates authority for incident management and control of assigned federal resources to the FCO when the FCO has established operational capability.

Regional Environmental Officer (REO). The REO serves as the Recipient's main point of contact for EHP compliance at FEMA. In a state-led PA operation, the ultimate responsibility for all EHP compliance and Agency decisions remains with FEMA. Recipients can contact the REO with questions related to compliance with EHP laws and Executive orders.

State Coordinating Officer (SCO). The SCO is appointed by the governor to represent the state and act in cooperation with the FCO to administer incident management efforts. The SCO brings the governor's priorities to the UCG and serves as the conduit for addressing the needs of the state. The relationship between the SCO and the FCO is always intended to be a partnership between federal and state authorities. The SCO and FCO work collaboratively to achieve unity of effort and create joint incident priorities, objectives, and strategies in accordance with the governor's priorities.

State-led Public Assistance (PA) Operation. The delivery of PA to Applicants and Subrecipients when some responsibilities are led by the Recipient instead of FEMA. A state-led PA operation can occur during Level III incidents. In 2001, FRN 66 FR 36784 authorized Recipients to lead PA delivery for Level III, small-sized presidential disaster declarations.

State-led Public Assistance (PA) Options. Recipients choose one of six state-led PA options based on three key functions: customer service, site inspections, and scoping and costing. There are two levels, shared and plus, for each key function, totaling six options. For shared options, Recipients will lead all responsibilities for some projects, and for plus options, they will lead all responsibilities for all projects. In the plus options, Recipients may take on other advanced responsibilities such as EHP or spend plans.

Structured Dialogue. FEMA and the Recipient discuss which tasks will be potentially led or co-led by the Recipient in the PA delivery operation. This only occurs if a Recipient is interested in potentially leading aspects of the PA operation.

Subgrant Closeout. The status of a subgrant for which FEMA has determined that the Recipient and the Subrecipient have certified that all projects (large and small) are 100 percent complete and that the Recipient has performed a final reconciliation on large projects.

Subrecipient. A non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program. A Subrecipient does not include an individual who is a beneficiary of such program. A Subrecipient may also be a Recipient of other federal awards directly from a federal awarding agency.

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APPENDIX C: AUTHORITIES AND FOUNDATIONAL DOCUMENTS

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

The Stafford Act authorizes the programs and processes by which the Federal Government provides disaster and emergency assistance to state and local governments, tribal nations, eligible private nonprofit organizations, and individuals affected by a declared major disaster or emergency. The Stafford Act covers all hazards, including natural disasters and terrorist events.

Title 2 of the Code of Federal Regulations (CFR), Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

This document provides guidance for non-federal entity recipients and Subrecipients of federal financial assistance awarded by FEMA when using that assistance to finance procurements of property and services. The guidance provided by this document only applies to federal financial assistance (e.g., grants and cooperative agreements) subject to the procurement standards of the government-wide Uniform Administrative Requirements, Cost Principles, and Audit Requirements for federal Awards.

Title 44 CFR, Emergency Management and Assistance.

The CFR is a codification of the general and permanent rules and regulations published in the FEDERAL REGISTER that contain basic policies and procedures. Title 44 is entitled “Emergency Management and Assistance,” and Chapter 1 of Title 44 contains the regulations issued by FEMA, including those related to implementing the Stafford Act.

Federal Register Notice (FRN), Volume 66, Number 135, FR Doc No. 01-17533, Documentation Citation, 66 FR 36783, Notice of the State Management of Public Assistance Operations in Small Disasters, 2001.

FRN 66 FR 36783 gave notice that FEMA would devolve major management responsibility of the PA Program in small disasters to interested states with demonstrated capability. Interested tribal governments may also participate.

FP 104-009-2, *Public Assistance Program and Policy Guide (PAPPG)*.

The PAPPG combines all Public Assistance (PA) policy into a single volume and provides an overview of the PA Program implementation process with links to other publications and documents that provide additional process details.

National Incident Management System (NIMS), Third Edition, October 2017.

The NIMS is a set of principles that provides a systematic, proactive approach to guiding government agencies at all levels, NGOs, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents—regardless of cause, size, location, or complexity—in order to reduce the loss of life or property and harm to the environment.

National Response Framework (NRF), Third Edition, June 2016.

The NRF is a guide to how the Nation conducts an all-hazards response. The NRF is built upon scalable, flexible, and adaptable coordinating structures to align key roles and responsibilities across the Nation, linking all levels of government, NGOs, and the private sector. The NRF is intended to capture specific authorities and best practices for managing incidents that range from serious but purely local events to large-scale terrorist attacks or catastrophic natural disasters.

National Disaster Recovery Framework (NDRF), Second Edition, June 2016.

The NDRF is a guide that enables effective recovery support to disaster-impacted states, tribes, territories, 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.

National Mitigation Framework, Second Edition, June 2016.

The document provides context for how the whole community works together and how mitigation efforts relate to all other parts of national preparedness. The document is one of the five documents in a suite of National Planning Frameworks. Each framework covers one preparedness mission area: prevention, protection, mitigation, response, or recovery.

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

This keystone is the primary document from which all other FEMA disaster response directives and policies are derived. This keystone describes how the Response Doctrine, articulated in the National Response Framework, is implemented in FEMA disaster response operations.

FEMA, *Regional Incident Support Manual (RISM)*, January 2013.

The RISM describes the organization, functions, and underlying doctrine of incident support activities at the regional level. The RISM explains how the Regional Response Coordination Staff (RRCS) supports incident operations and discusses steady-state activities pertinent to incident operations. Like the National Incident Support Manual (NISM), the RISM serves as the basis for developing guidance, including procedures, handbooks, incident guides, and training materials for FEMA incident support personnel. The RISM is also intended to inform FEMA's partners regarding guidelines and requirements for incident support operations.

FEMA, *National Incident Management System Guideline for the National Qualification System*, November 2017.

This document describes the components of a qualification and certification system, defines a process for certifying the qualifications of incident personnel, describes how to stand up and implement a peer review process, and provides an introduction to the process of credentialing personnel.

FEMA Directive 108-1, *Environmental Planning and Historic Preservation (EHP) Responsibilities and Program Requirements and Companion Instruction*, August 2016.

The purpose of this EHP Directive is to establish FEMA policies, roles, responsibilities, and procedures for delegations of authority concerning EHP. Environmental stewardship, preservation of historic and cultural resources, and sustainability are complementary goals to the emergency management mission and activities of FEMA. FEMA promotes these goals to support development of resilient communities in light of disasters, sea level rise, climate change, and other impacts that threaten the human environment. Environmental, historic, and cultural resources are important considerations when preparing for, responding to, recovering from, and mitigating hazards to the United States.

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APPENDIX D: OPERATIONAL AGREEMENT TEMPLATE

PUBLIC ASSISTANCE PROGRAMMATIC ADDENDUM

SUBPART C: STATE-LED PUBLIC ASSISTANCE

OPERATIONAL AGREEMENT

I. PURPOSE

The purpose of this Operational Agreement (Agreement) between the Federal Emergency Management Agency (FEMA) and the State is to build a FEMA-State collaborative partnership in the implementation of State-Led Public Assistance (PA). This document defines the roles, responsibilities, procedures, and processes in effect under this Agreement.

Under this arrangement, the State will lead certain key functions of the Public Assistance operation, which are outlined in more detail below. FEMA will retain obligation authority, the final approval of environmental and historic preservation reviews, and will assist the State to the extent that such assistance is necessary and requested by the State. This arrangement should be cost effective, maintain a high level of customer service, and provide consistency within the State's implementation of state-led Public Assistance. Both FEMA and the State agree to adhere to the provisions outlined in this Agreement.

II. APPLICABILITY

- A. This Agreement applies to the administration of the PA Program under disaster declaration FEMA-xxxx-DR-xx and is effective upon date of signature by both parties.
- B. Under this Agreement, all applicable laws, Executive Orders, regulations, OMB Circulars and FEMA policies and guidance remain in effect.
- C. The State or FEMA may request modifications to the Agreement at any time, which may include modifications to the options selected in Section B.2. Any amendments to the Agreement will be coordinated with FEMA's Office of Chief Counsel. Both signatories must sign amendments to the Agreement.

III. ROLES AND RESPONSIBILITIES

This section outlines which key functions of PA Program delivery (Customer Service, Site Inspection, and/or Scoping and Costing) the State will assume, and to what degree. FEMA regional staff will provide technical assistance to the State, obligate funding to the State, and monitor program implementation after project approvals.

A. GENERAL

1. The State will:

- a. Administer the Public Assistance Program consistent with applicable program laws, Executive Orders, regulations, OMB Circulars, and FEMA policies and guidance.
- b. Ensure the State Administrative Plan is current and approved by the FEMA Regional Administrator [or designee]. Document in the Plan the processes to determine eligible applicants and projects, develop appropriate scopes of work, and assure sufficient documentation exists on the project to allow for program review or audit.
- c. Maintain the technical capability necessary to meet its responsibilities under the Agreement. If, at any time, the State determines it requires additional technical capability, the State will request technical assistance from FEMA.
- d. Provide FEMA any information requested to assist FEMA in carrying out its functions.
- e. Utilize current electronic systems (e.g., Grants Manager and/or Grants Portal) to share information regarding the implementation of State-Led PA throughout the full grant lifecycle.

2. FEMA will:

- a. Ensure that the State administers the Public Assistance Program consistent with applicable program laws, Executive Orders, regulations, OMB Circulars, and FEMA policies and guidance, as well as all applicable environmental and historic preservation laws, policies, and guidance, through an on-going quality control review.
- b. Provide technical assistance to the State, upon request and as appropriate.
- c. Utilize current electronic systems (e.g., Grants Manager and/or Grants Portal) to share information regarding the implementation of State-Led PA throughout the full grant lifecycle.

B. PROGRAM DELIVERY

Throughout the delivery of PA grants, FEMA and the State will coordinate to perform one or more key functions (customer service, site inspections, and scoping and costing) to formulate each subgrant or project. While each of these functions correspond to FEMA PA position titles such as the Program Delivery Manager (PDMG) or the Site Inspector (SI), the State has flexibility in deciding how to execute these key functions in accordance with the PA delivery model, pursuant to the *Public Assistance Program and Policy Guide* (PAPPG). Although separate lines of effort, personnel performing these key functions will coordinate with one another to ensure quality assurance.

1. For disaster declaration FEMA-xxxx-DR-xx, the State will:

- a. Work with FEMA to develop a PA Management Plan that includes a situation overview and the processes and procedures for record management; program administration; staff management; PA delivery process; quality assurance; special considerations (e.g., insurance, mitigation, environmental and historic preservation); key issues and resolution (e.g., disaster-specific eligibility, debris removal, flood control facilities, private nonprofit eligibility, and cost estimating); transition and closeout timeline; Remedial Action Management Program; and, performance metrics. This Plan will be signed by FEMA Regional PA Leadership and the State Public Assistance Officer [or authorized representative];
- b. Conduct Applicant Briefings to provide high-level information regarding the PA Program;
- c. Conduct Recipient reviews of completed projects and awards in Grants Portal;
- d. Complete entry of all Version 0 Project Worksheets;
- e. Pursue an active partnership with FEMA to coordinate the obligation of funds;
- f. Pass-through funds to Subrecipient(s) when received from FEMA;
- g. Utilize the current electronic system for PA grants management (e.g., Grants Portal and/or Grants Manager) for processing, tracking, and reporting of projects and Subrecipients;
- h. Monitor grant funds and subaward-supported activities to ensure the grant activities are performed in accordance with the SOW; the activities are compliant with federal requirements and current codes, standards, and permitting requirements, in accordance with 44 C.F.R. § 206.226(b); and sufficient funds are available for closeout;
- i. Afford FEMA the opportunity to perform environmental planning and historic preservation (EHP) reviews prior to the start of construction for any Permanent Work project. Proceeding with Permanent Work before FEMA completes EHP reviews will jeopardize PA funding;
- j. Submit Quarterly Progress Reports and Financial Status Reports to FEMA;
- k. Make recommendations on appeals and provide FEMA with any necessary documentation;
- l. Respond to any requests for information related to audits and submit requested documentation to FEMA;
- m. Initiate and work with FEMA on timely project closeout by: conducting final financial reconciliation; and, ensuring that all appeals have a final determination, all funds have been obligated, the project is complete, and the final expenditure report has been submitted.

- n. Initiate and work with FEMA on timely Subrecipient closeout by submitting a written closeout request for each Subrecipient once all the Subrecipient's projects have been completed and closed for the disaster and submit a Project Completion and Certification Report (P.4 Form) to demonstrate that the Applicant is ready to close out its projects.
2. In addition to the functions above, the State will assume key functions under the following option(s) for state-led PA, as outlined in the *State-Led Public Assistance Guide* [check one or more]:
- **Customer Service Shared or Customer Service Plus; and/or**
 - Under **Customer Service Shared**, the State will perform customer service functions for some Applicants/Subrecipients, while FEMA performs them for the remaining Applicants/Subrecipients. Applicants/Subrecipients will be assigned to the State or FEMA in the PA Management Plan.
 - Under **Customer Service Plus**, the State will perform customer service functions for all Applicants/Subrecipients.
 - **Site Inspections Shared or Site Inspections Plus; and/or**
 - Under **Site Inspections Shared**, the State will perform the site inspection functions for some projects, while FEMA performs them for the remaining projects. Projects will be assigned to the State or FEMA in the PA Management Plan.
 - Under **Site Inspections Plus**, the State will perform site inspection functions for all projects.
 - **Scoping and Costing Shared or Scoping and Costing Plus.**
 - Under **Scoping and Costing Shared**, the State will perform all scoping and costing functions for some projects, while FEMA performs them for the remaining projects. Projects will be assigned to the State or FEMA in the PA Management Plan.
 - Under **Scoping and Costing Plus**, the State will perform all scoping and costing functions for all projects.
- a. **Under Customer Service Shared, for those Applicants/Subrecipients assigned to the State, the State will:**
- i. Perform eligibility reviews and ensure that only eligible projects, based on Applicant, facility, work and cost, are funded per the Agreement. Make eligibility recommendations to FEMA;
 - ii. Assign Program Delivery Managers (or equivalent) to Applicants for PA grant development;

- iii. Conduct exploratory calls with Applicant representatives to obtain general information about the Applicant and its disaster impacts, explain next steps, including the Damage Inventory, discuss potential special considerations and eligibility issues, and schedule the Recovery Scoping Meeting (RSM).
- iv. Work with Applicants to input an initial damage inventory into Grants Portal;
- v. Conduct Recovery Scoping Meetings;
- vi. Group damage into projects in Grants Manager;
- vii. Send Essential Elements of Information (EEI) requests to Applicants;
- viii. Submit site inspection work order requests;
- ix. Review Site Inspection Report and Damage Description and Dimensions (DDD);
- x. Review Applicant EEI responses;
- xi. Coordinate Applicant review and signature of the DDD;
- xii. Complete Development Guide questions in Grants Manager;
- xiii. Submit Project to Consolidated Resource Center (CRC) via Grants Manager;
- xiv. Conduct Project Reviews before obligation;
- xv. Conduct Recovery Transition Meetings.

b. Under Customer Service Plus, for all Applicants/Subrecipients, the State will:

- i. Perform eligibility reviews and ensure that only eligible projects, based on Applicant, facility, work and cost, are funded per the Agreement. Make eligibility recommendations to FEMA;
- ii. Assign Program Delivery Managers (or equivalent) to Applicants for PA grant development;
- iii. Conduct exploratory calls with Applicant representatives to obtain general information about the Applicant and its disaster impacts, explain next steps, including the Damage Inventory, discuss potential special considerations and eligibility issues, and schedule the Recovery Scoping Meeting (RSM).
- iv. Work with Applicants to input an initial damage inventory into Grants Portal;
- v. Conduct Recovery Scoping Meetings;
- vi. Group damage into projects in Grants Manager;

- vii. Send Essential Elements of Information (EEI) requests to Applicants;
- viii. Submit site inspection work order requests;
- ix. Review Site Inspection Report and Damage Description and Dimensions (DDD);
- x. Review Applicant EEI responses;
- xi. Coordinate Applicant review and signature of the DDD;
- xii. Complete Development Guide questions in Grants Manager;
- xiii. Submit Project to Consolidated Resource Center (CRC) via Grants Manager;
- xiv. Conduct Project Reviews before obligation;
- xv. Conduct Recovery Transition Meetings.

c. Under Site Inspections Shared, for those projects assigned to the State, the State will:

- i. Assess the type of site inspection needed;
- ii. Assign Site Inspectors (or equivalent) to projects;
- iii. Conduct site inspections to Site Inspection Work Orders in Grants Manager;
- iv. Assist Subrecipient in gathering required information and documentation, including for special considerations such as environmental planning and historic preservation (EHP), insurance, and mitigation, and review projects for completeness.

d. Under Site Inspections Plus, for all projects, the State will:

- i. Assess the type of site inspection needed;
- ii. Assign Site Inspectors (or equivalent) to projects;
- iii. Conduct site inspections to Site Inspection Work Orders in Grants Manager;
- iv. Assist Subrecipients in gathering required information and documentation, including for special considerations such as environmental planning and historic preservation (EHP), insurance, and mitigation, and review projects for completeness.

e. Under Scoping and Costing Shared, for those projects assigned to the State, the State will:

- i. Develop Scope of Work (SOW) and costs;
- ii. Draft or review Stafford Act Section 406 Hazard Mitigation Proposal for eligible facilities, if applicable.

- iii. Conduct initial environmental and historic preservation (EHP) compliance review.

f. Under Scoping and Costing Plus, for all projects, the State will:

- i. Develop Scope of Work (SOW) and costs;
- ii. Draft or review Stafford Act Section 406 Hazard Mitigation Proposal for eligible facilities, if applicable.
- iii. Conduct initial environmental and historic preservation (EHP) compliance review.

3. For disaster declaration FEMA-xxxx-DR-xx, FEMA will:

- a. Work with the State to develop a PA Management Plan that includes a situation overview and the processes and procedures for record management; program administration; staff management; PA delivery process; quality assurance; special considerations (e.g., insurance, mitigation, environmental and historic preservation); key issues and resolution (e.g., disaster-specific eligibility, debris removal, flood control facilities, private nonprofit eligibility, and cost estimating); transition and closeout; Remedial Action Management Program. This Plan will be signed by FEMA Regional PA Leadership and the State Public Assistance Officer [or authorized representative];
- b. Review Project Worksheets for which the State is the Applicant;
- c. Make all final facility and work eligibility determinations;
- d. Validate Scope of Work (SOW) and costs;
- e. Route projects and assign Consolidated Resource Center (CRC) staff;
- f. Conduct Program compliance evaluations, including Quality Assurance Evaluation, Insurance and Mitigation Evaluations, Minimum Threshold Evaluations, and Environmental and Historic Preservation (EHP) Evaluations;
- g. Review all projects to ensure the work complies with applicable Federal environmental and historic preservation (EHP) laws and their implementing regulations, and applicable Executive Orders (EOs);
- h. Conduct final reviews and obligate funding for eligible projects to the State utilizing the current electronic system (e.g., Grants Manager);
- i. Publish all Public Assistance public notices;
- j. Review appeal documentation and recommendations from the State, and inform the State of the determination;

- k. Inform the State of changes to a project or to funding if any are required in a Corrective Action Plan following an audit;
 - l. Complete project closeout, Subrecipient closeout, and disaster closeout in a timely manner.
4. In addition to the functions above, FEMA will retain key functions based on the option(s) for State-Led PA selected above, as outlined in the *State-Led Public Assistance Guide*:
- a. **Under Customer Service Shared, for those Applicants/Subrecipients assigned to FEMA, FEMA will:**
- i. Perform eligibility reviews and ensure that only eligible projects, based on Applicant, facility, work and cost, are funded per the Agreement. Make eligibility recommendations to FEMA;
 - ii. Assign Program Delivery Managers (or equivalent) to Applicants for PA grant development;
 - iii. Conduct exploratory calls with Applicant representatives to obtain general information about the Applicant and its disaster impacts, explain next steps, including the Damage Inventory, discuss potential special considerations and eligibility issues, and schedule the Recovery Scoping Meeting (RSM).
 - iv. Work with Applicants to input an initial damage inventory into Grants Portal;
 - v. Conduct Recovery Scoping Meetings;
 - vi. Group damage into projects in Grants Manager;
 - vii. Send Essential Elements of Information (EEI) requests to Applicants;
 - viii. Submit site inspection work order requests;
 - ix. Review Site Inspection Report and Damage Description and Dimensions (DDD);
 - x. Review Applicant EEI responses;
 - xi. Coordinate Applicant review and signature of the DDD;
 - xii. Complete Development Guide questions in Grants Manager;
 - xiii. Submit Project to Consolidated Resource Center (CRC) via Grants Manager;
 - xiv. Conduct Project Reviews before obligation;
 - xv. Conduct Recovery Transition Meetings.

b. Under Site Inspections Shared, for those projects assigned to FEMA, FEMA will:

- i. Assess the type of site inspection needed;
- ii. Assign Site Inspectors (or equivalent) to projects;
- iii. Conduct site inspections to Site Inspection Work Orders in Grants Manager;
- iv. Assist Subrecipients in gathering required information and documentation, including for special considerations such as environmental and historic preservation (EHP), insurance, and mitigation, and review projects for completeness.

c. Under Scoping and Costing Shared, for those projects assigned to FEMA, FEMA will:

- i. Develop and validate Scope of Work (SOW) and costs;
- ii. Review Stafford Act Section 406 Hazard Mitigation proposals;
- iii. Review all projects to ensure the work complies with applicable Federal environmental and historic preservation (EHP) laws and their implementing regulations, and applicable Executive Orders (EOs).

C. STATE MANAGEMENT COSTS

The allowance to cover management costs for the State-Led PA operation will be in accordance Section 324 of the Stafford Act and applicable polices and guidance.

1. The State will:

- a. Identify staffing and other resource requirements necessary for budgeting and proper program management/implementation for the disaster in the State Administrative Plan.

2. FEMA will:

- a. Review and approve the State Administrative Plan during the scoping meeting to determine the eligible management costs.
- b. Obligate eligible management costs based on the State Management Plan, in accordance with 2 C.F.R. §§ 327-328 and 44 C.F.R. §206.204(f).

D. DISPUTE RESOLUTION

The State and FEMA will resolve any disputes in the interpretation of regulations, policy, and the implementation of the Public Assistance Program by designating one Public Assistance staff member from the State and one from FEMA to research the issue and present the findings to the Federal and State PA Group Supervisors who will make a joint determination. If the dispute cannot be resolved, is highly sensitive or controversial, or if the funding level requires the Disaster Recovery Manager's (DRM's) authority to obligate, the PA Group

Supervisors will present a recommendation to the Federal Coordinating Officer (FCO) for a final determination. The FCO's decision does not waive the Applicant's right to appeal.

IV. CONCURRENCE

By their signatures below, the State and FEMA agree to abide by the terms of this agreement in the implementation of the Public Assistance Program for disaster declaration FEMA-xxxx-DR-xx.

[NAME]

Governor's Authorized Representative
[or designee]

[STATE] Emergency Management Agency

[NAME]

Regional Administrator [or designee]

FEMA Region []

Attachments

1. State Administration Plan
2. State Management Plan

APPENDIX E: PUBLIC ASSISTANCE GRANT LIFE CYCLE

This appendix places the unique activities needed to implement state-led PA in the context of the wider grant life cycle for an incident. Specifically, Tables 8 to 15 provide more detailed information on the PA grant life cycle, including describing processes, staff positions, and key steps FEMA currently uses to deliver PA grants for all incidents.

Recipients can refer to the detailed information in this appendix to customize their own implementation and staffing approaches when executing one or more of the state-led PA options described in Chapter 4: State-Led Public Assistance Operating Concept. Information in subsequent sections establishes common expectations of the functions that must be performed—either by Recipients or FEMA—to establish consistent implementation of the PA Program across all states and FEMA regions. Although Tables 8 to 15 identify FEMA-specific positions to provide greater context and consistent terminology, Recipients conducting a state-led PA operation have flexibility to align staffing approaches with their specific capabilities and resources.

Pre-Disaster Preparedness

Prior to a disaster, Recipients may undertake several activities to better position themselves to conduct a state-led PA operation, including an analysis of their capacity and capability to manage aspects of the PA Program. FEMA regions will reach out to Recipients to gauge their interest in a state-led PA operation pre-disaster to discuss and plan for potential state-led PA operations if they are interested in participating in the program.

Table 8 shows pre-disaster activities Recipients can undertake to better prepare themselves to initiate and conduct a state-led PA operation.

Table 8: Pre-Disaster Preparedness Activities

| Step | Description |
|--|--|
| a. Recipient Public Assistance (PA) Program Self-Assessment | Recipient assesses capability to manage aspects of the PA operation before a declaration and identifies conditions under which Recipient leadership may be interested in potentially pursuing a state-led operation. |
| b. Hazard Mitigation Plan | Recipient submits a plan showing how it intends to reduce risks from natural hazards, which must be approved by FEMA before hazard mitigation funding is provided. Jurisdictions must update these plans every 5 years to remain eligible for the Hazard Mitigation Assistance programs. |

| Step | Description |
|--|--|
| c. Recipient to Obtain Systems Access to Grants Manager | Recipient ensures it has access to the Grants Manger and Grants Portal and its organizational profile is up to date. Recipient identifies likely personnel who will need access to the system for state-led PA operations. Recipient should request access through its respective FEMA region. |
| d. Pre-Load Applicant Organizational Profiles into Grants Portal/Manager | Recipient or FEMA works with potential Applicants to create an organizational profile in the Grants Portal and Grants Manager. |
| e. Training | Recipient conducts (or requests) training to perform the key functions of PA delivery: customer service, site inspections, and scoping and costing, as well as other supporting functions such as EHP compliance and Hazard Mitigation. |

Pre-Declaration Coordination

After a disaster but prior to a presidential disaster declaration being issued, Recipients assess the disaster impacts and magnitude of damage by completing initial damage assessments and requesting and completing a joint Preliminary Damage Assessment (PDA) with FEMA. The objective is to collect and prepare the information and documentation required to request a presidential disaster declaration and receive supplemental federal assistance.

Recipients may choose to review and update PA-related assessments after a presidential disaster declaration because Recipient capacity and capability can shift based on factors such as staffing, resources, number of disasters currently being managed, and frequency of disaster declarations. For more information about considerations for selecting state-led PA and disaster characteristics, see Chapter 5: Decision-Making Considerations.

Table 9 identifies responsibilities that a Recipient can undertake before a presidential disaster declaration.

Table 9: Pre-Declaration Coordination Responsibilities

| Step | Description |
|--|---|
| a. Payment Management System Account | Recipient creates a FEMA-specific SmartLink account by submitting a Payment Management System Access Form and a Direct Deposit Form (SF-1199A). |
| b. Joint Preliminary Damage Assessment (PDA) | Recipient, FEMA, and local communities assess the disaster impacts and magnitude of damage. Recipient and FEMA begin discussion on potential applicability of state-led PA. |
| c. Request for Presidential Disaster Declaration | Recipient submits request for a presidential disaster declaration based on information collected from the PDA. |

| Step | Description |
|---|--|
| d. Prepare Application for Federal Assistance (SF-424,424D) | Recipient prepares Application for Federal Assistance (SF-424) and Assurances for Construction Programs (SF-424D) for submittal. |

Pre-Award Program Delivery

The purpose of this section is to establish a common terminology and understanding of the delivery model FEMA uses to implement the PA grant program. Recipients have flexibility in how they decide to staff these steps, depending on their resources and which state-led PA option(s) they select. These sections are meant to offer an example of how FEMA staffs each step of the PA delivery process.

Phase I: Operational Planning

The objective of operational planning in PA delivery is to establish a foundation for applicant-driven, outcome-based recovery by identifying disaster impacts and priorities. Developing a customized Disaster Operating Profile effectively integrates FEMA and Recipient capabilities and necessary support functions to deliver the federal assistance grant program. In addition to the responsibilities identified in Table 10, Recipients will need to determine the necessary staffing requirements and identify resource needs to manage the PA Program that could be met by the Recipient or FEMA personnel. During operational planning, Recipients and/or FEMA staff identify Subrecipients’ disaster impacts and recovery priorities and begin to address mitigation and EHP considerations with the Subrecipients.

Table 10 identifies the steps in operational planning that Recipients may undertake after a presidential disaster declaration to prepare for and select one or more state-led PA options.

Table 10: Operational Planning for PA Delivery

| Step | Description |
|---|---|
| a. Presidential Disaster Declaration | President declares an emergency or major disaster Declaration which authorizes Public Assistance (PA). |
| b. FEMA-State Agreement (FSA) | The governor and the FEMA Regional Administrator or designated representatives sign an agreement that states the understandings, commitments, and conditions for assistance under which FEMA disaster assistance shall be provided. |
| c. Structured Dialogue for State-Led PA | Following approval of a presidential declaration authorizing PA, FEMA and Recipient begin discussion on which state-led option(s) is most appropriate based on disaster characteristics and the Recipient’s capacity at the time of the disaster. |
| d. State Administrative Plan Amendment | Recipient submits an amendment (or new) State Administrative Plan for a specific presidential disaster declaration. |

| Step | Description |
|---|--|
| e. Submit Application for Federal Assistance (SF-424,424D) | Recipient submits the Application for federal assistance once a presidential disaster declaration has been issued. |
| f. Disaster Operating Profile and Overview Briefing | FEMA and/or Recipient develop the Disaster Operating Profile based on the disaster’s PDA and historical known data. FEMA and/or Recipient conduct(s) the Disaster Overview Briefing for staff involved with the disaster. |
| g. State-Led PA Operational Agreement | If state-led PA is agreed upon between FEMA and the Recipient, the Operational Agreement outlining the roles and responsibilities for the PA operation will be attached as an addendum within 72 hours of signing the FSA. |
| h. PA Management Plan | The PA Management Plan identifies the roles and responsibilities, processes, and procedures for administering the PA Program. |
| i. Applicant Briefing | Recipient conducts briefing for potential Applicants to provide high-level information regarding the PA Program. |
| j. Assess Applicant Eligibility | Applicants submit Requests for Public Assistance (RPA) through the Grants Portal. Recipient reviews and makes eligibility recommendation to FEMA through the Grants Portal. Internally, FEMA’s Office of Chief Counsel reviews RPAs from private nonprofits. The PA Group Supervisor (PAGS) reviews the other RPAs for Applicant eligibility. If an Applicant is not eligible, PAGS drafts determination memorandum and letter explaining why the Applicant is not eligible. |
| k. Assignment of Program Delivery Manager (PDMG) to Applicants | PAGS or Program Delivery Task Force Lead (PD TFL) assigns PDMGs to eligible Applicants for PA grant development. |
| l. Exploratory Call | PDMG conducts the Exploratory Call with Applicant representative(s) to introduce the role of the PDMG and the Applicant's role in the PA Program delivery process, understand the Applicant's disaster-related damage and identify Applicant's needs, explain the Damage Inventory, and schedule the Recovery Scoping Meeting (RSM). |
| m. Initial Damage Inventory | Prior to the RSM, the PDMG works with the Applicant to input an initial Damage Inventory into the Grants Portal. |
| n. Recovery Scoping Meeting (RSM) | The RSM represents the first substantive meeting between the PDMG and the Applicant and starts the 60-day regulatory timeframe for the Applicant to identify and report damage. The meeting covers an in-depth discussion about the Applicant’s damage claims, the supporting documentation needed, and the plan for site inspections and establishes the Applicant’s priorities. |

| Step | Description |
|------|--|
| | For all options, FEMA will issue the Determination Memorandum and Letter. If the Recipient is performing customer service functions, the Recipient may draft the Determination Memorandum and Letter for FEMA to review, approve, and send to the Applicant. |

Phase II: Intake Damage and Eligibility Analysis

After the Operational Planning phase, Recipients and FEMA conduct site inspections and collect documentation from Applicants. The objective of Phase II is to capture Applicants' disaster-related damage and determine eligibility within 60 days of the Recovery Scoping Meeting (RSM). Table 11 shows the responsibilities involved with Phase II in PA delivery, many of which would be managed by Recipients who choose the site inspections option(s).

Table 11: Intake Damage and Eligibility Analysis for PA Grants

| Step | Description |
|--|--|
| a. Assess Facility Eligibility | Program Delivery Manager (PDMG) assesses the eligibility of facilities on the Damage Inventory and discusses potential eligibility issues with the Public Assistance (PA) Group Supervisor (PAGS) to confirm eligibility recommendation. If a facility is found to be ineligible for PA, a Determination Memorandum will be issued with an explanation. |
| b. Group Damage into Projects | PDMG groups damages in the Damage Inventory into projects in the Grants Manager. Each project will be designated to a lane in the Consolidated Resource Center (CRC) for processing: Completed/Fully Documented, Standard, or Specialized. |
| c. Request Documentation | For each project, PDMG develops a request for documentation and information needed to support the Applicant's claims. PDMG sends the request to the Applicant through the Grants Manager. |
| d. Submit Site Inspection Work Order Request(s) | PDMG assesses what type of site inspection is needed—standard or specialized—and sends a Site Inspection Work Order Request to the Site Inspection Task Force Leader (SI TFL) through the Grants Manager. |
| e. Assign Site Inspector (SI) | SI TFL assesses the types of facilities on the Site Inspection Work Order request and the skill sets of available SIs. SI TFL assigns SIs to the Site Inspection Work Order. |
| f. Conduct Site Inspection | SI conducts the site inspection with the Applicant. SI captures detailed dimensions of the damage as shown by the Applicant on the Site Inspection Report (SIR). SI also takes photographs and drafts sketches of the damages shown. SI enters the site inspection information into the Grants Manager, which drafts the Damage Description and Dimensions (DDD) of the project. The SI sends the DDD to the PDMG. |
| g. Review the SIR and DDD | PDMG reviews the DDD to ensure the information is clear and matches the SIR and accompanying photographs. |

| Step | Description |
|--|--|
| h. Review Applicant Request for Documentation Responses | Applicant responds to the request for documentation for each project. After each request is satisfied, Applicant returns the request to the PDMG through the Grants Portal. PDMG reviews to ensure the request is complete. |
| i. Assess Work Eligibility (Recommendation) | Before sending the project to the next step, PDMG reviews the work claims for eligibility. If a project is deemed ineligible for PA, a Determination Memorandum will be issued with an explanation. |
| j. Applicant Reviews and Signs DDD | Through the Grants Manager, PDMG sends the DDDs associated with each project to the Applicant for review and approval. PDMG discusses the DDDs with the Applicant and the Applicant's desired method of repair. |
| k. Complete Development Guide Questions | PDMG completes the Development Guide Questions in the Grants Manager. These questions determine the following: who will develop the Scope of Work (SOW) and cost estimate for the project, the method of repair, the Applicant's interest in mitigation opportunities, and environmental planning and historic preservation (EHP) issues with the proposed method of repair. |
| l. Submit Project to CRC | PDMG sends project(s) to the CRC via the Grants Manager. |
| For all options, FEMA will issue the Determination Memorandum and Letter. If the Recipient is performing customer service functions, the Recipient may draft the Determination Memorandum and Letter for FEMA to review, approve, and send to the Applicant. | |

Phase III: Scoping and Costing

The objective for the Scoping and Costing phase is to validate Applicant-provided documents to develop Completed/Fully Documented projects or develop/validate the Scope of Work (SOW) and cost estimate for standard and specialized projects. Table 12 identifies responsibilities that Recipients choosing one or both of the scoping and costing options undertake. Many responsibilities in this phase will be managed by FEMA for all operations.

Table 12: Scoping and Costing for PA Delivery

| Step | Description |
|---|---|
| a. Assign Consolidated Resource Center (CRC) Specialists | CRC Lane Task Force Leads (TFL) assign specialists based on the project complexity and skill sets required. |
| b. Develop or Validate the Scope of Work (SOW) and Cost | Completed/Fully Documented: Specialists review/validate Applicant-provided documentation to develop the Damage Description and Dimensions (DDD), SOW, and cost for each project. Standard/Specialized: Specialists develop or validate Applicant-provided SOW and cost estimates for each project. |

| Step | Description |
|--|--|
| c. Draft 406 Hazard Mitigation Proposal | Program Delivery Manager (PDMG) drafts Hazard Mitigation Proposal for eligible facilities, if applicable. |
| d. Environmental and Historic Preservation (EHP), Insurance, and Mitigation | For special considerations, such as EHP, insurance, and mitigation, the Recipient may help Subrecipients gather required documentation and review projects for completeness. FEMA then performs compliance reviews to ensure projects comply with federal regulations related to their respective program. |
| e. Peer Review | CRC Lane TFLs or designees conduct a peer review of the project, as needed. |
| f. Determine Work and Cost for Eligibility | CRC Specialist assesses the work and costs and makes an eligibility recommendation. CRC raises eligibility issues with the PAGS to confirm eligibility recommendation. |
| g. Program Compliance Evaluations | FEMA conducts Quality Assurance, Insurance, Mitigation, and EHP evaluations for each project. |
| For all options, FEMA will issue the Determination Memorandum and Letter. If the Recipient is performing customer service functions, the Recipient may draft the Determination Memorandum and Letter for FEMA to review, approve, and send to the Applicant. | |

Phase IV: Obligation

In the final phase of the PA delivery process, funding is obligated to eligible projects. Once approved, FEMA obligates funds to the Recipient, who obligates subawards to Subrecipients.

Table 13 shows the responsibilities of this final phase. Recipients choosing one or both customer service options complete the PDMG review and conduct the Recovery Transition Meetings.

Table 13: Obligation of Funds for PA Delivery

| Step | Description |
|---|---|
| a. Program Delivery Manager (PDMG) Review | PDMG reviews the completed project and award in the Grants Manager. |
| b. FEMA Final Review | FEMA reviews the completed project and award in the Grants Manager. |
| c. Recipient Review | Recipient reviews the completed project and award in the Grants Portal. |
| d. Applicant Review | Applicant reviews the completed project and award in the Grants Portal and concurs with the terms of funding. |
| e. FEMA Obligates Funding to Recipient | Recipient receives grant funding from FEMA. |
| f. Pass-through Funds to Subrecipient | Recipient obligates subaward funds to Subrecipient(s). |
| g. Recovery Transition Meeting | The Recovery Transition Meeting is the formal transition briefing from FEMA back to the Recipient. The format of this meeting will depend on the organization of responsibilities for a state-led PA operation. |

Post-Award Grant Administration

Post-award grant administration occurs after FEMA has obligated funds. The objective is to monitor project construction and finances and to develop grant versions, as necessary. FEMA considers requests for time extensions or appeals in accordance with published guidance and may conduct audits during this phase. Table 14 shows the responsibilities in post-award grant administration, all of which are the same for a PA operation.

Table 14: Post-Award Grant Administration

| Step | Description |
|--|--|
| a. Monitoring Work Performed Under the Scope of Work (SOW) | Recipient monitors grant funds and subaward-supported activities to ensure the grant activities are being performed in accordance with the SOW, the activities are compliant with federal requirements, and sufficient funds are available for closeout. |
| b. Quarterly Progress Reports and Financial Status Reports | Recipient submits quarterly progress reports that list all open projects where Recipient has not processed the final federal payment to the Applicant. Recipient submits financial status reports proving the status of funds, expenditure drawdowns, and the status of the Recipient's cost-share requirements. |
| c. Appeals | FEMA provides two opportunities for Applicants to appeal a funding decision. The first is to the Regional Administrator (RA). If the Applicant disagrees with the first appeal determination, it may submit a second appeal to the Assistant Administrator of the Recovery Directorate at FEMA HQ. |

| Step | Description |
|------------------|---|
| d. Audits | FEMA responds to audits with a Corrective Action Plan for each recommendation with which it concurs and provides an explanation for each recommendation with which it does not concur. FEMA will notify Recipients of changes to a project or to funding if changes are required in a Corrective Action Plan. |

Closeout

Closeout is the final step of the PA life cycle and depends on the size of the project. The objective in this step is to ensure that the Subrecipient and Recipient have spent all obligated funds in the manner in which they were described.

Table 15 shows the final responsibilities in the PA grant life cycle required for PA grant closeout. Recipients play a role in closeout even when they do not pursue state-led PA.

Table 15: PA Grant Closeout

| Step | Description |
|---|---|
| a. Initiate Project Closeout | Recipient conducts final financial reconciliation and ensures all appeals have a final determination, all funds have been obligated, the project is complete, and the final expenditure report has been submitted. |
| b. Initiate Subrecipient Closeout | Recipient submits a written closeout request for each Subrecipient once all the Subrecipients' projects have been completed and closed for the disaster. Recipient submits Project Completion and Certification Report (P.4 Form) to demonstrate that the Applicant is ready for closure. |
| c. Project and Subrecipient Closeout | FEMA reviews the P.4 Form and informs the Recipient of outstanding issues. If no issues are found, FEMA concurs that the Subrecipient is ready for closure. |
| d. Disaster Closeout | FEMA closes out the award when it determines that all applicable administrative actions and all required work authorized by the grant have been completed. |

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APPENDIX F: RESOURCE TOOLKIT

Table 16 lists various resources that may be helpful to Recipients currently conducting Public Assistance (PA) operations or Recipients that may conduct PA operations in the future. Recipients can access these resources through the Grants Portal or Grants Manager or by contacting their Regional PA Branch Chief or designated PA official.

Table 16: Resource Toolkit

| Resource | Type | Description |
|---|----------------------|--|
| Exploratory Call and Recovery Scoping Meeting Guides | Document or Guidance | Guides containing objectives, checklists, and other information about Exploratory Calls and Recovery Scoping Meetings. |
| Position Assists | Document or Guidance | Position Assists provide guidance on the Public Assistance (PA) delivery model to FEMA PA Joint Field Office (JFO) and Consolidated Resource Center (CRC) staff. They explain when and how staff work in the four phases of the PA delivery process and provide links to checklists and tools to perform the work. The following Position Assists may provide helpful information for Recipients leading PA operations: <ul style="list-style-type: none"> • Site Inspector • Site Inspector Task Force Leader • Program Delivery Manager (PDMG) • Program Delivery Task Force Leader • Document Validation Specialist • Costing Specialist • Technical Specialist • EHP Advisor |
| Recipient-Developed Guides on PA Operations | Document or Guidance | Guides on PA operations developed by Recipients with experience leading PA operations. For example, the State of North Dakota adapted FEMA guidance to create its own PA Program Basics Guide, Site Inspector Guide, and PDMG Guide. |
| Recipient-Developed PA Position Descriptions | Document or Guidance | Position descriptions developed by Recipients that describe the essential job functions for positions that augment the state’s organic capacity (e.g., reservists) under state-led PA operations. |
| Recipient Experiences with Leading PA Operations | Lessons Learned | Documents detailing Recipient experiences leading PA operations, including challenges, benefits, best practices, and lessons learned. |
| Grants Portal/Grants Manager Training and Guidance | Training | Online or in-person training and written guidance on the use of the Grants Portal/Grants Manager platform, which allows FEMA and state, local, tribal, and territorial governments to manage PA grant applications and delivery. |

| Resource | Type | Description |
|-----------------------------------|----------|---|
| PA Program Training | Training | Online or in-person training provided by FEMA that introduces and provides an overview of the PA Program, process, and policies. The New PA Model for Recipients and Applicants course may be helpful for Recipients leading PA operations. |
| Position-Specific Training | Training | <p>In-person training provided by FEMA that teaches state-level emergency management staff about the roles and responsibilities of specific positions necessary to conduct PA operations (e.g., site inspectors and PDMGs). The trainings primarily take place after a presidential disaster declaration and may include long-form, 2-week training courses and shorter, refresher/micro trainings. Some of these courses may only be offered at FEMA training sites. The following courses may be helpful for Recipients leading PA operations:</p> <ul style="list-style-type: none"> • E0865, Public Assistance Site Inspection • E0866, Scoping and Costing • E0867, Public Assistance Document Review and Validation • E0869, Public Assistance Program Delivery Management • E0870, Public Assistance Field and CRC Operations Management • L253, Environmental and Historic Preservation |
| Operational Agreement | Template | Signed amendment to the FSA that codifies the Recipient’s commitment to conduct a state-led PA operation according to the conditions stated in the agreement. For more information, see Appendix D: Operational Agreement Template. |
| PA Management Plan | Template | Modified PA Management Plan template that Recipients can use during a state-led PA operation to track progress and milestones and consolidate resources to submit to Regional staff for management and oversight purposes. See Chapter 4: State-Led Public Assistance Operating Concept for more information. |