Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

PUBLIC ASSISTANCE

Applicant Toolkit

Guidance and Resources to Help You Through the Public Assistance Process



The Cal OES PA Applicant Toolkit provides Applicants with practical guidance, job aids, checklists, and reference materials to help navigate the FEMA PA process. This Toolkit is designed to simplify complex requirements, clarify Applicant responsibilities, and support timely, accurate, and complete submissions throughout the PA process.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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HOW TO USE THIS GUIDE

This Public Assistance (PA) Applicant Toolkit is designed to help Applicants understand and navigate the Federal Emergency Management Agency (FEMA) Public Assistance Program, from initial Application through Project Completion and Closeout.

The Toolkit begins with PA Program Overview Documents, which introduce the program, explain its structure, identify important requirements and considerations. These are followed by PA Program General Information Documents, which address common topics and requirements applicable across multiple PA Program Phases. The remaining documents are organized sequentially by the seven phases of the PA Process, allowing Applicants to locate guidance specific to their current activities and upcoming responsibilities.

While this Toolkit may be reviewed in its entirety, it is intended to serve as a practical reference to be used throughout the PA Program Delivery process. Applicants are encouraged to first familiarize themselves with the overall PA Program before using the individual job aids.

BEST PRACTICES FOR USING THIS TOOLKIT

- **Understand the Overall Process:** Start with the PA Program Overview documents. Review the PA Program Timeline and Process Steps to understand how activities are connected, when important decisions occur, and what may be required of the Applicant.
- **Review General Information:** Become familiar with common PA requirements, including project formulation, environmental and historic preservation considerations, project types, and Grants Portal best practices.
- **Use Job Aids for Specific Activities:** Reference the corresponding job aids for guidance on required actions, documentation, preparation activities, and important considerations.
- **Pay Attention to Deadlines:** Use the Toolkit to identify important timelines and submission requirements.

STAYING AHEAD OF THE PA PROCESS

- **Share Guidance with Team:** Distribute relevant job aids to staff responsible for finance, procurement, facilities, project management, insurance, and other functions supporting the PA application.
- **Anticipate Requirements**: Understand upcoming activities and potential information request.
- **Organize Documentation**: Collect and maintain supporting records before they are needed.
- **Reduce Delays**: Minimize incomplete submissions, avoidable Requests for Information (RFIs), and repeated follow-up.
- **Support Project Progression**: Prepare for upcoming milestones, reviews, and decisions.

KEY POINT: This Toolkit is intended to supplement, not replace, official FEMA policies, regulations, program guidance, or direction provided by FEMA and Cal OES. Applicants remain responsible for understanding and meeting all applicable program requirements, deadlines, and documentation standards.

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PUBLIC ASSISTANCE

Section One

PA Program Overview Documents



SECTION ONE — PA Program Overview Documents

1.	PA Program Overview
2.	PA Program Delivery Phases and Process Overview
3.	PA Program Categories of Work
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The information below provides eligibility considerations for facilities, work, and costs to support PA Applicants in identifying potentially eligible and ineligible damages.

APPLICANT ELIGIBILITY

Potentially Eligible Applicants:

- State agencies and departments
- Local governments (counties, cities, towns, villages)
- Tribal governments (recognized Native American tribes)
- Territorial governments (e.g., U.S. territories like Puerto Rico, Guam)
- Private Non-Profit (PNP) organizations that provide that provide critical services or noncritical but essential social services provided to the general public are eligible for assistance.

Ineligible Applicants:

- Privately for-profit businesses and individuals and households

FACILITY EXAMPLES

Potentially Eligible Facility:

- Maintained public improved property
- Building owned or leased by an eligible Applicant who is responsible for maintenance
- Public roads that are not funded by the Federal Highway Administration (FHWA)
- Engineered features of otherwise natural areas (e.g., water conveyance system or flood protection, engineered levees, embankments)

Ineligible Facility:

- Privately owned and maintained facilities
- Facilities not in active use or adequately maintained at the time of the disaster

WORK EXAMPLES

Potentially Eligible Work:

- Sandbagging and temporary levees set-up in preparation for the disaster
- Repair of road damage caused by the event
- Repair of facilities and / or temporary relocation of facilities within eligibility requirements

Ineligible Work:

- Repair for damage caused by Applicant negligence failure to maintain infrastructure

COST EXAMPLES

Potentially Eligible Costs:

- Replacement materials or equipment costs used for disaster response
- Engineering and design services for construction projects
- Costs for Hazard Mitigation and Codes and Standards

Ineligible Costs:

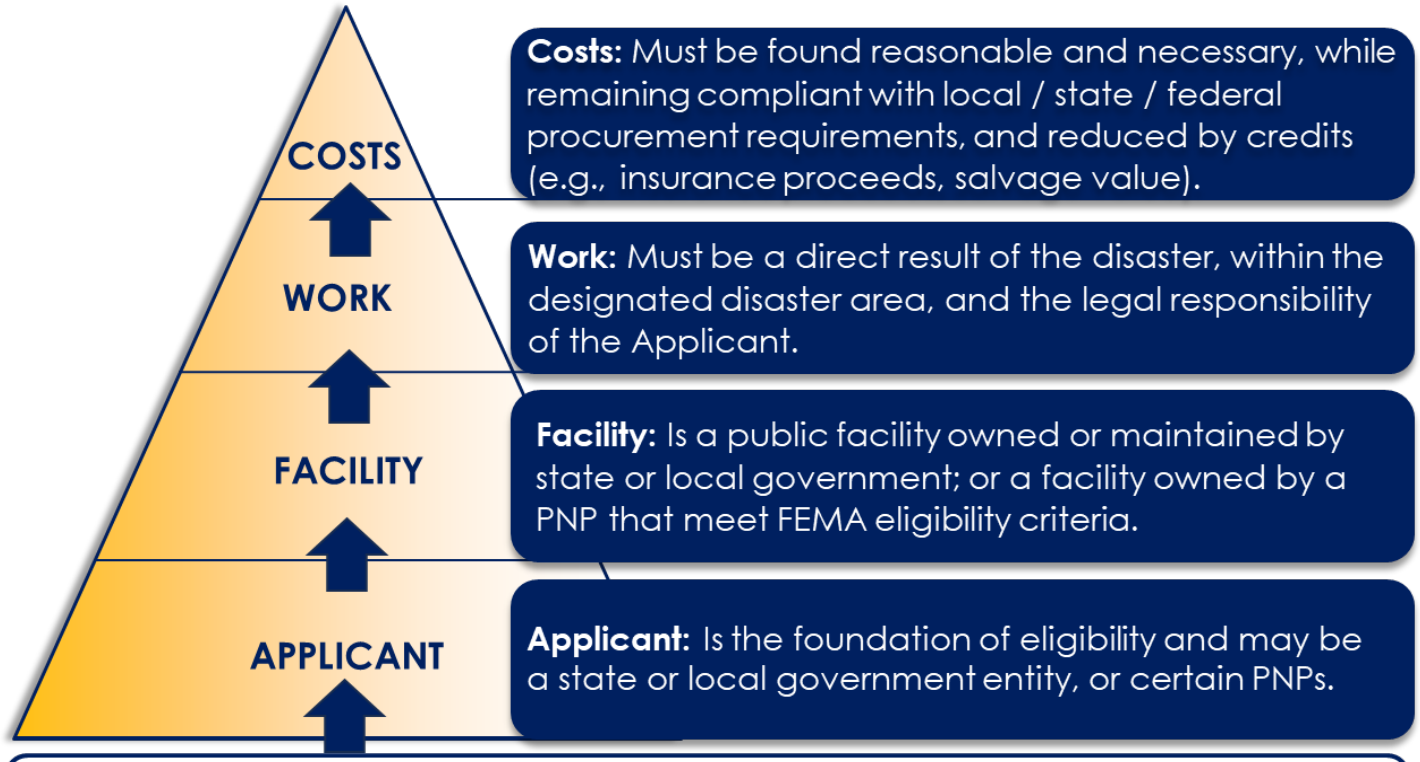
- Duplication of benefits due to anticipated insurance proceeds or other funds
- Loss of revenue or increased operating expenses for normal day-to-day activities
- Surveys to discover if there are damages to an eligible facility
- Contracts using non-approved procurement standards or those that do not meet federal 2 Code of Federal Regulations (CFR) 200 requirements

This document provides PA Applicants with an overview of the PA Program including an outline of eligibility requirements, and a summary of potentially eligible PA Program Work / Project Types.

PA PROGRAM SUMMARY

The FEMA PA Program helps state, local, tribal, and territorial governments, along with certain eligible Private Non-Profit (PNP) organizations, recover from federally declared disasters. The program provides financial assistance to remove disaster debris, protect lives and property during and immediately after a disaster, and repair or replace damaged public facilities and infrastructure. By sharing the cost of eligible recovery work, the PA Program helps communities restore essential services, rebuild public infrastructure, and recover more quickly from disasters.

To be eligible for FEMA PA, Applicants must meet specific criteria. There are four components to FEMA PA eligibility, building from bottom to top (i.e., Applicant, Facility, Work, and Costs), which each have their own criteria. The illustration below summarizes each component.



The FEMA PA eligibility pyramid builds from the bottom to top with Applicant eligibility serving as the foundation.

KEY POINT: Cal OES recognizes that FEMA PA is a complex grant program with nuanced eligibility and process requirements. For this reason, every eligible PA Applicant is assigned a Cal OES PA Specialists to assist the Applicant throughout PA Program Delivery.

The information below provides a summary of PA Categories of Work, in addition to examples of the work performed and additional considerations for each Category of Work.

CATEGORIES OF WORK

PA is organized into Categories of Work that define specific types of disaster-related work and costs. The FEMA PA Program distinguishes recovery work by type (Emergency or Permanent) and by category (A – G).

Category of Work	Description	Type of Work
A	Debris Removal	Emergency
B	Emergency Protective Measures	Emergency
C	Roads and Bridges	Permanent
D	Water Control Facilities	Permanent
E	Buildings and Equipment	Permanent
F	Utilities	Permanent
G	Parks, Recreational Facilities, and Other	Permanent

EXAMPLES OF EMERGENCY AND PERMANENT WORK

Emergency Work:

- Reduces or eliminates an immediate threat to life
- Protects health and safety
- Protects improved public and private property threatened as a result of the disaster

Permanent Work:

- Restores a damaged facility—through repair or restoration—to its pre-disaster design, function, and capacity



Emergency Work: Disaster-related threats to protect lives, property, and public safety.



Permanent Work: Restoration of damaged roads and bridges



Permanent Work: Repair of public utilities and water systems



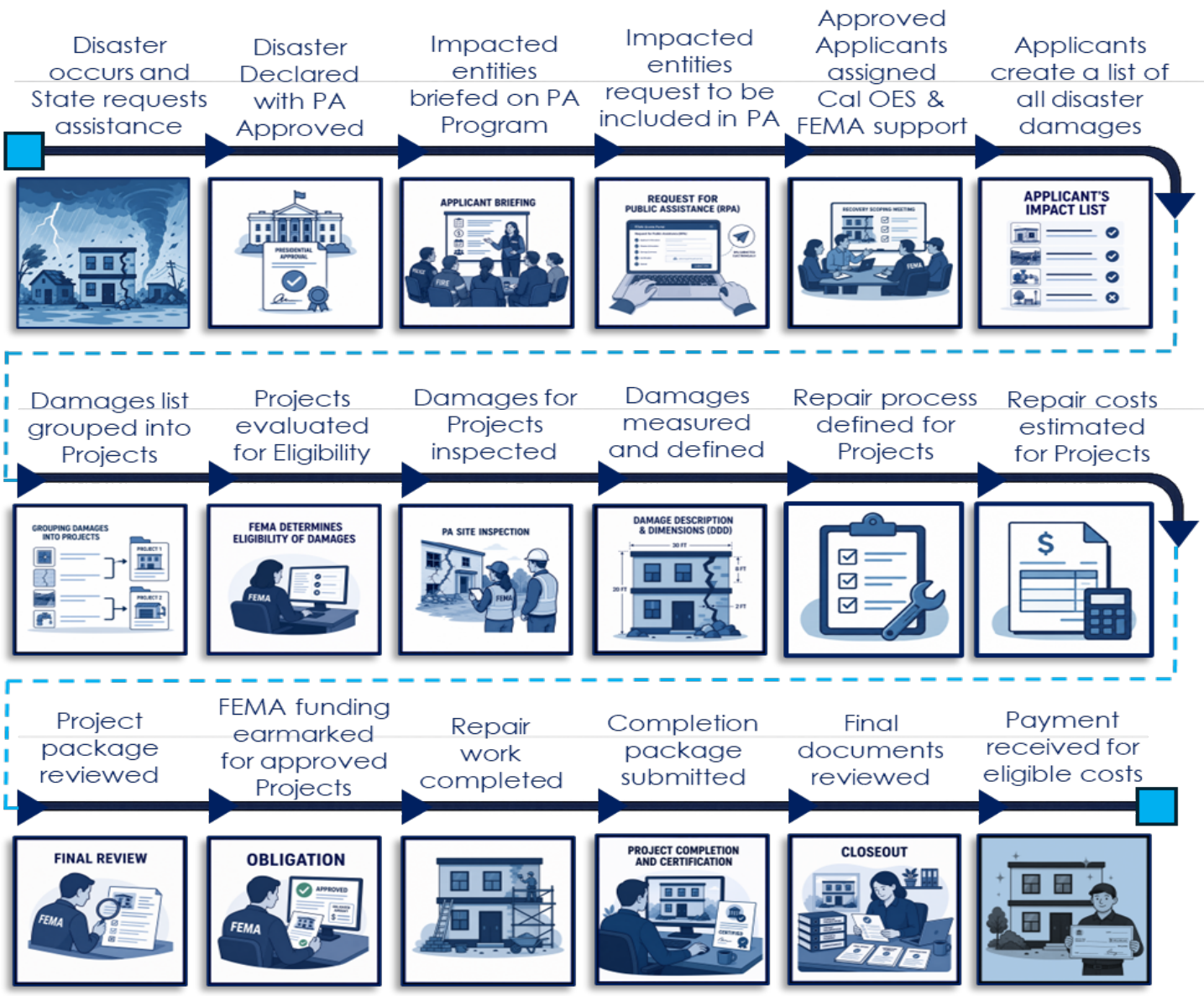
Permanent Work: Restoration of buildings & equipment

PA PROGRAM DELIVERY PHASES AND PROCESS OVERVIEW

This document summarizes the PA Program process, PA Program Delivery Phases, and Process Steps throughout each Phase. Additional information and technical guidance for Process Steps is available in the Cal OES PA Applicant Toolkit.

PA PROGRAM PROCESS SUMMARY

The PA Process, in a simplified explanation, typically begins when a disaster results in a Presidential Declaration that includes activation of FEMA PA. Potentially eligible entities are briefed on the PA Program and apply for inclusion. Eligible Applicants, working with Cal OES and FEMA, prepare a list of damages, group them into Projects, and then define the scope and costs for the Projects. Funding is Obligated by FEMA for approved Projects; costs are typically reimbursed upon completion of the work.



KEY POINT: This is a highly simplified depiction of the PA Program and generalizes the process. Details for each PA Program Phase, and key Process Steps are included below.

PA PROGRAM DELIVERY PHASES AND PROCESS OVERVIEW

Milestones presented below are based on typical PA Project development and are not intended to be encompassing of all tasks or Process Steps.

KEY POINT: FEMA may (at any point) issue **Requests for Information (RFI).** Applicants should respond to all RFIs in the time allotted by FEMA to avoid jeopardizing Project funding.

PHASE I - APPLICANT COORDINATION AND EVALUATION

During Phase I, FEMA and Cal OES engage with potential Applicants to provide initial PA guidance through various meetings, as well as to collect, evaluate, and assess Applicants' recovery and technical assistance needs.

Phase – Major Process Steps:

- **Applicant Briefing** – Cal OES presents an overview of PA for the potential Applicant, including deadlines, general eligibility criteria, and compliance requirements.
- **Request Public Assistance (RPA)** – The potential Applicant submits an RPA with information about the Applicant and damages. Cal OES and FEMA review the RPA.
- **Program Delivery Manager (PDMG) Assignment** – FEMA assigns a PDMG to an Applicant once an RPA is approved.
- **Impact List Development** – Cal OES conducts outreach to support the Applicant in developing a list of all damages and impacts for FEMA to review.
- **Recovery Scoping Meeting (RSM)** – FEMA and the Applicant complete the refinement of the Impact List, and FEMA develops a work plan—the Project Development Plan (PDP)—to guide the Applicant through project development.

KEY POINT: Applicants should treat FEMA deadlines as non-negotiable. Missing required deadlines or failing to submit requested information on time is likely to jeopardize eligibility.

PHASE II - IMPACTS AND ELIGIBILITY

During Phase II, after completion of the RSM, FEMA and Cal OES coordinate with the Applicant to obtain information on impacts / damages and group into projects.

Phase II – Major Process Steps:

- **Essential Elements of Information (EEIs)** – Essential Elements of Information (EEIs) are the key questions within the Project Application that help FEMA evaluate eligibility and formulate the project.
- **Impact List / Applicant Impact Survey (AIS) Submittal** – The Applicant completes the Impact List to identify all impacts / damages for FEMA eligibility review.
- **Evaluation of Facility Eligibility** – FEMA reviews sites / facilities for eligibility.
- **Grouping Impacts and Damages** – FEMA combines impacts and damages into projects based on categories of work and site / facility.
- **Site Inspections** – FEMA and the Applicant conduct a field validation of specific information about a damaged site to assess eligibility and compliance requirements.
- **Damage Description and Dimensions (DDD)** – FEMA develops the DDD to provide a narrative description, dimensions, quantities, responses to questions, and documentation related to impacts and damages, and it is included in the project.

KEY POINT: Damages that are not identified and documented may not be included in the Damage Description and Dimensions (DDD), Scope of Work, or Cost Estimate, potentially affecting Project eligibility and funding.

PHASE III - SCOPING AND COSTING

During Phase III, once FEMA, Cal OES, and the Applicant agree on damages, the FEMA Consolidated Resource Center (CRC) develops and validates the Scope of Work (SOW) and cost estimate(s) and coordinates with the Applicant to confirm project compliance with the PA Program.

Phase III – Major Process Steps:

- **Scope of Work** – The Scope of Work identifies the specific work required to repair, restore, or replace eligible disaster-related damages.
- **Cost Estimate** - The Cost Estimate identifies the anticipated costs to complete the eligible Scope of Work.
- **406 Hazard Mitigation (HM)** – If applicable / eligible, the Applicant completes a proposal for PA 406 HM. FEMA reviews the SOW for the proposal, detailed cost estimates, and documentation for cost-effectiveness and compliance.
- **Compliance Evaluation** – The FEMA CRC conducts reviews for compliance that include quality assurance, insurance requirements, 406 HM eligibility, and Environmental and Historic Preservation (EHP).

KEY POINT: Changes to the SOW after FEMA approval is a difficult and complicated process commonly resulting in Project delays of months or years.

PHASE IV - FINAL REVIEWS

During Phase IV, once compliance evaluations are complete, Projects are forwarded to final review and an additional EHP compliance review. After Cal OES and FEMA conduct final reviews, the Applicant signs / certifies the project prior to obligation.

Phase IV – Major Process Steps:

- **FEMA Final PDMG Review** – The PDMG completes a comprehensive project review.
- **FEMA Final Public Assistance Group Supervisor (PAGS) Review** – The PAGS completes a final eligibility review.
- **Record of Environmental Consideration (REC)** – FEMA EHP reviews the project SOW for compliance with applicable laws and regulations to produce a formal project REC.
- **Cal OES Final Review** – Cal OES reviews the project application to confirm the Applicant has provided sufficient information and documentation for the project.
- **Applicant Final Review** – The Applicant reviews the conditions of the subgrants and final details to confirm the Project is ready to proceed to Phase V.

KEY POINT: Applicants should carefully review and concur with all Project documentation during the Final Review phase. This is the final opportunity to request corrections or revisions before the Project is approved and changes may require the formal amendments process.

PHASE V - OBLIGATION AND RECOVERY TRANSITION

During Phase V, after the Subrecipient has signed the project application, FEMA obligates funding to Cal OES, who is responsible for disbursing funds to the Subrecipient.

Phase V – Major Process Steps:

- **Obligation** – FEMA obligates and disburses funds to Cal OES based on the approved project amount.
- **Funding Draw Down and Disbursement** – Cal OES validates the Subrecipient's project documentation and expenditure amounts prior to disbursement. Cal OES will notify the Subrecipient of funding availability and provide information on the process of receiving disbursements.
- **Recovery Transition Meeting (RTM)** – After the final project for each Subrecipient is signed, FEMA coordinates with Cal OES to facilitate an RTM with the Subrecipient.

KEY POINT: Projects are not eligible for payment until they are officially obligated. Applicants with questions about Projects not yet obligated should contact their assigned PA Specialists.

PHASE VI - PROJECT MONITORING AND AMENDMENTS

During Phase VI, following completion of the RTM, Cal OES PA Specialists monitor the project to confirm the Subrecipient spends funds in compliance with the approved SOW, deadline, and conditions of the project. During this Phase, FEMA and Cal OES respond to requests for SOW changes, time extensions, appeals, and audits.

Phase VI – Major Process Steps:

- **Quarterly Progress Reports** (QPR) – Cal OES PA Specialists collect QPRs from Subrecipients to monitor projects, review the use of funding, and track project progression. The Subrecipient must submit the QPR to obtain funding disbursements from Cal OES.
- **Scope and Cost Amendments** – If a project requires changes to the scope / cost, the Subrecipient submits an amendment request to FEMA prior to performing work. FEMA and Cal OES will coordinate with the Subrecipient on compliance and necessary cost adjustments.
- **Time Extensions** – If additional time is required to complete the work, the Subrecipient provides a written request to Cal OES to extend the work completion deadline.
- **Appeal** – The Subrecipient may appeal a FEMA determination through Cal OES, who submits the appeal to FEMA with a recommendation. If the first appeal is denied, the Subrecipient may submit a second appeal to FEMA.

KEY POINT: Project Obligation and completion of the RTM does not eliminate FEMA deadlines. Applicants should continue to adhere to all FEMA-established timeframes, particularly for Time Extension requests, Appeals, and other post-Obligation actions, as missed deadlines are likely to jeopardize eligibility.

PHASE VII - FINAL RECONCILIATION AND CLOSEOUT

During Phase VII, as Project work is completed, FEMA and Cal OES work to Closeout all Projects and Subrecipients. Once all projects and Subrecipients have been closed, Cal OES will request to close the award for the incident.

Phase VII – Major Process Steps:

- **Project Completion and Certification** – The Subrecipient submits a signed Project Completion and Certification Report (P.4 Form) to Cal OES with documentation of actual project costs and how the work was completed.
- **Final Inspection Report (FIR) Development** – Cal OES reviews the project information, including SOW completion, costs incurred, and compliance with any special conditions. Cal OES provides a recommendation and compiles relevant documents to submit to FEMA.
- **Close Subrecipient** – Cal OES requests FEMA closeout for a Subrecipient once all projects have been completed and closed.

KEY POINT: Subrecipients must maintain all source (financial and program) documentation for 3 years after the date indicated on the Recipient's Audit Waiver Letter sent by the Cal OES Financial Assistance Branch (FAB) following financial closeout.

TECHNICAL GUIDANCE FOR PA APPLICANTS

- Throughout each Phase of the PA Process, FEMA may issue **Requests for Information (RFI)** if additional information / documentation is needed. Applicants should respond to all RFIs in the time FEMA allotted by FEMA to avoid jeopardizing Project funding.
- If the project has eligibility or compliance issues, FEMA may issue a **Determination Memo** (DM) to the Applicant explaining the full or partial denial. Cal OES provides technical guidance and assistance to support the Applicant in appealing DMs.
- The FEMA **PA Implementation timeline** is typically established at the onset of each new disaster and describes deadlines for Process Steps and Phases – Applicants should work closely with Cal OES to adhere to the timeline to avoid receiving a DM for missed deadlines.

ADDITIONAL GUIDING DOCUMENTS

This document provides a simplified overview of the FEMA PA Program and is intended to support general understanding of the Program Delivery process.

Additional guidance, including detailed job aids for individual process steps, is available in the Cal OES Public Assistance Toolkit for Applicants.

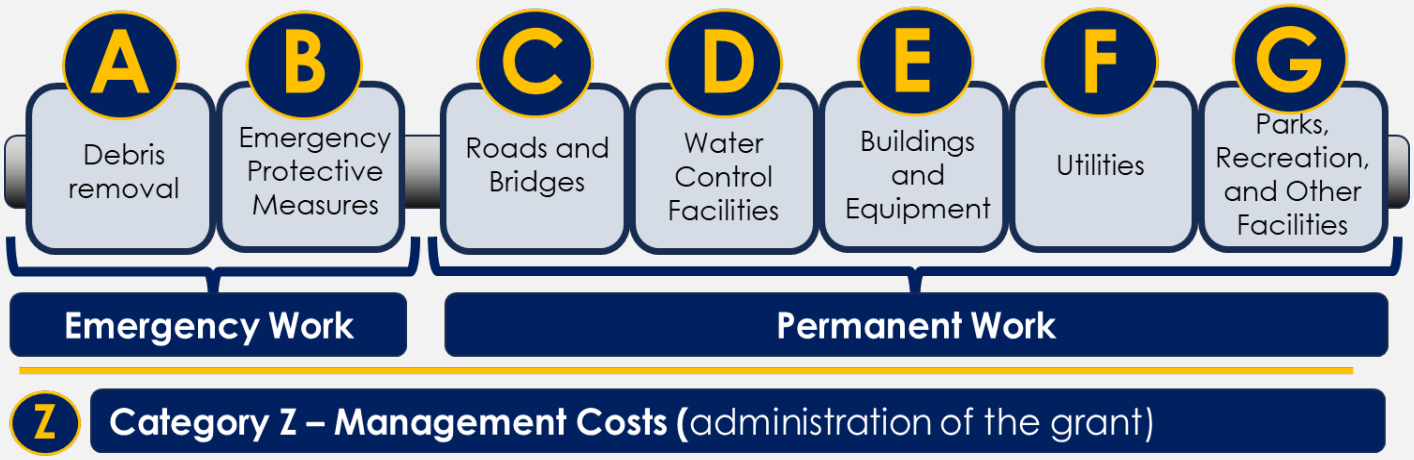
Potential and / or approved Applicants should coordinate with their assigned Cal OES PA Specialist for project-specific guidance or contact Cal OES using the email address below.

PA PROGRAM CATEGORIES OF WORK OVERVIEW

This document provides PA Applicants with a summary of Emergency Work versus Permanent Work, examples of PA Program Categories of Work, and examples of potentially eligible and ineligible projects.

CATEGORIES OF WORK OVERVIEW

PA, Category A, Debris Removal and Category B, Emergency Protective Measures (EPM) differ from Categories C–G because they fund Emergency Work performed to eliminate immediate threats to life, public health and safety, and improved property. This work is generally completed during or shortly after the incident and focuses on response and stabilization rather than permanent recovery. In contrast, Categories C–G fund Permanent Work to repair, restore, reconstruct, or replace disaster-damaged facilities and infrastructure.



CATEGORY A: DEBRIS REMOVAL

Debris includes vegetative (e.g., trees, sand, mud, silt, gravel), building components (e.g., drywall, cinder blocks, rebar), household goods (e.g., cleaning solutions, chemical items), "white goods" (e.g., refrigerators, stoves, air conditioners), or debris from a damaged facility.

Eligibility: Debris removal operations must eliminate threats to lives, public health, and safety. Potentially eligible Projects include, but are not limited to:

- Debris removed from a public right of way or public facility (e.g., public road, public sidewalks, public parking lots)
- Debris removed to eliminate a public health and safety hazard / threats of significant damage to improved public or private property

Potentially Ineligible Debris Removal Work:

- Activities where the Applicant does not have legal responsibility to remove debris
- Activities where Cal OES / FEMA did not approve private property debris removal
- Removal of debris not generated by the disaster
- Removal of:
  - Private vehicles
  - Equipment and materials on private property before the disaster
  - Damaged swimming pools
  - Basements / foundations
  - Reconstruction debris
  - Debris on agricultural lands

PA PROGRAM CATEGORIES OF WORK OVERVIEW

The information below provides a summary of PA Category B Work and summarizes key points for Applicants specific to Emergency Work PA Categories.

CATEGORY B: EMERGENCY PROTECTIVE MEASURES

EPMs include activities undertaken by the Applicant before, during, and following a disaster to eliminate or reduce an immediate threat to life, public health, or safety, or to eliminate an immediate threat of significant damage to improved public or private property.

Eligibility: Work includes, but is not limited to, transportation / prepositioning equipment (prepositioned equipment must have been utilized in the event for eligibility), flood fighting, emergency operations center (EOC)-related operations, medical care and transport, evacuation and sheltering, search and rescue operations, firefighting, and use or lease of generators for essential community services. Potentially eligible Projects include, but are not limited to:

- Search and rescue, including the transportation of disaster victims
- Provision of food, water, ice, and essential services (if Applicant has legal responsibility)
- Activation / staffing of EOCs
- Measures used to prevent further damages to an eligible facility
- Removal of health / safety hazards
- Temporary generators for facilities providing health / safety services
- Emergency communications set-up and security in an emergency area
- Evacuation and sheltering during active disaster response

Potentially Ineligible EPM Work:

- Straight time costs for budgeted staff
- Non-emergency medical treatment costs, labor costs, follow-up treatment costs, and loss of revenue
- Demolishing buildings that were already determined to be a safety threat before the disaster occurred
- Inspection of damaged structures to determine any necessary repairs

KEY POINTS FOR PA APPLICANTS – EMERGENCY WORK (CAT A-B)

- Category A (Debris Removal) and Category B (Emergency Protective Measures) are collectively referred to as Emergency Work because they address immediate threats created by the disaster rather than permanently repairing damaged facilities.
- Emergency Work is performed to save lives, protect public health and safety, safeguard improved property, and ensure the economic recovery of the affected community.
- Unlike Permanent Work (Categories C–G), Emergency Work does not restore facilities to their pre-disaster condition. Its purpose is to stabilize the incident, protect lives and property, and enable communities to safely transition into recovery.
- Because most federally declared disasters require debris removal and immediate emergency actions regardless of the type of damage, Category A and B projects are typically more common than Categories C–G, which only apply when eligible permanent damage to specific facilities has occurred.

For additional information summarizing general technical assistance, review the ***PA Supporting Documentation Overview*** in the Cal OES PA Toolkit.

The information below provides a summary of PA Categories C through G (Permanent Work) and summarizes key points for Applicants specific to Permanent Work PA Categories.

CATEGORY C: ROADS AND BRIDGES

Road and bridge repair work includes, but is not limited to, restoration of components related to road pavement and shoulders, culverts, and low water crossings. This includes repairs to public roads and bridges unless restoration is under the authority of another federal agency.

Eligibility: The Applicant should confirm they have legal responsibility for the repairs being assessed. Federal / State highways that fall under the jurisdiction of the Federal Highway Administration (FHWA) are ineligible for FEMA PA, even for roadways where counties are responsible for repairs and maintenance. Potentially eligible Projects include, but are not limited to:

- Surfaces, bases, and shoulders
- Ditches, drainage structures, and low water crossings
- Decking and pavement
- Piers, girders, and abutments
- Slope protection and approaches

Potentially Ineligible Road and Bridge Work:

- Unmaintained or pre-disaster damaged roads and bridges
- Roads and bridges under a separate federal aid program or jurisdiction
- Private roads (e.g., homeowners' association roads)

KEY POINT: FHWA roads can typically be identified using the Functional Classification (FC) | Caltrans website and reviewing the California Road System - Functional Classification

CATEGORY D: WATER CONTROL FACILITIES

Water control facility work includes restoration of dams / reservoirs, irrigation, water conveyance systems (e.g., canal, pipeline), sediment / debris basins, flood control mechanisms (e.g., levee), navigational waterways, and shipping channels.

Eligibility: To be eligible the Applicant must demonstrate pre-disaster function / capacity of the facility, that the facility was maintained, and they have legal responsibility of the facility. Potentially eligible Projects include, but are not limited to:

- Dams and reservoirs
- Levees
- Lined and unlined engineered drainage channels
- Canals and aqueducts
- Sediment basins
- Shore protective devices
- Irrigation / pumping facilities

Potentially Ineligible Water Control Facility Work:

- Flood control works that fall under the authority of the U.S. Army Corp of Engineers (USACE) or Natural Resources Conservation Service (NRCS)
- Channels or basins restored to an increased capacity from their pre-disaster condition
- Non-engineered non-maintained natural occurring river / stream

CATEGORY E: BUILDINGS AND EQUIPMENT

Buildings and equipment include costs / work that allow for the repair / replacement of structural and non-structural components as well as contents (e.g., furnishings) and equipment within the building.

Eligibility: Applicants must distinguish between damage caused by the incident and pre-existing damage. Potentially eligible Projects include, but are not limited to:

- Structural components, interior work, and electrical / mechanical work;
- Damages caused as a direct result of the disaster and not due to preexisting conditions;
- Replacement of contents (e.g., furniture, consumables, inventory, publications); and
- Damage to equipment used on eligible disaster work that is caused by the disaster, not the result of negligence.

Potentially Ineligible Building and Equipment Work:

- Re-establishing files and records from original information;
- Any equipment or structures that are fully covered by insurance;
- Buildings in violation of codes prior to impact;
- Increased maintenance of equipment used during the disaster; and
- Replacement of damaged equipment caused by an accident that could have been avoided or a result of negligence.

KEY POINT: The Applicant should be able to confirm legal responsibility and that the facility, equipment, or site was maintained and in use before the damage causing event.

CATEGORY F: UTILITIES

Utilities work includes restoration of water storage treatment plants / delivery systems (e.g., power generation, transmission, distribution facilities), natural gas systems, wind turbines, generators, substations, power lines, sewage collection systems, treatment plants, and communication systems.

Eligibility: To be eligible the Applicant should be able to confirm legal responsibility and that the utility was maintained, in use before the disaster, and is part of a public system. The Applicant should also identify if the facility receives funding from another source. Potentially eligible Projects include, but are not limited to:

- Water treatment plants and delivery systems;
- Power generation / distribution facilities (e.g., natural gas, wind, power lines);
- Sewage collection systems and treatment plants; and Other public utilities.

Potentially Ineligible Utilities Work:

- Costs associated with surveys performed to discover if there are damages to the facility;
- Increased operating expenses due to the disaster; and
- Loss of revenue if a utility is shut down due to the disaster.

KEY POINT: Applicants with damages to utilities should identify if the facility receives funding from another federal source.

CATEGORY G: PARKS, RECREATIONAL FACILITIES, AND OTHER

Parks, recreational facilities, and other public facility work includes restoration of parks, playground equipment, public swimming pools, tennis courts, boat docks, piers, picnic areas, golf / disc golf courses, ball fields, fish hatcheries, and ports / harbors, and landfills.

Eligibility: The site must be engineered and improved public property (e.g., parks, trails) open to the public without requirements that exclude the general public (e.g., unaffordable or limiting membership). Potentially eligible Projects include, but are not limited to:

- Mass transit facilities (e.g., railways. airports), swimming pools, playground equipment, bath houses, tennis courts, boat docks, piers, golf courses, picnic tables, and other types of facilities that do not fit in Categories C – F;
- Roads, buildings, or utilities located in parks and recreational areas;
- Engineered and maintained beaches that do not fall under the authority of another entity;
- Natural features (must be improved or maintained); and
- Grass, trees, or ground cover when necessary for slope stabilization and / or erosion control.

Potentially Ineligible Parks, Recreational Facilities, and Other Work:

- Replacement of trees, shrubs, or ground cover, including those in parks or other public facilities (e.g., median strips along the roadway) unless included in as engineered design / purpose; and
- Restoration of sand on natural beaches or berms that is beyond what is necessary for emergency protection.

CATEGORY Z: MANAGEMENT COSTS

Management Costs provide funding for the administrative activities necessary to manage and deliver FEMA Public Assistance projects throughout the recovery process.

Eligibility: Management Costs are associated with the administration of eligible Public Assistance grants and may be incurred throughout the life of the disaster. Potentially eligible activities include, but are not limited to:

- Staff time spent coordinating with FEMA, the Recipient, and other agencies to administer eligible PA Projects;
- Applicant-level management and oversight activities directly related to administering eligible Public Assistance funding.

Potentially Ineligible Management Costs:

- Administrative activities that are unrelated to the management of eligible PA Projects;
- Costs associated with performing or supervising the actual disaster work funded under Categories A–G (these costs should be charged to the applicable project);
- General governmental operating expenses or routine administrative costs that would have been incurred regardless of the disaster;

KEY POINT: Unlike Categories A–G, which fund disaster work, Category Z reimburses the costs of administering FEMA PA grants and managing eligible recovery projects.

PA PROGRAM TIMELINE AND PROCESS STEPS

This document provides a list of the key Process Steps and associated deadlines / timeframe for each based on the FEMA Public Assistance Program and Policy Guide (PAPPG) and FEMA's 2025 PA Program Implementation Timeline.

This material is intended to accompany additional program guidance available from the Cal OES PA Branch.

KEY POINT: These timelines are subject to change based on the evolving nature of FEMA's PA Program Delivery. At the onset of a new event, Cal OES will work with FEMA to develop a disaster specific timeline. The information below reflects typical deadlines to help Applicants prepare.



PROCESS STEP	DEADLINE / TIMEFRAME
Applicant Briefing	Within 30 days from declaration date.
Request for Public Assistance (RPA)	Within 30 days from declaration date.
Recovery Scoping Meeting (RSM)	Within 30 days of RPA Approval.



PROCESS STEP	DEADLINE / TIMEFRAME
Impact List	Applicants must submit within 60 days of the RSM.
Site Eligibility	FEMA dependent following Impact List submission.
Group Impacts and Damages	Completed by FEMA with the Applicant following receipt of the Impact List.
Site Inspections	FEMA completes within 30 days from receipt of Impact List
Damage, Description & Dimensions (DDD)	FEMA completes the DDD within 30 days of site inspection.



PROCESS STEP	DEADLINE / TIMEFRAME
Develop / Validate Scope of Work (SOW) and Costs	Consolidated Resource Center (CRC) develops SOW and costs, (or validates Applicant provided SOW / costs) including within 60 days of completion of Phase II.
Support Hazard Mitigation	Timeframe is based on FEMA response. Applicants are encouraged to coordinate with their assigned Cal OES PA Specialists for assistance / guidance with Hazard Mitigation.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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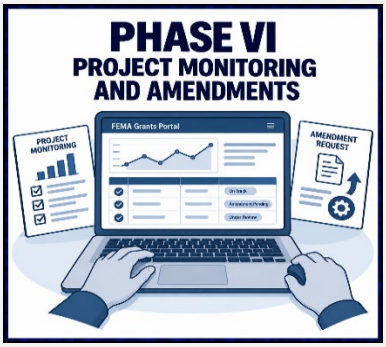
PROCESS STEP	DEADLINE / TIMEFRAME
Environmental and Historic Preservation (EHP) Review	FEMA EHP typically completes compliance review of projects ~14 days from receiving the project.
Final Reviews (i.e., FEMA, Cal OES, and Applicant)	FEMA's operational performance target is to complete 90% of final project reviews within 20 days of entering Phase IV.

KEY POINT: During DR-4856 FEMA implemented a 7-day period for Cal OES to complete Recipient Final Review, and 7 days for the Applicant to complete Applicant Final Review.



PROCESS STEP	DEADLINE / TIMEFRAME
Obligation of Funds	FEMA targets obligation within 3 days of Applicant signature or completion of the LPN process, subject to required reviews and approvals.
Recovery Transition Meeting	In general, the PDMG conducts an RTM once the Applicant has signed all of their Project Applications.

KEY POINT: FEMA Obligation of funding, although indicated to occur "within 30 days of completion of Phase 4" may take considerably longer. In addition, FEMA may initiate the RTM before all Project applications are signed depending on the disaster.



PROCESS STEP	DEADLINE / TIMEFRAME
Quarterly Reporting	Applicants submit quarterly reports and participate in quarterly review meeting.
Appeals	Applicant has 60 days from the confirmed receipt of FEMA's determination. Cal OES has 120 days from receiving the appeal to review and submit recommendation to FEMA.



PROCESS STEP	DEADLINE / TIMEFRAME
Project Completion and Certification Report (P.4 Form)	~90 days from SOW completion.
Final Inspection Report	~180 days from SOW completion.
Close Subrecipients	~180 days from Work Completion date or Project Deadline, whichever is first.

For additional information summarizing general technical assistance, review the ***PA Closeout Overview*** in the Cal OES PA Toolkit.

PA APPLICANT ROLES AND RESPONSIBILITIES

This document summarizes common PA Applicant roles and responsibilities specific to PA Program Delivery.

The FEMA PA process requires active participation and coordination among the Applicant, Cal OES, and FEMA. Each has roles and responsibilities throughout the PA process, working together to support Project development, eligibility review, documentation, and funding.

APPLICANT / SUBRECIPIENT RESPONSIBILITES

Program Management:

- Designate a primary point of contact who can make decisions and coordinate with Cal OES and FEMA
- Identify technical subject matter experts (e.g., Public Works, Finance, Engineering, Facilities, Procurement, Environmental) to support project development
- Attend required meetings and maintain regular communication with your Cal OES PA Specialist and FEMA Program Delivery Manager (PDMG)

Documentation:

- Maintain complete disaster documentation from the beginning of the incident
- Submit documentation that supports: Damage, Cause of damage, Emergency response activities, Permanent repairs, Cost, Procurement, Insurance, Environmental compliance
- Organize records by project whenever possible
- Notify Cal OES and FEMA immediately if staffing changes occur

Project Development:

- Identify all damaged facilities and impacts
- Participate in site inspections
- Review Damage Descriptions and Dimensions (DDD) for inaccuracies and discuss with assigned Cal OES PA Specialist
- Review Scope of Work (SOW) and cost estimates before project approval
- Identify opportunities for Section 406 Hazard Mitigation improvements

Communications:

- Respond promptly to Requests for Information (RFI)
- Meet established deadlines or request additional time before deadlines expire
- Inform Cal OES and FEMA when project conditions change
- Notify FEMA before performing work that could affect eligibility if questions exist

Financial Management:

- Track all disaster related costs separately
- Maintain labor, equipment, material, and contract documentation
- Maintain procurement records
- Monitor project expenditures against approved scopes of work
- Submit required Quarterly Progress Reports (QPR), when applicable

Key Point: Once the Project Application is signed, the Applicant becomes the Subrecipient for grant administration purposes and remains responsible for managing the project until final closeout.

PA STATE AND FEMA ROLES AND RESPONSIBILITIES OVERVIEW

This document summarizes common Cal OES, and FEMA roles and responsibilities during a Federally led, State supported disaster recovery operation.

CAL OES - PA POSITIONS

POSITION	ROLES AND RESPONSIBILITIES
As the Recipient, Cal OES administers the PA Program on behalf of the State and serves as the primary point of coordination between FEMA and Applicants. Cal OES supports Applicants with program requirements, documentation, project development, compliance, and reimbursement activities throughout the PA process.	
JFO PA Specialist	• Serves as the main Cal OES point of contact and advocate for Applicants throughout the PA process • Coordinate frequently with the FEMA Program Delivery Manager (PDMG) and the Applicant to support completion of all requirements • Monitors Grants Portal and informs Applicants of status / deadlines • Tracks / reminds the Applicant of upcoming deadlines • Coordinates with the Applicant on FEMA required tasks / RFIs • Coordinates with JFO PA Leadership on any complex / priority projects

FEMA POSITIONS

POSITION	ROLES AND RESPONSIBILITIES
JFO Program Delivery Manager (PDMG)	• FEMA point of contact for the Applicant and Cal OES JFO PA Specialist • Conducts the Exploratory Call, Recovery Scoping Meeting, and confirms completion of the Project Development Plan (PDP) • Coordinates with Cal OES and the Applicant to develop the Impact List and group sites / facilities / damages into projects • Generates Site Inspection (SI) work orders and reviews DDD and SI Reports for eligibility • Generates, sends, and reviews RFIs to the Applicant
FEMA Site Inspector	• Schedules and conducts SIs for impacts reported by the Applicant and validates Applicant-provided site inspection information • Develops and validates SI Reports • Monitors project formulation for proper development based on site inspection results and documents collected
CRC Costing Specialist	• Develops a SOW, in coordination with Cal OES and the Applicant, for uncompleted work based on the DDD, SI Report, and documentation • Estimates costs for projects with uncompleted work based on the SOW • Reviews Projects with potential eligibility concerns • Initiates RFIs for FEMA to send to the Applicant
CRC Document Validation Specialist	• Validates detailed DDD, Scope of Work (SOW), and cost estimates • Reviews projects for potential eligibility concerns • Initiates RFIs for FEMA to send to the Applicant
CRC Specialist Review	• Conducts additional compliance reviews (e.g., insurance, Environmental and Historic Preservation (EHP), Mitigation, Quality Assurance) as applicable by project type / damages
FEMA EHP	• Reviews proposed work for compliance with EHP requirements

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
PA STATE AND FEMA ROLES AND RESPONSIBILITIES OVERVIEW

The diagram below details the types of FEMA offices commonly involved in the delivery of PA for Federally led, State supported disaster recovery operations.

FEMA HEADQUARTERS (HQ)
Provides national oversight of the PA program, including policy and strategy development and coordinate national resources.

FEMA CONSOLIDATED RESOURCE CENTER (CRC)
Provides programmatic, compliance, and project processing support for all PA events nationwide.

JOINT FIELD OFFICE (JFO)
A temporary organizational structure is established to provide federal support when a federal disaster is declared.

FEMA REGION IX (REG)
Primarily responsible for directing the delivery of the PA Program.

The process below summarizes the common workflow for project development within FEMA. Cal OES PA Specialists should proactively engage in each step and consistently advocate for the Applicant through each phase and office within FEMA. The column to the right facility where the most work is conducted specific to each Phase.

PA PROJECT DEVELOPMENT / FEMA	
 **PHASE I:** During this phase, FEMA provides an overview of Public Assistance, conducts Recovery Scoping Meetings, and initiates a list of damage impacts with the Applicant.	JFO
 **PHASE II:** During this phase, FEMA supports the Applicant in finalizing and grouping impacts into projects. FEMA also conducts site inspections, develops the DDD, and collects project documentation.	JFO
 **PHASE III:** During this phase, FEMA and the Applicant use the DDD to develop a SOW to describe the project's type of work, completion timeframe, and estimated costs.	CRC
 **PHASE IV:** During this phase, FEMA and Cal OES complete reviews to approve the project application (e.g., Environmental and Historic Preservation, insurance). The Applicant signs the final Project Application.	JFO
 **PHASE V:** During this phase, FEMA obligates funding to Cal OES. FEMA also conducts the Recovery Transition Meeting, which signifies the end of the JFO structure. The majority of FEMA staff return to the region, and new staff may be assigned to support Applicants.	JFO
 **PHASE VI:** During this phase, Cal OES and FEMA monitor projects until projects are ready for closeout, including maintaining QPRs, processing amendment / time extension requests, assisting appeals, and disbursing funds.	REG
 **PHASE VII:** During this phase, Cal OES and FEMA work to closeout all projects and Subrecipients. After the closeout of all projects and Subrecipients, Cal OES will request to close the incident.	REG

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

SMART GUIDE FOR SMALL AND LARGE PROJECTS

This guide provides step-by-step instructions for managing Small and Large PA Projects, including documentation requirements, processing workflows, and financial reconciliation activities, with a specific focus on handling FEMA Small Project cost variances and limits.

SMALL PROJECTS SUMMARY

Small Projects are those with total eligible costs below the FEMA-established threshold for the fiscal year the disaster was declared in. For Fiscal Year (FY) 2025, the threshold is $1,062,900. These projects use a streamlined documentation process compared to Large Projects.

- **Applicants can confirm a small project classification** by verifying that the project's scope and estimated cost fall below the $1,062,900 threshold. For example, repairing a local park restroom facility with estimated eligible costs of $350,000 qualifies as a Small Project.

SMALL PROJECT PROCESS

Initial Project Development

- Identify the project type according to FEMA's Categories of Work
- Record the project scope, location(s), estimated costs, and category in a secure tracking system (Excel spreadsheet, Grants Portal (GP), or internal system).
- Collect and retain base documents such as insurance, payroll, and procurement policies relevant to the facility or work performed.

Document Collection and Cost Documentation Requirements

- Proof of payment and evidence of work completion / eligibility are the focus.
- If the work is not yet completed, cost estimates, contracts/bids, design documents, or an engineer's estimate may be used to estimate the approved project amount.
- This level of documentation may not be required to obligate Small Projects with "work to be completed"; however, all supporting documentation must be maintained and made available to FEMA or Cal OES upon request or for audit purposes. This documentation includes, but is not limited to:
  - Materials/Supplies: Itemized summaries, invoices, receipts, inventory records.
  - Labor: Timesheets, payroll records, pay policies.
  - Equipment: Usage logs, operator info, rate summaries, proofs of payment.
  - Contracts: Contract summaries, invoices, procurement records, proofs of payment.
  - Mutual Aid: Written agreements, cost summaries, proofs of payments.
- Connect payment documents (e.g., checks, electronic transfer) reports to the correct invoice or contract, showing payer, payee, total amounts, date, and payment status.
- Organize supporting evidence by type and date, matching documents to claims.

Validation and Monitoring

- Large Projects may be selected for FEMA Validate As You Go (VAYGo) reviews to substantiate reimbursement request.
- All Category Z management cost projects are subject to Cal OES VAYGo review.
- For actual costs, FEMA issues a 15-day Requests for Information (RFIs) response requirement; if necessary documents are not submitted within this window, an extension request with a specific date is mandatory to avoid adverse determinations.
- For estimated costs, the RFI deadline is extended to 30 days, after which insufficient responses may push the project to a Cost Review Committee without further reconsideration for unsupported items. Respond promptly (preferably within 30 days) to RFI and provide all missing documentation as requested.

SMALL PROJECT PROCESS (CONTINUED)

Project Closeout and Financial Reconciliation

- Certify eligible costs and payments aligned with the approved Scope of Work (SOW).
- Upload final proofs of payment to Grants Portal and complete the Project Completion and Certification Report (P.4).

Small Project Cost Reconciliation: Net Small Project Underruns and Overruns

- Small Project costs should be tracked and reconciled internally as work is completed. At closeout, final costs will be reconciled in aggregate across all Small Projects.
- A **Net Small Project Underrun (NSPU)** exists when actual reconciled costs are less than the FEMA-approved amount for all Small Projects in aggregate.
- **A Net Small Project Overrun (NSPO)** exists when actual costs exceed the FEMA-approved amount for all Small Projects in aggregate.
- Document all cost variances during reconciliation and provide a concise explanation.
- NSPUs do not require a de-obligation or the return of excess FEMA funds but may result in an adjustment to California Disaster Assistance Act (CDAA) funding / cost share to align with the documented / substantiated costs only.
- NSPOs require a complete programmatic / documentation review of all expended costs for Small Projects to evaluate the eligibility of potential additional funding.
- An NSPO is an Appeal and must be requested within 60 days of completing the last Small Project. If all of the Subrecipient's Small Projects have not been Obligated at that time, then the Subrecipient is allowed 60 days from the date FEMA Obligated its last Small Project to submit an appeal. **Late NSPO submissions will result in the Subrecipient assuming responsibility for any cost overruns.**
- NSPO Appeals MUST be submitted electronically via Grants Portal. Additionally, it is recommended that a copy be emailed to Cal OES at DisasterRecovery@CalOES.ca.gov

BEST PRACTICES FOR SMALL PROJECTS

- Maintain organized, accessible documentation and upload as soon as possible.
- Retain copies of all receipts, payroll, and proofs of payment for the full FEMA retention period or in alignment with the Subrecipient's retention policy, whichever is longer.
- Separate documentation and costs for FEMA-eligible work from ineligible work, especially under the same contract.
- Create an audit-ready trail of documentation from project approval until closeout.
- Provide clear explanations for cost codes or unusual items to reviewers.

CDAA CONSIDERATIONS

CDAA makes no differentiation between Project sizes and requires full documentation to receive any CDAA funding. Key points for Subrecipients include:

- Full documentation ***must*** be provided to receive CDAA funding for a cost share.
- Failure to provide full documentation ***will*** result in the deobligation of CDAA funds.
- Even if FEMA does not require full documentation to provide PA funding, CDAA requires comprehensive documentation to validate ***all*** costs and expenditures for the entire project to provide the State cost share.

For additional information summarizing NSPOs, review the ***Net Small Project Overrun Fact Sheet*** in the PA Applicant Toolkit.

The information below provides a summary of Large Projects and associated processes.

LARGE PROJECTS SUMMARY

Large Projects are those which exceed the FEMA Small Project threshold, meaning total eligible costs are greater than $1,062,900(i.e., FY 2025 threshold). These projects require more detailed documentation, review, and processing.

- **Example:** Reconstruction of a city bridge damaged by an earthquake with estimated eligible costs over $2 million qualifies as a Large Project.

LARGE PROJECTS PROCESS

Initial Project Setup

- Identify the project category and confirm it qualifies as a Large Project.
- Record the Project's details including scope of work, locations, and anticipated costs into a cost recovery tracking system (Excel, Grants Portal).
- Gather base documents including insurance, payroll, and procurement policies.

LARGE PROJECTS SUMMARY (CONTINUED)

Detailed Documentation Collection

- Full supporting documentation is required to substantiate all claimed costs including, but not limited to: invoices, receipts, labor records, timesheets, contracts, equipment logs, vendor agreements, and procurement justifications.
- Maintain detailed logs and audit trails demonstrating eligibility and cost reasonableness.

Ongoing Monitoring and Validation Cycles

- Large Projects undergo rigorous validation cycles such as VAYGo or other Cal OES/FEMA monitoring processes.
- Submit all requested documentation fully and promptly in response to FEMA Requests for Information (RFI).

Cost Revisions and Change Orders

- Any scope or cost changes require formal change orders with written justification, technical reports, and must be approved by Cal OES/FEMA prior to performing work.
- Document all changes carefully to avoid eligibility issues or disputes during reconciliation.

Project Closeout

- Financial reconciliation must certify all actual costs approved SOW.
- Submit final cost documentation and proofs of payment.
- Document all change orders, cost adjustments, or Appeals in closeout documentation.

BEST PRACTICES FOR LARGE PROJECTS

- Keep all documentation distinct and well-organized.
- Retain all source documents for the full retention period for audit readiness.
- Monitor project progress and expenditures closely to anticipate scope or cost changes.
- Engage in regular communication with Cal OES/FEMA to proactively resolve issues throughout the Project lifecycle.
- Maintain a comprehensive tracking log of all costs, supporting documents, and project activities.

For additional information specific to PA Project documentation, review the ***PA Supporting Documentation Job Aid*** as part of the Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA DUPLICATION OF BENEFITS OVERVIEW

This document provides PA Applicants an overview of Duplication of Benefits (DOB) including what it is, why it matters, and Applicant responsibilities for identifying, documenting, and avoiding duplicate funding from multiple sources.

The following information provides an overview of DOB and summarizes methods for determining if a duplication of benefits has occurred.

DUPLICATION OF BENEFITS OVERVIEW

The US Code of Federal Regulations (42 U.S.C. § 5155) requires FEMA to ensure that no person, business, or other entity will receive FEMA disaster assistance if they have received financial assistance from insurance, another funding program, or any other source for the same work. In other words, a DOB occurs when an Applicant receives assistance from multiple sources for the same disaster-related loss, and the total amount exceeds the documented need for that loss. By law, federal assistance cannot duplicate aid provided by other sources.

DUPLICATION OF BENEFITS - METHODS OF DETERMINATION

FEMA determines if benefits have been duplicated through a combination of Applicant self-reporting, data-sharing agreements with other agencies and insurers, and compliance audits.

- **Applicant Self-Reporting**: All Applicants are legally required to disclose all forms of disaster assistance they have received or are expecting to receive from sources like insurance claims, Small Business Administration (SBA) loans, and other private or voluntary agency grants.
- **Data Sharing and Coordination**: FEMA has data-sharing agreements with other federal entities, including the SBA and Department of Housing and Urban Development (HUD) grantees. These agreements are used to cross-reference Applicant data and identify potential overlaps in assistance. This also helps ensure that each agency provides assistance in a specific sequence of delivery to prevent DOB.
- **Documentation Review**: FEMA and its partner agencies review documentation, such as insurance claim summaries, receipts for repairs, and contract records, to verify how funds were expended and to ensure they were not used for the same purpose as other benefits received.
- **Compliance Audits**: FEMA conducts random audits of case files to ensure that a DOB has not occurred and that established procedures have been followed.
- **Ineligibility Determinations**: A DOB is a common reason for an initial FEMA ineligibility determination. In such cases, the Applicant is notified and given an opportunity to provide additional documentation to clarify how the funds were used or demonstrate unmet needs.

Disaster benefit processes often have lengthy time frames. In particular, insurance and legal provisions may result in funds being received, or audits identifying a potential DOB, years after project closeout. This is one reason why long-term retention of disaster recovery records is considered a best practice.

PA DUPLICATION OF BENEFITS OVERVIEW

The following information provides guidance to resolve potential DOB and summarizes technical guidance for PA Applicants.

RESOLVING DUPLICATION OF BENEFITS

If a DOB is found, Recipients may be required to return the duplicative funds to FEMA. Applicants can appeal this decision within 60 calendar days of FEMA's official determination date by providing documentation demonstrating that funds were used for different purposes or that unmet recovery needs remain. Types of assistance that might result in a DOB with FEMA PA include, but are not limited to:

- **Insurance Payouts**: Payments from building, equipment, fire, or flood insurance (specifically the National Flood Insurance Program) for covered damages to a facility.
- **Legal Settlements**: Funds from legal awards or settlements that cover the same damages. This includes funds / legal settlements from any third-party found to be legally liable for property and / or infrastructure damage.
- **Small Business Administration (SBA) Disaster Loans**: The amount of an approved SBA loan that covers the same repair or replacement costs as FEMA assistance. While individuals are not required to accept a loan offer, the *amount offered* may still be considered a potential benefit that cannot be duplicated by other federal sources.
- **Other Federal, State, or Local Government Programs**: Grants or loans from other federal agencies (e.g., HUD Community Development Block Grant Disaster Recovery funds) or from state and local programs that serve the same purpose, unless permitted under the terms of the grant or loan and approved by FEMA.
- **Nonprofit and Charitable Organization Assistance**: Aid (financial or in-kind repairs) from voluntary agencies and community foundations when the assistance is specifically for the same repair or item that FEMA would fund. These costs may be included in a Donated Resources Project and applied toward the non-federal cost share.
- **Non-Federal Grants and Cash Donations:** Funds designated for the same purpose as eligible work may be applied toward an Applicant's non-federal cost share.
- **404 Hazard Mitigation Grant Program (HMGP):** The Applicant may use both PA 406 Hazard Mitigation and 404 HMGP funds for mitigation measures on the same facility, but NOT for the same work. FEMA expressly prohibits using funds from one mitigation program to satisfy the non-Federal cost share for work funded by another mitigation program.

For additional information related to DOB, review the ***PA Donated Resources Job Aid*** in the Cal OES PA Applicant Toolkit.

PA DUPLICATION OF BENEFITS OVERVIEW

The following information provides technical guidance for PA Applicants as well as a summary of key points specific to DOB.

TECHNICAL GUIDANCE FOR APPLICANTS

Understanding DOB is essential to maintaining eligibility for FEMA PA funding and ensuring disaster recovery costs are reimbursed appropriately. In general, a DOB occurs when an Applicant receives funding from multiple sources for the same eligible purpose or loss, resulting in total assistance that exceeds the actual documented need.

- **Same Purpose, Same Loss:** Duplication only occurs if the assistance is for the exact same purpose (e.g., building repair). Aid for different purposes which are not eligible for PA is generally not considered duplicative.
- **Documentation is Crucial:** Applicants must disclose all forms of assistance received and are urged to keep receipts for all expenditures for at least three years after the final project closeout. Providing documentation that funds were used for a different, non-duplicative purpose can prevent a DOB determination.
- **Assistance Does Not Exceed Need:** The total assistance received from all sources cannot exceed the total documented cost to restore the facility to its pre-disaster, form, function, and capacity.
- **Requirement to Pursue Legal Settlements**: When a third-party causes damage (e.g., oil spills, fire caused by power company equipment) or increases the cost of repair or cleanup, and the Applicant requests FEMA funding for the costs, FEMA requires the Applicant to make reasonable efforts to recover any costs it is entitled to receive from the third-party.

DUPLICATION OF BENEFITS KEY POINTS

- Relief funds may come from any number of sources. It is important to define and track which specific relief area or project each source will fund.
- Funds are not considered to be a duplication of FEMA benefits when applied to:
  - Costs not eligible for FEMA reimbursement;
  - Costs that exceed FEMA assistance, but not the overall documented need; and
  - Costs not approved for FEMA reimbursement.
- Identifying all sources of disaster assistance and carefully applying non-FEMA funds to areas of need not covered by FEMA is essential to avoid DOB while maximizing relief for impacted communities.
- If the Applicant receives funds from a third-party for both eligible and ineligible work or losses, FEMA determines the offset amount based on either the proceeds identified in the settlement documentation as covering eligible losses or the ratio of eligible losses to total losses. FEMA deducts only the portion of the third-party payment that covers the same eligible damage FEMA would otherwise fund.

For additional information specific to PA Program Delivery, review the ***PA Program Delivery Phases***, ***PA Program Deadlines***, *and the* ***PA Supporting Documentation Overview*** in the Cal OES PA Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA PROJECT FORCE ACCOUNT LABOR JOB AID

This Job Aid provides PA Applicants with an overview of Force Account Labor (FAL) including FEMA eligibility considerations, documentation requirements, and key points specific to FAL.

FORCE ACCOUNT LABOR SUMMARY

FAL is work performed by a PA Applicant's own permanent or temporary employees to carry out eligible Emergency or Permanent Work, rather than work performed by an outside contractor. Examples of FAL include, but are not limited to:

- Public Works crews clearing debris from roads using city-employed staff;
- Utility department employees repairing damaged water or sewer lines after a disaster; or
- Police or fire personnel working overtime to perform emergency protective measures (e.g., traffic control, evacuations)

FORCE ACCOUNT LABOR FEMA ELIGIBILITY

Under the FEMA PA Program, FAL is eligible when an Applicant's own employees perform work that is necessary, reasonable, and directly tied to an approved disaster-related activity. In the context of the FEMA PA Program, "necessary" means the work—including associated FAL costs—is required to address an immediate threat, restore essential services, or complete eligible disaster-related repairs—without being excessive or unrelated to the incident. Specific eligibility requirements include:

- Work must be required as a direct result of the declared incident
- Labor must support eligible work and be fully documented
- Costs must be reasonable and consistent with the Applicant's normal policies (including overtime rules)
- Labor cost eligibility depends on the labor policy in effect **prior** to the start of the incident
- For Emergency Work (i.e., Categories A & B), straight-time labor costs for budgeted employees are generally ineligible, while overtime labor costs are eligible.
- For unbudgeted employees performing Emergency Work, costs for both straight-time and overtime labor hours are eligible
- For Emergency Work, labor eligibility varies based on the type of work and whether employee hours are budgeted or unbudgeted—Generally, overtime is eligible; straight-time eligibility is subject to FEMA requirements
- For Permanent Work (i.e., Categories C – G), straight-time and overtime pay are eligible for budgeted and unbudgeted employee labor costs
- Work must be related to an eligible activity or Project for costs to be eligible
- Costs must be properly documented (e.g., timesheets, labor classifications, pay rates).
- Must comply with procurement standards and applicable Federal, State, and local laws
- FEMA will reimburse for accrued compensatory time as long as the proposed Applicant's methodology and claims are consistent with their established pre-disaster pay policy.

KEY POINT: For Emergency Work performed by a private non-profit (PNP) entity's FAL, costs must be submitted through a local authority / agency with **the legal responsibility to perform the work** and cannot be submitted by the PNP.

While emergency activities provided by PNPs may be helpful and fit within the PNPs internal mission statement / purpose, the costs of the services will *NOT* be eligible for the PA Program if the PNPs "self-deploy," or perform "Emergency Work" based on their own assessment of need.

PA PROJECT FORCE ACCOUNT LABOR JOB AID

The information below provides additional information summarizing Force Account Labor supporting documentation and key points for PA Applicants.

FORCE ACCOUNT LABOR DOCUMENTATION GUIDANCE

Thorough documentation of FAL is critical to substantiate and verify that work was eligible, necessary, and properly costed. Without clear and thorough documentation, PA reimbursements may be reduced, delayed, or denied. Proper documentation to substantiate FAL includes, but is not limited to:

- Daily timesheets that identify each employee, date, hours worked (straight vs. overtime), specific disaster-related tasks performed, and the associated project or site;
- Labor classifications and fully burdened rates (e.g., hourly pay, employer paid health insurance, retirement contributions, worker's compensation) tied to payroll policies or union agreements;
- Activity logs or work reports describing the location, scope, and purpose of the work which is directly tied to eligible work;
- Clear separation of eligible vs. ineligible work (e.g., disaster response vs. routine duties);
- Overtime authorization records showing when and why overtime was required;
- Force Account Equipment usage records (if applicable) tied to an operator performing eligible work;
- Organizational records (e.g., employee rosters) to distinguish permanent, temporary, and reassigned staff;
- Payroll records (e.g., pay stubs, general ledger entries) that support costs claimed;
- Cost summaries that reconcile timesheets to total claimed labor amounts;
- Applicable labor policies (e.g., overtime, backfills, standby time) demonstrating costs are consistent with normal practices;
- Photographs, maps, or incident logs to demonstrate that the work was disaster-related and necessary; and
- Retention of all records in accordance with FEMA and State / Federal recordkeeping requirements for audit purposes.

KEY POINTS - APPLICANTS

For Applicants participating in the FEMA PA Program, employing a few of the following best practices can help avoid the most common FAL pitfalls:

- **Track work activities daily and in detail**—vague or retroactive timesheets are a leading cause of scrutinized / denied costs.
- **Clearly distinguish each labor hour for eligible, disaster-related work** from routine or mixed activities (non-disaster related work / activities).
- **Apply pre-disaster pay policies consistently** (especially overtime vs. straight time).
- **Maintain complete, accurate, and reconcilable documentation** (e.g., timesheets, payroll, and cost summaries).
- **Follow your policies:** Costs must align with your established labor and pay policies.

For additional information specific to Procurement and documentation, review the ***PA Project Procurement Overview*** and ***PA Supporting Documentation Job Aid*** in the PA Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA PROJECT PROCUREMENT OVERVIEW

This guide provides PA Applicants with an overview of the federal procurement standards applicable to eligible entities and information about the regulations for administering grant funds appropriately to maximize reimbursement funding.

KEY POINT: This document is not intended to serve as legal advice, but rather to provide a brief overview of key points, procurement rules and regulations, and basic technical guidance. All **PA Applicants should consult their legal counsel for procurement guidance** and confirm alignment with federal laws, regulations, and the ***current*** Federal Emergency Management Agency (FEMA) *PA Program and Policy Guide* (PAPPG).

Applicants are responsible for maintaining clear documentation, demonstrating full and open competition, and ensuring contracts align with federal regulations. **Cal OES cannot guarantee that adherence to the items in this Job Aid will result in full reimbursement of Project costs** and recommends reviewing the requirements in Title 2 Code of Federal Regulations (CFR) 200 and the current version of FEMA's *Procurement Under Grants Policy Guide*.

PROCUREMENT OVERVIEW

Procurement is the process by which Applicants acquire goods (i.e., equipment, resources, supplies) and services necessary to carry out eligible disaster response and recovery work. Within the FEMA PA Program, procurement must be conducted in a manner that is fair, competitive, and compliant with applicable local, State, and Federal requirements. Following proper procurement standards helps support eligibility for reimbursement and reduces the risk of delays, costs disallowances, or deobligation of funds.

RULES, RESOURCES, AND AUTHORITIES

Applicants must follow applicable Federal regulations, policies, and guidance when conducting procurement under the FEMA PA Program. These authorities establish the requirements for full and open competition, contract administration, cost reasonableness, and documentation necessary to support eligibility for reimbursement:

Primary Regulations and Policy Guides:

- Title 2 CFR Part 200
- 2 CFR 200.317-200.327
- Procurement Under Grants Policy Guide (current version)
- FEMA Contract Provisions Guide (current version)
- FEMA Roadmap to Procurement Compliance (current version)

Additional Key FEMA Guidance:

- PAPPG (current version)
- 44 CFR Part 206

Applicants are responsible for ensuring that all procurement actions comply with these authorities, as well as any applicable state and local procurement requirements. When conflicts arise, the most restrictive applicable requirement should be followed to maintain compliance and protect eligibility for FEMA reimbursement.

For additional information summarizing documentation to support PA eligibility, review the ***PA Supporting Documentation Job Aid*** in the PA Applicant Toolkit.

The following information summarizes common procurement methods and contract structures used under the FEMA PA Program.

PROCUREMENT OF SERVICES AND CONTRACT TYPES

Applicants must select procurement methods and contract types that align with federal requirements, promote full and open competitions, and ensure costs are reasonable and necessary. The following are common procurement methods and contract structures used under the FEMA PA Program.

Non-competitive / Sole Source:
Used only under limited circumstances as defined in 2 CFR 200.320, such as when there is an emergency that will not permit a delay, when only one source is available, or after solicitation of multiple sources results in inadequate competition or FEMA authorization.

- Must be fully justified and documented.
- Requires cost analysis and demonstration of price reasonableness (emergency / exigent circumstances provide some exceptions – see *Special Rules During Emergencies and Exigencies* section below)
- Often subject to heightened FEMA scrutiny.

Sealed Bid (Formal Advertising):
Typically used for construction projects where clear specifications are available.

- Publicly advertised with fixed specifications.
- Awarded to the lowest responsive and responsible bidder.
- Preferred method when conditions allow for clear scope and price competition.

Request for Proposal (RFP):
Used when conditions are not appropriate for sealed bids and factors other than price are considered.

- Includes evaluation criteria (e.g., technical approach, experience, cost).
- Allows for negotiations.
- Award is made to the most advantageous proposal, not necessarily the lowest cost.

Request for Qualifications (RFQ):
Used to evaluate contractor qualifications, typically for architectural and engineering (A & E) services.

- Selection is based on qualifications, not price (consistent with Brooks Act requirements – 40 U.S.C. §§1101–1104).
- Price is negotiated after selection of the most qualified firm.
- Common for complex or specialized services.

"Piggybacking":
Use of an existing contract procured by another entity.

- Must have been originally procured in compliance with federal procurement standards.
- Contract must allow for cooperative or shared use.
- Applicant must still perform due diligence to ensure compliance and cost reasonableness.
- **Not recommended by FEMA** because the original underlying contract often does not meet all of the federal procurement standards, having often been issued under different circumstances and for a different scope of work.

PROCUREMENT OF SERVICES AND CONTRACT TYPES (CONTINUED)

Fixed-Price Contracts:
Provides a set price for a defined Scope of Work (SOW).

- Preferred by FEMA when scope is well defined.
- Minimizes risk to the Applicant.
- Encourages cost control and efficiency by the contractor.

Time and Materials (T&M):
Used when the SOW cannot be clearly defined at the outset.

- Includes labor rates and material costs.
- Must include a not to exceed ceiling price.
- Requires close monitoring and documentation; only appropriate for short-term emergency work per 2 CFR 200.318.

Cost-Reimbursement Contracts:
Generally used when the exact SOW, quantity, or duration cannot be reliably determined in advance.

- Requires strong oversight and documentation.
- May include cost-plus-fixed-fee or cost-plus-award-fee structures.
- **Cost-plus-percentage contracts (CPPC) and percentage-of-construction-cost (PCC) methods are prohibited; increased costs associated with these methods are not eligible for PA funding.**

Applicants should select the procurement method and contract type that best aligns with Project conditions, while maintaining compliance with Title 2 CFR Part 200 and applicable FEMA guidance. Proper documentation, justification, and oversight are critical to ensure eligibility for PA reimbursement. When looking at reconstruction, the information below provides common (FEMA eligible) sequences of delivery to contract rebuild projects.

Design-Bid-Build (DBB):
Traditional method where design and construction are procured separately.

- Allows for clear scope definition prior to bidding.
- Typically uses sealed bid procurement.
- Longer timeline but often lower risk and greater cost control.

Design-Build (DB):
Combines design and construction under a single contract.

- Can accelerate project delivery.
- Requires use of RFP or qualifications-based procurement.
- May introduce complexity in cost evaluation.
- Requires careful documentation to ensure compliance.

KEY POINT: A **CPPC** contract is a cost-reimbursement contract containing some element that commits the contracting entity to pay the contractor an amount in the form of either profit or cost (entitlement), undetermined at the time of the contract award, based on a percentage of future costs.

- Payment is made at a pre-determined percentage rate;
- The pre-determined percentage rate is applied to actual performance costs;
- The contractor's entitlement is uncertain at the time of contracting; and
- The contractor's entitlement increases with increased performance costs

The following information summarizes procurement of goods under the FEMA PA Program, provides examples related to FEMA regulations, and includes key points for Applicants.

PROCUREMENT OF GOODS

The purchase of goods and materials may not require a contract in the methods framed above. For example, purchasing a piece of equipment would not require a time and materials contract – a purchase order would be more appropriate. However, there are still applicable procurement rules that should be followed. The Simplified Acquisition Threshold (SAT) establishes limits for FEMA, but each organization may have lower limits. The following provides examples of procurement of goods in accordance with FEMA procurement requirements.

- **Under Cost Threshold for Durable Goods:**
  A public works department needs to replace several damaged chainsaws and safety equipment following a disaster. The total purchase cost falls below the organization's small purchase threshold. The Applicant obtains the required quotes or follows its local purchasing procedures, documents the purchase, and retains receipts and records.
- **Above Cost Threshold for Durable Goods:**
  A utility district needs to purchase a replacement front loader valued above its procurement threshold. The Applicant conducts the required competitive procurement process, documents vendor selection, and maintains all procurement records, quotes, bids, and purchase documentation.
- **Purchase versus Lease:**
  An Applicant needs a front loader to support debris removal operations. Before acquiring the equipment, the Applicant evaluates whether purchasing or leasing is the most cost-effective option based on the anticipated duration of use, operational needs, maintenance costs, and long-term value. The analysis and decision should be documented and retained in the procurement file.

Under FEMA PA regulations, durable goods with a cost of $10,000 or more are generally subject to federal property management requirements, and applicants must maintain inventory records, account for use, retention, transfer, or disposal as a condition of eligibility.

- **Durable goods** are items with an expected useful life of more than one year that can be used repeatedly without being consumed, such as generators, pumps, tools, and equipment.
- **Non-durable goods** are consumable items that are used up, depleted, or discarded during operations, such as fuel, sandbags, food, water, medical supplies, and personal protective equipment (PPE).

KEY POINTS - PROCUREMENT OF GOODS

- If an Applicant's limits are lower than FEMA's SAT, the Applicant must follow their policy / limits for procurement of goods. The most stringent rules must be followed.
- In some circumstances, an Applicant may commit to a lease for goods. While a lease is often viewed as a type of contract, this is still considered procurement of goods.
- Applicants should maintain documentation of the procurement process, including quotes, bids, purchase orders, invoices, receipts, and rationale for vendor selection.
- In some cases, FEMA may offset the value of a durable good if it has a useful life beyond the disaster-specific use.

The following information describes special rules during emergencies, competition requirements, and contract changes / modifications.

SPECIAL RULES DURING EMERGENCIES AND EXIGENCIES (EXPIRE QUICKLY)

Public Emergency	Public Exigency
An unexpected and dangerous situation that threatens life, public health, or safety, or improved property.	A particular situation requiring immediate aid or action, often resulting from a public emergency.

- Competitive solicitation requirements are waived during emergency and exigency situations that require immediate response.
  - Note: Waivers are only allowable during the actual exigent or emergency circumstances. It cannot be used after the immediate crisis is averted.
- Contracts entered into under exigent or emergency circumstances without competitive procurement should include a termination-for-convenience clause to be replaced immediately following the end of the emergency/exigency period.
- While not required by regulation, it is advisable to document an account of the circumstances that justified the necessity of an immediate response/procurement, in case the contract is called into question at a later date.

FULL COMPETITION REQUIREMENTS

Federal procurement standards require Applicants to conduct procurement actions in a manner that provides full and open competition, consistent with Title 2 CFR Part 200.

- Open Process: Procurement actions should be publicly advertised or otherwise solicited in a manner that promotes fair and open competition among qualified vendors whenever practicable.
- Documented Process: Applicants should maintain clear procurement records documenting solicitations, bids or proposals received, evaluation criteria, selection decisions, contract awards, cost analyses, and contract administration activities.
- Equal Opportunity for Vendors: Procurement requirements and specifications should not unnecessarily restrict competition or provide an unfair advantage to a particular contractor or vendor.
- Written Procurement Procedures: Applicants should follow written procurement procedures consistent with federal, state, and local requirements throughout the procurement lifecycle.
- Cost Reasonableness: Applicants must ensure costs are necessary, reasonable, and supported through appropriate price or cost analysis. FEMA evaluates market pricing, historical pricing, price competition and certified engineering estimates.

CONTRACT CHANGES OR MODIFICATIONS

A major deviation from the original purpose (i.e., a cardinal change) is typically viewed as a noncompetitive award and would have to meet the sole sourcing criteria for the new work to be eligible.

- All changes should be documented and be within the SOW of the original contract.
- FEMA would also have to assess whether the changes were beyond the original contract's general SOW and the competition's scope at solicitation.

PA PROJECT PROCUREMENT OVERVIEW

The following information includes common procurement questions, procurement best practices, and a summary of procurement key points for Applicants.

FREQUENTLY ASKED PROCUREMENT QUESTIONS

What if we don't have a written procurement policy? Providing your FEMA/Cal OES representatives with a written document that details how your organization typically goes about procuring goods or services when using non-federal funds, can be helpful. This may include consistent requirements, such as obtaining a minimum number of bids or securing additional approval over a certain dollar amount.

What if I already have a contract in place? If the procurement did not meet the federal requirements for solicitation, you may consider cancelling the contract and resoliciting. If the procurement did meet the federal solicitation requirements, you may be able to amend the contract to add required and recommended clauses or other remedies.

BEST PRACTICES

- Promote **full and open competition** in all procurements.
- Perform and document **price or cost analyses** for procurements exceeding the **SAT.**
- Document **emergency or exigent circumstances** supporting **sole-source** procurement.
- Transition from **sole-source contracting** to **competitively procured contracts** once emergency / exigent conditions have stabilized.
- Take and document all required "**affirmative steps**" to engage **small**, **minority**, **women owned, and labor surplus area firms**.
- Use "**time and materials**" **contracts** only when appropriate, establish a **ceiling price**, and document why no other contract type is suitable.
- Include all required / recommended **federal contract clauses** in procurement and contract documents.
- Use only **compliant contract types and procurement methods**.
- Verify contractors are **not suspended** or **debarred** prior to contract award.
- Maintain **thorough procurement documentation** to support transparency, compliance, and future audits or reviews.

KEY POINTS FOR PA APPLICANTS

- Applicants **MUST** apply the most stringent procurement requirements between local, State, and Federal rules—even if the federal requirements are lesser.
- FEMA requires that **procurement transactions are conducted in a manner beyond reproach**, at arm's length, with impartiality, and without preferential treatment.
- Document every step in the process.
- Make sure there is a clear definition of any Emergency/Exigent circumstances that would allow for less stringent procurement.
- Gifts are generally not permissible, including gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- No employee may participate in the selection, award, or administration of a contract if they have a real or apparent conflict of interest.
- Applicants should consult with their respective procurement staff or legal representation before taking any action and discuss potential options with the assigned FEMA/Cal OES specialists.

PA PROGRAM DONATED RESOURCE PROJECTS OVERVIEW

This guide provides PA Applicants with an overview of PA Program Donated Resources Projects, including key considerations related to Cost-Shares, Eligibility, and Documentation requirements.

DONATED RESOURCE PROJECTS SUMMARY

Within the FEMA PA Program, a Donated Resource Project refers to the use of third-party, in-kind contributions—such as volunteer labor, donated equipment, and materials—to perform eligible disaster work. These resources are not reimbursed directly by FEMA, but their calculated value can be credited toward the non-Federal Cost-Share of an eligible PA Project.

Donated Resources offer dual value because:

- They help communities recover by providing free goods and labor; and
- Each volunteer hour and donated good is assigned a dollar value that can be applied to offset the Applicant's local Cost-Share.

Real-World Example: During the Joplin tornado recovery, tracking 102,000 volunteers contributing 610,300 hours resulted in a ~$17.7 million Cost-Share offset.

DONATED RESOURCES APPLICATION TO PA PROJECTS

Donated Resources are generally associated with specific PA eligible work and may be applied in different ways depending on whether the work involves emergency or permanent work, as described below:

- For Emergency Work (i.e., Debris Removal and Emergency Protective Measures) performed, any applicable Donated Resources may be applied across all Category A and B Projects within the application.
- For Permanent Work Projects, Donated Resources must be associated with a specific PA Project and eligible Scope of Work and can only be applied to offset the Cost-Share of that specific Project.

The FEMA Public Assistance Program and Policy Guide dictates that Donated Resources:

- Must be supplied by third parties (i.e., not from the Applicant or other governmental entities); and
- Must be applied to eligible work under the PA program typically for debris removal and emergency work (non-cash contributions of property or services), though later policy allows for use of certain permanent work Cost- Share offsets as well.
- Are credited only up to the non-Federal share and cannot generate additional reimbursement beyond actual Project costs.

KEY POINT: Under the FEMA PA Program, Donated Resource Projects—including volunteer labor—are assigned a standardized monetary value based on FEMA-approved labor rates rather than the individual's typical or market hourly rate.

PA PROGRAM DONATED RESOURCE PROJECTS OVERVIEW

The following information provides an overview of the standard FEMA / State / Local Cost-Share structure, along with sample calculations to assist PA Applicants.

UNDERSTANDING COST-SHARE AND LOCAL COST

The table below illustrates the typical FEMA /State / Local Cost-Share structure for a Standard 75/25 Cost-Share. Actual Cost-Share percentages may vary depending on the declared event.

Share Type	Percentage	Example ($100,000 project)
Federal Share	**75%**	**$75,000**
Breakdown of the Non-Federal Share		
Non-Federal, Local Share (Cost)	**25%**	**$25,000**

NOTE: California Disaster Assistance Act (CDAA) may be available to certain Applicants to help further reduce the Local Cost-Share burden. In these cases, CDAA may cover up to 75% of the non-Federal share, reducing the Applicant's Local Share to 6.25%, or $6,250, based on the example above. For simplicity purposes, this Job Aid presents information based on Federal events *without* the inclusion of a CDAA offset.

HOW DONATED RESOURCES REDUCE LOCAL COST

The Federal Share can never exceed a Project's total costs, and the offset is capped at the non-Federal Cost-Share amount.

EXAMPLE 1 CALCULATION:
(Donated Resources Offset Non-Federal Share)
An applicant has $100,000 in documented eligible costs for debris removal and $25,000 in qualifying Donated Resources.

Federal Share = $100,000 x .75 = $75,000
Non-Federal Share = $100,00 x .25 = $25,000
Donated Resource Offset = $25,000
Actual Local Cash Required = $25,000 - $25,000 = $0
With proper documentation, the local government's cash contribution can be reduced to **zero**.

EXAMPLE 2 CALCULATION:
(Donated Resources Exceed Non-Federal Share)
The applicant documents $100,000 in eligible costs ($25,000 non-Federal share) and $35,000 in qualifying Donated Resources. The offset is capped at $25,000, meaning the Applicant cannot seek reimbursement for the remaining $10,000 in excess value.

KEY POINT: Regardless of the Cost-Share amount, or CDAA availability, Applicants should still carefully document all Donated Resources received by Project – even if the total value of Donated Resources exceeds the anticipated non-Federal Cost-Share.

PA PROGRAM DONATED RESOURCE PROJECTS OVERVIEW

The following information summarizes eligibility and PA Program requirements specific to Donated Resource Projects.

ELIGIBILTY REQUIREMENTS

To qualify for a Cost-Share offset, Donated Resources must meet the following **four criteria**:

1. **Third-party provider:** Private entities, community groups, individuals volunteering on their own time, or government employees volunteering off duty (i.e., not acting on behalf of employer)
2. **Necessary and reasonable:** Required for eligible PA work (e.g., Debris Removal, Emergency Protective Measures, approved Permanent Work)
3. **Actually used:** Applied within a Project's Period of Performance and are tied directly to eligible work sites and tasks
4. **Real-time tracking:** Contemporaneous documentation of who, what, where, and when

WHAT DOES NOT QUALIFY:

The table below describes commonly ineligible Donated Resources.

Ineligible Resource Type	Reason
Federal employees on duty	Resources provided by other Federal Agencies or from other Federal Awards are likely duplicative.
National Guard on Title 32 orders	Federally funded
Staff funded under Federal grants	Cannot be counted twice (i.e., Duplication of Benefits)
Resources applied to ineligible work	Cannot offset costs for FEMA ineligible work
Standby time	Only active, documented work is creditable
During a 100% Federal Cost-Share period	There is no non-Federal match to offset

DONATED RESOURCES DOCUMENTATION

FEMA requires documentation which substantiates Donated Resources as soon as is practical after the work is performed, not reconstructed weeks or months later. Incomplete or late documentation may result in disallowed Cost-Share offsets. Examples of potential documentation methods PA Applicants may develop include, but are not limited to:

- Daily volunteer sign-in sheets used daily to record staff hours for volunteer labor;
- Donated Equipment Logs to document loaned and volunteer-owned equipment hours of usage tied to assigned operator's hours for each piece of equipment;
- Donated supplies and material receipts and inventory tracking records for all supplies and tangible resources donated throughout the entirety of the Project; and / or
- Resource distribution records to identify and track donated resources distributed to the public or other entities / stakeholders.

PA PROGRAM DONATED RESOURCE PROJECTS OVERVIEW

The following information summarizes key points for Applicants to track Donated Resources.

KEY POINTS FOR APPLICANTS

Effective tracking of Donated Resources transforms community generosity into concrete financial benefits. With diligent management, tracking, and documentation, PA Applicants can substantially reduce or eliminate their non-Federal Cost-Share for eligible Projects. The key points below will help Applicants maximize opportunities to leverage Donated Resources and translate community generosity into tangible financial benefits.

Volunteer Organizations can be identified through early coordination with the Cal OES Volunteer Agency Liaison (VAL) and Private Sector/ Non-Governmental Organization (NGO) Coordinator. Applicants should collaborate with their assigned Cal OES PA Specialists to connect with entities that may be able to provide Donated Resources or support, such as:

- Non-profit organizations;
- Volunteer Organizations Active in Disasters (VOADs);
- Faith-based groups; and
- Organizations including the American Red Cross, Salvation Army, and others.

Tracking Volunteer Hours can be applied as in-kind match to offset part of the 25% required match for FEMA hazard mitigation grants. Tips for successful tracking include, but are not limited to:

- Establishing tracking mechanisms and processes within first 24-48 hours;
- Maintaining consistent, real-time documentation at all worksites; and
- Implementing quality control processes throughout the disaster lifecycle to maintain tracking / review mechanisms and support program eligibility.

Tracking Professional Services is vital for Donated Resource Projects and should include recording volunteer hours / resources provided as professional services (e.g., engineers, architects, medical personnel, safety inspectors) along with:

- License numbers and credentials;
- Detailed descriptions of work performed; and
- Basis fair market rates with a clearly defined method for determining (e.g., market data, organizational pay scales).

Mutual Aid assistance provided at no cost may be eligible as Donated Resources, provided it meets PA eligibility and documentation standards. Coordinate early with your assigned Cal OES PA Specialist to discuss details of Mutual Aid eligibility.

Federal procurement standards (2 CFR 200.319) prohibit practices limiting competition or creating favoritism.

- Unsolicited donations from non-competing contractors may be acceptable.
- Do not solicit donations in RFPs or provide preference to donating contractors.

KEY POINT: Contact your assigned Cal OES PA Specialists, or email DisasterRecovery@CalOES.ca.gov to request template tracking forms specific to Donated Resources and volunteer hours.

PUBLIC ASSISTANCE

Section Two

PA Program General Information Documents



SECTION TWO PA Program General Information Documents

12.	Project Formulation Overview
13.	Insurance Proceed Reconciliation
14.	Category Z Projects
15.	PA Streamlined Project Application
16.	PA RAPID Projects
17.	PA Flexible Project Restoration Types
18.	EHP Considerations
19.	Grants Portal System Best Practices

This document provides PA Applicants with an overview of Project Formulation, including processes and information for different types of PA Projects.

PA PROJECT FORMULATION SUMMARY

Project Formulation is the process of documenting eligibility for the facility, the work, and the costs of a project to develop the Project Application, also known as the Project Worksheet (PW). This process entails every step, from the identification and grouping of damages into a project to obligation. It involves milestones such as the Site Inspection (SI), development of the Scope of Work (SOW), Cost Estimates, and reviews by technical specialists.

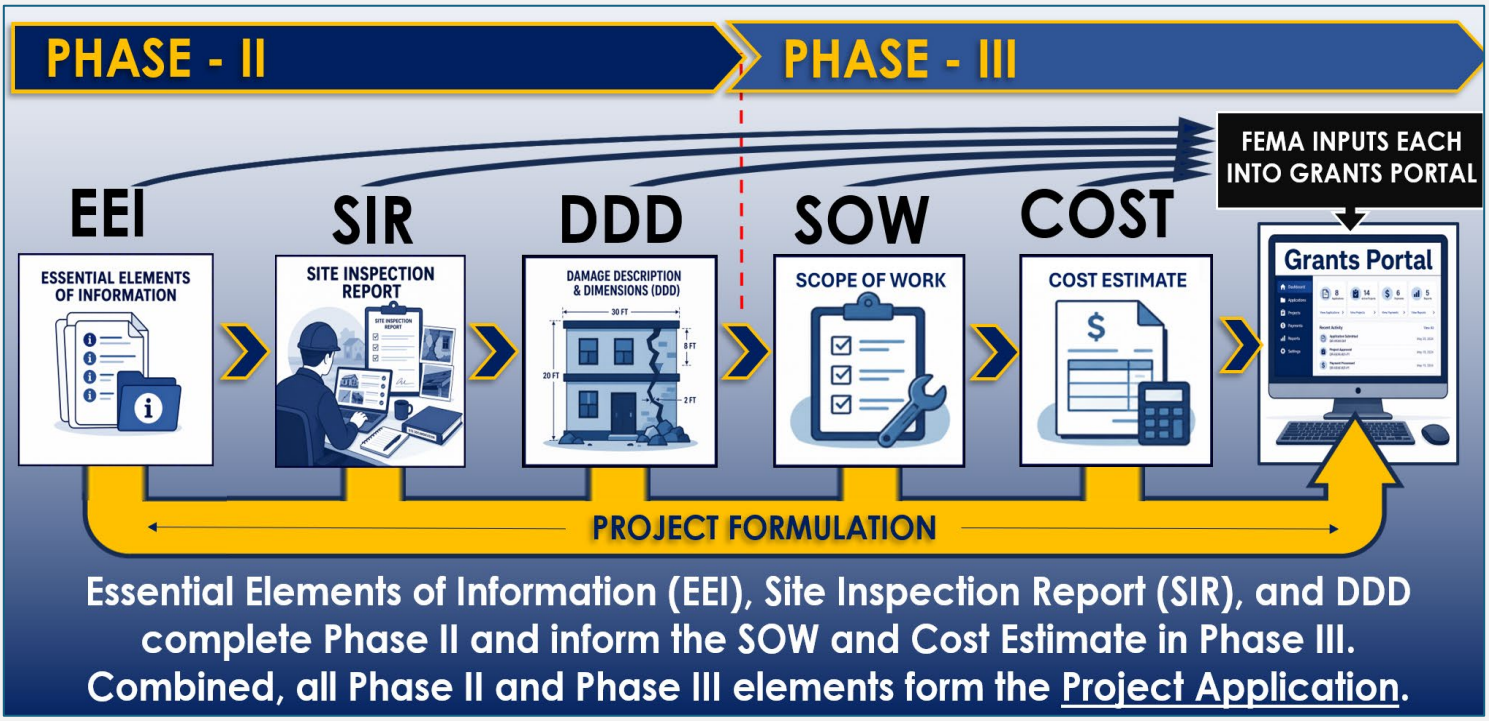
Project Lanes are the different pathways to Project development and are based on Project details (e.g., status of work completion, technical complexity of a project) and determine how the SI and Damage Description and Dimensions (DDD) are developed.

Project Types

- Small and Large Projects are based on the estimated cost of the Project and have different procedures to develop and administer the Project.
- Flexible Restoration Projects provide options for Applicants who want to change the pre-disaster design and function of a facility.

For additional information specific to Process Steps before Phase II, including the development of Impact Lists, see the ***PA Applicant Impact Lists Job Aid*** and the ***PA Program Delivery Phases and Process Overview*** in the Cal OES PA Toolkit.

Typical Standard Lane Project Formulation Process



The information below provides an overview of project lanes and different requirements for performing the SI and developing the DDDs.

PROJECT LANES

All Projects typically follow three lanes for project formulation: Standard Lane, Work Completed / Fully Documented Lane, and Specialized Lane. The information below describes these project pathways.

- **Standard Lane** is for any project with less than 100% of work completed and does not require technical expertise to complete the SI or review the supporting documentation.
- **Specialized Lane** is for any project with less than 100% of work completed and requires technical expertise (e.g., engineering, Environmental and Historic Preservation (EHP) review) to complete the SI or review the supporting documentation.
- **Work Completed / Fully Documented Lane** is for any project with 100% of work completed or work that will be completed within two weeks of the Recovery Scoping Meeting (RSM).

Project Lanes and Project Types

	ESSENTIAL ELEMENTS OF INFORMATION	SITE INSPECTION	DAMAGE DESCRIPTIONS AND DIMENSIONS	
STANDARD LANE	FEMA PDMG requests Applicant EEIs in Grants Portal	FEMA, Cal OES, and Applicant complete the SI	Complete DDDs after SI	CRC
SPECIALIZED LANE	FEMA PDMG requests Applicant EEIs in Grants Portal	FEMA, Cal OES, and Applicant complete the SI with Technical Specialists	Complete DDDs after SI	CRC
WORK COMPLETED LANE	FEMA PDMG requests Applicant EEIs in Grants Portal	No SI conducted. FEMA determines project eligibility based on information from the EEI	Completed / Fully Documented Lane projects receive DDD once at the CRC	CRC

AFTER DDD/ INITIAL ELIGIBILITY REVIEWS, ALL PROJECTS ARE SENT TO THE CRC.

For additional information specific to Small and Large Projects, see the ***PA Applicant Smart Guide for Small and Large Projects*** in the Cal OES PA Toolkit.

For additional information on rebuilding to a different design, Improved, or Alternate Project type, (outside of the Standard Lane) see the ***PA Flexible Restoration Project Types Overview*** in the Cal OES PA Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA APPLICANT INSURANCE PROCEEDS RECONCILIATION JOB AID

This document provides PA Applicants with a concise summary of what Insurance Reconciliation is, when it occurs, how it may impact PA Project funding, and technical guidance to assist Applicants after insurance proceeds are formalized.

KEY POINT: Insurance is considered throughout the PA process, beginning very early during Project development when anticipated insurance proceeds are identified. This material focuses on reconciliation, which typically occurs when actual insurance settlements or payments become available and must be compared with the amounts previously estimated. While reconciliation may occur in later PA Program Delivery phases, Applicants should begin planning for and preparing documentation as early as possible in the PA process.

INSURANCE RECONCILIATION OVERVIEW

Insurance reconciliation is the process of reviewing and comparing actual insurance proceeds received or expected by an Applicant against the costs of disaster-related work funded through FEMA's PA Program. Insurance reconciliation may occur during Project development, throughout Project implementation, and again during final Project reconciliation or Closeout. This process ensures that insurance payments and PA funding are properly accounted for and that Applicants do not receive duplicate funding for the same eligible disaster-related costs. However, the remaining deductible is reimbursable.

Failure to properly document or report insurance payments may result in funding adjustments, delays in project closeout, or the recovery of previously awarded funds.

Applicants should understand that receiving insurance payments does not automatically make a project ineligible for PA funding. FEMA may provide assistance for the applied insurance deductible and otherwise eligible costs not covered by insurance, subject to applicable program requirements. The table below provides a simplified example of insurance reconciliation as it may apply to FEMA Project funding.

Example of Insurance Estimate During Project Formulation	
Eligible repair costs	$100,000
Initial estimated insurance proceeds	($40,000)
Initial PA-eligible amount after insurance reduction	$60,000
Insurance Reconciliation After Insurance is Confirmed	
Final actual repair costs	$100,000
Final actual insurance proceeds	($35,000)
Reconciled PA-eligible amount	$65,000

Because the actual insurance proceeds confirmed during insurance reconciliation were $5,000 less than originally estimated, the Applicant may be eligible for a $5,000 increase in approved eligible costs, subject to FEMA review, applicable requirements.

KEY POINT: Insurance related funding is always reconciled to actual costs. The project's initial anticipated insurance proceeds will not always reflect FEMA's final insurance determination and does not resolve any documentation reporting responsibilities.

PA APPLICANT INSURANCE PROCEEDS RECONCILIATION JOB AID

The information below summarizes the insurance reconciliation process, explains the difference between estimated and actual insurance proceeds.

KEY POINT: FEMA requires Applicants to make reasonable efforts to pursue insurance proceeds to which they are entitled. Insurance reconciliation may occur during project development, monitoring, amendments, or closeout; it is not limited to Phase VII.

INSURANCE RECONCILIATION PROCESS SUMMARY

The State (Recipient) and FEMA coordinate with the Applicant to review insurance documentation, determine whether adjustments to eligible project costs are necessary, and finalize the appropriate amount of federal assistance. The information below presents a simplified summary of the process.

1. Collect Insurance Documentation: Cal OES coordinates with the Applicant to obtain insurance policies, claims information, settlement documentation, and records of insurance payments received or anticipated.

2. Review Insurance Coverage: Cal OES and FEMA review the documentation to identify insured facilities, covered damages, applicable deductibles, policy limits, and exclusions.

3. Verify Insurance Proceeds: FEMA evaluates actual insurance payments and any outstanding claims to determine the amount of insurance benefits applicable to eligible disaster-related work.

4. Determine Funding Adjustments: FEMA determines whether insurance proceeds require adjustments to previously approved PA funding to prevent duplication of benefits. Cal OES coordinates with the Applicant to resolve discrepancies or obtain additional documentation.

5. Finalize Reconciliation: FEMA documents its insurance determination and processes any necessary Project or funding adjustments. The Applicants assigned Cal OES PA Specialist coordinates with the Applicant for any remaining actions.

6. Complete Project Closeout: Once insurance and other Project requirements are resolved, Cal OES and FEMA complete applicable final reconciliation and Closeout activities.

ACTUAL INSURANCE PROCEEDS VERSUS ESTIMATED

Insurance proceeds may be addressed differently depending on whether the amount is **estimated** during Project development or based on an **actual** completed insurance claim or settlement. Understanding this distinction is important because insurance proceeds reduce eligible PA funding to prevent a Duplication of Benefits.

- **Estimated Insurance Proceeds**: Estimated proceeds are not a final settlement, and amounts may change as the insurance claim is reviewed, adjusted, or settled. FEMA may use an estimated or anticipated amount of insurance proceeds based on the applicable policy to account for expected coverage when developing the Project.
- **Actual Insurance Proceeds:** Once the insurance claim is finalized, the amount actually received by the Applicant replaces the estimate to determine the applicable reduction.

KEY POINT: FEMA specifically states that Large Projects undergo final reconciliation based on **actual costs and insurance proceeds received**. Small Projects are generally not reconciled to actual costs, but an individual Small Project may be adjusted when actual insurance proceeds differ from the insurance amount FEMA previously deducted.

PA APPLICANT INSURANCE PROCEEDS RECONCILIATION JOB AID

The information below provides a summary of potential impacts to Large and Small Project sizes based on adjusted costs and describes the FEMA Obtain and Maintain policy.

IMPACT TO LARGE VERSUS SMALL PROJECTS

FEMA determines whether a Project is large or small based on the total eligible costs after any cost adjustments, including insurance reductions. Small. Applicants should carefully track insurance coverage and proceeds separately from PA eligibility determinations and Project costs to support accurate project formulation, funding calculations, and final reconciliation.

- Identify Project size based on total Project costs to determine whether a Project is Large or Small based on the total eligible Project cost before anticipated insurance proceeds.
- Track insurance coverage and PA eligibility separately. Work or damage covered by an insurance policy is not automatically eligible for PA. Likewise, PA-eligible work may not be covered by insurance. Maintain sufficient detail to identify which costs and insurance proceeds apply to each eligible Project.

NOTE: Carefully allocate insurance proceeds associated with ineligible damages. A single insurance claim or settlement may cover multiple losses, including damages that are not eligible for PA, such as damage to facilities outside the declared disaster area. Applicants should maintain documentation supporting the allocation of insurance proceeds to corresponding losses to ensure that proceeds associated with ineligible losses are not improperly deducted from otherwise eligible PA projects.

KEY POINT: Applicants receiving PA funding for certain permanent work must comply with FEMA's requirements to obtain and maintain insurance against future losses. These obligations are separate from the reconciliation of current insurance payments.

OBTAIN AND MAINTAIN INSURANCE REQUIREMENTS

When FEMA provides an applicant assistance for Permanent Work to replace, restore, repair, reconstruct, or construct a facility, the applicant must insure that facility against future loss. FEMA refers to this as the requirement to "Obtain and Maintain" insurance, or, the "insurance requirement."

1. By law, applicants must comply with this requirement as a condition of FEMA assistance.
2. FEMA applies this requirement to buildings, contents, equipment, and vehicles.
3. FEMA does not require applicants to obtain and maintain insurance for temporary facilities.

Consequences of Non-Compliance (Failure to Obtain and Maintain Insurance). If an Applicant does not comply with the insurance requirement in accordance with this policy and applicable legal authorities, FEMA is likely to deny or de-obligate assistance in the current disaster and **deny future assistance** for that facility.

PA APPLICANT INSURANCE PROCEEDS RECONCILIATION JOB AID

The information below provides additional technical guidance to assist Applicants in planning for insurance reconciliation for PA Projects.

TECHNICAL GUIDANCE FOR PA APPLICANTS

The Cal OES PA Specialist assigned to the Applicant will provide technical assistance throughout PA Project formulation and PA Program delivery. The following technical guidance is provided to assist Applicants in understanding the importance of planning for and documenting insurance throughout the entirety of the PA process.

- **Bring in the right person.** Identify the person in your organization who understands and manages insurance coverage and involve them early in PA Project development.
- **Identify insurance early.** Determine which damaged facilities are insured and provide applicable policies, schedules, endorsements, coverage information, claims, and settlement documentation as early as possible.
- **Understand insurance applicability to specific Projects.** Insurance may cover losses that are not eligible for PA, while PA may fund eligible work that is not covered by insurance.
- **Identify damaged facilities that received previous PA funding.** Facilities for which PA funding was previously received may be subject to Obtain and Maintain requirements and should be identified early with proper insurance documentation collected.
- **Track PA eligibility separately from insurance coverage.** An insurer's determination that a loss is covered does not necessarily mean the work is eligible for PA, and PA-eligible work may not necessarily be covered by insurance.
- **Track where insurance proceeds apply.** If a settlement includes PA-ineligible losses, damages outside the declared area, or other losses not associated with eligible PA projects, maintain detailed documentation to clearly delineate line-item allocation of the proceeds rather than applying the entire settlement against PA funding.
- **Expect final reconciliation.** Maintain insurance documentation throughout the Project lifecycle. Actual insurance proceeds can result in adjustments during Project reconciliation and closeout.
- **Maintain documentation**. Applicants should collect, organize, and maintain documentation, including but not limited to damages, Project costs, insurance coverage, claims, and insurance proceeds.

KEY POINT: FEMA has additional federal floodplain management requirements that may apply to facilities located in a Special Flood Hazard Area (SFHA). FEMA asks applicants to identify SFHA facilities early because the designation can trigger additional reviews, documentation, compliance requirements and insurance requirements. Applicants should discuss SFHA with their assigned Cal OES PA Specialists to understand applicability.

KEY POINT: Identify all damaged facilities for which PA funding was previously received during a prior incident and for which the Applicant may be required to demonstrate proof of insurance in accordance with Obtain and Maintain policies.

For additional information specific to the Project Formulation and documentation, review the ***PA Project Formulation Overview,*** ***PA Applicant Duplication of Benefits Job Aid,*** and the ***PA Supporting Documentation Overview*** in the Cal OES PA Applicant Toolkit

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

This document provides an overview of Category Z Projects, including funding information, eligible activities, roles and responsibilities, and key considerations. It is intended to help Applicants understand the requirements for Category Z Projects and prepare to become eligible Subrecipients with Obligated Projects.

CATEGORY Z PROJECTS OVERVIEW

Category Z Projects provide reimbursement for eligible management costs incurred by a Subrecipient in developing and administering eligible PA Projects. These costs cover the time, resources, and administrative activities necessary to manage eligible PA Projects. Per FEMA Policy FP 104-11-2 (Interim), management costs may include the following expenses when associated with the PA portion of a major disaster or emergency:

- Indirect costs;
- Direct administrative costs (DAC); or
- Other administrative expenses associated with a specific project.

NOTE: FEMA has several different PA management-cost/DAC frameworks depending on the disaster declaration date. Contact your assigned Cal OES PA Specialist for declaration/policy governing your specific disaster. Eligible management costs are documented under a separate Category Z Project Worksheet (PW) and are reimbursed based on actual eligible costs incurred, up to the maximum amount allowable by FEMA.

KEY POINT: Category Z Projects may require a Time Extension request if necessary – the period of performance is governed by the management-cost policy rather than the ordinary emergency/permanent work completion deadlines.

HOW MUCH CATEGORY Z FUNDING IS AVAILABLE

The total award amount is based on the Subrecipient's actual eligible PA Project costs, including both the Federal and non-Federal shares, after deducting insurance and other applicable reductions. Eligible Category Z management costs are funded at 100% Federal Share. Therefore, no cost share is required for eligible Category Z management costs.

Example: If an Applicant has $2,000,000 in eligible PA project **awards after Obligation** and applicable reductions:

Maximum potential Category Z funding:
$2,000,000 x 5% = $100,000

Within this example (since award for Category Z is based on **actual expenses** and capped at 5%):

- If the Applicant documents $72,000 in eligible management costs, FEMA may reimburse up to $72,000.
- If the Applicant documents $120,000 in eligible management costs, FEMA may reimburse no more than the maximum of $100,000.

NOTE: Category B Donated Resource PWs are not included when calculating the Category Z maximum because donated resource projects are not considered project awards for purposes of the management cost calculation.

KEY POINT: The Category Z funding amount will not be finalized until all Project costs are documented and approved at grant Closeout. As a result, the 5% maximum for Category Z will not be fully realized until Closeout.

The information below provides examples of Category Z activities and processes.

ELIGIBLE MANAGEMENT COST ACTIVITIES

Eligible Category Z activities generally include administrative and management activities necessary to conduct eligible PA work. Examples may include, but are not limited to:

- Participating in Preliminary Damage Assessments (PDA);
- Attending meetings related to the PA Program or the Applicant's overall PA claim;
- Organizing damage sites into logical project groupings;
- Preparing PA related correspondence;
- Participating in site inspections;
- Compiling eligible PA related travel expenses;
- Developing detailed, site-specific damage descriptions;
- Evaluating potential Section 406 Hazard Mitigation measures;
- Preparing Small and Large Projects and reviewing PWs and project documentation;
- Collecting, copying, organizing, or submitting documents supporting eligible PA claims;
- Responding to PA documentation and information requirements;
- Requesting disbursement of PA funds; and
- Conducting or participating in PA related training.

NOTE: Work performed in support of a Project Appeal that is granted by FEMA, may be eligible for management cost reimbursement once the Project is Obligated. Management costs may include both **regular time and overtime**, when the work performed is eligible **and fully supported with detailed documentation.**

KEY POINT: Administrative work associated with **PA activities determined ineligible at any stage in the PA Process is not eligible** for reimbursement as a Category Z management cost.

CATEGORY Z PROJECT PROCESS

Applicants should coordinate with their assigned Cal OES PA Specialists for guidance on how to prepare and initiate a Category Z Project after FEMA has Obligated one or more of the Applicant's PA Projects (at which point the Applicant becomes a Subrecipient).

If the Subrecipient's final PA award amount and management costs have not yet been determined, FEMA may formulate a Category Z Project Worksheet (PW) based on 5 percent of the total amounts obligated for the Applicant's PA Projects as of the date of the request. As FEMA Obligates additional PA projects, FEMA may process additional Versions of the Category Z PW on a quarterly basis, to account for increases or decreases in the Subrecipient's total Obligated PA funding. FEMA will Obligate actual costs up to the Subrecipient's applicable 5 percent.

At the end of the PA process, FEMA reconciles the Category Z Project to the Subrecipient's final eligible PA award amount, and final actual eligible management costs. The final Category Z amount may therefore result in an additional Obligation or deobligation.

The Subrecipient may claim management costs incurred for whichever occurs first:

a. 180 days after the Subrecipient completes its last non-management cost PA Project; or
b. 180 days after the latest period of performance of the Subrecipient's non-management cost PA project(s); or
c. Two years from the date of an Emergency Declaration; or
d. Eight years from the date of a Major Disaster Declaration.

The information below provides key points for PA Applicants and Subrecipients to help plan, prepare, and submit Category Z Projects.

KEY POINTS FOR APPLICANTS / SUBRECIPIENTS

Applicants should establish a process for tracking Category Z activities and costs early in the disaster recovery process rather than attempting to recreate records at closeout. Early planning and preparedness enables Applicants to track and organize documentation throughout PA Program Delivery to support efficient development of Category Z Projects after Project Obligations.

Once FEMA creates a Subrecipient's Category Z PW, the Subrecipient will need to submit all relevant supporting documentation to substantiate the actual costs. Preparing in advance and addressing the key points below will help streamline the Category Z Project process for Subrecipients:

- Identify employees, departments, contractors, or other personnel performing PA management activities;
- Track the specific PA related activities being performed;
  - Clearly distinguish PA management activities from normal operating responsibilities and other disaster work;
- Maintain records identifying the dates and hours associated with those activities;
  - Time records should describe what PA management activity was performed, not simply state broad descriptions such as "FEMA work," "disaster recovery," or "administrative support;"
- Maintain payroll and personnel documentation supporting labor costs;
- Maintain invoices, contracts, procurement records, travel documentation, and other records supporting claimed contractor costs;
- Ensure contracted management services comply with applicable Federal, State, and local procurement requirements;
- Periodically reconcile tracked management cost against the Applicant's current Category Z maximum;
- Coordinate with Cal OES when additional PA Projects are Obligated or deobligated and the Category Z ceiling may be adjusted; and
- Retain complete documentation for Final Reconciliation and Closeout.

NOTE: Once FEMA obligates the Category Z Project, Cal OES receives notification of the Obligation and establishes the project within the State's financial processing system. The Subrecipient will receive notification of the Project Obligation and applicable instructions for requesting reimbursement.

For additional information relevant to Category Z Projects, see the ***PA Program Delivery Phases Summary*** in the Cal OES PA Toolkit.

Additional information specific to post-Obligation processes is available in the ***PA Applicant – Final Reconciliation and Closeout Job Aid*** *and the* ***PA Applicant - Payment Overview*** in the Cal OES PA Toolkit

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA CATEGORY Z PROEJCTS JOB AID

The information below summarizes the Applicant, Cal OES, and FEMA role for key Process Steps specific to Category Z projects.

APPLICANT / CAL OES PA SPECIALIST / FEMA ROLES			
PROCESS STEP	**APPLICANT ROLE**	**CAL OES PA SPECIALIST ROLE**	**FEMA ROLE**
Track Management Cost	Identify and track eligible PA management activities and actual costs. **Maintain supporting documentation from the onset of PA Program Delivery.**	Provide guidance on eligible activities and documentation requirements and provide technical assistance to help Applicants organize documentation.	Establish eligibility requirements for management costs.
Initiating a Category Z Project	Coordinate with Cal OES to request / initiate a Category Z Project after PA Projects are Obligated.	Coordinate with and support the Applicant through Category Z Project development.	Upon request, formulate the PW based on eligible project Obligations and notify Cal OES and the Subrecipient to provide documents.
Submit Supporting Document for Eligible Costs	Provide payroll, activity descriptions, contracts, invoices, travel records, and other supporting documentation.	Review documentation and provide technical assistance as needed.	Determine whether claimed costs and activities are eligible and reasonable.
Update Category Z Funding	Notify Cal OES of additional eligible management costs or changes to the Project.	Coordinate updates as PA Projects are Obligated, adjusted, or deobligated.	Process eligible Category Z versions and costs, up to the 5% maximum.
Request Reimbursement	Submit reimbursement request and required documentation to support the claim.	Assist with reimbursement request requirements and coordinate with Cal OES Financial Processing.	Provide Federal funding for eligible Obligated Category Z costs.
Final Reconciliation and Closeout	Submit final actual management costs and supporting documentation within applicable deadlines.	Review and coordinate final reconciliation and closeout.	Reconcile actual costs against the final 5% maximum and obligate or deobligate funds as necessary.

Additional information specific to reimbursement, see the ***PA Applicant – Final Reconciliation and Closeout Job Aid*** *and the* ***PA Applicant - Payment Overview*** in the Cal OES PA Toolkit

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA STREAMLINED PROJECT APPLICATION (SPA) JOB AID

The SPA Overview provides high-level information for Applicants to help determine whether the SPA is the most appropriate Application type for specific Project needs.

SPA SUMMARY

The SPA is a formal request for FEMA PA Program funding that is submitted by the Applicant through an application process in Grants Portal (GP). The SPA does not require a FEMA Program Delivery Manager (PDMG) or Cal OES PA Specialist to complete and submit.

Traditionally, for PA projects, Applicants submit information and documentation to FEMA and Cal OES, who provide technical assistance to formulate projects on the Applicant's behalf. This commonly includes FEMA and Cal OES providing technical assistance throughout each step of the process, and FEMA PDMGs completing most of the project milestones in collaboration with the Applicant and Cal OES.

For SPA projects, Applicants complete and submit their own application, including but not limited to the Damage Description and Dimensions (DDD), Scope of Work (SOW), cost summary, and all supporting documentation throughout the process.

SPA BENEFITS AND CHALLENGES

The SPA provides the Applicant greater control and oversight of project formulation (e.g., grouping of impacts and damages, development of the SOW) and the submission process. However, the SPA also requires an increased level of self-sufficiency for Applicants. Applicants with limited PA experience, technical capabilities, or dedicated staffing resources may find it difficult to navigate the SPA process and are more likely to miss deadlines and / or submit a project that is incomplete, inaccurate, or lacking sufficient documentation. This may result in project delays and ineligibility reviews.

KEY POINTS FOR APPLICANTS CONSIDERING SPA

During the Recovery Scoping Meeting (RSM), FEMA PDMGs may encourage Applicants to submit a SPA without fully explaining the complexities. Prior to Applicants agreeing to the SPA process they should discuss their capabilities, experience, and questions with their assigned Cal OES PA Specialists:

- Applicants that do not already have a GP account and require assistance to establish one may lack the technical capability to complete the SPA.
- Applicants must independently develop a detailed DDD, SOW, and Cost Estimate.
- Applicants will need knowledgeable staff to monitor GP for FEMA communications and may not receive notifications of project updates or information requests outside of GP.
- Applicant responsibilities are greater—and application fields are more complex—for projects with work to be completed, versus work completed / fully documented emergency work (i.e., Category A & B) and permanent work (i.e., Category C-G) projects.
- Cal OES may provide technical assistance if requested but has no required function until the Applicant submits the project application for Recipient Review.
- FEMA typically does not provide direct outreach or technical assistance to the Applicant and has no required function until the project application has been completed, reviewed by the Recipient, and submitted for FEMA PDMG Review.

PA STREAMLINED PROJECT APPLICATION (SPA) JOB AID

The information below summarizes key SPA components for the Project Application, including Cost Schedules and Work Surveys.

The SPA contains three main components: the project application, cost schedule(s), and work survey(s). **Based on the answers provided in each section, survey, and schedule, the GP system prompts specific documentation uploads.** The sections below outline key requirements / information for which Applicants are responsible.

PROJECT APPLICATION

The project application includes the following four sections:

- **Section I (Project Application Information):** Entity information (e.g., Applicant name, organization / entity type) and the Declaration Number / FEMA PA Code.
- **Section II (Scope of Work):** Confirmation the work was the legal responsibility of the Applicant and required to protect public health and safety. Additionally, a detailed description of when, where, and by whom work was or will be completed is required.
- **Section III (Cost and Work Status Information):** An itemized summary of costs associated with overtime labor, contract labor, equipment, supplies, and other expenses, including thorough documentation for all expenses and insurance information.
- **Section IV (Project Acknowledgements and Certifications):** Certifications that work activities and costs claimed comply with applicable State and Federal rules and regulations. This includes a c**ost reasonableness attestation, a d**eclaration that confirms costs are reasonable / necessary and align with established cost principles, contracting regulations, and other eligibility requirements.

COST SCHEDULES

For activities reported in Section II, the Applicant is required to complete one of the following cost schedules:

- **Schedule A:** Required for Applicants requesting expedited funding.
- **Schedules B and C:** Required for large projects to report activities and associated costs as either completed or in progress.
- **Schedule EZ:** Required for small projects to report activities and estimated costs.

WORK SURVEYS

Work surveys and costs schedules may be triggered by Applicant responses in the project application. The most common types of surveys / schedules include:

- **Large Project Eligibility Survey:** Required when total claimed costs exceed the large project threshold.
- **EHP Survey:** Required for activities that may have environmental or historic preservation considerations.
- **Private Property Survey:** Required when claiming costs for activities conducted on private property.
- **Temporary Facility Survey:** Required when claiming costs for activities related to temporary facilities and / or the temporary relocation of facilities.
- **Completion of Work Survey:** Required when claiming costs for permanent work, dependent on the activities conducted / to be conducted to collect detailed information about the nature and scope of the work.

PA STREAMLINED PROJECT APPLICATION (SPA) JOB AID

The information below summarizes the Applicant and PA Specialist roles throughout key steps in the SPA process. This list is not all inclusive, but rather highlights major steps in the Applicant-driven process.

APPLICANT AND PA SPECIALIST ROLES THROUGHOUT THE SPA PROCESS		
PROCESS STEP	**APPLICANT ROLE**	**PA SPECIALIST ROLE**
Pre-Application	Evaluate the SPA process and internal capabilities to determine if the SPA is the appropriate method to apply for PA funding.	Provide guidance to the Applicant to determine if the SPA is the appropriate application method, given project complexity and the Applicant's level of expertise / staffing resources.
Completing the Application	Prepare and complete the Project Application and supporting documentation.	Provide technical assistance if requested.
Recipient Application Review	Revise application content and submit additional documentation based on Cal OES requests.	Complete the Recipient Review and approve or provide direction to the Applicant to address revisions or include additional documentation.
FEMA PDMG Project Review	Revise application content and submit additional documentation based on FEMA requests.	Provide technical assistance if requested.
FEMA Processing	Generally, the Applicant has no action during this step unless contacted by FEMA or the Recipient.	Generally, the PA Specialist has no action during this step unless requested by FEMA or the Applicant.
Final FEMA Review	Generally, the Applicant has no action while FEMA conducts a final eligibility review.	Generally, the PA Specialist has no action during this step unless requested by FEMA or the Applicant.
Recipient Final Review	Revise application content and submit additional documentation based on Cal OES requests.	Complete the recipient final review and approve or provide direction to the Applicant to address revisions or include additional documentation.
Applicant Project Review	Complete the final review and signature process.	Notify the Applicant that their project is pending Applicant action and provide technical assistance as requested.
Applicant Signature	Applicant reviews and signs the project in Grants Portal.	Provide technical assistance if requested.

Following Applicant Signature, FEMA obligates funding through the Recipient. For additional information on next steps, see the ***PA Program Delivery Phases Summary*** and ***Recovery Transition Meeting Overview*** in the Cal OES PA Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA APPLICANT RAPID PROJECT OVERVIEW

This guide provides PA Applicants with an overview of the Rapid Assessment with Public Infrastructure Data (RAPID) Project process. RAPID is a streamlined project development process designed to simplify and accelerate the development of eligible Large Projects.

RAPID PROJECT OVERVIEW

FEMA developed the PA RAPID method to expedite the estimation of replacement costs **for facilities that have been completely destroyed**, where the need for replacement can be determined using post-disaster imagery without requiring site inspections. FEMA's intent was to create a "reduced timeline for providing grant funding to impacted communities" for eligible Permanent Work Projects.

The RAPID Project option *may* be suitable for eligible Projects that can be developed with minimal coordination and information gathering, rather than requiring staff-intensive efforts to collect detailed information throughout Project development process. The RAPID approach shifts much of the work to the beginning of the process, with FEMA relying on public data and expecting Applicants to provide any necessary supporting information early in the process.

RAPID is not designed to expedite every Project. According to FEMA's RAPID Fact Sheet, Projects considered for RAPID implementation must meet the following requirements:

1. The Applicant has an eligible facility damaged beyond repair (i.e., fully destroyed) as a result of a declared disaster, such as wildfire, tornado, earthquake, or hurricane.
2. The Applicant is looking to receive eligible funding to restore community infrastructure that supports emergency services, education, healthcare, transportation, and public resources.
3. There is public data available for FEMA to create a cost estimate and replacement Scope of Work (SOW).

RAPID PROCESS SUMMARY

The main process steps for RAPID Project development include, but are not limited to:

1. Project Initiation: Based on the circumstances of the disaster and information available, Cal OES and FEMA assess the feasibility of RAPID implementation.

2. Scoping; Costing; Damage Description and Dimensions (DDD); and Narrative Development: The FEMA Consolidated Resource Center (CRC) / FEMA Specialists develop the cost estimates and other materials for the Projects deemed eligible / appropriate for RAPID.

3. Applicant Coordination and Project Compliance RAPID Meeting: The FEMA Program Delivery Manager (PDMG) presents pre-developed materials to the Applicant.

4. FEMA Review: Following the RAPID Meeting, if the Applicant elects to continue with a RAPID Project, FEMA reviews the Applicant's project information and supporting documentation.

5. Project Obligation: Once all required reviews have been completed and eligibility has been established, the Project may advance toward Obligation.

NOTE: **After the RAPID Meeting, Applicants should conduct a thorough review of FEMA's developed Project SOW to confirm it aligns with the Applicant's needs. If the Applicant believes the Project costs or Scope are not accurate / appropriate, this should be communicated to FEMA as soon as possible.**

PA APPLICANT RAPID PROJECT OVERVIEW

The information below summarizes technical assistance for Applicants prior to, during, and after the RAPID Meeting.

POST-OBLIGATION CONSIDERATIONS FOR PA APPLICANTS

The RAPID Project Lane may help expedite Process Steps during the early Phases of PA Program Delivery. However, Applicants should consider important post-Obligation implications. Specifically, unless a facility is being replaced exactly in-kind, the RAPID approach provides limited architectural and engineering (A&E) funding to support the development of the intended scope. This allows the Applicant to further define the scope and subsequently version the project, as necessary. Additional considerations include:

- Version zero (V0) RAPID projects do not go through Environmental and Historic Preservation (EHP) Review
  - Upon Obligation, A&E costs for in-kind/like-for-like rebuild may be drawn down.
  - Upon completion of A&E activities:
    - If the Applicant intends to move forward with in-kind scope as described in V0, the Applicant will need to request EHP review of the V0 scope.
    - Beginning work before EHP review is complete may jeopardize federal funding.
    - If the Applicant requires changes to the SOW as described in V0, the Applicant will need to submit an Amendment Request to include the updated SOW/costs.
    - If approved, the updated SOW will need to go through EHP review.
- **Standard Lane Projects may be a better choice for Applicants intending to leverage flexible restoration** (e.g., rebuilding to a different design, Improved, Alternate Project).

For additional information on rebuilding to a different design, Improved, or Alternate Project type, see the ***PA Flexible Restoration Project Types Overview*** in the Cal OES PA Applicant Toolkit.

TECHNICAL GUIDANCE FOR PA APPLICANTS

- Applicants should **ensure that appropriate subject matter experts are available to review FEMA's technical assessments and cost estimates,** to make the most informed decision about whether to proceed with a RAPID Project approach.
- Applicants should carefully review the proposed SOW and Cost Estimate to identify missing or inaccurate information and resolve questions with FEMA.
- RAPID Projects still require Applicants to maintain the same eligibility requirements as Standard Lane Projects and to provide any supporting documentation.
- **RAPID Projects do not exempt Applicants from PA Program** timelines, work completion deadlines, or Time Extension requirements.
- Applicants should actively participate in discussions and seek clarification whenever FEMA processes / documents are unclear.

Note: Applicants should not elect to use RAPID as the preferred option simply based on the expedited timeline during early PA Program Delivery Phases. Even if an Applicant has previous experience and knowledge about FEMA's PA Program, **Applicants should assess the decision early with their assigned Cal OES PA Specialists** due to the evolving nature of the PA program. Significant changes may have been implemented by FEMA since previous events.

KEY POINT: Applicants should carefully **review the DDD and FEMA SOW** as soon as possible to confirm that both accurately reflect actual damages and the Applicant's intended SOW. Changes to either the DDD or SOW become increasingly more difficult later in the process.

PA APPLICANT RAPID PROJECT OVERVIEW

The following table provides a comparison of Project Development for Standard Lane Projects versus RAPID Projects.

PROCESS STEP	STANDARD PROJECTS	RAPID PROJECTS
Project Development	More deliberate project development process, allowing time to review damages, develop Project details, and refine the approach with FEMA.	Accelerated development (if returning to pre-disaster design) but provides less opportunity to adjust Project details before formulation.
Documentation	Applicant provides detailed documentation supporting the facility, disaster-related damages, pre-disaster condition, proposed work, and costs.	Relies heavily on information already available to FEMA, including public data and existing records describing the facility and pre-disaster conditions.
Scope and Cost Development	SOW and Cost Estimates developed through an iterative process, providing Applicants opportunity to review, clarify, and provide information.	FEMA develops the SOW and Cost Estimate. However, the estimate may not take into account complexities of construction in California. Applicant input is limited.
Technical Support / Assistance	Greater opportunity for technical assistance from FEMA and Cal OES during Project formulation, including meetings, documentation review, and resolution of technical issues.	Designed to minimize extended project-development activities. FEMA generally presents a developed Project for Applicant review, reducing the need for—and opportunity for—extensive engagement or discussion.
Obligation	Obligation generally occurs after completion of the full Project development and review process and may require multiple rounds of documentation, clarification, and coordination.	Obligation may occur substantially faster if the Applicant accepts FEMA's proposed SOW and Cost Estimate based on the information available during RAPID development. V0 RAPID Projects do not go through EHP review before Obligation.
Post-Obligation Timelines	The Applicant proceeds under standard PA post-Obligation requirements, including applicable work-completion deadlines, documentation requirements, and closeout procedures.	Changes to the V0 Rapid Project Scope will require an Amendment and all RAPID Projects will be required to go through a Post-Obligation EHP review once the intended Scope is confirmed and/or approved.
Work Completion	**(Typically, the same for both):** Applicant completes the approved SOW in accordance with the Obligated Project and applicable PA requirements.	
Closeout	**(Typically, the same for both):** Standard PA project completion and closeout process, including reconciliation of completed work and required supporting documentation, as applicable for each Project.	
Key Consideration	Requires greater Applicant involvement and often a long development timeline but supports the preparation of more accurate SOWs and Cost Estimates.	Prioritizes speed to Obligation and reduced Project development burden in exchange for less Applicant involvement and potentially less flexibility to address Project complexities post-Obligation. Post-Obligation requirements for Amendments and EHP reviews may impact construction timelines post-obligation.

FLEXIBLE RESTORATION PROJECT TYPES OVERVIEW

This guide provides PA Applicants with an overview of Flexible Restoration Project Types. This job aid specifically focuses on Capped Projects to include Improved, Alternate, and Section 428 Project Types and includes Project Type examples, as well as a comparison table.

FLEXIBLE RESTORATION PROJECTS OVERVIEW

FEMA PA generally funds the restoration of disaster-damaged facilities to their pre-disaster design and function. However, when restoring a facility exactly as it existed is not practical or does not meet the Applicant's long-term needs, FEMA provides Flexible Restoration Project options that allow Applicants to use eligible PA funding toward a different design, facility, or approach, subject to applicable eligibility requirements and funding limitations.

Standard PA Projects are the most common type and are focused on restoring what was lost to pre-disaster design and function (including required upgrades for codes and standards).

Flexible Restoration Projects (i.e., Projects that do not restore a facility to pre-disaster design and function), offer three options under FEMA guidance for restoring or replacing a facility with a different design and / or function.

- **Improved Projects** allow Applicants to enhance a facility (e.g., through better materials or design) while maintaining the same function and at least the same capacity of the damaged facility prior to the disaster. Improvements or changes to the pre-disaster design that are not required by eligible codes and standards may also be incorporated.
  - Note: This applies to both Small and Large Projects

- **Alternate Projects** allow Applicants to use funds for a different facility or purpose when restoring the original facility is not practical or desirable, provided the Project is for permanent work that benefits the same community.
  - Note: This applies to both Small and Large Projects

- **Alternative Procedures** (i.e., Section 428) are typically used under specific FEMA programs to offer streamlined processes and greater flexibility but may be subject to stricter cost caps.
  - Note: These can only be applied to large Projects for permanent work.
  - Note: The Subrecipient can combine multiple eligible projects into an Alternative Procedures Project.

Additional information specific to the funding cap for each Project Type is provided in the table on the final page of this job aid.

KEY POINT: For Flexible Restoration Projects, FEMA caps the amount of PA funding based on the estimated amount to restore the damaged facility to its pre-disaster design and function, including eligible costs required to comply with current codes and standards.

FLEXIBLE RESTORATION PROJECT TYPES OVERVIEW

The information below provides examples of Flexible Restoration Projects and summarizes key points for Applicants.

FLEXIBLE RESTORATION EXAMPLES BY PROJECT TYPE

Improved Project Example:

- Scenario: A fire station is damaged by flooding.
- Action: The city elects to rebuild it with flood-resistant materials and adds a second bay for emergency vehicles.
- Note: Improvements are allowable, but the federal share is capped at the original estimate to restore the station to its pre-disaster function and capacity.

Alternate Project Example:

- Scenario: A library is damaged beyond repair and is not essential in its current location.
- Action: The city uses the funds to build a smaller library annex in a different neighborhood or convert the funds to improve a community center.
- Note: Funding for the proposed actions are capped at the estimated cost to restore the original library back to its pre-disaster function and capacity.

Alternative Procedures Example:

- Scenario: A school district opts into FEMA's PA Alternative Procedures after a wildfire.
- Action: Instead of restoring each damaged school, the district consolidates resources to build a new, centralized education center at an entirely different location.
- Note: The district receives a capped grant and has flexibility in how it uses the funds.

KEY POINTS FOR APPLICANTS

- Applicants considering Flexible Restoration options should discuss strategies and Project considerations with their assigned Cal OES PA Specialists as early as possible to provide sufficient time for development, review, and consideration of FEMA Cost Estimates.
- For Alternative Procedures Projects (i.e., Section 428), FEMA, the Recipient, and the Applicant must negotiate a fixed cost agreement within 18 months of the declaration date.
- Each time FEMA transmits a fixed-cost offer, the Recipient and Applicant have a combined total of 30 calendar days from the date of FEMA's transmittal of the fixed-cost offer to accept the offer (not to exceed the 18-month deadline).
- Applicants electing to pursue a capped project must first obtain approval from Cal OES before moving forward.
- Additional approvals are required by FEMA depending on the type of Flexible Restoration / Alternate Project.

For additional information on standard Projects, see the ***PA Project Formulation Overview*** in the Cal OES PA Toolkit.

FLEXIBLE RESTORATION PROJECT TYPES OVERVIEW

The following table provides a comparison of the project types for Capped Projects compared to Standard projects.

CRITERIA	STANDARD PROJECTS	IMPROVED PROJECTS	ALTERNATE PROJECTS	*ALTERNATIVE PROCEDURES
Initial Estimate Based on Scope of Work (SOW)	The **SOW** is based on restoring the damaged facility to its pre-disaster design and function, including required upgrades for current codes and standards.	**Same as Standard Project.** Estimate is based on restoring the facility to pre-disaster function but allows for improvements which are capped.	**Same as Standard Project.** Estimate is based on restoring the facility to pre-disaster design. Funds are capped - can be used for alternate purposes	**Same as Standard Project** but are typically applied under streamlined or pilot programs. **Capped at the aggregate estimate** for all selected damages.
Costs Exceeding Initial Estimate	**Might be reimbursed** if justified and eligible under FEMA policy. Applicants are advised to discuss circumstances with their assigned Cal OES Program Specialist.	**Not reimbursed.** Costs are capped at the approved estimate or *federal share of the actual costs*. Applicant is responsible for any cost overruns.	**Not reimbursed.** Costs are capped at the approved estimate or *federal share of the actual costs*. Applicant is responsible for any cost overruns.	**Not reimbursed.** Strict cap on federal share. FEMA develops and transmits a **fixed-cost offer** to the applicant.
Required Improvements (i.e., Codes and Standards)	**Included** in estimate if necessary to restore the facility to pre-disaster function/ capacity.	**Included**. Required improvements are still part of the pre-disaster or in-kind estimate.	**Included.** If the project requires modifications, improvements must be accounted for.	**Included.** Required improvements must be met even under alternative procedures.
Elective Improvements (Not Required)	**Not allowed.** Only eligible work is funded.	**Allowed**. For example, upgrading materials or design.	**Allowed**. Funds can be redirected to a different facility or function.	**Allowed**. Offers maximum flexibility - funds may be used **across all Alternative Procedures Projects**.
Complete Changes to the Project (Do Not Replace / Rebuild Facility)	**Not allowed.** Must restore the original facility.	**Not allowed.** Improvements are allowed, but the facility must maintain original purpose / function.	**Allowed.** Funds can be used for a different facility or purpose.	**Allowed.** Offers **flexibility** to use funds differently, often under pilot or simplified procedures.
Mitigation Funds	**May be included** to reduce future risk (e.g., hazard mitigation).	**May be included.**	**Not allowed.** FEMA does not include costs related to PA mitigation in the capped amount.	**May be included.** Can vary depending on program rules. **Discuss with Cal OES PA Specialist.**

PA ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) CONSIDERATIONS

This document provides a high-level overview of EHP considerations, including how and when to identify potential EHP considerations as well as guidance on engaging Cal OES EHP for technical assistance.

WHAT IS AN EHP CONSIDERATION AND HOW DOES IT IMPACT PA OPERATIONS

All FEMA-funded projects must comply with state and federal regulations and laws. An EHP consideration is any potential impact to natural and cultural resources—resulting from PA project work—that may require FEMA review to determine whether legal requirements have been met. EHP considerations are identified and evaluated throughout all phases of PA Program Delivery. PA Applicants are not expected to be EHP experts; however, Applicants should be familiar with general EHP considerations to effectively monitor Projects and assess when coordination with Cal OES EHP may be needed for specialty support.

The sections below provide examples of common PA Project work, activities, and conditions that Applicants should monitor for to support the identification of potential EHP considerations.

WATERWAY CONSIDERATIONS

Watersheds, coastal areas, and water conveyance systems all support fragile ecosystems that may include fisheries, agriculture, and drinking water. Waterway examples Applicants should be aware of include, but are not limited to:

- Installation / use of temporary bridges and water crossings;
- Streambed alterations / work within the high-water mark;
- Projects within / adjacent to wetlands or coastal areas; and
- Impacts to water conveyance structures / systems.



SPECIES CONSIDERATIONS

State and federal endangered and protected species acts, treaties, and regulations exist to conserve and sustain the habitats and status of specific terrestrial, avian, and aquatic species. Species examples Applicants should be aware of include, but are not limited to:

- Endangered and protected avian and terrestrial species;
- Migrating fish, their habitats, and migratory routes; and
- Presence of nesting birds (during nesting bird season).



HISTORIC CONSIDERATIONS

Buildings, structures, sites, objects, and cultural resources that are at least 45 years old may have special protections and considerations specific to project work. Historic and cultural resource examples Applicants should be aware of include, but are not limited to:

- Registered and unregistered historic structures;
- Signs, objects, trails, historic landmarks;
- Historic, cultural, and tribal resources / areas; and
- Ground disturbing activities that may unearth artifacts.



PA ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) CONSIDERATIONS

WHEN AND HOW TO MONITOR FOR EHP CONSIDERATIONS

Applicants should proactively monitor damages / projects throughout each Phase of PA Program Delivery and continually assess new information / documents to identify potential EHP considerations. If a potential EHP consideration is identified, Applicants should coordinate with their assigned PA Specialists and Cal OES EHP. This collaborative approach reduces potential Project issues and delays (e.g., acquiring necessary permits, compliance documentation). PA Specialists and Cal OES EHP both have responsibilities for supporting Applicants in identifying and addressing EHP considerations.

- PA Specialists assess projects at a high level and, along with the Applicant, monitor for potential EHP considerations to effectively coordinate with Cal OES EHP.
- The Cal OES EHP Unit reviews projects and provides subject matter expertise to Applicants to support compliance with state and federal regulations and laws.

The section below highlights key milestones when EHP Consideration may be identified. These milestones provide opportunities for PA Specialists to gather information, ask questions, and review documents to discover EHP considerations to minimize project delays / deobligations.

	APPLICANT COORDINATION AND EVALUATION	MILESTONES
PHASE I	During Phase I, PA Applicants should coordinate with their assigned PA Specialists and Cal OES EHP to identify potential damages with EHP considerations when drafting their Impact List.	▪ Applicant Briefing ▪ Impact List Development ▪ Exploratory Call ▪ Recovery Scoping Meeting

	IMPACTS AND ELIGIBILITY	MILESTONES
PHASE II	During Phase II, Applicants should coordinate with their assigned PA Specialists and Cal OES EHP to develop damage descriptions that summarize any identified EHP considerations.	▪ Impact List Submittal ▪ Grouping Damages ▪ Site Inspections ▪ Damage, Description and Dimensions (DDD)

	SCOPING AND COSTING	MILESTONES
PHASE III	During Phase III, Applicants should coordinate with their assigned PA Specialists and Cal OES EHP to determine if the Scope of Work (SOW) and Cost Estimates include identified EHP considerations.	▪ Develop / Validate SOW and Cost Estimates ▪ 406 Hazard Mitigation ▪ Review Applicant Documents ▪ Compliance Evaluation

	FINAL REVIEWS	MILESTONES
PHASE IV	During Phase IV, Applicants should coordinate with their assigned PA Specialists and Cal OES EHP to confirm that all EHP requirements have been met prior to signing the Project Application.	▪ Final EHP Review ▪ Final Cal OES Review ▪ Final FEMA Review

PA ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) CONSIDERATIONS

The information below provides a workflow to assist PA Specialists when engaging Cal OES EHP for technical assistance.

HOW APPLICANTS ENGAGE CAL OES EHP

Once an EHP consideration is identified, Applicants should coordinate with their assigned PA Specialists to engage Cal OES EHP for technical assistance.

1. **Gather and prepare relevant information to provide Cal OES EHP a brief summary (e.g., short paragraph) of the damages / project and potential EHP consideration including:**

    - Applicant / project names and disaster / project numbers;
    - Description of the potential EHP consideration;
    - A summary of current / ongoing Applicant actions ; and
    - Permits the Applicant has obtained / requested.

2. **Email the brief summary to Cal OES PA Specialists to request a technical review of the damages / project by Cal OES EHP Specialists.**

3. **Facilitate an initial review meeting with the Cal OES EHP Unit and PA Specialists to discuss the potential EHP consideration. Applicants should:**

    - Schedule the EHP engagement meeting;
    - Introduce staff and relevant points of contact (POCs) to Cal OES EHP; and
    - Facilitate an initial consultation with Cal OES EHP to provide further details and ask targeted questions.

4. **Monitor the consideration, coordinating with Cal OES EHP and PA Specialists as appropriate, to minimize delays in moving the Project through each Phase of PA Program Delivery. Applicants should:**

    - Inquire about progress with the EHP consideration / technical assistance during regular PA meetings and engagements with the PA Specialists; and
    - Engage with Cal OES EHP as needed until EHP confirms that requirements are met.

5. **Continue monitoring the damages / projects throughout each Phase of PA Program Delivery to identify additional EHP considerations that may arise.**

For additional information summarizing Project documentation
Review the *PA Applicant - EEIs and Supporting Documentation Job Aid* in the Cal OES PA Toolkit.

PA GRANTS PORTAL OVERVIEW

This document provides a brief overview of the Grants Portal (GP) system used to support PA, guidance for accessing GP and references to resources for Applicants to address frequently asked questions (FAQs). This material is intended to supplement additional program guidance available from the Cal OES PA Branch.

GRANTS PORTAL OVERVIEW

GP is an online platform maintained by FEMA to deliver and administer the PA program. GP enables Applicants to identify damages and develop them into PA projects. All Applicant actions to execute project formulation, including identifying damages, developing Scope of Work (SOW), and providing final project approvals occur within GP. Applicants should monitor GP on a regular basis to track the progression of projects and complete actions necessary to advance projects to the next PA Milestone.

- GP serves as FEMA's primary online system for managing PA grants, providing a centralized location for submitting and tracking project documentation.
- Applicants use GP to upload required forms, damage information, cost documentation, and supporting records throughout the Project lifecycle.
- The system facilitates communication and collaboration between Applicants, Cal OES and FEMA by enabling RFIs, document sharing, and project updates.
- GP provides real-time visibility into project status, funding determinations, and key actions, helping Applicants monitor progress and meet program deadlines.
- By maintaining a complete electronic record of all project-related activities and documentation, Grants Portal supports transparency, accountability, and efficient grant administration.

GP is used by all Applicant and FEMA stakeholders, including but not limited to authorized Applicant Representatives, FEMA Program Delivery Managers (PDMG), and Hazard Mitigation and Environmental and Historic Preservation (EHP) staff. Every action, document, request for information (RFI), and eligibility determination should be captured in GP to consolidate records and streamline administration of projects.

GUIDANCE FOR PA APPLICANTS

- Applicants should regularly review their GP Applicant Event Profiles, Project information, and updates, as there is no universal GP system for official notifications of every project change / update.
- Applicants should upload and document communications / decisions within GP from PDMGs which occurred outside of GP.
- Applicants should respond to RFIs as promptly and completely as possible, notify their assigned PA Specialists to review and provide feedback on the RFI response, and upload requested documents.
- Applicants should proactively upload eligibility and project documentation throughout all PA Program Delivery Milestones – it is particularly helpful to submit Requests for Public Assistance (RPAs) as early as possible.

The following information summarizes official FEMA resources that provide GP training.

FEMA TRAINING VIDEOS

FEMA maintains the official FEMA PA GP YouTube Channel. This channel provides more than 100 training videos related to a wide variety of GP training topics that are designed to assist both beginner and / or experienced users.

- **Official training video link:**
  FEMA Public Assistance - YouTube
  (https://www.youtube.com/@femapagrantsportal-grantsm8920)

- **Recommended search term in your preferred search platform:**
  "FEMA Grants Portal Official YouTube Channel"

For assistance identifying key search terms to locate resources for navigating the FEMA GP YouTube Channel, reference the Cal OES PA Toolkit, "PA Program Delivery Phases" document for a list of PA Milestones.

HOW TO ACCESS GRANTS PORTAL, HELP INFORMATION, AND FAQs

The information below summarizes how to establish a GP account (if Applicant does not already have one), how to log into GP, and how to navigate / utilize the help section and FAQs.

How to Establish a Grants Portal Account

The registration process requires state and local governments and certain private non-profit (PNP) organizations to request an account for GP. FEMA identifies three (3) methods to establish a GP account:

1) Request account / assistance through Cal OES;
2) Accept an emailed invitation from Cal OES; and
3) Navigate to GP (https://grantee.fema.gov/) and follow the directions provided by FEMA for establishing an account, by clicking on the link to "Register Your Organization for Public Assistance" as pictured below.

This link is located on the GP home page underneath the "Sign In" button.



For assistance establishing a GP account, please contact the GP Hotline:

Phone: (866) 337-8448
E-mail: FEMA-Recovery-PA-Grants@fema.dhs.gov

You can also reach out to Cal OES at disasterrecovery@caloes.ca.gov for assistance.

How to Login to Grants Portal

Users are able to log into GP after their agency has established a GP account. This process requires two-factor authentication. To initiate the log in process, navigate to GP (https://grantee.fema.gov/) and follow the steps below:

- Enter the username and password.
  - This will prompt the system to send the user an authentication passcode to their email, which serves as "two-factor authentication." GP requires a passcode for accessing the system each time an user logs in.
- Enter the emailed authentication code into GP.
  - Please note that this code is temporary and will expire. If the code expires, the user will need to log into Grants Portal again to receive a new passcode.

Upon successful login, the user will be directed to the GP dashboard for their agency, and they may begin utilizing the system.

How to Navigate to the Help Section

The FEMA GP offers a comprehensive help section that includes an extensive library of FAQs. This resource is easily accessible within GP and provides quick assistance and guidance. The "Help" and FAQ sections may be accessed by clicking on the GP "Help Icon". The icon presented in the image below, can be found in the upper right corner of the GP system.



For assistance establishing a GP account, please contact the GP Hotline:

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E-mail: FEMA-Recovery-PA-Grants@fema.dhs.gov

You can also reach out to Cal OES at disasterrecovery@caloes.ca.gov for assistance.

How to use the Help Section

The help section within Grants Portal provides five (5) options to assist users:

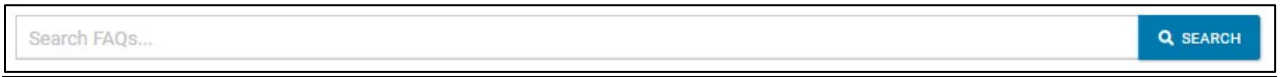
FAQ	RESOURCES	FEEDBACK
Answers to FAQs	Instructional tools and resources	Portal to submit GP feedback to FEMA

YOUR ACCOUNT	CONTACT US
Portal to manage personal profile and project subscriptions	Portal to request customer support and provide improvement feedback

How to use the Frequently Asked Questions Section

The FAQ section provides multiple options for accessing support / training information and topics, including, but not limited to, the ones shown below.

A dedicated search field (pictured below) allowing users to search by key terms.



For assistance identifying key search terms to locate answers to FAQs and navigating GP, reference the Cal OES PA Toolkit, "PA Program Delivery Phases" document for helpful PA Milestones.

A display field of popular FAQs (pictured below) for GP users to review as a starting point for searching and using the FAQ section.

What is eligible? *Public Assistance Eligibility*	**What private nonprofits are eligible for assistance?** *Private Non-Profit Eligibility*
What resources are available for new Applicants? *Resources for Applicants*	**Where can I get help with Grants Portal?** *Technical Assistance*
What is the Damage Inventory? *Damage Inventory Description*	**What is a Recovery Scoping Meeting?** *Recovery Scoping Meeting Description*

For assistance establishing a GP account, please contact the GP Hotline:

Phone: (866) 337-8448
E-mail: FEMA-Recovery-PA-Grants@fema.dhs.gov

You can also reach out to Cal OES at disasterrecovery@caloes.ca.gov for assistance.

PUBLIC ASSISTANCE

PA Phase I

Applicant Coordination and Evaluation Job Aids





20.	Applicant Briefings
21.	Request for Public Assistance (RPA)
22.	PA PNP Fact Sheet
23.	PA Recovery Scoping Meeting Job Aid

PA APPLICANT BRIEFING OVERVIEW

This document provides Cal OES PA Specialists with a summary of the Applicant Briefing (AB), provides technical guidance, and a summary of actions / key points for potential PA Applicants before, during, and after the AB.

APPLICANT BRIEFING SUMMARY

The AB is an informational session held by Cal OES to educate potential PA Applicants—such as local governments, tribal governments, state agencies, and certain non-profit organizations—about the PA Program following a federal disaster declaration.

The AB is an important first step for organizations interested in receiving funding through FEMA's Public Assistance (PA) Program. Conducted by Cal OES, the briefing provides potential Applicants with an overview of the PA Program, eligibility requirements, application procedures, important deadlines, and documentation needed to support a successful application.

For potential PA Applicants, participation in the AB is an important step in a successful start to the PA Program Delivery process.

TECHNICAL GUIDANCE FOR PA APPLICANTS

Potential Applicants are strongly encouraged to attend to better understand program requirements, ask questions, and prepare for the next steps in the recovery process. To prepare for the AB potential PA Applicants should:

- **Understand that the Applicant Briefing is informational** and attendance does not constitute an application for PA funding and/or eligibility determination.
- Ensure the appropriate representatives / staff from their organization attend (i.e., individuals that can help identify damages, document costs, coordinate the application process, and are familiar with the sites / damages).
- Ask questions to clarify eligibility requirements, application procedures, deadlines, and documentation expectations. **Do not assume your organization or its disaster-related costs are automatically eligible for assistance.**
- Prepare to Submit Your Request for Public Assistance (RPA) to avoid delays while gathering detailed damage information.
- **Review incident specific instructions** such as deadlines, available assistance, and application requirements that may vary by declaration and funding program.
- Understand the next steps and become familiar with the PA Program Delivery process, including Applicant eligibility review, damage identification, site inspections, project formulation, and funding reviews.

KEY POINT: Attendance of an AB or being a potential Applicant inside a county approved for Public Assistance does not automatically grant FEMA assistance. AN RPA must be submitted by each potential Applicant.

For additional information specific to the RPA review the ***PA Applicant Request for Public Assistance Job Aid*** in the Cal OES PA Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

PA APPLICANT BRIEFING OVERVIEW

The information below provides potential PA Applicants a summary of actions / key points for before, during, and after the AB.

BEFORE THE APPLICANT BRIEFING

Potential Applicants should prepare to participate in the briefing by:

- Reviewing the briefing schedule, location, and instructions provided by Cal OES.
- Identifying appropriate representatives from management, emergency response, public works, and finance to attend.
- Designating a primary point of contact to coordinate with Cal OES and FEMA.
- Reviewing available Cal OES PA resources and FEMA Grants Portal account registration guidance.
- Identifying questions regarding potential eligibility, disaster related impacts, application requirements, or program deadlines.

DURING THE APPLICANT BRIEFING

Applicants should pay particular attention to information presented by Cal OES regarding:

- **Program Overview**: PA application procedures, program delivery, and FEMA Grants Portal.
- **Eligibility**: General requirements for eligible Applicants, facilities, work, and cost.
- **Program Deadlines**: Important submission deadlines and time sensitive requirements.
- **Project Funding**: Federal assistance, cost sharing requirements, and available funding procedures.
- **Compliance**: Procurement, insurance, Environmental and Historic Preservation (EHP), and hazard mitigation considerations.
- **Documentation**: Administrative responsibilities, recordkeeping, and supporting documentation requirements.

KEY POINT: Potential PA Applicants should ask questions to clarify program requirements and identify any necessary follow-up actions.

AFTER THE APPLICANT BRIEFING

Applicants interested in pursuing PA funding should:

- Review the application instructions, resources, and deadlines provided during the briefing.
- Establish or access their FEMA Grants Portal account.
- Submit a Request for Public Assistance (RPA) through FEMA Grants Portal withing the applicable deadline.
- Coordinate internally to identify disaster related damages, emergency work, associated costs, and available supporting documentation.
- Retain documentation needed to support potential PA project development and eligibility determinations.
- Monitor communications from Cal OES and FEMA regarding application status, required information, and subsequent steps in the PA process.

PA REQUESTS FOR PUBLIC ASSISTANCE JOB AID

This document provides an overview of Requests for Public Assistance (RPA) and describes the differences between public and private-non-profit (PNP) Applicants.

REQUEST FOR PUBLIC ASSISTANCE SUMMARY

The **Request for Public Assistance (RPA)** is a potential Applicant's official notification to FEMA of its intent to participate in the Public Assistance (PA) Program. The RPA collects general information about the organization, including its name, address, and primary and secondary contacts, as well as basic information used by Cal OES and FEMA to determine whether the organization is eligible to participate in the PA Program.

RPAs are due in FEMA Grants Portal (GP) within 30 days of the disaster declaration. Potential Applicants should submit the RPA as soon as possible after the applicable disaster declaration. Failure to submit within the required timeframe may result in the organization being unable to receive PA funding. Requests for extensions should be limited to circumstances where additional time is necessary and adequately justified. Application requirements differ for Public and PNP Applicants. The sections below provide guidance specific to each entity.

- **Public Applicants:** Generally, include eligible state, territorial, tribal, and local government entities and certain governmental organizations.
- **PNP Applicants:** Per FEMA guidance, eligible PNPs that own or operate "facilities that provide critical services or noncritical but essential social services that are provided to the general public are eligible for assistance."

Terminology: Your organization may use the term "Non-Profit Organization" (NPO), whereas FEMA uses the term PNP. For the purposes of this guide, PNP will be used to match FEMA terminology.

Key Point: RPA approval establishes the entity as an eligible PA Applicant but does not automatically establish the eligibility of individual facilities, damages, work, or costs.

CONSIDERATIONS FOR PUBLIC APPLICANTS

State, local, tribal, and territorial government entities generally follow the standard FEMA Public Assistance Applicant eligibility requirements. **Public Applicants should be prepared to establish their legal responsibility for disaster-related work and provide documentation necessary to support their RPA.**

- Confirm the entity meets FEMA requirements as an eligible public Applicant.
- Identify the facilities, infrastructure, and services impacted by the declared disaster.
- Be prepared to demonstrate the Applicant's legal responsibility for the damaged facility and work being claimed.
- Maintain documentation supporting damages, emergency response activities, costs, contracts, procurement, and insurance, as applicable.
- Identify and submit disaster-related impacts within applicable PA deadlines and respond promptly to requests for additional information.
- Designate appropriate personnel to coordinate with FEMA and the Recipient throughout project development and review.

The information below summarizes RPA considerations specific to PNPs as well as additional technical guidance for all PA Applicants.

CONSIDERATIONS FOR PRIVATE NON-PROFIT APPLICANTS

PNP organizations have additional eligibility and documentation requirements that differ from those of state, local, tribal, and territorial government Applicants. **PNPs should be prepared to provide additional information and documentation when submitting a Request for Public Assistance (RPA).**

- Be prepared to provide documentation demonstrating the organization's PNP status service (i.e., articles of incorporation, tax letter establishing PNP status).
- Provide documentation describing the facility (i.e., rent or lease agreements, deeds of trust), services provided, and how the facility was used at the time of the disaster to support FEMA's eligibility determination.
- Certain PNPs seeking assistance for permanent work may be required to first apply to the U.S. Small Business Administration (SBA) for a disaster loan before FEMA can provide assistance for eligible permanent work. Applications to SBA and FEMA should be made concurrently due to similar deadlines.
- Respond promptly to requests for additional information, as FEMA may require additional documentation before determining Applicant or facility eligibility.
- Maintain supporting records throughout the PA process, including ownership, insurance, maintenance, damage, cost, and procurement documentation, as applicable.

For additional PA information specific to PNP Applicants, see the ***PA Private Non-Profit Fact Sheet*** in the Cal OES PA Toolkit.

TECHNICAL GUIDANCE FOR ALL APPLICANTS

- **Identify your PA team early.** Designate staff responsible for coordinating with Cal OES and FEMA and managing documentation, project development, and deadlines.
- **Begin organizing disaster documentation immediately.** Maintain records of damages, photographs, emergency activities, contracts, procurement actions, labor, equipment, materials, and other disaster-related costs.
- **Understand the PA process before project development begins.** Participate in Applicant Briefings and FEMA/Cal OES training and become familiar with key PA requirements, terminology, timelines, and documentation expectations.
- **Establish a centralized documentation system.** Organize records by facility, damage location, project, and cost category so supporting information can be easily retrieved throughout project development and closeout.
- **Do not wait for FEMA to begin documenting impacts.** Identify and document all known disaster-related damages and emergency activities as early as possible; missing or incomplete information can affect subsequent project development and funding eligibility.

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
PA PRIVATE NON-PROFIT (PNP) FACT SHEET

This document provides a summary of PA Program eligibility, requests, and disaster loan requirements, as well as additional project funding and documentation information for PNPs.

TERMINOLOGY: Your organization may use the term "Non-Profit Organization" (NPO), whereas FEMA uses the term PNP. For the purposes of this guide, PNP will be used to match FEMA terminology.

FEMA PA PROGRAM SUMMARY FOR PUBLIC VS PNP APPLICANTS

The FEMA PA Program was designed to help public entities restore critical community services and infrastructure essential for public safety after disasters. FEMA's PA Program sets different requirements for PNP Applicants. While PNPs may provide *government-type* services, they are not government entities and must demonstrate that they provide *eligible, essential services* (as defined by FEMA) to the public at the request of the legally responsible jurisdiction.

Specific to "Emergency Work," for costs to be eligible for the PA Program, PNPs must also demonstrate that the services were requested by a local authority / agency. While the services provided by PNPs may help and fit within the PNPs internal mission statement / purpose, the costs of the services will *NOT* be eligible for the PA Program for PNPs that "self-deploy," or provide "Emergency Work" based on their own assessment of need.

FFEMA PA PROGRAM KEY-POINTS FOR PNP APPLICANTS

The FEMA PA Program differs from traditional (non-disaster elated) grants programs:

- The **PA Grants Program is a reimbursement program.**
- Reimbursement, under this program, means the PA Program (with few exceptions) does *NOT* provide funding up-front, but rather reimburses eligible costs upon completion and submission of documentation as proof of costs and payment.
- While there are some exceptions, PNP Applicants should operate with the expectation that it will be their responsibility to pay for work (or acquire funding from other non-government sources) and then receive eligible compensation afterward.
- PNPs should think of the PA Program as similar to that of a "rebate / refund" program, as opposed to a more common grant programs that provide money up front for projects.

PNP ELIGIBILITY TECHNICAL ASSISTANCE

PNPs may receive assistance from the PA Program but have different eligibility and process requirements than public Applicants. This includes, but is not limited to:

- Applicant Eligibility – A PNP must demonstrate tax emption under 501 (c), (d), or (e) of the Internal Revenue Code.
- Facility Eligibility – A PNP must demonstrate that the facility is used to provide critical or essential services to the general public.
- Work Eligibility – Depending on the type of work and services provided, the PNP may be required to apply for a Small Business Administration (SBA) disaster loan.

Eligible PNPs must also provide critical or essential services to the general public.

- PA Eligible Critical Services: Education, Emergency Medical, Utility, Emergency Services.
- PA Eligible Essential Services: Community Centers, Rehabilitation or other care facilities, Childcare, Food Assistance, Low-income Housing, Homeless Shelters, etc.
- PA Ineligible Services: Athletic Training, Camps / Retreats / Conferences, Natural Areas for Preservation or Conservation, Irrigation for Agricultural, etc.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA PRIVATE NON-PROFIT (PNP) FACT SHEET

KEY POINT: PNPs should review the **current** FEMA Public Assistance Program Policy Guide (PAPPG), and discuss with Cal OES PA Specialists the differences in Permanent, Temporary, and Emergency Work.

REQUESTS FOR PUBLIC ASSISTANCE (RPA) AND DOCUMENTATION

The RPA is the first step for Applicants in the PA process. To meet FEMA eligibility requirements, PNPs should be prepared to submit the following documentation with the RPA:

- Applicant Eligibility Documentation:
  - Internal Revenue Service (IRS) documentation demonstrating tax exempt status;
  - Letter from a state agency declaring the PNP a non-revue producing entity; and
  - Articles of association, bylaws, or other documentation indicating it is an organized entity compliant with IRS and state law requirements.
- Legal Responsibility Documentation / Proof of Ownership:
  - Deed, title, mortgage documentation, property tax bill / receipt, insurance; or
  - Documents demonstrating responsibility to repair (e.g., lease contract / agreement.
- List of services provided at the damaged site, when they were provided, and to whom.
- Membership Organizations: Membership / fee policy, and policy for waiving fees.
- Childcare Facility: Proof that the facility is a state recognized and licensed facility.
- Education Facility: Proof that the facility is accredited or recognized by the California Department of Education.

SBA DISASTER LOAN TECHNICAL ASSISTANCE

Depending on the type of services provided, a PNP may be **required** to apply for an SBA disaster loan to receive FEMA PA Grants funding:

- PNP Critical Services: FEMA provides assistance for both Emergency Work and Permanent work and an SBA loan application is not required.
- PNP Non-Critical, Essential Services: FEMA provides assistance for eligible Emergency Work, however, for Permanent Work, the PNP **must** apply for an SBA disaster loan. For these Applicants, FEMA considers SBA the **primary source of federal funding** for permanent work with FEMA being the **secondary source**.

All PNPs will be **ineligible** for PA Permanent Work in the following circumstances:

- If the PNP does not submit the disaster loan application prior to the SBA deadline;
- If the PNP does not accept an approved SBA disaster loan; or
- If the PNP cannot accept the terms of the loan.

DUPLICATION OF BENEFITS

In the FEMA PA Program, a **"duplication of benefits"** occurs when an applicant receives financial assistance from multiple sources for the **same** costs or damages. PNP Applicants should understand that certain sources of financial assistance are viewed as "credits," and will be deducted from FEMA PA Grants Program funds, including but not limited to:

- Insurance proceeds / settlements FEMA; and / or
- SBA / Government approved loans or other government grants.

OTHER FUNDING SOURCES

PNPs seeking funding (outside of SBA) to start project work should note the following:

- Funds obtained, specifically for the PNP Applicant's PA Project, need to be reported in the Applicants project documentation.

PA RECOVERY SCOPING MEETING (RSM) JOB AID

This document provides a summary of the Recovery Scoping Meeting (RSM), timeframes associated, roles and responsibilities, and key points for PA Applicants.

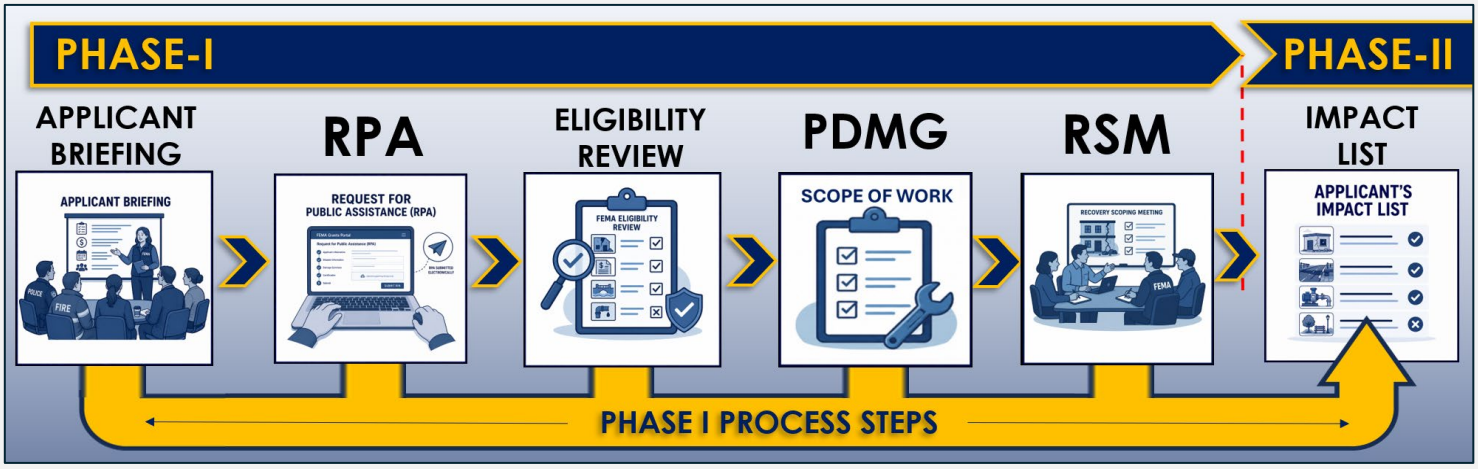
PA Applicant's will be assigned a Cal OES Specialists prior to or following the RSM depending on the severity and scope of the disaster. Cal OES Specialists provide assistance throughout the PA Program to help Applicant's navigate program complexities.

RECOVERY SCOPING MEETING SUMMARY

The RSM is an early meeting with FEMA, the Applicant, and Cal OES to discuss disaster damages with PA Applicants, identify potentially eligible work, and determine how Projects will move through the PA process. During the meeting, participants review impacts, documentation needs, and identify any additional information or site inspections needed to develop Projects.

- The primary purpose of the RSM is to prepare the Applicant for PA project development and discuss the Applicant's Impact List
- The FEMA Program Delivery Manager (PDMG) facilitates the meeting by discussing the PA delivery process and policies specifically applicable to the Applicant
- The RSM typically occurs within 21 days of FEMA assigning a PDMG to the Applicant
- The Applicant has 60 days from the RSM to submit the final Impact List to FEMA
- The completion of the RSM concludes PA Program Delivery Phase I

KEY POINT: Applicants should come to the RSM prepared to clearly explain what was damaged, what work has been or needs to be completed, and what documentation is available to support the claim.



RECOVERY SCOPING MEETING APPLICANT ROLE

- Applicants should take a proactive approach in preparing for the RSM, one of the most important meetings at the onset of the PA Program.
- Applicants should invite the appropriate parties (e.g., involved entities, persons with site-specific knowledge of the damages, finance / admin) to the RSM.
- Applicant should ask questions, especially pertaining to the next steps and documentation / information requirements.
- The PA Specialists should assist the Applicant in identifying and reporting all eligible impacts to FEMA within 60 days of the RSM.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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PA RECOVERY SCOPING MEETING (RSM) JOB AID

The information below provides Applicant's guidance for before, during, and after the RSM.

BEFORE THE RSM		
☐	Coordinate Attendance	Once the RSM is scheduled, coordinate who should attend the meeting, and continue assisting the Applicant in preparing the Impact List.
☐	Confirm RSM Details	Confirm the meeting date, time, and location with the assigned FEMA PDMG.
☐	Confirm Details	Gather available damage documentation, photographs, cost estimates, insurance information, and other records related to disaster impacts.
☐	Grants Portal	Upload available damage documentation and supporting records to Grants Portal before the RSM.
☐	Review Information	Review Grants Portal to understand required documentation, Essential Elements of Information (EEIs), and upcoming PA process steps.

DURING THE RSM		
The PA Applicant should confirm FEMA discusses all topics and key points below.		
☐	Impact List	The Applicant has 60 days to submit to FEMA from the date of the RSM.
☐	Small and Larg Project Costs	FEMA.gov publishes the current and historical Small and Large Project cost thresholds for Public Assistance applications. Note: Per Capita Impact Indicator and Project Thresholds change annually.
☐	Project Funding	Small Project funding is disbursed before work completion and may be estimate based. Large Project funding is disbursed after completion based on actual costs. Cal OES retains 10% of obligated funds until closeouts.
☐	Cost Share Percentages	FEMA generally covers 75%, but may adjust upward to 90%, or 100% of eligible costs depending on the event. In instances where the cost share is 75%, Cal OES would provide 18.75% of the local share, and the Applicant is responsible for the remaining 6.25%.
☐	Cost Estimates	The Applicant should discuss how to, and what entity may produce the Cost Estimate for their anticipated Project(s).

AFTER THE RSM		
☐	RSM Review Meeting	Within 5 business days of the RSM, Applicants should coordinate with their assigned Cal OES PA Specialist to conduct an RSM Debrief and schedule recurring meetings.
☐	Project Development Plan (PDP)	Within 7 business days of the RSM, the Applicant should request the PDP from the assigned FEMA PDMG. If not provided within 7 days, Applicants should request assistance from their assigned Cal OES PA Specialist.
☐	Ongoing Guidance	Applicants should review timelines with their assigned Cal OES PA Specialists and provide weekly updates to complete the Impact List as soon as possible (due within 60 days after RSM).

KEY POINT: The Applicant should understand requirements, funding expectations, and deadlines; submit the Impact List on time; and coordinate frequently with FEMA and Cal OES.

PUBLIC ASSISTANCE

PA Phase II

Impacts and Eligibility Job Aids



PA PHASE II — Impacts and Eligibility Job Aids

24.	Essential Elements of Information (EEI)
25.	Supporting Documentation
26.	Impact List Job Aid
27.	Site Inspection Best Practices
28.	Damage descriptions and Dimensions (DDD) Overview

PA ESSENTIAL ELEMENTS OF INFORMATION JOB AID

This document provides Applicants with an overview of Essential Elements of Information (EEIs) and guidance to support thorough, detailed, and well documented response within Grants Portal (GP).

ESSENTIAL ELEMENTS OF INFORMATION SUMMARY

EEIs are Project specific documentation FEMA requires from Applicants. FEMA uses EEIs to identify and collect documentation needed to support Project development and demonstrate eligibility for PA funding. EEIs help FEMA establish and document key Project information related to the facility, disaster related damage, completed or proposed work, costs, and applicable compliance considerations. Depending on the Project and the Applicant's responses, FEMA may request additional information or documentation to fully evaluate the Applicant, facility, and work when determining PA eligibility.

Applicants are encouraged to coordinate closely with their assigned **Cal OES PA Specialist** and FEMA Program Delivery Manager (PDMG) when requested documentation is unavailable, an EEI is unclear, or technical assistance is needed. Cal OES provides technical assistance to Applicants navigating federal and state PA requirements.

COMPLETING ESSENTIAL ELEMENTS OF INFORMATION

During the **Recovery Scoping Meeting (RSM)**, the FEMA PDMG discusses documentation requirements and the EEI process with the Applicant. FEMA explains what EEIs are, how requests provided through Grants Portal, how Applicants will be notified, and how documentation is submitted. After the RSM, the PDMG enters project specific EEIs in Grants Portal as damages are grouped into projects. Depending on the Project's **Category or Work and identified damages**, FEMA may identify additional documentation requirements.

EEIs may be issued **prior to the Site Inspection,** Applicants continue submitting required EEI documentation throughout Phase II of the PA delivery process. Supporting documentation may also assist FEMA in validating disaster related damage and developing the **Damage Description and Dimensions (DDD)**. When completing EEIs, Applicants should:

- Review each EEI and identify the information and supporting documentation requested.
- Provide clear, project specific responses and attach relevant supporting documentation.
- Coordinate with internal departments and subject matter experts to obtain necessary records.
- Confirm documentation is associated with the correct project and accurately described in GP.
- Ensure project information is consistent with the DDD, photographs, Scope of Work, cost information, and other supporting documentation.
- Coordinate with your PA Specialist when questions or documentation issues arise.

Key Point: Begin gathering and responding to EEIs early in project development. Complete, and well supported EEI responses help FEMA in documenting disaster related damage and developing and evaluating the project for eligibility.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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The information below describes Applicant considerations for completing EEIs as well as examples of EEIs.

APPLICANT CONSIDERATIONS

Applicants should consider the following when responding to EEIs:

- **Monitor EEI requests and due dates in GP**. FEMA sends EEI requests through GP, and Applicants may also receive email notifications.
- **Prioritize accurate and complete responses**. Review information carefully before submitting it to FEMA and avoid submitting incomplete, unclear, or potentially inaccurate information.
- **Submit supporting documentation with the EEI response whenever possible.** Documentation should clearly support the disaster related damage, completed or proposed work, costs, and other information provided.
- **Coordinate with appropriate technical experts and departments.** Depending on the project, relevant information may involve personnel familiar with facilities, engineering, operations, finance, procurement, insurance, labor, equipment, or project costs.
- **Ensure information is consistent throughout the project record.** Damage, dimensions, work, quantities, and costs reflected in supporting documentation should align with the DDD and Scope of Work.
- **Address unavailable documentation**. If requested documentation does not exist or is unavailable, provide an explanation in GP and coordinate with the Cal OES PA Specialist regarding other information that may support the project.

Key Point: Applicants that do not have previous PA experience may want to consult their assigned Cal OES PA Specialists for guidance when preparing Project EEIs.

EXAMPLE ESSENTIAL ELEMENTS OF INFORMATION

The examples below are provided to assist Applicants with drafting general EEIs. The examples below identify documentation that may support project development or be requested through the EEI process. **Documentation requirements vary by project, and these examples are not all inclusive.**

- **Road damages**: Pre-disaster condition and maintenance records, maps and other documentation of damaged sections (demonstrating measurements and impacts of damage), as-built technical drawings (if applicable), material purchase invoices.
- **Buildings / Facilities**: Documentation of disaster related damages (photos / reports), use documentation, as-built records, maintenance and condition of building, insurance documentation, year of original construction and applicable historical significance, documentation of disaster related damages (photos / reports).
- **Emergency Work:** Emergency proclamation and waivers, activation dates and time logs for Emergency operation Center (EOC), evacuation orders and maps, shelter locations (including populations and opening and closing dates), mutual aid agreements, Force Account labor, equipment, and material documentation.
- **Debris Removal:** Site maps, debris quantities by type, load tickets, debris monitor reports, temporary reduction and permanent disposal site locations, permits, and lease agreements for temporary sites, when applicable.

The information below provides a summary of EEI documentation and a brief description of how an EEI and Request for Information (RFI) vary.

GENERAL ELIGIBILITY

While some documentation may not be immediately requested, Applicants should maintain complete disaster related project and cost documentation throughout the PA process. Cal OES Specialist works with Applicant to ensure required documentation is available to support costs claimed. Documentation may also be needed to support applicable CDAA reimbursement, including eligible non-federal cost share.

EEI/Eligibility Consideration	Documentation / Information
Establish Disaster Related Damage	Pre-incident photographs, facility maintenance records, safety / inspection reports
Within Declared Area	Address or GPS coordinates
Active Use / Pre-Incident Function	Maintenance records and / or invoices for services rendered to maintain the building, proof of operations
Legal Responsibility	Deed, title, lease agreement, bill of sale, land contract, mortgage, property tax bill, insurance policy, contract

EEI VS. REQUEST FOR INFORMATION (RFI)

EEI: Project specific documentation FEMA requests from the Applicant to support development and evaluation of the PA project. EEIs are managed through Grant Portal and may address documentation related to the facility, damage, work, costs, insurance, and other project specific requirements.

RFI: An official written request for information or documentation FEMA needs to make an eligibility determination or validate the claimed Scope of Work or costs. FEMA may issue an RFI when additional clarification or documentation is needed or when an Applicant has not completed an EEI. FEMA identifies a 15-day response deadline for an RFI in GP.

Key Point: **EEIs** identify the project specific information and documentation FEMA needs to develop and evaluate a project; and **RFI** is a formal request issued when FEMA needs additional information or clarification to complete its eligibility review or validate the claimed work or costs.

For additional information summarizing general technical assistance, review the ***PA Supporting Documentation Overview*** in the Cal OES PA Toolkit.

For additional information summarizing general technical assistance, review the ***PA Technical Assistance Overview*** in the Cal OES PA Toolkit.

PA SUPPORTING DOCUMENTATION OVERVIEW

This document provides Applicants with an overview of Supporting Documentation and guidance to support thorough, detailed, and well supported response within Grants Portal.

SUPPORTING DOCUMENTATION SUMMARY

Supporting documentation helps establish what the disaster damaged, why the work was necessary, what work was completed, and how the claimed costs were calculated. Applicants should organize records by project and retain the source documents behind each cost summary. FEMA may accept summaries or certifications for certain Small Projects, while requesting additional records when needed to validate eligibility, costs, or project closeout.

SUPPORTING DOCUMENTATION CONSIDERATIONS FOR APPLICANTS

While some documentation may not be immediately requested for a project, Applicants should maintain all disaster related documentation, as it may later be required to support California Disaster Assistance Act (CDAA) cost share reimbursement and /or future audits.

- Review information and attachments for accuracy and consistency before submitting them in Grants Portal. **Once information is entered into Grants Portal it becomes part of FEMA's record. Revising or removing incorrect information is extremely challenging.**
- Keep source records even when FEMA requests only a cost summary or certification. Retain records in alignment with the applicable federal and state retention requirements, including any longer period associated with an audit or litigation.
- Daily activity logs should identify the date, location, personnel, hours, and work performed. An ICS Form 214 may be used when it captures the needed detail; the key requirement is an adequate record of the work, rather than a particular form.

DOCUMENTATION AND INFORMATION BY COST TYPE

Cost Type	Documentation / Information
Force Account Labor ***(Applicant's own employees)*** For additional information see the ***PA Applicant Force Account Labor Job Aid*** in the Cal OES PA Toolkit.	Applicants should submit their pay policy and document the following in a cost summary: • Name; • Job title and function; • Type of employee (e.g., full-time exempt, full-time non-exempt, part-time, temporary); • Date and hours worked if the house were straight time or overtime; • Pay rate and fringe benefit rate; • Description of work performed with daily logs / activity reports; • Timesheets; and • Fringe benefit calculations. If the time being submitted is tied to the use of equipment, document this information as it can support validation for Force Account Equipment. Even if Applicants are not requesting reimbursement for the cost related to the employee, as this information is required for reimbursement.

DOCUMENTATION AND INFORMATION BY COST TYPE (CONTINUED)

Cost Type	Documentation / Information

Force Account Equipment ***(Owned by a potential Applicant)***	Applicants should develop an itemized cost summary organized by type of equipment to document the following:
	• Applicant-Owned Equipment
	  ○ Type of equipment and attachments used, including year, make, model, size, capacity, horsepower, and wattage (as applicable);
	  ○ Location or site used;
	  ○ Equipment code if using FEMA rates or the schedule of rates, including rate component, if not using FEMA rates; and
	  ○ Operator's name with date and hours used each day.
	• Applicant Purchased Equipment
	  ○ Invoices or receipts.
	Applicants may estimate the cost of force account equipment using FEMA equipment rates **or** tribal, state, or local equipment rates that meet criteria defined by FEMA. Applicants must provide documentation to justify the rate.

Leased Equipment	Applicants should develop an itemized Cost Summary organized by type of equipment and provide the following documentation / information: • Type of equipment, including make, model, size, capacity, horsepower, and wattage; • Location, site, and activity used; • Dates and hours used; • Rates and total costs including amount of fuel used; • Vendor and invoice number; • Lease agreement; and • Invoices or receipts. Applicants may be required to submit a cost reasonableness justification with documentation demonstrating multiple quotes solicited from vendors, formal bid process, etc.
Mutual Aid Agreements	Applicants should develop an itemized Cost Summary to document the following: • Dates worked; • Entity name; • Description of work performed; and • Total costs. Applicants should provide additional documentation including: • Written agreement (pre- or post-event); • Services requested and received; and • Invoices and proof of payment.

DOCUMENTATION AND INFORMATION BY COST TYPE (CONTINUED)

Cost Type	Documentation / Information

Materials and Supplies	Applicants should develop an itemized Cost Summary to document the following:
	• Stock Materials and Supplies
	  ○ Cost documentation such as original invoices, other historical cost records, or replacement costs;
	  ○ Inventory records;
	  ○ Type of supplies and quantities used; and
	  ○ Location used.
	• Purchased Materials and Supplies:
	  ○ Receipts or invoices;
	  ○ Quantities used; and
	  ○ Justification if the supplies were unused (e.g., explaining what the expected versus actual impacts were to justify why supplies were unused).
	Applicants should also provide their established method for pricing supplies and materials (e.g., historic prices for materials, cost estimates for materials pulled from stock, prices from area vendors, or replacement cost of the same material type).

Contract Services For additional information see the ***PA Applicant Procurement Overview*** in the Cal OES PA Toolkit.	Applicants should develop an itemized Cost Summary to document the following: • Contractor name; • Dates worked; • Billing or invoice numbers; • Amount; and • Descriptions of work performed. Applicants should provide documents related to procurement including: • Request for proposal; • Selection process; • Procurement policy; • Cost or price analysis; • Contract and change orders; and • Invoices. Applicants should provide documents related to contractor oversight for Time and Materials contracts including: • Daily or weekly logs; or • Records of performance meetings. If competitive processes were not followed, Applicants should document the local proclamation or State of Emergency that allowed for emergency procurement.

GENERAL DOCUMENTATION

Other Considerations	Documentation / Information
Insurance For additional information see the ***PA Applicant - Insurance Proceed Reconciliation Job Aid*** in the Cal OES PA Toolkit.	Applicants should provide all relevant insurance policies (e.g., property insurance, auto insurance, flood Insurance). Applicants should include the following information: • Property policy declaration; • Schedule of covered locations; • Property policy forms and endorsements; • Inland marine coverage section; and • Equipment breakdown section. Insurance settlement documentation should include the following information as applicable: • Final Statement of Loss; • Adjuster's estimates; • Settlement checks or documentation to support total insurance proceeds; • Correspondence explaining the settlement amount and allocation; and • Letter of denial.

Donations
 	
For additional information see the ***PA Applicant Donated Resource Projects Job Aid*** in the Cal OES PA Toolkit.
	Applicants should provide documentation with the following information for donated work:
	• Sign-in sheet; and
	• For each individual:
	  ○ Name;
	  ○ Title and function (for professional services);
	  ○ Date and hours worked;
	  ○ Location; and
	  ○ Description of work performed.
	Applicants should provide documentation with the following information for donated equipment:
	• Name of donor; and
	• Type of equipment, including make, model, size, capacity, horsepower, and wattage as applicable.
	• Location or site used; and
	• Date and hours used.
	Applicants should provide documentation with the following information for each supply or material:
	• Name of donor;
	• Description and quantity;
	• Location used; and
	Documentation to validate claimed value, including invoices or historical cost records.

DOCUMENTATION AND INFORMATION BY TYPE OF WORK

Type of Work	Documentation / Information
Emergency Work General Eligibility	Applicants should document the following information: • Detailed descriptions of work performed; • Description of immediate threat; and • If not apparent based on the description provided, records demonstrating presence of immediate threat (e.g., technical report, safety inspector reports, photographs).
Permanent Work General Eligibility	Applicants should document the following information: • Detailed descriptions of work performed; • Regular maintenance performed; • Pre-disaster condition of the facility / site; • All relevant insurance policies; • Impacts and severity of the damage from the incident; and measures to prevent additional damage.

DOCUMENTATION AND INFORMATION BY CATEGORY OF WORK

Category of Work	Documentation / Information
Category A: Debris Removal	Applicants should provide estimated or actual debris quantities removed, reduced, disposed, and recycled by type. The following provides additional information or documentation that may be required. • If debris removal is contracted, Applicants must provide documentation to support monitoring efforts; • Original debris location, transportation methods, and permanent / final disposal sites; • Location of temporary debris staging and reduction sites • Type of disposal site (e.g., public, private, commercial) • Copies of permits and authorization for reduction and disposal sites; • Documentation to substantiate coordination with regulatory and federal agencies; and • Documentation to substantiate debris is not pre-existing if removing from a waterway.
Category B: Emergency Protective Measures	Applicants should document the following as applicable: • The immediate threat caused by the declared incident; • The location, dates, and description of work performed; • Records supporting claimed labor, equipment, materials, and contract cost; and • And additional documentation required for specific protective measures under the current PAPPG.

DOCUMENTATION AND INFORMATION BY CATEGORY OF WORK

Category of Work	Documentation / Information

Category C: Roads and Bridges	Applicants must provide the following information / documentation for damaged, inundated, or submerged roads:
	• Documentation of pre- and post- event surface condition with pre-disaster and post-event photo or videos of impacted sections of the roads;
	• Documentation of any post-disaster repair work already completed;
	• Documentation of any repairs following the last pre-disaster assessments; and
	• Maintenance records or other documentation establishing that the Applicant has a routine maintenance program:
	  ○ Bridge inspection reports;
	  ○ Public meeting or contract work records;
	  ○ Documentation of pavement evaluation / management program; and
	  ○ Material purchases invoices and activity logs.
	Applicants must provide the following information / documentation for gravel loss on roads:
	• Documentation indicating gravel loss (e.g., work logs, material invoice quantities of the amount placed within 12 months of the start of the incident period); and
	• Photographs or videos of the field of displaced gravel.

Category D: Water Control Facilities	Applicants should submit the following information / documentation to support pre-incident capacity of channels, basins, or resources: • Pre-disaster capacity of the facility; and • Documentation supporting regular maintenance including maintenance plan and activity logs.
Category E: Public Buildings and Contents	Applicants must provide information / documentation about the following components: • Contents and supplies; • Status of documentation, records, or files stored in the facility; • Irreplaceable contents or objects; • Research-related contents; • Equipment; and • Vehicles.

KEYPOINT: For each project, provide applicable insurance policies and available claim records, or identify uninsured or self-insured facilities. FEMA reviews coverage and deducts actual or anticipated insurance proceeds from eligible costs.

DOCUMENTATION AND INFORMATION BY CATEGORY OF WORK

Category of Work	Documentation / Information
Category F: Utilities	Applicants should provide the following documentation to support pre-disaster condition: • Records of pre-disaster capacity and condition including maintenance records, contract documents, work orders, inspection logs, or a description of post inspection / maintenance certified by a licensed professional engineer; and • Construction work plan demonstrating the utility's past practices and current and future project (if available).
Category G: Parks, Recreation and Other Facilities	Applicants should document the following as applicable: • Each damaged park or trail feature's location, dimensions, maintenance records, and disaster related damage; • Pre-disaster condition, using photographs, inspection reports; • Repair work and associated cost; and • For engineered beaches, original design and construction records, maintenance and renourishment history, and pre- and post-disaster profiles to substantiate sand loss. If pre-disaster profiles are unavailable, design documents, and renourishment history may be used.

The information in this document is intended to supplement the guidance included in the FEMA PAPPG and provide an overview of guidance for common projects. Applicants should reference the PAPPG for project-specific guidance.

For additional information specific to PA Program Delivery, review the ***PA Program Delivery Phases***, ***PA Program Deadlines***, *and the* ***PA Roles and Responsibilities Overview*** in the Cal OES PA Applicant Toolkit.

This document provides PA Applicants with an overview of how to develop an Impact List and subsequently Group Damages, including technical assistance based on the Category of Work.

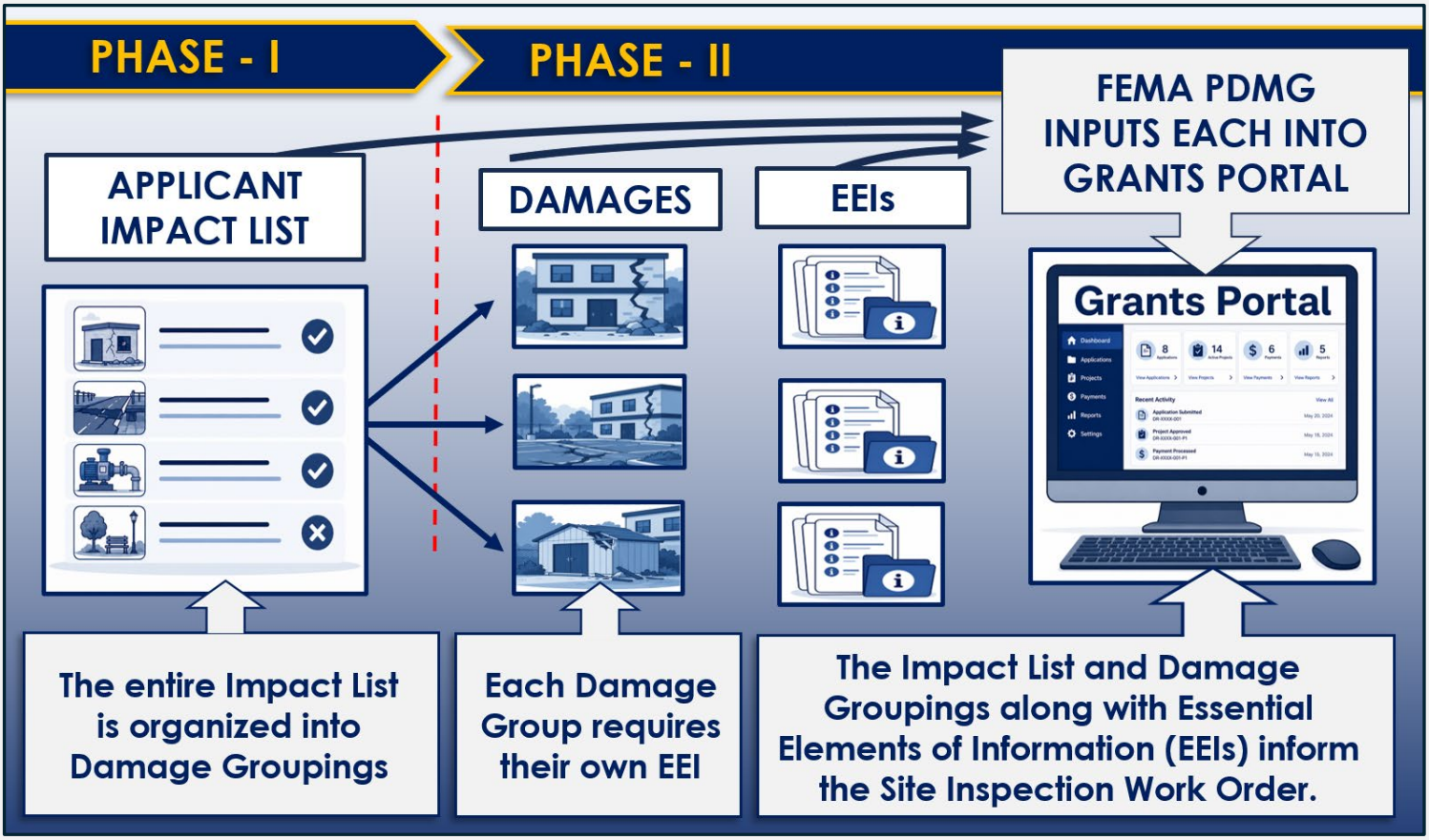
IMPACT LIST SUMMARY

An Impact List, previously referred to as a Damage Inventory, lists all debris impacts, emergency response activities, and damages for which the Applicant intends to seek FEMA PA reimbursement. The Impact List is one of the most critical documents at the start of the PA Program Delivery process, as all potential projects start with proper identification of damages.

Applicants should photograph and document all damages, the location, and measurements in the Impact List. The Applicant should capture consistent information about each identified damage on the Impact List, including but not limited to: damage name, location, description of damage, cause of damage, estimated cost, Category of Work, and type of labor.

Applicants should be prepared to discuss initial damages identified and have a draft Impact List prepared for the Recovery Scoping Meeting (RSM).

KEY POINT: All disaster-related damages must be identified and reported on the final Impact List within 60 days of the RSM. If damages are not clearly identified on the Impact List, it may lead to project delays, denial of sites / damages (even if otherwise eligible), or deobligation of funding.



For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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PA IMPACT LIST JOB AID

The information below summarizes the process for grouping damages and outlines technical guidance for Applicants preparing Impact Lists.

GROUPING DAMAGES SUMMARY

After the Impact List is finalized, FEMA PDMGs group damages into Projects based on internal guidance. This initiates the Project Formulation process. The grouping of damages into Projects sets the foundation of the Project Application and informs all future project formulation steps (e.g., EEIs, Site Inspection, Damage Description and Dimensions (DDD)).

Damages are grouped into Projects based on many factors. Applicants should inform the FEMA PDMG of any preferences for how damages are grouped and evaluate how grouping damages may impact the Applicant's ability to manage the Project (i.e., contracts / work orders, priorities for project completion). Applicants should consider how grouping damages will impact Project Formulation, including Site Inspection and Scope of Work. **The FEMA PDMG does not have to accept the Applicant's preferences**; however, the Applicant and the Cal OES assigned Cal OES PA Specialist should advocate for reasonable preferences, especially pertaining to Project strategies and site specifics that FEMA may not fully understand.

KEY POINTS FOR APPLICANTS

Impact List

- Applicants should use clear and descriptive names as the name of damage line items may be used in the development of the Site Inspection Work Order and DDD.
- Applicants should consider Categories of Work, prioritization of work completion, and Project Formulation during the development of the Impact List to facilitate a more deliberate and efficient grouping of damages.
- Applicant should carefully review the Impact List with their assigned Cal OES PA Specialist to verify that all eligible damages are included including any that were unable to be verified due to inaccessibility.

Grouping Damages

- Applicants should draft logically grouped damages for projects that have / may have:
  - Technical considerations (e.g., Environmental, Hazard Mitigation, Specialized Work);
  - Matching category of work (e.g., grouping debris damages into projects);
  - Proximity of damaged locations (e.g., along same road, k-rails for debris);
  - Same party performing repairs (e.g., County Force Account Labor); or
  - Matching project formulation lane (e.g., Standard Lane, Work Completed).

The assigned Cal OES PA Specialists can help differentiate between temporary and permanent work and other grouping considerations.

KEY POINT: It is much easier to remove damages from the Impact List than to add damages through an appeal at a later date.

For additional information on Project Formulation, review the ***PA Project Formulation Overview*** in the Cal OES PA Toolkit.

PA IMPACT LIST JOB AID

The information below provides summaries and examples for grouping damages by Category of Work to assist Applicants developing the Impact List and grouping damages.

CATEGORY A: DEBRIS REMOVAL

- Use a general description (e.g., "county-wide") for debris removed from several locations.
- List Private Property Debris Removal (PPDR) and demolition activities separately.
- Group multiple temporary debris staging sites into one line item, when applicable.
- List different types of debris (e.g., structural, vegetative) or significantly different methods of debris removal (e.g., right-of-way, bin program), as separate damage line items as they will likely be grouped into different projects.

CATEGORY B: EMERGENCY PROTECTIVE MEASURES

- List labor, materials, and supplies as separate damage line items, related but not limited to the following: donated resources, temporary facilities, rented contents.
- Group similar labor, equipment, and / or materials (e.g., sheltering, feeding, evacuation support) across multiple departments.

CATEGORY C: ROAD AND BRIDGES

- Logically group roads together based on proximity, accessibility, and type of repairs.
- List all road names in the damage line-item description.
- Record separate damage line items for repairs to culverts and bridges.
- Group road repairs connected to the repair of a culvert / bridge.
- Non-disaster damaged areas of repair should be kept separate from submitted Impact Lists (example: repairs to road sections on either end of disaster damages)

CATEGORY D: WATER CONTROL

- Document all water control facilities as separate damage line items.
- Record large components (e.g., emergency spillway, main spillway) for large water control facilities (e.g., Orville Dam), as separate damage line items.

CATEGORY E: BUILDINGS AND EQUIPMENT

- List each facility and its contents, equipment, and vehicles as separate line items.
- Consider potential smoke and water damage, which are often missed during initial damage identification, prior to finalizing the Impact List.

CATEGORY F: UTILITIES

- Record water storage and treatment, natural gas distribution, sewage collection and treatment, and power generation facilities as separate damage line items.
- Group poles, transformers, and guy-wire damages if located in proximity.
- List large utility complexes (e.g., hydroelectric dam) and separate facilities (e.g., substation, pump house) as separate damage line items.

CATEGORY G: PARKS, RECREATIONAL, OTHER

- Record all parks and beaches as separate damage line items.
- Identify facilities within a park or beach under Category E: Buildings and Equipment.
- Document roads within a park or beach under Category C: Roads and Bridges.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA SITE INSPECTIONS OVERVIEW

This document provides Applicants with an overview of the Site Inspection (SI) process, outlines Applicant roles and responsibilities, and identifies best practices and guidance to support preparation for, participation in, and follow-up actions related to Site Inspections conducted in coordination with Cal OES and FEMA.

SITE INSPECTION PURPOSE

The SI process allows Applicants to work with Cal OES and FEMA to document disaster related damages through in person field assessments. The SI helps ensure that damages, impacts, and potential repair needs are accurately captured to support development of the FEMA Public Assistance (PA) project. A SI may include, but is not limited to the following:

- Verification that the incident caused the damage;
- Identification of the facility /site (e.g., building materials, waterlines, integral ground);
- Documentation and confirmation of impacts / damages to the facility (e.g., components / materials, failure mechanisms, dimensions of damages); and
- Discussion of potential methods to restore the site to pre-disaster condition and function.

Information collected during the SI is used to develop the project's **Damage Description and Dimensions** (DDD). The DDD documents eligible disaster related damages and becomes the basis for the Scope of Work (SOW).

Site Inspection Process Summary



Depending on the event, FEMA, Cal OES, or the Applicant may perform the duties of the Site Inspector. PA Leadership may approve an in-person field visit or another method (e.g., desktop review). The Applicant should coordinate with their assigned Cal OES and FEMA representatives to confirm how the SI process will be conducted for their damages.

PA SITE INSPECTIONS OVERVIEW

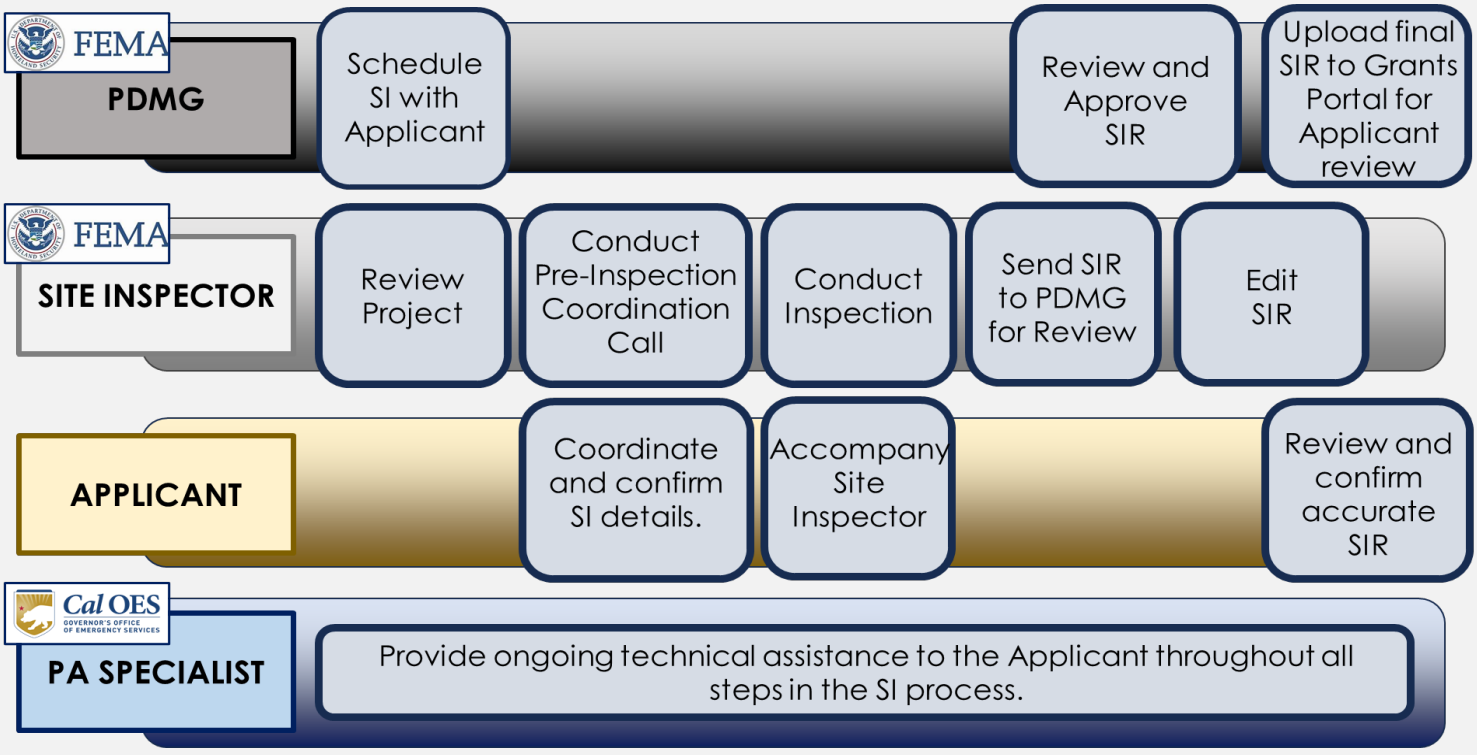
The information below illustrates the roles and responsibilities during the SI process and identifies key coordination points to help Applicants prepare and participate to support successful completion of the Site Inspection.

APPLICANT ROLE BEFORE THE SITE INSPECTION

- Gather documentation related to the facility / site (e.g., insurance, proof of ownership, pre-disaster condition, facility use, proposed repair methods, engineering reports).
- Identify if any SME with knowledge of the use of the facility and damaged components will be required to attend the SI and review the SIR.
- Review the SI Work Order to confirm a complete description of the site and area to be inspected is included.
- Participate in a Pre-Inspection Coordination Call with the Site Inspector and PDMG to confirm the details of the SI.
- Provide documentation for each damage line item, as it is included on the Impact List.
- Confirm the safety and accessibility of the facility / site.

KEY POINT: The Applicant should have staff with thorough understanding and working knowledge of the facility / site present at the SI to identify damages for the FEMA Site Inspector and answer any technical questions about the location. If the Applicant is not present or cannot identify appropriate damages, the SI will be rescheduled.

Overview of Site Inspection Roles



This diagram presents FEMA staff as the primary Site Inspectors, which is the most common structure during the PA process. Although the role may in some cases be performed by Cal OES staff or another entity.

PA SITE INSPECTIONS OVERVIEW

The information below provides high-level considerations and guidance for PA Specialists to provide to Applicants prior to initiating the SI process.

APPLICANT ROLE DURING THE SITE INSPECTION

- Attend the SI with any technical or SME with knowledge of the use of the facility and damaged components.
- Provide pertinent documentation / information to the Site Inspector and PDMG.
- Describe the method of repair / restoration (e.g., type of labor or equipment, changes related to pre-disaster design / function, codes, and standards, building materials).
- Document and measure everything the Site Inspector records to have a record of the SI and support the review of the SIR.
- Photograph / sketch damages and site conditions from multiple angles.

The Applicant must thoroughly review the SIR with a facility / site SME that has working knowledge of the facility / site to confirm the SIR contains accurate information and descriptions of the damages and methods of restoration.

KEY POINT: Most of the subsequent PA Program Delivery Process Steps, including the development of the DDD relies on the SIR. If there are damages not captured, or inaccurate information recorded in the SIR it can impact Project development and potential eligibility for proposed Scope of Work later in the PA process.

APPLICANT ROLE AFTER THE SITE INSPECTION

- Monitor the site, protect the site from further damages in other events, and notify Cal OES if additional damage occurs at the site.
- Submit any additional documentation that was requested during the SI to the PDMG.
- Review and approve the DDD for accuracy and monitor Grants Portal.

KEY POINTS FOR APPLICANTS

- The Applicant should have knowledgeable staff present at the SI that have technical knowledge of the facility / site to identify damages for the FEMA Site Inspector and / or answer technical questions.
- If the Applicant is not present or cannot identify appropriate damages, the SI will be rescheduled.
- The Applicant must thoroughly review the SIR with the facility / site SME for accuracy in description of the damages, dimensions, photographs / sketches, and methods of restoration.
- After the SI process, the Applicant does not receive another opportunity to address the information in the SIR prior to it being used to develop the DDD.
- If there are damages not captured, or inaccurate information recorded in the SIR it can impact Project development and potential eligibility for proposed Scope of Work later in the PA process.

PA DAMAGE DESCRIPTIONS AND DIMENSIONS (DDD) OVERVIEW

This document provides an overview of the DDD component of PA Projects, outlines the process for development and explains the Applicant review process.

DAMAGE DESCRIPTION AND DIMENSIONS SUMMARY

The **DDD provides the foundation for project eligibility and the Scope of Work** (SOW). The DDD is developed based on Essential Elements of Information (EEIs) provided by the Applicant and the Site Inspection Report (SIR). The DDD contains the following information:

- The date, cause of the damage, and pre-incident condition of the facility;
- The location of the damage (i.e., latitude, longitude);
- Proof that the Applicant is legally responsible for performing the work; and
- Descriptions and dimensions of damages or emergency services.

Applicants are encouraged to proactively submit supporting information for the DDD, as opposed to waiting until it is requested. Providing the required information / documentation earlier in the process supports successful development of an accurate and thorough DDD.

DEVELOPING THE DDD

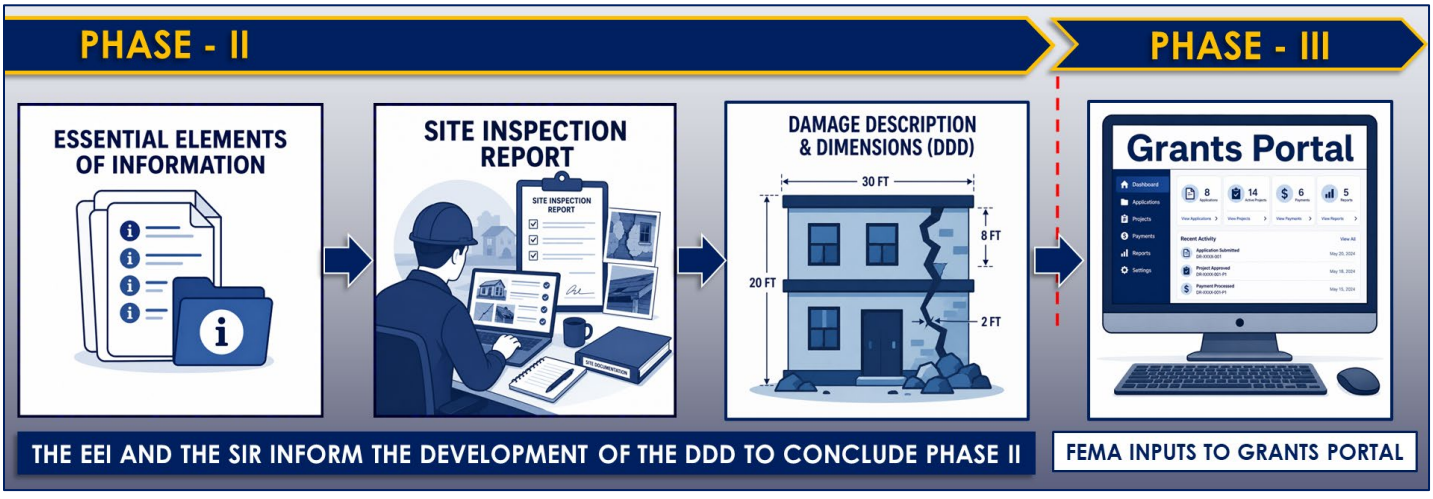
The FEMA Program Delivery Manager (PDMG) develops the DDD for PA Projects with work not yet completed, and FEMA's Consolidated Resource Center (CRC) develops the DDD for completed work that does not require a Site Inspection. In both cases, the Applicant may review the DDD once FEMA provides or uploads it to Grants Portal (GP).

Following FEMA PA Program delivery process updates in 2025, Applicants approval steps have significantly changed from previous years.

- PA Applicants no longer have the ability to "Approve" their DDD in the Grants Portal System.
- FEMA will prepare the DDD (based on verified damages in the SIR) only.
- Following the DDD Projects advance directly to Scoping and Costing.

Specific guidance provided from FEMA at the time of the change indicated the following:

- For future requests to modify the DDD prior to obligation, FEMA will consider prior requests made by FEMA for damage identification and supporting documentation.
- For post award changes, FEMA will substantiate the eligibility of proposed revisions in adherence to FEMA eligibility and procurement standards.



For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

PA DAMAGE DESCRIPTIONS AND DIMENSIONS (DDD) OVERVIEW

The information below outlines technical assistance for PA Specialists to provide Applicants prior to signing the final project.

APPLICANT REVIEW OF THE DDD

FEMA updated DDD processes in 2025. Applicants with prior PA experience should understand the process revisions as DDD review and approval steps have significantly changed from previous years.

- PA Applicants no longer have the ability to "Approve" their DDD in the Grants Portal System.
- FEMA will prepare the DDD (based on verified damages in the SIR) only.
- Following the DDD Projects advance directly to Scoping and Costing.

Specific guidance provided from FEMA at the time of the change indicated the following:

- For future requests to modify the DDD prior to obligation, FEMA will consider prior requests made by FEMA for damage identification and supporting documentation.
- For post award changes, FEMA will substantiate the eligibility of proposed revisions.

The Applicant should conduct a thorough review of the DDD, including comparing it to the SIR and having any technical or subject matter experts involved in the Site Inspection perform a complete review.

The Applicant should thoroughly review the DDD for any discrepancies and immediately contact their assigned Cal OES PA Specialists to discuss any issues. In some cases, the FEMA PDMG / CRC may be able to modify the DDD to resolve inaccuracies prior to the development of the SOW. Resolving discrepancies later in the PA Process is extremely difficult and may even require a Project version after Obligation.

KEY POINTS FOR APPLICANTS

- Applicants should review the project's details carefully and submit all questions (particularly related to EHP considerations) to Cal OES and FEMA PA prior to signing.
- If needed, Cal OES PA Specialists can assist Applicant in comparing the final project submission's SOW and FEMA Cost Estimate to the DDD to confirm that the information is comprehensive and accurate.
- Applicants should have an appropriate technical specialist familiar with the location, facility, and work review and concur with the project's details.
- After completing the Applicant Review, Applicants should prepare for the Recovery Transition Meeting (RTM) which initiates the formal transition of grant oversight from FEMA back to Cal OES (Recipient).
- Cal OES will provide additional information after the RTM specific to post-obligation processes for financial processing.

KEY POINT: The Applicant should thoroughly review the DDD for any discrepancies and immediately contact their assigned Cal OES PA Specialists to discuss any issues. Resolving discrepancies later in the PA Process is extremely difficult and may even require a Project version after Obligation.

PUBLIC ASSISTANCE

PA Phase III

Scoping and Costing Job Aids



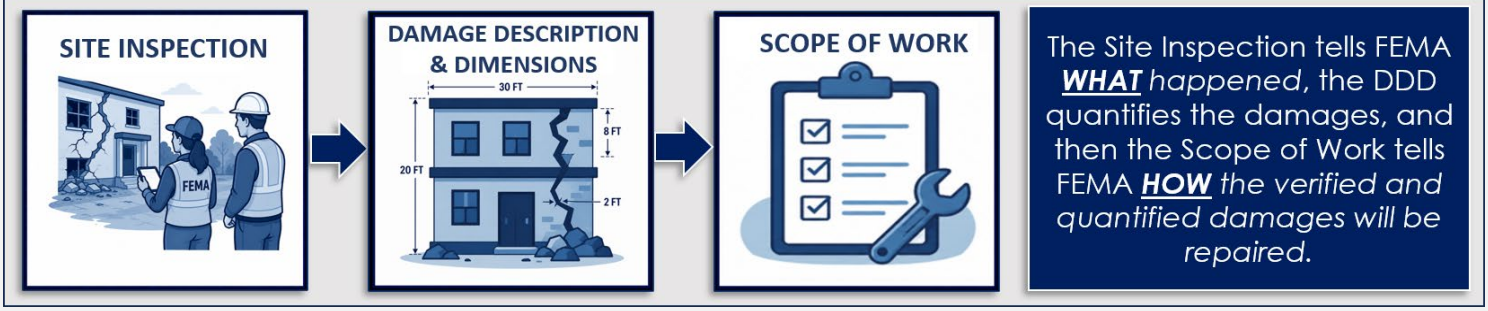
PA PHASE III — Scoping and Costing Job Aids

29.	PA Project Scope of Work (SOW) Overview
30.	PA Section 406 Hazard Mitigation Overview
31.	Appendix J Fact Sheet
32.	PA Project Cost Estimates Job Aid
33.	Appendix L Fact Sheet

This document provides PA Applicants with an overview of the Scope of Work (SOW), descriptions of FEMA and Applicant roles for developing the SOW, and guidance to support Applicants during the process.

SCOPE OF WORK SUMMARY

The SOW is a vital component of the PA Project. The SOW is a detailed description of the work, tasks, and activities necessary to repair damages detailed in the Damage Descriptions and Dimensions (DDD). A detailed SOW is crucial to support development of the Cost Estimate (CE). All technical reviews, and subsequent approvals, and project cost estimates are based on the SOW. ***ANY*** change to the SOW may require that the project restart review processes and repeat any completed PA Program Delivery Phases. ***Changes to the SOW after FEMA approval commonly results in project delays of months or years.***



KEY POINT: Ineligible damages, or **damages NOT included in the DDD cannot be included** in the SOW. Under the FEMA PA Program the SOW and Cost Estimate can *only* describe work for eligible damages identified in the DDD.

COMPONENTS OF A GOOD SCOPE OF WORK

To develop the SOW, FEMA requires Applicants to provide the following for each site / Project (not an all inclusive list):

- Percentage of work completed;
- Who performed, or will perform, the work (e.g., force account, contract, mutual aid);
- Proposed PA hazard mitigation measures, and identified consensus-based codes, specifications, and standards requirements; and,
- Technical studies, reports, and assessments.

A well-written SOW should clearly describe all aspects of the work required, including, but not limited to:

- Clear identification of the disaster-related damage or condition being addressed.
- Detailed description of the work necessary to complete the Project.
- Specific quantities, dimensions, and locations for resources and materials.
- Thorough explanation of the repair or restoration method and materials to be used to address the eligible work needed to complete the Project.
- Specific detail sufficient for FEMA to determine eligibility, reasonableness, and support development of a detailed Cost Estimate after the SOW is approved.

KEY POINT: The SOW comes before the Architectural & Engineering (A&E) plans, although the two become increasingly interconnected as projects become more complex. The SOW establishes the intent of the project. The A&E plans provide technical details.

The information below summarizes how codes and standards are applicable within the SOW.

CODES AND STANDARDS

Applicants are required to restore facilities in conformity with applicable State, local, or Tribal government codes and standards required in the local jurisdiction, and FEMA's Consensus-Based Codes, Specifications, and Standards—the minimum design criteria for eligible projects. Failure to include the required codes, specifications, and standards in eligible PA Project restoration will result in denial or deobligation of Project funding. Applicants must provide documentation to support the eligibility of facility upgrades required by codes or standards.

There are situations where Applicants are not required to follow FEMA's consensus-based codes, specifications, and standards, such as when:

- The jurisdiction has adopted codes that comply with 44 C.F.R. § 206.226(d) and have hazard-resistant elements that are the same or greater than those listed as FEMA's requirements;
- Implementing the required consensus-based codes, specifications, and standards would be technically infeasible;
- It would create an extraordinary burden on the applicant; or,
- It would otherwise be inappropriate for the facility (such as adversely affecting a facility that is listed or is eligible to be listed on the National Register of Historic Places).

If any of the above conditions apply, Applicants may request a waiver for the incorporation of codes, specifications, and standards with approval from the Regional Administrator.

KEY POINT: In most cases, FEMA will fund repairs that meet applicable pre-disaster codes and standards, while requirements resulting from new codes adopted after the disaster are generally not eligible.

FEMA CONSENSUS-BASED CODES, SPECIFICATIONS, AND STANDARDS

Applicants are responsible for identifying which of the consensus-based codes, specifications, and standards are applicable for each damaged facility, element, or component. Applicable consensus-based codes, specifications and standards are **outlined in Appendix M of FEMA's PA Program and Policy Guide (PAPPG)**. The SOW should provide a description of the work required to comply with those standards including but not limited to:

- Identifying specific elements or components affected and describe how each code, specification, or standard applies;
- Describing the work related to the codes, specifications, and standards and provide design drawings, component lists, or other similar documentation;
- Including dimensions and quantities for all components; and,
- Describing the direct relationship between disaster-related damage and any upgrades to undamaged elements.

KEY POINT: PA Applicants should review the current version of the FEMA PAPPG for specific guidance related to FEMA Codes and Standards requirements.

SCOPE OF WORK OVERVIEW

The information below summarizes Applicant and FEMA roles for an Applicant led SOW.

APPLICANT DEVELOPED SCOPE OF WORK

Applicants should work closely with their assigned Cal OES PA Specialists to discuss their familiarity with FEMA PA and experience in developing comprehensive SOW statements. FEMA is not obligated to accept an Applicant developed SOW and may only do so if the SOW clearly addresses every aspect of the DDD and provides strong justification.

Applicant Role	FEMA Role
• Create a thorough description of work to address all damages in the DDD • Provide a detailed justification for work that must occur beyond the DDD to facilitate repair (e.g., digging past a landslide to moderate peripheral slope failure) • Clearly articulate areas in which the work will require upgrades to meet currently enacted and enforced codes and standards • Develop clear explanations between repair work and any Hazard Mitigation work that may be included in the SOW	*Note: FEMA Program Delivery Managers (PDMGs) do not assist the Applicant in developing a SOW.* • PDMGs receive the SOW and provide it to the Consolidated Resource Center (CRC) for review • CRC review may take several weeks or months to complete insurance, legal, and Environmental and Historic Preservation (EHP) reviews • If the CRC accepts the SOW, it will upload it into Grants Portal (GP) • If the CRC does not accept the Applicant SOW, the CRC will develop one to meet FEMA requirements for Applicant review

KEY POINT: Changes to the SOW after FEMA approval commonly results in project delays of months or years.

APPLICANT DEVELOPED SCOPE OF WORK – CAT A

- Specify and describe the quantity of debris that was or will be removed / disposed
- Identify where debris was and where it will be disposed (temporary and / or final disposal)
- Describe any efforts to reduce the debris (i.e., mechanical compaction)
- Describe how removal / disposal efforts were or will be monitored
- Identify who removed the debris and who monitored the activity (i.e., contract labor)

APPLICANT DEVELOPED SCOPE OF WORK – CAT B

- Describe type and location of protective measures that have taken or will take place
- Explain how work reduced or will reduce / eliminate immediate threats
- Identify who performed or will perform the work (e.g., force account labor, contract)

APPLICANT DEVELOPED SCOPE OF WORK – CAT C-G

- Describe how the SOW restores the facility's pre-disaster design, function, and capacity
- Describe and justify in detail, any work that was / will be completed that may change the pre-disaster design and function of the facility
- Identify who performed or will perform the work (i.e., force account labor, contract)
- Force account labor must include labor and equipment hours, and amount and types of materials used

SCOPE OF WORK OVERVIEW

The information below summarizes Applicant and FEMA roles for a FEMA led SOW.

FEMA DEVELOPED SCOPE OF WORK

Applicants should coordinate with their assigned Cal OES PA Specialists to confirm that the FEMA SOW completely and accurately captures all required work that has been / will be completed.

Applicant Role	FEMA Role
• Monitor GP for Requests for Information (RFIs) and respond quickly to prevent project delays • Upon notification that the SOW is completed and awaiting Applicant approval, the Applicant should ensure that appropriate staff (i.e., project engineer, specialists) reviews and concurs with the SOW ***BEFORE*** the Applicant approves it • Coordinate with Cal OES PA Specialists and FEMA PDMGs for any aspects the Applicant believes should be revised • Approve the SOW ***ONLY*** after thorough review and concurrence that the SOW completely and accurately describes necessary work, activities, and tasks	• The CRC develops the entire SOW based on information provided in the DDD • The CRC may submit RFIs to the Applicant through GP if additional information / documentation is needed to complete the SOW • The CRC facilitates internal reviews (i.e., insurance, legal, EHP) • After CRC approval, FEMA PA reviews and approves, then Cal OES reviews and approves before the SOW is provided to the Applicant • The CRC uploads the completed SOW to GP for Applicant approval

APPLICANT REVIEW AND APPROVAL CONSIDERATIONS

The information below provides high-level considerations and guidance for Applicants prior to reviewing / approving a FEMA provided SOW.

- The Applicant review of the SOW is the final opportunity to make / request project changes without having to go through the formal amendments process
- The Applicant should clearly articulate and justify requested changes to the SOW before the Applicant approves it
- The Applicant staff member monitoring Grants Portal, prior to approving the SOW, should confirm that a project engineer or specialist with knowledge specific to the site and work completed / to be completed has reviewed and approved the SOW
- FEMA does not have formal processes for disputing a FEMA developed SOW – for this reason it is crucial that the Applicant review the SOW thoroughly and coordinate closely with Cal OES PA Specialists and FEMA PDMGS
- Applicants should maintain complete written documentation of all requested changes, decisions, and approvals within the project record and should not rely solely on informal emails, conversations, or verbal direction from FEMA personnel.

For additional information related to supporting documentation for SOW / Cost Estimates, review the ***PA Project Supporting Documentation*** in the Cal OES PA Applicant Toolkit.

PA SECTION 406 HAZARD MITIGATION OVERVIEW

This document provides a high-level overview of PA Section 406 Hazard Mitigation (HM) measures, including a comparison of PA Section 406 HM versus 404 Hazard Mitigation Grants Program (HMGP), key points for PA Applicants, eligibility, and cost-effectiveness.

WHAT IS PA SECTION 406 HAZARD MITIGATION?

PA Section 406 HM provides funding for HM measures that improve the resilience of public infrastructure / facilities impacted by a disaster. PA Section 406 HM specifically allows Applicants to implement repairs or replacements that strengthen damaged portions of infrastructure / facilities to reduce future vulnerability as part of the Applicant's PA project(s).

PA SECTION 406 HM VERSUS SECTION 404 HM

PA Section 406 HM is a distinct program from Section 404 HMGP. PA Section 406 HM provides funding for mitigation measures to **repair or replace damaged portions of facilities for eligible PA projects following a disaster.** In comparison, Section 404 HMGP provides funding for projects before or after a disaster, aimed at reducing the risk of future damage (facilities not damaged by a declared disaster). Key differences are summarized in the table below.

Category	PA Section 406 HM	Section 404 HMGP
Facility Eligibility	Applies to damaged facilities after disaster damage occurs.	Funds projects at undamaged facilities following a disaster.
Project Focus	Focuses on repairing disaster-damaged facilities with added mitigation to reduce future risk.	Covers a broad range of mitigation projects aimed at long-term risk reduction.
Geographic Applicability	Limited to declared counties with approved PA Permanent Work.	Funding is available statewide, not limited to declared counties.
Program Structure	Integrated into PA and directly tied to disaster-specific projects.	Administered as a separate, competitive grant program.

SECTION 406 KEY POINTS FOR PA APPLICANTS

The information below provides high-level considerations and key points for PA Applicants considering inclusion of PA Section 406 HM measures as part of a PA project.

- PA Section 406 HM funding not only supports repairs but also mitigation measures that reduce the risk of future disaster damage.
- Applicants should work with their assigned Cal OES PA Specialist and Cal OES HM branch to identify critical infrastructure and facilities that would benefit from PA Section 406 HM.
- Proposed PA Section 406 HM measures must meet cost-effectiveness evaluations to support funding approval.
- PA Section 406 HM measures must be integrated into the disaster recovery process, not as separate or delayed projects.
- Early collaboration with FEMA and Cal OES staff to discuss potential mitigation measures and help Applicants align proposed improvements with FEMA guidelines.
- Any mitigation measures must comply with local building codes, standards, environmental regulations, and be approved by FEMA -- however, code-required upgrades (adopted and enforced prior to the disaster) are not considered PA Section 406 HM measures, and **do not** require separate approval.
- Thorough documentation and reporting are required to support mitigation efforts that meet FEMA's eligibility requirements for approval.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA SECTION 406 HAZARD MITIGATION OVERVIEW

The information below summarizes PA Section 406 Hazard Mitigation eligibility and cost-effectiveness considerations.

PA SECTION 406 HAZARD MITIGATION ELIGIBILITY

As with all PA projects, FEMA will verify if the damage is the result of a declared disaster. For PA Section 406 HM projects, FEMA will also verify that mitigation measures do not negatively impact the facility's operation or make it more susceptible to damage from another hazard.

FEMA evaluates proposed PA Section 406 HM measures based on four main factors:

1. The proposed mitigation measure must reduce the potential impact of future damage.
2. The proposed mitigation measure must be cost-effective (see below).
3. The proposed mitigation measure must be technically feasible and effective.
4. The proposed mitigation measure must comply with applicable laws, regulations, and Executive Orders, including Environmental Planning and Historic Preservation review.

PA SECTION 406 HAZARD MITIGATION COST-EFFECTIVENESS

PA Section 406 HM measures must meet one of the following tests of cost-effectiveness:

- The mitigation measure is **specifically listed in the FEMA Public Assistance Program and Policy Guide (PAPPG), Appendix J**, and the cost does not exceed 100 percent of the damaged facility's repair cost to which the mitigation measure applies;
- The cost for the mitigation measure (not explicitly mentioned in PAPPG, Appendix J) does not exceed 15 percent of the damaged facility's repair cost to which the mitigation measure applies; or
- The Applicant demonstrates that a mitigation project is cost-effective with FEMA's Benefit-Cost-Analysis Toolkit.

PA SECTION 406 APPENDIX J

The items listed in Appendix J were derived from historical mitigation measures FEMA has determined to be cost effective. The following are examples of mitigation measures from Appendix J:

- Replacing a drainage structure with a larger structure;
- Installing submersible pumps in water or a wastewater plant;
- Elevating equipment vulnerable to flood damage;
- Anchoring storage tanks to prevent movement;
- Installing shut-off valves on underground pipes;
- Elevating or drying floodproof buildings; and
- Replacing damaged power poles with higher-rated poles.

For additional information specific to PAPPG Appendix J:

Assistance for Governments and Private Non-Profits After a Disaster | FEMA.gov

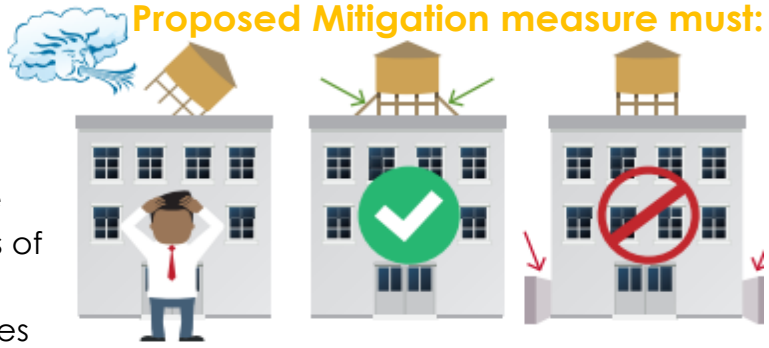
For additional information specific to Appendix J, see the ***PA Appendix J Overview*** in the Cal OES PA Toolkit for Applicants.

PA SECTION 406 HAZARD MITIGATION OVERVIEW

The illustration below demonstrates the four main factors for proposed PA Section 406 HM measures.

Proposed Mitigation measure must:

1 Reduce impacts of future damages



To be eligible, the 406 measures must be related to the damaged portion of the facility or the site. For example, the retaining walls in the example would not be eligible.

2 Must be cost-effective



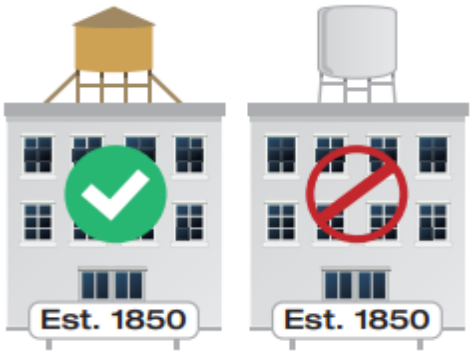
To be eligible, the 406 measures must be cost effective. In this example, the mitigation measures applied would be unlikely to bass benefit cost analysis.

3 Technically feasible



To be eligible, the 406 measures must be technically feasible. In this example, the proposed measure would not be possible from an engineering perspective.

4 Comply with Environmental and Historic Preservation (EHP) rules, laws, and regulations



To be eligible, the 406 measures must be in alignment with EHP standards. In this example the measure would not align with the preservation of the historic facility.

KEY POINT: For assistance in identifying potential PA Section 406 HM measures, Applicants can coordinate with Cal OES HM and PA Specialists.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA SECTION 406 HAZARD MITIGATION OVERVIEW

The information below summarizes PA Section 406 HM Workflows through PA Project development.

EXAMPLE SECTION 406 WORKFLOW

PA PHASE I - APPLICANT COORDINATION AND EVALUATION

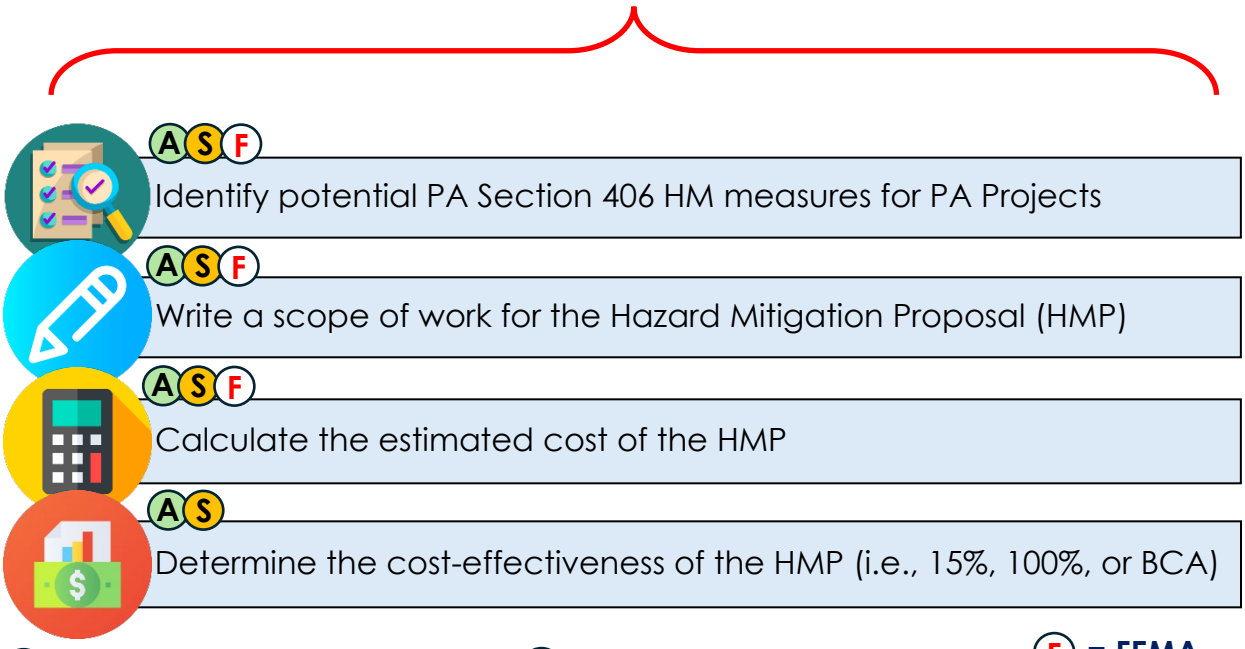
Submit Request for Public Assistance (RPA) → **Develop Impact List** → **Complete Recovery Scoping Meeting (RSM)**

PA PHASE II - IMPACTS AND ELIGIBILITY

Submit Impact List of Damages and Costs → **Complete and review Site Inspection** → **Review Damage Descriptions Dimensions (DDD)**

PA PHASE III - SCOPING AND COSTING

Validate Scope of Work → **Complete proposal for PA 406 Mitigation** → **FEMA Consolidated Resource Center (CRC) Evaluation**



A = APPLICANT S = CAL OES F = FEMA

KEY POINT: As an Applicant's moves into Phase II, if it is a good time to start considering 406 measures as Impact Lists are developed. Cal OES PA and HM Specialists can assist Applicant's in evaluating PA Section 406 HM opportunities.

PA PROJECT CONTINUES THROUGH REMAINING PHASES OF PA PROGRAM DELIVERY

PA APPENDIX J OVERVIEW

This document provides a summary of FEMA's Public Assistance Program and Policy Guide (PAPPG) Appendix J as it applies to Section 406 Hazard Mitigation Measures proposed as part of an Applicant's PA Project.

APPENDIX J OVERVIEW

Appendix J of FEMA's PAPPG provides guidance for evaluating the cost-effectiveness of certain Section 406 Hazard Mitigation Measures proposed as part of a PA Project. Appendix J identifies specific mitigation measures that FEMA has determined to be cost-effective when the applicable requirements and cost thresholds are met, **allowing Applicants to demonstrate cost-effectiveness without the requirement of a Benefit-Cost Analysis (BCA).**

Applicants should use Appendix J when developing potential mitigation measures to determine whether the proposed work qualifies under one of FEMA's pre-determined cost-effective measures and to understand the documentation and cost information needed to support FEMA review. The items listed in Appendix J are derived from historical mitigation measures FEMA has determined to be cost effective.

The following are examples of mitigation measures from Appendix J:

- Replacing a drainage structure with a larger structure;
- Installing submersible pumps in water or a wastewater plant;
- Elevating equipment vulnerable to flood damage;
- Anchoring storage tanks to prevent movement;
- Installing shut-off valves on underground pipes;
- Elevating or drying floodproof buildings; and
- Replacing damaged power poles with higher-rated poles.

APPENDIX J KEY POINTS FOR PA APPLICANTS

- **Review Appendix J early** to determine whether the proposed mitigation measure is specifically identified by FEMA as a potentially cost-effective measure.
- **Confirm all Appendix J conditions are satisfied** for the specific measure; simply appearing in Appendix J does not automatically make a proposed mitigation measure eligible or cost-effective.
- **Match the proposed mitigation measure to the applicable measure** and eligibility conditions identified in Appendix J.
- **Use Appendix J cost-effectiveness criteria** to determine whether the proposed measure may be considered cost-effective without requiring a separate Benefit-Cost Analysis (BCA).
- **Identify the applicable cost threshold or limitation in Appendix J** and compare it against the estimated cost of the proposed mitigation measure.
- **Document how the proposed measure meets Appendix J criteria** and provide supporting cost information and documentation needed for FEMA to validate the determination.

For additional information specific to Stafford Act Section 406 see:
Stafford Act | FEMA.gov
For additional information specific to PAPPG Appendix J:
Assistance for Governments and Private Non-Profits After a Disaster | FEMA.gov

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA PROJECT COST ESTIMATE JOB AID

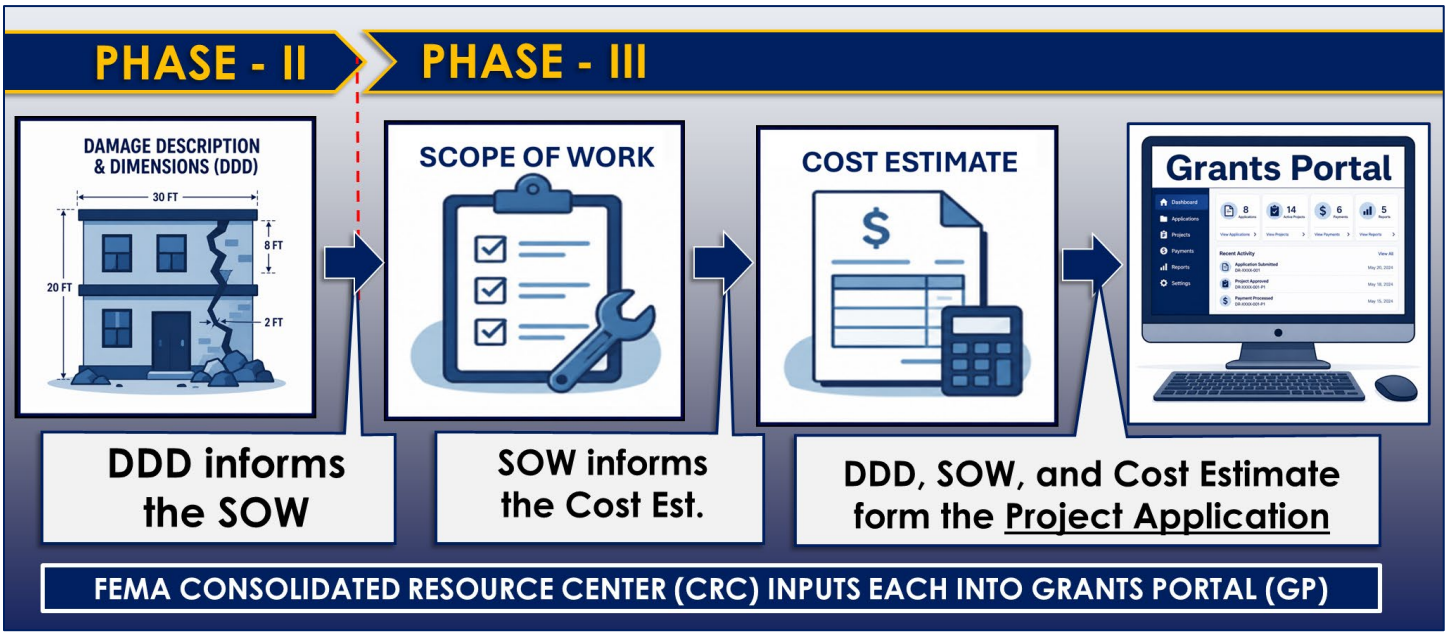
This guide provides PA Applicants with an overview of the Cost Estimate process, descriptions of FEMA and Applicant roles for developing each, technical considerations to support Applicants during the process, and a summary of Appendix L as it pertains to Cost Estimates.

COST ESTIMATE SUMMARY

The Cost Estimate is a description of anticipated outlays to complete all actions defined in the Scope of Work (SOW) to repair the damages. Cost Estimates may include already incurred costs, costs under contract not yet incurred, and / or anticipated future costs. An accurate and well-documented Cost Estimate is critical to establish the basis for determining the amount of eligible funding needed to repair, restore, or replace disaster-damaged facilities. **The estimate must be supported by clear documentation, reasonable cost assumptions, and a direct connection to the eligible work being claimed.**

The Cost Estimate depends on an accurate and complete Damage Description and Dimensions (DDD) and Scope of Work (SOW). The DDD must fully capture the disaster-related damages; if damages are missed or not clearly documented in the DDD, they cannot be properly included in the SOW. If the SOW does not include the work needed to repair those damages, the associated repair costs cannot be included in the Cost Estimate. **As a result, incomplete damage documentation can lead to a significantly reduced Cost Estimate and, ultimately, a smaller payment to the Applicant.**

The graphic below illustrates how the preceding PA Process Steps inform development of the Cost Estimate and collectively form the Project Application.



For additional information specific to the DDD review the ***PA Applicant - Damage, Description, and Dimensions Job Aid*** in the Cal OES PA Applicant Toolkit.

For additional information specific to the SOW review the ***PA Applicant - Scope of Work Job Aid*** in the Cal OES PA Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

PA PROJECT COST ESTIMATE JOB AID

The information below summarizes Applicant versus FEMA developed Cost Estimates and considerations for each.

APPLICANT DEVELOPED COST ESTIMATE

FEMA accepts an applicant-submitted cost estimate if the estimate:

- Is prepared by a licensed professional engineer or other estimating professional, such as a licensed architect or certified professional cost estimator who certifies that the estimate was prepared in accordance with industry standards;
- Includes certification that the estimated cost directly corresponds to the repair of the agreed upon damage;
- Is based on unit costs for each component of the scope of work and not a lump sum amount;
- Contains a level of detail sufficient for FEMA to validate that all components correspond with the agreed upon scope of work;
- Is based on the current phase of design or construction inclusive of any known costs;
- Includes actual costs for work completed at the time the cost estimate is developed; and,
- Is reasonable.

Any foreseeable contingency costs such as security, staging, etc. should be included in an applicant submitted cost estimate. FEMA evaluates applicant-submitted estimates for reasonableness based on the criteria in the FEMA Public Assistance Program Policy Guide (PAPPG).

FEMA DEVELOPED COST ESTIMATE

When work is not yet complete, FEMA determines the amount of PA funding based on the estimated cost to restore the damaged facility to its pre-disaster design and function, including eligible codes and standards. The amount may include a reasonable amount of anticipated soft costs but does not include costs that are only related to, or only triggered by, changes to the pre-disaster design or function of the damaged facility. These include, but are not limited to, costs related to:

- Engineering and design;
- EHP compliance; and,
- Work required by codes or standards identified by the applicant and verified by FEMA. If FEMA develops the scope of work, it will also develop the associated cost estimate.

COST ESTIMATE CONSIDERATIONS FOR APPLICANTS

- For Projects that require an engineering analysis to determine the method of repair, FEMA may approve PA funding for engineering and design services if requested by an applicant.
- Any foreseeable contingency costs such as security, staging, etc. should be included in an Applicant submitted cost estimate.
- FEMA reduces the estimate to account for insurance coverage based on:
    - Actual insurance proceeds, if known; or
    - Anticipated insurance proceeds based on the applicant's insurance policy if the amount of actual proceeds is unknown.

PA PROJECT COST ESTIMATE JOB AID

The information below summarizes Applicant / FEMA roles for an Applicant developed Cost Estimate versus a FEMA developed Cost Estimate but is not inclusive of all actions.

APPLICANT DEVELOPED COST ESTIMATE

Applicant Role	FEMA Role
• Delineate already incurred costs, costs under contract not yet incurred, and anticipated future costs • Detail all aspects of the Project (e.g., costs for work execution, temporary services and utilities, safety and security measures, field supervision, quality control and administrative submittals) • Account for cost escalation over long-duration projects, and confirm insurance proceeds are accurately captured	*Note: FEMA Program Delivery Managers (PDMGs) do not assist the Applicant in developing the Cost Estimate.* • PDMGs receive the Cost Estimate and provide it to the CRC for review • CRC completes insurance, legal, and costing review; if the CRC accepts the costs, the CRC will upload it into GP • If the CRC does not accept the Applicant Cost Estimate, the CRC will develop their own, that meets FEMA requirements, and upload to GP for Applicant Approval

FEMA DEVELOPED COST ESTIMATE

Applicant Role	FEMA Role
• Monitor GP for Request for Information (RFI) and respond quickly • Identify appropriate staff familiar with project details and contract costing to review the Cost Estimate • Coordinate with Cal OES PA Specialists and FEMA PDMGs to discuss any requested revisions • Approve the Cost Estimate only after thorough review and concurrence on costs	• The CRC develops the Cost Estimate based upon the SOW • FEMA may submit RFIs to the Applicant through GP if additional information / documentation is needed • After CRC completion, FEMA PA reviews and approves, before the Cost Estimate is provided to the Applicant and Cal OES for review.

COST ESTIMATE CONSIDERATIONS FOR APPLICANT REVIEW AND APPROVAL

The information below briefly summarizes technical considerations for Applicants prior to developing, reviewing, and / or approving a Cost Estimate.

- FEMA costing is based on national averages and the FEMA Cost Estimating Format (CEF) and may not be reflective of current costs in California or local conditions / factors.
- For Large Projects, final Obligated costs paid by FEMA are based on actual cost incurred, not a Cost Estimate

FEMA does not have formal processes for disputing a FEMA developed Cost Estimate – for this reason it is crucial that Applicants review the Cost Estimate thoroughly and coordinate closely with Cal OES PA Specialists / FEMA PDMGS for requested revisions.

KEY POINT: If Applicants do not fully concur with the Cost Estimate, they should consult their assigned Cal OES PA Specialists to discuss potential resolutions with FEMA prior to the Applicant approving / signing the Project.

PA APPENDIX L FACT SHEET

This information below provides an overview of the FEMA PAPPG Appendix L and best practices for Applicants to utilize Appendix L.

APPENDIX L OVERVIEW

Appendix L is part of FEMA's PAPPG and serves as cost-estimating validation checklist. Appendix L is used to evaluate whether applicant-developed cost estimates are reasonable, complete, and adequately documented. This appendix provides a checklist that FEMA PA staff must use to review and validate cost estimates submitted to FEMA for large permanent work projects.

Appendix L assists Applicants that choose to develop and submit their own repair or replacement cost estimate. The estimate must be structured so FEMA can verify that the costs are reasonable and directly tied to the eligible Scope of Work. In practical terms, Appendix L helps Applicants understand how their cost estimate should be structured and the key information that should be included.

- A strong Appendix L-style estimate separates the cost estimate into measurable components such as demolition, concrete, structural steel, roofing, electrical systems, labor, equipment, quantities, unit costs, design fees, and other applicable project costs.
- An incomplete estimate such as a one-page contractor quote with generalized comments such as, "repair facility" would likely be unacceptable per FEMA requirements.

APPENDIX L BEST PRACTICES FOR APPLICANTS

Estimate development - Use Appendix L while the architect, engineer, or cost estimator is building the estimate so it is structured correctly from the beginning.

Eligibility crosswalk - Take every major estimate line item and crosswalk it to eligible damage, eligible Scope of Work (SOW) actions, quantity of material / resources, unit cost, and supporting source for unit costs.

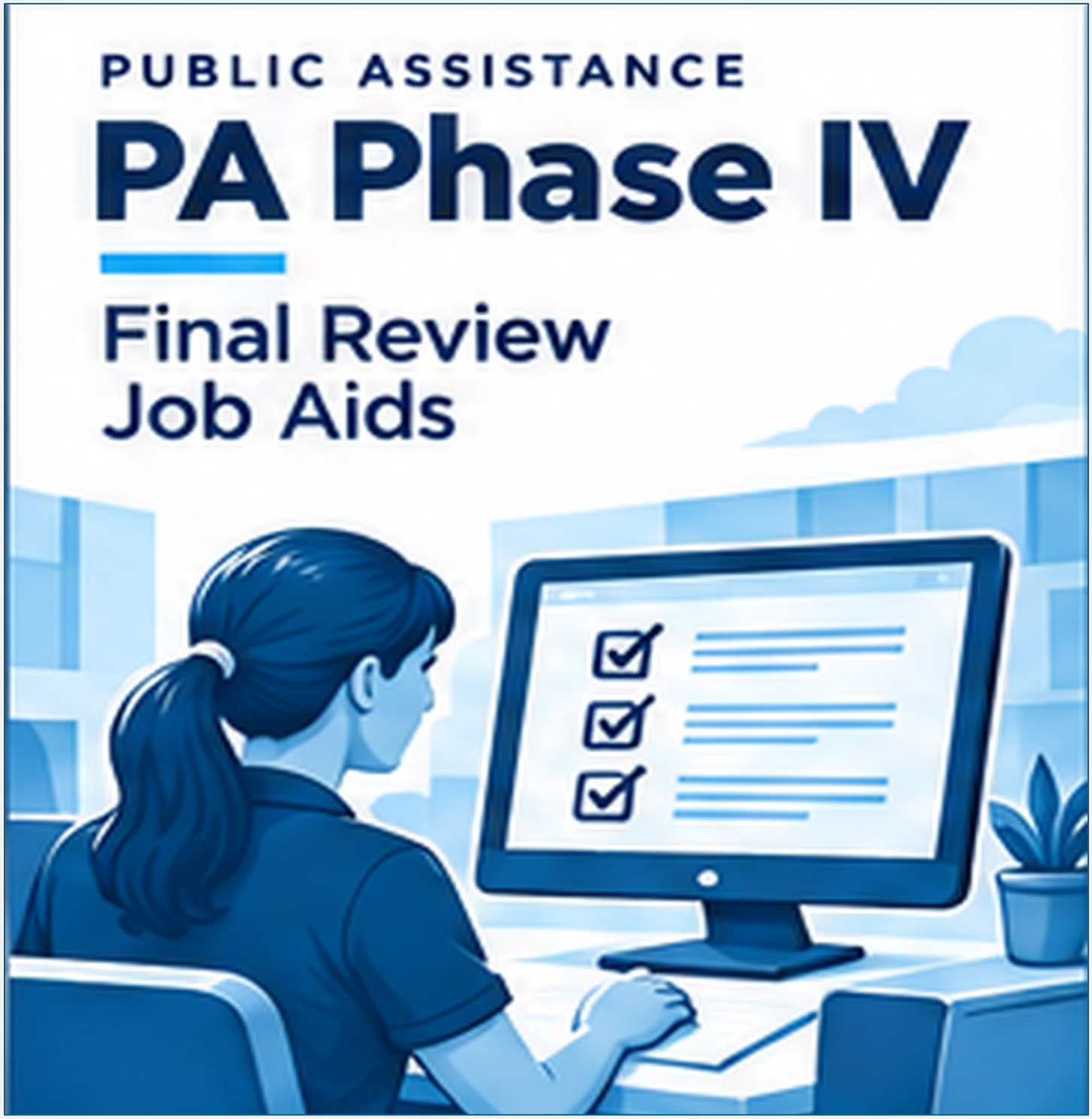
Conduct Pre-submittal audit - Have someone who did **not** prepare the estimate check Appendix L line by line to confirm:

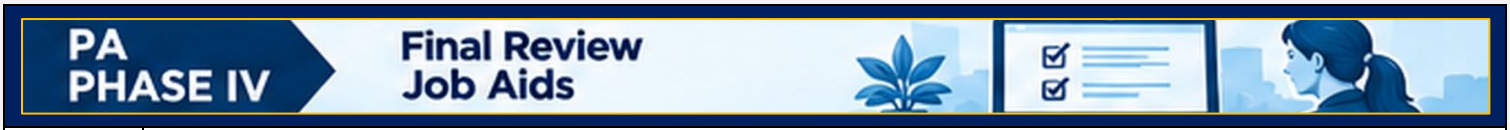
- Every material cost in this estimate can be connected to documented disaster damage
- Every cost is connected to an aspect of the Scope of Work
- Materials include a measurable quantity
- Each line item is connected to a defensible cost basis

For a large, complex project, a comprehensive Applicant estimate package may contain the estimate itself plus an Appendix L compliance crosswalk showing exactly where each validation requirement is supported in the project file.

KEY POINT: Appendix L is not a FEMA form to complete at the end, but rather a framework for building an estimate that aligned to FEMA validation, closeout, and audit requirements.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov





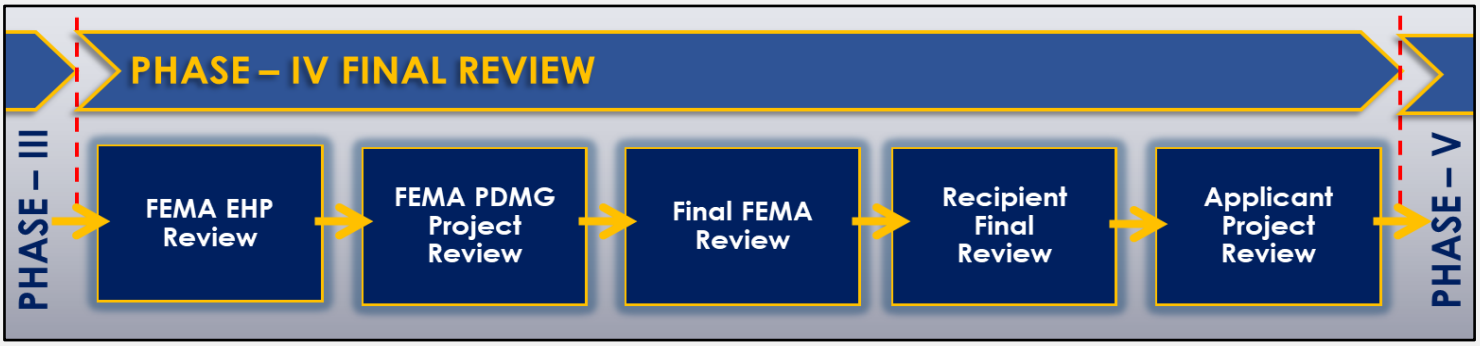
34.	Applicant Final Review Process Overview
35.	Applicant Final Review Checklist

PA APPLICANT FINAL REVIEW PROCESS OVERVIEW

This document provides an overview of the PA Program Delivery - Phase IV Final Review process and workflow. Furthermore, it summarizes the roles and responsibilities of FEMA, Cal OES, and the Applicant in reviewing project applications and outlines technical assistance for Applicants prior to signing the final application.

APPLICANT FINAL REVIEW SUMMARY

The Applicant Review process step occurs during Phase IV of PA Program Delivery. During this step, the Recipient (Cal OES) followed by the Applicant reviews each project to verify that all necessary information and supporting documentation has been provided / uploaded to Grants Portal (GP), all PA Program requirements have been met, and the Project(s) are ready for final approval and Obligation from FEMA. The Applicant's role is to confirm project completeness, accuracy, and compliance with both State and FEMA guidelines, as well as any applicable regulations.



PHASE IV FINAL REVIEW PROCESS STEPS & RESPONSIBILITIES

The initial process steps within Phase IV of the PA Program Delivery are internal to FEMA. Once completed, the project advances to Recipient and Applicant Final Review (summarized on the following page).

Environmental and Historic Preservation (EHP) Review:

- A FEMA EHP Specialist evaluates the project for EHP impacts and considerations, issuing a Record of Environmental Consideration (REC). The REC identifies any relevant EHP conditions and compliance requirements.
- The FEMA EHP Specialist also notifies the Applicant of any necessary consultations with regulatory agencies and outlines specific project compliance conditions.

Project Application Review and Confirmation of Completeness:

- A FEMA Program Delivery Manager (PDMG) reviews the project to confirm that it's complete and accurately reflects the facility, work, and costs claimed.
- A FEMA Public Assistance Group Supervisor (PAGS) conducts an additional review of the application to verify the project's eligibility and ensures compliance with all applicable laws, regulations, and policies, including procurement rules.

Any Requests for Information (RFI) issued by FEMA during Phase IV should be addressed promptly by the Applicant to ensure adherence with FEMA deadlines. Applicants should continuously monitor projects in GP during all process steps within Phase IV of PA Program Delivery.

PA APPLICANT FINAL REVIEW PROCESS OVERVIEW

The information below summarizes the Recipient and Applicant Final Review Process Steps, responsibilities, and provides technical guidance for PA Applicants.

PHASE IV FINAL REVIEW PROCESS STEPS & RESPONSIBILITIES

Recipient Final Review:

- Once FEMA has approved the project, a Cal OES PA Specialist performs a Recipient Review of the project and verifies that the Applicant has addressed all incident-related impacts, repair methods and costs, and recommends the project for PA leadership review.
    - This includes confirming that all necessary supporting documentation is provided, and that FEMA has accurately captured the details in the application—particularly the Damages, Descriptions, and Dimensions (DDD), Scope of Work (SOW), and Cost Estimates.
- Once confirmed, Cal OES PA leadership completes the Recipient Final Review in GP.

Applicant Final Review and Agreement:

- The Applicant reviews the project, including subgrant conditions and grant requirements, then completes the Applicant Project Review in GP, agreeing to the terms, funding conditions, and reporting requirements.

NOTE: It is important that the Applicant continuously monitors projects in GP which require an Applicant Review to avoid project delays.

GUIDANCE FOR APPLICANTS

The information below provides best practices to assist Applicants with FEMA and Recipient policy to help protect and streamline reimbursement during reviews, closeout, and audits.

- Applicants should review the project's details carefully and submit all questions (particularly related to EHP considerations) to Cal OES and FEMA PA prior to signing.
- If needed, Cal OES PA Specialists can assist Applicant in comparing the final project submission's SOW and FEMA Cost Estimate to the DDD to confirm that the information is comprehensive and accurate.
- Applicants should have an appropriate technical specialist familiar with the location, facility, and work review and concur with the project's details.
- After completing the Applicant Review, Applicants should prepare for the Recovery Transition Meeting (RTM) which initiates the formal transition of grant oversight from FEMA back to Cal OES.
- Cal OES will provide additional information after the RTM specific to post-obligation processes for financial processing.

KEY POINT: The "Subscribe" button within GP allows Applicants to receive automated email notifications for project changes, uploaded documents, and changes in Process Steps. This is a useful tool for Applicants but should not substitute Applicants regularly logging into GP and reviewing Projects for changes, revisions, or updates from FEMA or Cal OES.

For additional information summarizing the RTM, review the ***Recovery Transition Meeting Overview*** in the PA Applicant Toolkit.

This document provides a summary of PA Program eligibility, requests, and disaster loan requirements, as well as additional project funding and documentation information for PNPs.

PA Applicants should continue to work closely with Cal OES PA Specialists when Applicant Projects enter PA Program Delivery Phase IV to prepare for final reviews.

	INITIAL DOCUMENTATION REVIEW
☐	Confirm project worksheet (PW)/Grants Portal (GP) project application is complete.
☐	Confirm that all Essential Elements of Information (EEI) are complete.
☐	Confirm that supporting documentation (e.g., insurance policies, procurement records) is uploaded.
☐	Confirm that documented damages align with declared incident period.
☐	Confirm that the project description includes period of performance in the summary.
☐	Verify inclusion of environmental and historic preservation (EHP) documentation.
	SCOPE AND COST REVIEW
☐	Thoroughly review the Damage Description and Dimensions (DDD), Scope of Work (SOW) and Cost Estimates of the project to confirm that the project is written to accurately reflect all project information provided to FEMA.
☐	Confirm force account labor/equipment costs are accurate / consistent with FEMA guidance, and that for Category A Projects, straight-time is included.
☐	Confirm that insurance proceeds are applied and include insurance deductible calculations.
	ADMINISTRATIVE REVIEW
☐	Check that SOW and costs match documentation submitted in Grants Portal.
☐	Confirm that Special Considerations (e.g., insurance proceeds, procurement records, EHP requirements) are fully addressed and included.
☐	Confirm small vs. large project thresholds are applied correctly.
☐	Confirm small project certification document submitted for small perm work projects.
☐	Review comments for any notable requests/actions not yet completed or captured.
☐	Confirm that for all Permanent Work to be Completed Projects a document or comment is included that indicates desire to pursue a 406 HM component.
	COMPLETING REVIEW
	If you approve of the project, review the Subgrant Conditions included in the GP Project Application and sign in agreement to the funding terms, including requirements for reporting on project work progress and completion.

If you identify errors, omissions, or discrepancies, send the project back to Cal OES, notifying the assigned Cal OES PA Specialist and FEMA PDMG of the findings – <u>as an Applicant, this is the last chance to request changes before FEMA finalizes the project.</u>

For projects advanced on behalf of the Applicant without Applicant agreement, an appeal can be submitted within 60 days of project obligation.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PUBLIC ASSISTANCE

PA Phase V

Obligation and Recovery Transition Job Aids





36.	Recovery Transition Meeting (RTM) Job Aid
37.	Appeals Process Overview

PA RECOVERY TRANSTION MEETING JOB AID

This document provides an overview of the Recovery Transition Meeting (RTM) for PA Applicants that have reached Project Obligation. This document summarizes the RTM purpose, criteria for requesting an RTM, and provides guidance for Applicants to utilize before, during, and after the RTM.

RTM SUMMARY

The RTM is a meeting held with FEMA, Cal OES, and the Applicant which signifies the completion of PA Program Delivery Phase V (Obligation and Recovery Transition). The RTM represents the point at which the management of PA projects transitions from field level support by FEMA Program Delivery Managers (PDMG) to the Applicant and Cal OES, with remaining federal coordination occurring through the assigned Cal OES point of contact and with the FEMA Region IX office.

The purpose of the RTM is to review the status of all projects, identify any outstanding issues, and plan for the effective completion of any ongoing project work. Ultimately, the RTM provides FEMA, Cal OES, and the Applicant an opportunity to discuss next steps to confirm the Applicant is prepared to take responsibility for completing any remaining project work, communicating directly with PA Specialists for ongoing project monitoring (e.g., Scope of Work (SOW) changes, Time Extensions (TE), Quarterly Progress Report (QPR)), and coordinating with Cal OES PA Financial Processing and Closeout to request drawdowns on Obligated funds to close their grant award. RTM discussions should address the following:

- Ensure the Applicant understands the terms and conditions of the project;
- Ensure all claimed damage is documented accurately and sufficiently;
- Resolve any existing problems / challenges and identify next steps for resolution;
- Discuss record retention requirements;
- Explain deadlines for completion of work, appeals, and closeout;
- Identify steps to request drawdowns and initiate grant closeout (when appropriate);
- Transition the primary point of contact from FEMA to Cal OES (Recipient); and,
- Discuss questions or concerns.

PRIOR TO SCHEDULING THE RTM

The PDMG coordinates with Cal OES and Applicant and initiates the scheduling of the RTM in the Grants Manager. Prior to this, the Applicant should confirm they have completed the following FEMA criteria:

- Consult with Cal OES PA Specialists to determine what should be discussed at the RTM specific to unresolved Project discrepancies, challenges, or issues that are documented and the Applicant is prepared to discuss next steps / resolution options at the RTM.
- Consult with Cal OES PA Specialists to determine if any additional notes, comments, or documents should be added to GP ahead of the RTM.
- Final Review Process Steps are complete.

NOTE: FEMA has traditionally waited until all Projects are Obligated and signed in GP by the Applicant to initiate the RTM. However, this workflow is subject to change as the FEMA PA Program evolves. Applicants nearing Obligation should coordinate closely with their Cal OES PA Specialists, during Phase IV Final Review Process Steps to understand any changes in workflow, responsibilities, and preparation activities for upcoming RTMs.

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
PA RECOVERY TRANSTION MEETING JOB AID

The information below provides technical assistance to Subrecipients for use before, during, and after the RTM.

BEFORE THE RTM

- Coordinate with the FEMA PDMG and the Cal OES PA Specialist to schedule the RTM once all projects are Obligated.
- Confirm that staff who will be responsible for any remaining project work (e.g., field supervision of work activities) and ongoing project monitoring (e.g., Request for Information, initiation of closeout) will be in attendance.
- Coordinate internally with finance and / or legal staff who will be responsible for reviewing documents, submitting reports, or processing received payments will be in attendance.
- Prepare questions related to any remaining project work and next steps to manage the projects through completion.
- Prepare questions specific to timelines and deadlines as well as payment processes. For example:
  - What are the deadlines for project development, obligation, and closeout?
  - How should project scope or cost changes be handled later?
  - What extension options are available if delays occur?
  - How and when will funds be Obligated and reimbursed?
  - What documentation is required for reimbursement requests?

DURING THE RTM

- Utilize the Checklist included with this Job Aid to confirm that all FEMA RTM requirements have been addressed for the Applicant and to confirm all key points in the checklist were clearly explained.
- Present FEMA and Cal OES with prepared questions that may not have been addressed during the presentation and take detailed notes to guide post-obligation activities.

AFTER THE RTM

- Review and sign the RTM Report from the FEMA PDMG, review the RTM Checklist in GP, and complete the RTM signature / certification.
- Coordinate with the Cal OES PA Specialist to identify additional steps and prepare for an effective transition between Cal OES PA and Cal OES Closeout POCs.
- Confirm that knowledgeable Applicant Representative and alternates are correctly designated in Grants Portal and ensure they understand project scope, procurement, and documentation requirements.
- Document and circulate RTM outcomes internally, including FEMA guidance, decisions, and notes specific to timelines, deadlines, and financial processes.
- Update designated POCs in Grants Portal and notify Cal OES for any staff transitions that occur following the RTM.
- Monitor insurance recoveries and report changes to Cal OES to avoid duplication of benefits.

For additional information specific to financial process after the RTM, review the ***PA Applicant Closeout Overview*** document in the Cal OES PA Applicant Toolkit.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

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PA RECOVERY TRANSTION MEETING JOB AID

The information below provides a checklist for Applicants to use during the RTM to confirm that all key points are discussed by FEMA and Cal OES during the RTM as well as best practices for managing post-Obligation projects.

RTM CHECKLIST

☐	FEMA Applicant Profile Report provided
☐	FEMA has discussed each project status and any remaining tasks
☐	Environmental and Historic Preservation (EHP) considerations discussed (if applicable)
☐	406 Hazard Mitigation discussed (if applicable)
☐	Partial Determination Memorandums (DM) issued by FEMA discussed (if applicable)
☐	Completion of work and time extension deadlines discussed
☐	FEMA time extension request processes discussed
☐	FEMA requirements for SOW changes discussed
☐	FEMA and Cal OES record retention requirements discussed
☐	FEMA insurance requirements discussed
☐	Cal OES and FEMA project reconciliation and closeout processes discussed
☐	Cal OES and FEMA appeals processes and timelines discussed
☐	Cal OES QPR expectations and procedures discussed
☐	Cal OES drawdown request procedures for FEMA Obligated funds discussed
☐	Confirm the designated Authorized Agent is current, and that they know where to obtain a Cal OES 132 Form (Large Project Reimbursement form) and that any additional required Cal OES forms are filed.

POST-OBLIGATION BEST PRACTICES

The following Key Points are provided as best practices for Applicants to ensure successful completion of projects and receipt of PA reimbursement. Even though the RTM has been completed, and projects are Obligated, Applicants must continue to:

- Maintain procurement compliance for any ongoing or future contracts;
- Maintain all required permits, monitoring, and reporting requirements issued by regulatory agencies and EHP;
- Track costs continuously and separately by project, category, and funding source;
- Monitor insurance recoveries and report changes to Cal OES as well any additional third-party funds recovered that may be deemed a duplication of benefits;
- Submit requests for time extensions or scope changes in writing and before deadlines lapse;
- Retain all records (financial, procurement, and construction) for audit and closeout purposes; and,
- Remain prepared for reviews or audits and respond promptly to FEMA / Cal OES requests.

The RTM is the moment where project strategy, eligibility, and compliance expectations are locked in. Applicants who follow through with disciplined documentation and communication are far more likely to avoid deobligations, delays, or funding reductions.

PA APPEALS PROCESS OVERVIEW

This document provides an introduction to the PA Program Appeals process, steps for submitting an Appeal, and key points for Applicants.

PA PROGRAM APPEALS OVERVIEW

The FEMA PA Appeals process most commonly occurs during Phase VI of PA Program Delivery, but any FEMA decision may be appealed. The Appeals process provides Applicants with a formal opportunity to challenge determinations made by FEMA. **If an Applicant disagrees with any FEMA determination associated with Project eligibility, Project costs, Scope of Work, Time Extension, or another decision, they have the right to Appeal.** By using the Appeals process, Applicants can make their case, provide supporting documentation, and potentially secure funding for their PA Projects.

PA PROGRAM PROCESS SUMMARY

The table below provides a summary of the Appeals process.

Quick Reference Summary Table

Step	Description	Notes
Understand Determination / Decision	Read the FEMA letter/memo to understand the decision, laws, and policies applied.	Reference the applicable Public Assistance Program and Policy Guide (PAPPG) valid at the time of the disaster declaration date.
Know Appeal Rights	Review Appeal Rights for eligibility, cost, Time Extensions, or other PA decisions.	Appeals may be submitted to challenge a total or partial determination, and/or justify additional eligible costs.
Appeal Timeline & Submission	Submit a written Appeal within 60 calendar days of FEMA's official determination date.	Submit to Grants Portal and email to Cal OES; Appeal deadlines are strict and non-negotiable.
Prepare Appeal Documentation	Develop Appeal with dates, justification, documentation, signatures, and contact info.	Include invoices, photos, reports, and emails; organize the Appeal using Overview, Background, and Analysis.
Submit Appeal	Submit via Grants Portal and email to Cal OES; maintain copies.	Early submission is strongly recommended. Use green "Request Appeal" button in Grants Portal.
FEMA Review	FEMA reviews the Appeal with subject matter experts and may request more information from the Applicant.	Applicants should respond as quickly as possible to FEMA Requests for Information to avoid Appeal delays/denials.
After First Appeal Decision	Option for 2nd Appeal **or** arbitration for disputes that meet arbitration eligibility criteria. 2nd Appeal determinations are final; timelines must be met.	Arbitration requests must be made within 60 days of the first Appeal decision or 30 days of Appeal withdrawal if no decision is issued. **Arbitration and 2nd Appeal decisions are final.**
Withdrawal of Appeal	Written notification required.	FEMA provides acknowledgment.

PA APPEALS PROCESS OVERVIEW

The information below provides additional details for each step in the PA Appeals process.

STEP 1 - UNDERSTAND FEMA'S DETERMINATION / DECISION

- Thoroughly read FEMA's Determination Memo (DM), letter, and / or communication specific to the decision you intend to Appeal to identify the exact reason(s) for denial, and if your application was partially approved or wholly denied.
- Understand fully the Federal laws, regulations, and/or policies FEMA is citing.
- Verify FEMA applied each cited regulation accurately for every decision.
- Check if other applicable regulations (Federal, State, Local, Tribal) support your Appeal.
- Reference the version of the PAPPG valid at the time of the disaster's declaration.
- Review and understand key statutes and regulations relevant to FEMA PA Appeals:
  - Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Title 42
  - Title 44 of the Code of Federal Regulations (C.F.R.), Parts 206 Subparts G, H, and I.
  - 2 C.F.R. Part 200 (Uniform Administrative Requirements).
  - Additional policies if applicable (e.g., Section 428 PA Alternate Procedures policies)

STEP 2 – KNOW YOUR APPEAL RIGHTS

- You have the right to Appeal any official FEMA determination / decision, including:
  - Initial eligibility denials and DMs;
  - Cost denials / post-Obligation Project Costs; and
  - Time Extension denials, Damage Description and Dimensions, and **any** other FEMA PA decision.
- Appeals can be:
  - For all or part of FEMA's determination / decision; and/or
  - For additional eligible costs or discovery of hidden incident-related damage identified during project performance, outside of FEMA's initial approved funding.
- Appeals must be submitted in writing, with supporting justification.

STEP 3 – APPEAL TIMELINE AND SUBMISSION DEADLINES

- Appeals are due 60 calendar days from either:
  - Date of Determination (typically "Completed on Date" in Grants Portal) for disasters declared on or after 1/1/22
  - Receipt Date (earliest date DM or letter viewed in Grants Portal or when physically received) for disasters declared before 1/1/22
- If the 60-day deadline occurs on a weekend or a Federal holiday, it is extended to the next business day.
- Appeal submissions for:
  - Disasters on/after 1/1/22: must be submitted via Grants Portal using the "Request Appeal" button on the DM and be emailed to Cal OES at DisasterRecovery@caloes.ca.gov
  - For disasters declared before 1/1/22: must be emailed directly to Cal OES at DisasterRecovery@caloes.ca.gov
- Notify Cal OES of your intent to Appeal as soon as possible and submit early to avoid denials. Deadlines are non-negotiable; **late Appeals will be denied by FEMA.**
- Use Excel or calendar tools for precise due date calculation.
- Please refer to Cal OES' cover letter or contact DisasterRecovery@CalOES.ca.gov for specific guidance on Appeal due dates.

STEP 4 – PREPARE YOUR APPEAL DOCUMENTATION (COMPONENTS OF A GOOD APPEAL)

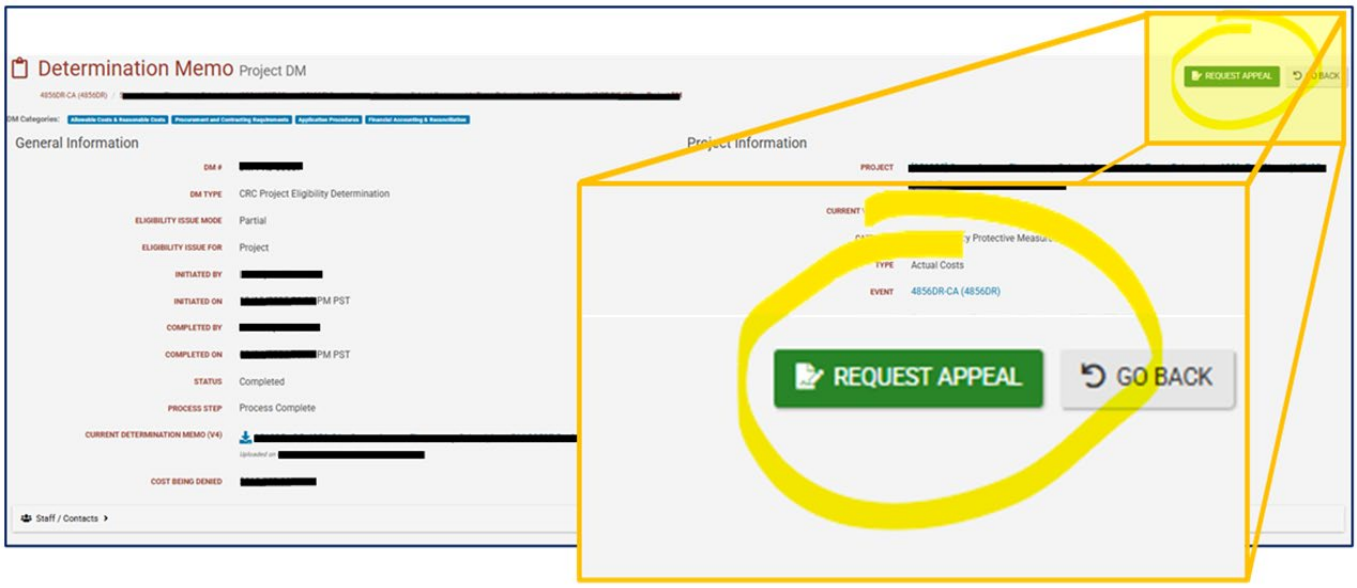
- Your Appeal must be a written letter/document that includes:
  - Decision/determination you are appealing (specific reasons);
  - The disputed funding amounts (if applicable);
  - Justifications citing applicable laws, regulations, or policies;
  - Laws, regulations and policies misapplied by FEMA
  - Proof/supporting documentation, including but not limited to:
    - Invoices, statements
    - Emails, correspondence
    - Photos, reports
    - Detailed maintenance records
    - Consultant or geotechnical reports, professional reviews
  - Evidence to support your claim, even if previously submitted to FEMA;
- You may appeal specific parts of FEMA's decision if you agree with other parts.
- You may appeal more than what FEMA identified (e.g., actual vs estimated costs, omitted damage inventory) if tied to the decision/determination.
- Organize your Appeal letter clearly with these sections:
  - Overview:
    - What is being appealed
    - Amount being appealed
    - Confirmation of timely submission
  - Background:
    - Describe the project and purpose of work or costs incurred
    - Explain what was denied by FEMA
    - Provide any other relevant facts and assume no prior knowledge by the reader
  - Analysis:
    - Address each denial individually and argue why it is incorrect or does not apply
    - Include documented proof to support each argument
    - Reference attached exhibits/documents within the Appeal
  - Additional Information:
    - Include outside professional/regulatory resources if applicable (e.g., consultant reports)
    - Summarize any large datasets or evidence for clarity and provide clear direction on where pertinent information can be found within those large documents
  - Summary:
    - Provide a concise "elevator pitch" summary of your argument
    - Contact Info:
      - Names and contacts for individuals who can respond quickly to inquiries or Requests for Information
  - Include in the Appeal:
    - Signature and date
    - Page numbers
    - Reference to specific PAPPG sections or pages if quoting policy (no need to attach entire guide)

STEP 5 – SUBMIT THE APPEAL

There are multiple ways to submit an Appeal in Grants Portal. The following information describes two potential methods. For disaster-specific instructions, or technical guidance for specific Projects, email DisasterRecovery@caloes.ca.gov.

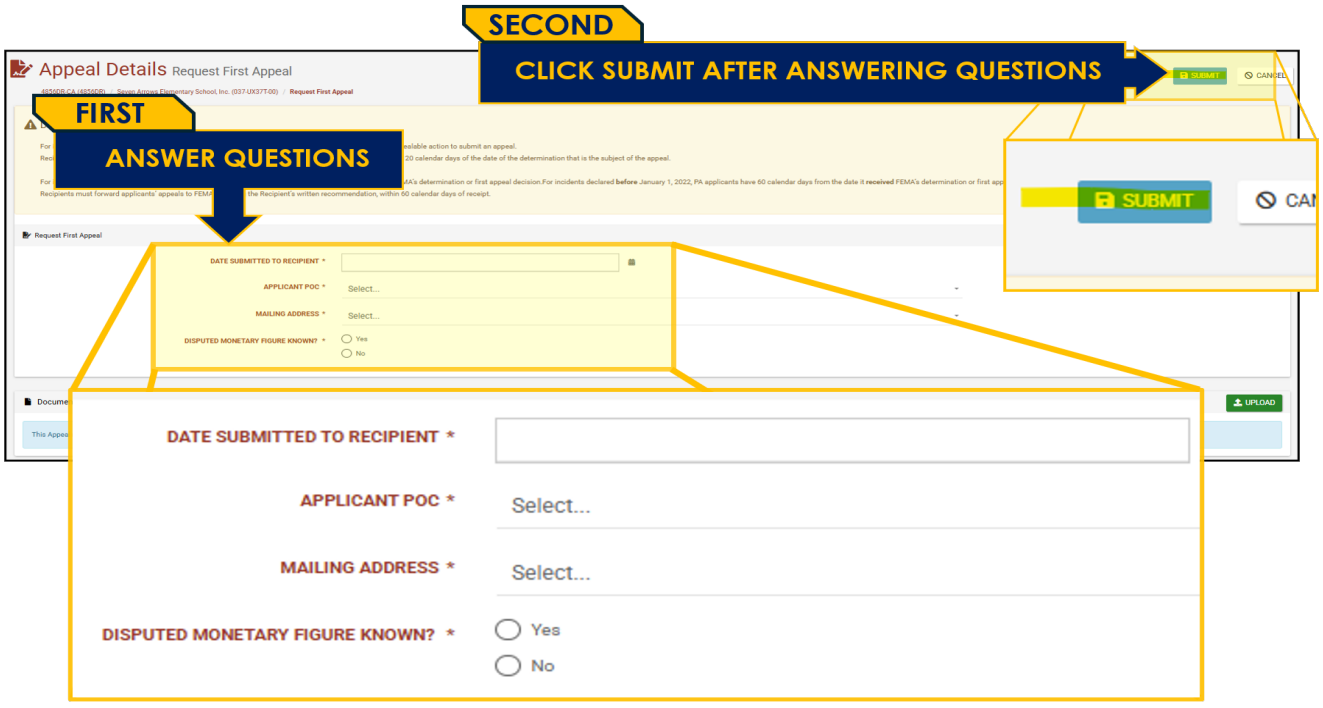
INITIATING THE APPEAL FOR FEMA DETERMINATION MEMO

- From the "Determination Memo" page, click the green "Request Appeal" button
- If you do not see this button, contact your Cal OES PA Specialist for assistance.



SUBMITTING THE APPEAL

Once the above selection is made, the following screen will appear. Note the inactive light blue "Submit" button will turn active and dark blue once the criteria below are met.

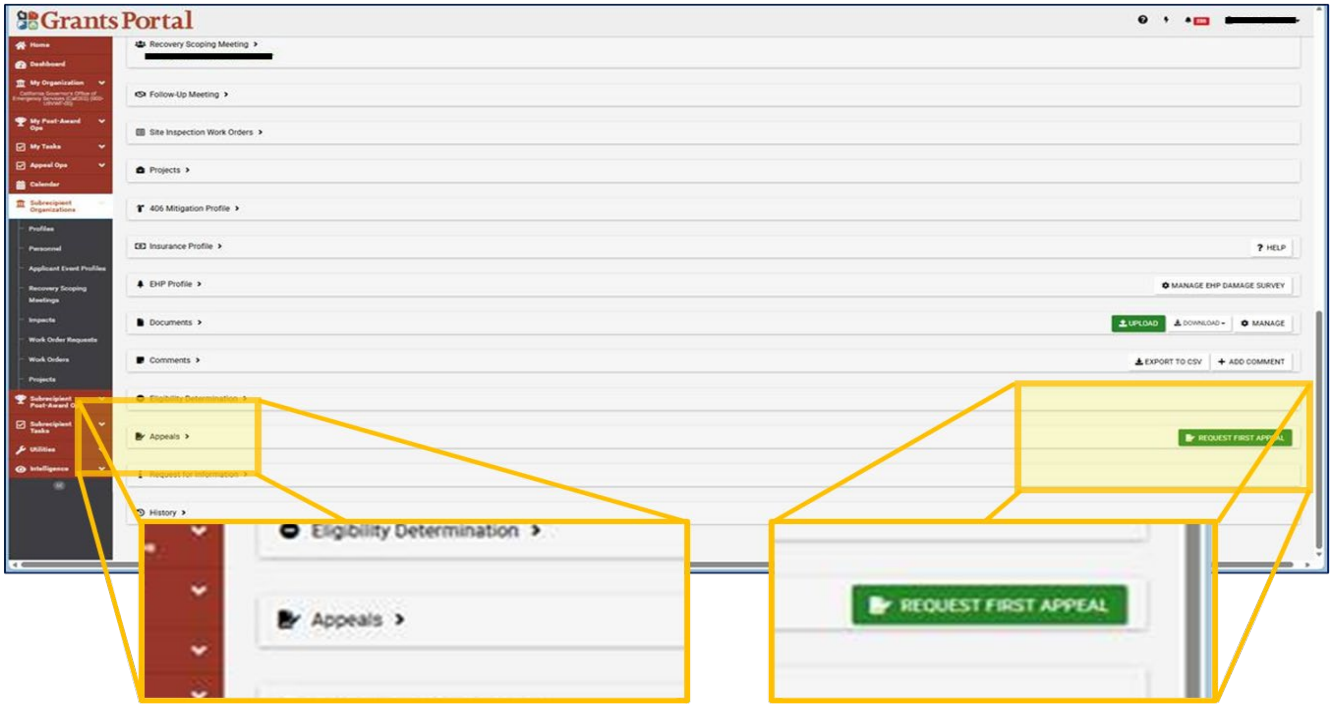


STEP 5 – SUBMIT THE APPEAL

INITIATING AN APPEAL FOR A NON-DM FEMA DECISION

When submitting an Appeal for a non-DM FEMA decision (e.g., Project Costs, Scope of Work, Damage Descriptions and Dimensions):

- Click the green "Request First Appeal" button in the Appeals section of the Applicant Event Profile under the relevant event.
- If you do not see this button, contact your Cal OES PA Specialist for assistance.



ADDITIONAL GRANTS PORTAL HELP FOR APPEALS

FEMA Grants Portal offers a comprehensive support section that includes an extensive library of Frequently Asked Questions (FAQ). This resource is easily accessible within Grants Portal and provides quick assistance and guidance. The "Help" and FAQ sections may be accessed by clicking on the "Support Icon". The icon presented in the image below can be found in the upper right corner of the Grants Portal system.



STEP 6 – FEMA FIRST APPEAL REVIEW PROCESS

- FEMA Region IX will review your complete Appeal package, including all supporting documentation.
- FEMA Region IX may request additional information or clarifications.
- Independent subject matter experts may be consulted by FEMA as needed.
- FEMA Region IX should issue a decision or a Request for Information within 90 days of receiving a completed Appeal.

STEP 7 – AFTER THE FIRST APPEAL DECISION

- Read the full Appeal response to determine what has been approved or denied; make sure that all the appealed items have been addressed and resolved to your satisfaction. If not, you may continue to submit a second Appeal.
- If your first Appeal is denied or partially approved:
  - You may submit a second Appeal addressed to FEMA Headquarters (Assistant Administrator for Recovery) within the applicable deadlines via Grants Portal. Remember to email the second Appeal to Cal OES.
  - Alternatively, for disputes exceeding $500,000 (or $100,000 in rural areas), you may request arbitration through the Civilian Board of Contract Appeals (CBCA) if:
    - The first Appeal was denied, or
    - The first Appeal decision was not made by FEMA Region IX within 180 days of Cal OES submission.
- Arbitration requests must be made within 60 days of the first Appeal decision or, if no decision was issued, within 30 days of the Appeal withdrawal.
- CBCA arbitration decisions are final; you cannot pursue both the second Appeal and arbitration for the same issue.
- Second Appeal decisions are always final.

STEP 8 – WITHDRAWAL OF APPEAL

- You may withdraw your Appeal at any time by providing written notification to DisasterRecovery@caloes.ca.gov and FEMA.
- FEMA will provide written acknowledgment of the withdrawal.

KEY POINTS FOR APPLICANTS

- Applicants may appeal any FEMA decision.
- Reference the FEMA PAPPG valid at the time of the disaster declaration date and consult with your assigned Cal OES PA Specialist to confirm the process above is accurate to your specific event, and whether any additional disaster specific information is applicable.
- Deadlines are non-negotiable; late Appeals will be denied by FEMA. Use Excel or calendar tools to calculate an accurate due date.
- Notify Cal OES of your intent to appeal as soon as possible.
- Submit early to avoid denial.

PUBLIC ASSISTANCE

PA Phase VI

Project Monitoring and Amendments Job Aids



PA PHASE VI — Project Monitoring and Amendments Job Aids

38.	Post-Award Project Monitoring Job Aid
39.	Project Amendments and Versioning Job Aid
40.	Net Small Project Overruns (NSPO) Job Aid
41.	Time Extension Request Overview

PA PROJECT POST AWARD MONITORING JOB AID

This document provides a summary of Post-Award Monitoring, outlines processes, and identifies technical guidance and best practices for PA Subrecipients.

POST AWARD MONITORING SUMMARY

The **Post-Award Monitoring** process helps verify that PA projects comply with program regulations, meet milestones, and are completed successfully. This monitoring process is crucial for confirming that funds are used appropriately, and that the recovery process remains on track. Post-Award monitoring involves several steps designed to track progress, verify expenditures, and reinforce compliance with FEMA's requirements.

The monitoring process is required by FEMA as part of the FEMA State Agreement established at the onset of a declared disaster, as well as a requirement in the Cal OES / Applicant Grant Agreement. Quarterly Progress Reports (QPR) are only required for Large Projects, however, project documentation may be requested on any project at any time by FEMA or Cal OES.

QUARTERLY PROGRESS REPORTING PROCESS

To support ongoing project monitoring, Cal OES, in coordination with the Subrecipient, submits QPRs to FEMA. Subrecipients play a key role in coordinating with Cal OES to provide FEMA with the required quarterly updates on the status of all awarded projects and associated funding. The following describes the typical QPR Process:

1. **FEMA establishes and Cal OES confirms the periods for which QPRs** are due, which typically align with the fiscal quarters of: October 1st - December 31st, January 1st - March 31st, April 1st - June 30th, and July 1st - September 30th.
2. **Cal OES collects relevant project data from the Subrecipient (e.g., work progress, financial data, supporting documentation).**
3. **Cal OES completes and submits the FEMA QPR form which includes:**
    a. Project Identification Number (PID), name, and description;
    b. Summary of progress made during the reporting period;
    c. Financial reporting, including costs incurred to date; and
    d. An explanation of any delays or challenges faced and scope / timeline changes.
4. The Subrecipient works with **Cal OES** to confirm that the report meets all requirements before Cal OES submits the QPR to FEMA for review.
5. **FEMA** reviews the QPR for:
    a. Compliance with regulations and requirements;
    b. Whether the progress is aligned with the funding agreement;
    c. The accuracy of the financial data; and
    d. Any issues or concerns raised in the report (delays, cost overruns, etc.).
        - **NOTE:** If FEMA identifies any discrepancies or issues, they may request additional information or clarification.
6. If there are any issues, the **Subrecipient** and **Cal OES** address corrective actions or submit a project amendment request.
7. Cal OES and the Subrecipient continue ongoing reporting until project completion.

KEY POINT: If no progress has occurred during the quarter, you are still required to submit a QPR stating: No progress this period, and the reason for inactivity. If a QPR is not submitted, Cal OES will submit the most current information regardless of Subrecipient concurrence.

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES
GOVERNOR'S OFFICE OF EMERGENCY SERVICES

The information below summarizes technical assistance for PA Specialists to provide Subrecipients to meet Quarterly Progress Reporting requirements.

TECHNICAL ASSISTANCE FOR QPR REPORTING

Subrecipient Responsibilities for QPR Reporting:
To support successful Post Award Monitoring, Subrecipient should:

- Maintain thorough and organized documentation of all expenditures and work progress
- Ensure all reported information is accurate, consistent, and supportable
- Submit QPRs within 30 days of the end of each quarter
- Communicate early and proactively with Cal OES regarding issues, delays, or changes
- Demonstrate continued progress toward project completion or justification for delays

Failure to meet reporting requirements may result in:

- Delays in reimbursements or funding drawdowns
- Increased monitoring by Cal OES or FEMA
- Potential deobligation of funding
- Risk to future funding eligibility

Preparing for Quarterly Progress Reporting:
Subrecipients should prepare and maintain the following information in advance of each reporting cycle:

- Project Status and Progress: Summary of work completed during reporting period, key milestones achieved, and current project status (e.g., not started, in progress, completed)
- Schedule and Timeline Updates: Estimated project completion date, identification of delays and clear explanation of causes, and updates to project timelines
- Financial Information: Total expenditures to date, remaining project balance, and any changes to cost projections
- Challenges and Risks: Procurement or contracting delays, environmental or permitting issues, resource or staffing constraints, any factors impacting project execution
- Supporting Documentation: Photos of work completed, invoices and receipts, contracts and procurement records, work logs or progress tracking reports

Best Practices for Effective QPR Reporting:

- Keep project records up to date throughout the quarter, not just at reporting time
- Align QPR information with internal tracking tools and contractor updates
- Use clear, concise summaries that accurately reflect project status
- Report issues early to allow time for coordination and resolution
- Establish a routine internal review process (e.g., monthly) to stay on track

Recipients are also required to submit Closeout Reports, which consist of the final financial and performance reports.

For additional information specific to the Closeout Process, review the ***PA Closeout Overview*** in the Cal OES PA Toolkit

For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

PA PROJECT AMENDMENTS AND VERSIONING JOB AID

This guide provides PA Subrecipients with a concise summary of Project Amendments, Versioning, and Version control best practices in the FEMA PA Program. It explains why Versioning matters, how to establish folder structures and naming conventions, how to maintain Version logs, and how to prepare for successful FEMA submissions, closeout, and potential audits.

KEY POINT: In 2025, FEMA updated its process to clarify that post-Obligation **changes to the Damage, Descriptions, and Dimensions (DDD) cannot be addressed via a Project Amendment and resulting Version** and instead require Subrecipients to submit a post-Obligation Appeal.

For additional information summarizing the PA Program Appeals Process, review the ***PA Applicant Appeals Overview*** in the PA Applicant Toolkit.

PROJECT VERSIONING SUMMARY

In the FEMA PA Program, a ***Project Version is created after an Amendment Request has been approved by the Recipient and FEMA to revise the Project to capture specific changes (e.g., Scope of Work (SOW) or Project Costs).*** Versioning occurs **after a Project has been Obligated**.

- Project Versions document the evolution of scope, costs, and supporting documentation from initial Obligation through closeout.
- Each Version is assigned a unique number (e.g., Version 1.0, Version 2.0) and is associated with a specific date and reason for the change.

NOTE: For any proposed change to the FEMA approved SOW, a Project Version must be approved before work begins. This includes any changes that may require additional regulatory review, such as an Environmental and Historic Preservation (EHP) review.

FEMA ELIGIBILITY AND POLICIES

PA Process Steps and requirements may change over time. Subrecipients are responsible for staying informed and complying with all Process Step deadlines. The following information summarizes FEMA Eligibility and programmatic policy requirements related to Project documentation and Version controls.

- Subrecipients must maintain clear, auditable documentation of all Project changes, including SOW modifications, cost updates, and supporting records.
- All Versions and supporting documentation must be retained in accordance with FEMA retention requirements.
- Subrecipients must align internal records with official FEMA Grants Portal Project Versions and Cal OES determinations to ensure documentation matches the Project Version.

WHEN TO REQUEST A PROJECT VERSION

A Project Amendment Request should be submitted when key elements change—SOW, costs, Hazard Mitigation Plan (HMP) inclusion—rather than for minor formatting edits.

When to Request a Project Amendment / New Version:

- Any proposed change to the previously approved SOW.
- Costs substantially higher than estimated or change orders affecting scope / cost.
- Critical supporting documentation such as insurance settlements and certified actual costs (if significantly higher than the approved project amount).

The following section summarizes Project Versioning information specific to Scope of Work and / or cost changes along with examples of each.

POST OBLIGATION SCOPE OF WORK OR COST CHANGES

Subrecipients must ensure PA funding is used exclusively for eligible work specified in the approved Project. If a change to the SOW or costs becomes necessary, Subrecipients should promptly consult with both Cal OES and FEMA PA to allow sufficient time for FEMA to review the proposed changes for eligibility. To request a Project Amendment, Subrecipients must submit a written request to Cal OES including both a detailed justification of why the change is necessary and supporting documentation for FEMA to verify the eligibility of the proposed revision. Subrecipients should include required documentation and information to support SOW / cost changes to facilitate FEMA's evaluation. If the request involves previously unknown damage, Subrecipients must also provide documentation linking the work to the disaster.

KEY POINT: SOW changes should be submitted prior to work beginning (if feasible), whereas cost changes should be submitted as soon as the Subrecipient is aware of the change.

Common eligible reasons for SOW changes include, but are not limited to:

- Alternate repair method is more cost-effective than the originally proposed repair method;
- Original repair method is no longer technically feasible;
- Upgrades are necessary per the applicable codes and standards;
- Necessary increase to the previously approved quantities of materials;
- Discovery of hidden incident-related damage during construction; or
- Subrecipient wishes to pursue an improved or alternate project.

Common eligible reasons for cost changes include, but are not limited to:

- Significant increases in actual costs compared to original estimates;
- Material quantity overruns (may be eligible depending on circumstances, consult Cal OES PA Specialists for specific guidance unique to your Project);
- Market-driven price escalations for labor, materials, or equipment; or
- Insurance adjustments for denied or decreased proceeds impacting a Subrecipient's ability to drawdown.

NOTE: PA Process Steps and requirements may change over time. Subrecipients are responsible for staying informed and meeting all Process Step deadlines. Subrecipients should review the current Version of the FEMA Public Assistance Program and Policy Guide (PAPPG) and coordinate with Cal OES Specialists to better understand any applicable Process Step changes / revisions.

KEY POINT: A Project Amendment request should be submitted when key elements change, such as the SOW, costs, or inclusion of a Hazard Mitigation Plan (HMP).
Changes to the Damage, Descriptions, and Dimensions (DDD), however, require the Subrecipient to submit an Appeal.

PA PROJECT AMENDMENTS AND VERSIONING JOB AID

The following section summarizes Project Versioning information specific to the inclusion of Hazard Mitigation Proposals (HMP), reviews best practices for Versioning, and outlines the submission process and next steps for Subrecipients.

POST OBLIGATION VERSIONING TO INCLUDE AHAZARD MITIGATION PROPOSAL

Subrecipients may need to submit a **Project Amendment Request** to include a Section 406 Hazard Mitigation Proposal (HMP) when mitigation measures were not identified or developed prior to the original Project Obligation. This typically occurs when additional mitigation opportunities are identified during design, engineering, or construction, or when the Subrecipient determines that cost-effective measures can be implemented to reduce the risk of similar disaster damage.

Since Section 406 Hazard Mitigation (HM) must be reviewed and approved by FEMA for eligibility and cost reasonableness, the Subrecipient must formally request a Project Amendment and provide a detailed mitigation proposal, supporting documentation, and cost estimate before performing any additional work. Examples of Section 406 HM elements that may be added to a project include:

- Elevating a damaged facility or critical equipment above base flood elevation;
- Installing flood barriers, berms, or floodwalls to protect a facility;
- Upsizing or hardening drainage infrastructure to reduce future flood risk;
- Seismic bracing or structural reinforcement to meet enhanced stability standards;
- Wind retrofits, impact-resistant windows, or strengthened connections; or,
- Replacement and upgrade of construction materials with non-combustible alternatives.

HOW TO REQUEST A PROJECT VERSION

The information below provides basic guidance for PA Subrecipients to initiate a Project Amendment Request.

- Coordinate with your assigned Cal OES PA Specialist as soon as possible to discuss potential options and necessary processes if you believe you may need to request a Project Amendment for any PA Project.
- Cal OES PA Specialists will provide guidance for submitting a request and outline information / documentation that may be required.
- Subrecipient requests can be initiated by submitting a letter to the Cal OES Disaster Recovery email at: DisasterRecovery@CalOES.ca.gov

The Cal OES PA Specialist assigned to support the Applicant provides technical assistance on drafting and submitting to the Disaster Recovery inbox.

NEXT STEPS FOR SUBRECIPIENTS

The information below summarizes next steps for PA Subrecipients after a Project Amendment has been requested / submitted.

- Confirm that all documentation in Grants Portal is accurate.
- Continue to monitor the Project through all Process Steps that require rework.
- Respond to all requests from FEMA / Cal OES promptly within all timelines / deadlines.

The following section summarizes best practices for Subrecipients submitting Project Amendment requests.

BEST PRACTICES

The information below provides best practices to assist Subrecipients when preparing a Project Amendment Request.

- Do not delete any old versions of internal documents; archive them to demonstrate a Project's evolution for any subsequent audit / compliance requirements.
- Confirm that Special Considerations (e.g., insurance proceeds, procurement records, EHP requirements) are fully addressed and included.
- When developing an Amendment Request, utilize plain language to clearly articulate the reason and intent.
- Before sending any package to Cal OES / FEMA, confirm all required documents are included, filenames are consistent, and the Version log is up to date.
- Upload / document all official correspondence between Cal OES, Subrecipients, and FEMA in the Grants Portal "Documents Section" for each Project.

KEY POINT: Since each disaster presents unique circumstances, and FEMA processes may evolve / change, additional disaster specific guidance may be provided by Cal OES to provide additional details or define process steps.

Cal OES PA Specialists will provide additional information to Subrecipients for process updates / revisions specific to each declared event as applicable.

NOTE: PA Process Steps and requirements may change over time. Subrecipients are responsible for staying informed and meeting all Process Step deadlines. Subrecipients should review the current Version of the FEMA PAPPG and coordinate with their assigned Cal OES Specialists to understand any changes / revisions to the process steps above.

For additional information summarizing the PA Program Appeals Process, review the ***PA Applicant Appeals Overview*** in the PA Applicant Toolkit.

PA NET SMALL PROJECT OVERRUN (NSPO) APPEAL FACT SHEET

This document explains how a Net Small Project Overrun (NSPO) Appeal is identified and summarizes requirements and policies for Subrecipients to be eligible for submitting an NSPO request.

NET SMALL PROJECT OVERRUNS SUMMARY

FEMA obligates Small Projects based on documentation and/or estimates available at the time of Project Worksheet (PW) preparation and generally does not adjust Small Projects unless specific Public Assistance Program and Policy Guide (PAPPG) criteria are met. If the total actual costs incurred of all completed Small Projects exceed the total amount obligated by FEMA, Subrecipients *may* be able to request additional funding through an NSPO Appeal.

- A Project's designation as a Small Project is based on the project threshold determined for the given fiscal year at the time of obligation, not when work is completed, or costs are incurred.
  - Individual project adjustments outlined in the PAPPG (e.g., errors / omissions, insurance, non-completion of the approved Scope of Work) should be accounted for prior to the aggregate NSPO calculation.
- A NSPO exists when there is an ***Aggregate*** Cost Overrun Across ***All*** Small Projects.
  - A NSPO is determined by comparing the total costs incurred for all Small Projects to the total obligated costs for those same projects.
  - If an aggregate overrun does not exist, FEMA will not adjust project costs for individual Small Project overruns.
- Only FEMA-eligible costs should be included in NSPO calculations.
- Costs will be considered ineligible if they are outside the approved Scope of Work, not compliant with procurement or environmental requirements, or ineligible under PA policy.

Example NSPO Cost Comparison:

Project	Total Approved	Actual Eligible Costs
#1234567	$10,256.32	$11,156.17
#1234568	$90,411.66	$89,998.40
#1234569	$118,833.46	$122,742.79
Totals:	**$219,501.44**	**$223,897.36**
Actual Costs $223,897.36 – Total Approved $219,501.44 = **$4,395.92 NSPO**		

INITIATING NSPO APPEALS

Subrecipients must submit an NSPO Appeal within 60 days of completing the last Small Project OR the obligation of the last Small Project, whichever is latest.

- To support potential eligibility for an NSPO appeal, Subrecipients should:
  - Monitor Small Project costs and work completion status;
  - Notify Cal OES as soon as possible when net overruns are anticipated to coordinate next steps and applicable deadlines; and
  - Retain and submit actual cost documentation for all Small Projects when requested.

KEY POINT: Small Projects are typically closed together; however, Cal OES has begun to close Small Projects on an individual basis. **Subrecipients should consult their assigned Cal OES PA / Closeout Specialist to discuss their respective projects and path forward.**

PA NET SMALL PROJECT OVERRUNS (NSPO) FACT SHEET

The following section provides a review of NSPO key points as well as a summary of best practices for Subrecipients.

NSPO KEY POINTS

If the Subrecipient determines the approved Scope of Work may change, those changes ***MUST*** be formally approved by FEMA ***BEFORE*** the work is completed. Unapproved scope changes cannot be claimed through a NSPO Appeal.

- NSPO Appeals cannot be used to address ineligible work, procurement violations, or unapproved changes within a project.
- NSPO Appeals only allow FEMA to reimburse eligible net overruns.
- NSPO Appeals do not:
  - Increase the Federal Cost Share amount or percentage;
  - Cover a Subrecipient's local cost share; or,
  - Replace insurance or other funding.

NOTE: FEMA's PA Program is regularly reviewed and updated to improve efficiency and delivery of assistance. As a result, PA Process Steps and requirements may change over time. Subrecipients are responsible for staying informed and meeting all Process Step deadlines.

BEST PRACTICES FOR SUBRECIPIENTS

The information below identifies best practices for Subrecipients specific to NSPOs.

- Procurement conditions still apply to NSPO Appeals—costs tied to noncompliant procurement (e.g., lack of competition, missing contracts) will be excluded, potentially eliminating net overruns.
- Subrecipients must maintain and provide clear, auditable documentation of actual costs for all Small Projects (regardless of individual project over / underruns), including:
  - Force Account Labor
  - Equipment
  - Materials
  - Mutual Aid
  - Contracts and Change Orders
  - Proof of Payment
- Subrecipients are best positioned for a successful NSPO Appeal and can be prepared for potential audits when they:
  - Track costs meticulously and retain supporting documentation;
  - Maintain compliance with programmatic eligibility conditions and requirements; and
  - Actively coordinate with their assigned Cal OES PA Specialist and FEMA Program Delivery Manager (PDMG).

KEY POINT: Inadequate supporting documentation can result in disallowed costs and lead to unsuccessful NSPO appeals.

For additional information specific to submitting Appeal requests, first review the ***PAPPG and then review the PA Applicant Appeals Overview*** in the PA Applicant Toolkit.

PA NET SMALL PROJECT OVERRUNS (NSPO) FACT SHEET

This information provides a workflow for to determine if an aggregate NSPO exists.

SUBRECIPIENT WORKFLOW

The process outlined below details a workflow for Subrecipients to determine whether an aggregate NSPO exists and if the Subrecipient is ready to file an Appeal.

STEP 1 — ARE THE PROJECTS CLASSIFIED AS SMALL?

Subrecipients should confirm that projects were Obligated as Small Projects based on the Small Project threshold at time of Obligation.

- **YES → Proceed to Step 2**
- **NO → STOP**

If no, remember, Large Projects are closed on actual costs incurred and overruns are not addressed via a NSPO appeal.

STEP 2 — ARE ALL SMALL PROJECTS OBLIGATED AND IS THE WORK COMPLETE FOR EACH?

Subrecipients should verify that each Small Project is Obligated and that the approved Scope of Work, **is complete**.

- **YES → Proceed to Step 3**
- **NO → WAIT**

If no, remember, monitor project costs and work completion status for potential NSPO.

STEP 3 — HAS ALL SUPPORTING DOCUMENTATION FOR SMALL PROJECTS BEEN COMPILED?

Subrecipients should proactively compile and **prepare supporting cost documentation** for **all Small Projects** for submission to Cal OES.

- **YES → Proceed to Step 4**
- **NO → Compile documentation**

If no, gather all supporting documents to support claimed costs and any applicable Environmental and Historic Preservation (EHP), Hazard Mitigation, or Insurance considerations.

STEP 4 — ARE ALL COSTS FEMA-ELIGIBLE?

Confirm that incurred Project costs are:

1. Aligned with the approved Scope of Work;
2. Properly documented;
3. Procured in compliance with Federal requirements; and,
4. Environmentally and legally compliant.

- **YES (TO ALL) → Proceed to Step 7**
- **NO (TO ANY) → Remove / exclude ineligible costs**

If no (to any), consult with a Cal OES PA / Closeout Specialist and return to Step 4 to recalculate the final eligible incurred costs.

PA NET SMALL PROJECT OVERRUNS (NSPO) FACT SHEET

SUBRECIPIENT WORKFLOW (CONTINUED)

STEP 5 — DO THE TOTAL ACTUAL ELIGIBLE COSTS INCURRED EXCEED THE TOTAL OBLIGATED AMOUNT?	
Subrecipients should calculate total approved vs. total actual eligible costs incurred.	
🟢	YES → Proceed to Step 5
🔴	NO → STOP
If no, an aggregate NSPO does not exist.	

STEP 6 — DID YOU FILE YOUR NSPO APPEAL WITHIN THE 60-DAY TIMELINE?	
Subrecipients should confirm whether they are within 60-days of the last Small Project's work completion or Obligation to submit an NSPO Appeal.	
🟢	YES → Proceed to Step 6
🔴	NO → Coordinate with Cal OES
If no, remember, NSPOs are not supported by Cal OES or approved unless programmatic requirements are met.	

STEP 7 — HAS THE REQUEST BEEN SUBMITTED TO GRANTS PORTAL AND CAL OES?	
Subrecipients must file their NSPO Appeal in Grants Portal and it is a best practice to also submit to DisasterRecovery@caloes.ca.gov for Cal OES awareness.	
🟢	YES → Coordinate with Cal OES for additional information and next steps.
🔴	NO → Coordinate with Cal OES to complete any remaining Process Steps.
FEMA and Cal OES will notify Subrecipients when an NSPO is approved and Obligated.	

KEY POINTS FOR NET SMALL PROJECT UNDERRUNS (NSPU)

An NSPU occurs when the total actual costs incurred of all completed Small Projects is *less* than the total amount obligated by FEMA. The information below summarizes key points specific to NSPUs and Closeout reconciliation.

- If an NSPU exists, FEMA will not require repayment of the federal share, provided the approved Scope of Work was completed and no funding reductions were made at closeout.
- If an NSPU exists, Subrecipients may forfeit all or a portion of their anticipated California Disaster Assistance Act (CDAA) State Cost Share funding, as the federal cost share may have already fully reimbursed their eligible project costs.
- CDAA cannot provide funding for costs without documentation.

PA TIME EXTENSION REQUEST OVERVIEW

This guide provides PA Applicants (referred to as Subrecipients once projects are Obligated) guidance on what a Time Extension is, when it may be required, documentation needed to support the request, and the steps for submission and approval.

NOTE: This guide is specific to formal Time Extension (TE) requests to extend the work completion deadline for a Project. This information is not related to Subrecipients requesting additional time for other FEMA process steps (e.g., late Requests for Public Assistance, FEMA Requests for Information (RFI) deadlines, pre-obligation process step timelines).

TIME EXTENSION SUMMARY

A TE request is a formal request submitted by a Subrecipient to extend the regulatory deadline for completing a Project's approved Scope of Work (SOW). TEs are necessary when extenuating circumstances beyond the Subrecipient's control prevent work completion within the regulatory or previously extended period of performance (POP). Examples of extenuating circumstances generally include, but are not limited to, delays caused by permitting or Environmental and Historic Preservation (EHP) reviews and requirements, atypical limitations like narrow construction windows, adverse weather, supply chain disruptions, or unforeseen site conditions.

Cal OES, as the Recipient, has the authority to approve certain TEs. Cal OES may extend the POP for Emergency Work up to an additional six months and Permanent Work up to an additional 30 months on a project-by-project basis, **with the exception of temporary relocation and Category I Projects**. Typically, Cal OES approves TEs up to 12 months at a time. If additional time is necessary, Subrecipients may need to submit multiple TE requests over the lifecycle of a Project. Any extensions requested beyond Cal OES' authority require FEMA's approval and will be transmitted to FEMA accordingly.

KEY POINT: FEMA does not consider situations such as a lack of funding, administrative changes, delayed permit requests, or documentation compilation as valid reasons for TEs.

WORK COMPLETION DEADLINES

FEMA provides PA funding only for work completed and costs incurred within specified regulatory deadlines. The timeframe to complete work is known as the POP for a Project.

- For Emergency Work Projects, the initial POP deadline is six months from the disaster declaration date.
- For Permanent Work Projects the initial POP deadline 18 months from the disaster declaration date.
- For Category I Projects, there is an 180-day limit with no option for a TE.

FEMA defines work completion as fulfilling all tasks included in the approved SOW and meeting all programmatic compliance requirements. The deadlines outlined above represent the initial regulatory POPs for a Project which may be extended upon request.

KEY POINT: Work completion does not include the additional time required to pay invoices, fulfill warranty obligations, or complete grant management activities, such as submitting closeout documentation, reconciling financial records, or requesting reimbursement.

KEY POINT: A TE **cannot be approved until a Project is Obligated**, even if work is delayed prior to Obligation. Subrecipients that anticipate needing a TE should communicate with their assigned Cal OES PA Specialist and prepare a request prior to the expiration of the POP.

PA TIME EXTENSION REQUEST OVERVIEW

The information below briefly summarizes the request process to submit a TE Request as well as TE guidance for Temporary Facilities Projects.

TIME EXTENSION REQUEST PROCESS

To request a TE to complete the approved SOW, **send a formal request** on organization letterhead, addressed to the below, and email the letter to DisasterRecovery@caloes.ca.gov.

Robert Larsen, State Public Assistance Officer
California Governor's Office of Emergency Services
Recovery Section, Public Assistance Division
3650 Schriever Avenue
Mather, CA 95655

When submitting a TE request, be sure to submit separate requests for each Project application needing an extension and include the following information in your request letter:

- Cal OES ID Number (if assigned or indicate N/A);
- FEMA PA ID Number;
- Project name and number;
- Reason for delay and justification of circumstances beyond Subrecipient's control;
- Current status of the work and percentage complete;
- Project timeline from event declaration through the estimated completion date; and
- Dates and provisions of any previously granted TEs.

KEY POINT: Late TE Request submissions may not be approved by FEMA due to evolving PA Program Delivery guidance and may jeopardize Project funding.

TIME EXTENSION REQUEST PROCESS - TEMPORARY FACILITY PROJECT

FEMA and Cal OES each have the authority to extend the deadline for Emergency Work for up to six additional months (12 months cumulatively) depending on the extent of damages. However, for temporary facility (i.e., Emergency Work) projects, ***only*** FEMA has the authority to approve a TE to the Project's initial six-month POP deadline.

- If restoration is expected to exceed six months, Subrecipients should coordinate with the assigned Cal OES PA Specialists at the earliest opportunity to solicit technical guidance.

For each temporary facility, Subrecipients submitting a TE request must provide an estimated Project timeline. **Timelines should align to the work schedule of the associated Category E - Permanent Work Project which coincides with the Temporary Facility Project.** The timeline should begin with the declaration date of the event and include completion dates for all relevant milestones including, but not limited to those listed below:

- Selection of permanent construction site;
- Completion of design and permitting phases;
- Request for proposal (RFP) timeline'
- Selection of contractor(s); and
- Start of construction and projected completion dates.

PA TIME EXTENSION REQUEST OVERVIEW

The information below summarizes Time Extension Best Practices for PA Subrecipients and briefly describes Time Extension determination Appeals.

TIME EXTENSION REQUEST BEST PRACTICES

The information below provides best practices to assist Subrecipients.

- Cal OES can only approve TE requests for **Obligated** projects even if work is delayed prior to initial Obligation. Accordingly, TE requests should be submitted immediately upon Project Obligation.
- Subrecipients should **coordinate closely with Cal OES PA Specialists early and often** during project formulation to understand POP deadlines and potential needs for a TE.
- If a Subrecipient has **multiple temporary facility projects**, each timeline should be assessed individually in alignment with the associated Permanent Work Project.
- A formal TE is **only used to request an extension to the POP**.
- A TE request will not change the Federal Cost Share.
- A TE request does not replace the requirement to submit a Project Amendment Request when a change to the approved SOW is necessary. In such cases, both a TE Request and a Project Amendment Request may be required and may be submitted together as a single request, provided they apply to only one Project.
- A TE does not provide Subrecipients with additional time for avoidable delays resulting from inaction of the Subrecipient (i.e., Delayed permit requests, lack of funding / staff to complete Project work, administrative / staff changes)
- If a TE Request is denied by FEMA, then a Subrecipient can exercise Appeal rights.

TIME EXTENSION DETERMINATION APPEALS

Subrecipients may Appeal any FEMA determination regarding an application for PA Program funding. This includes TE denials.

FEMA provides Subrecipients with opportunities to Appeal a determination:

- For all disasters declared on or after January 1, 2022: an applicant has **60 calendar days** from the date FEMA electronically transmits its determination or first Appeal decision to submit an Appeal. These Appeals must be submitted electronically via Grants Portal.
- For all disasters declared prior to January 1, 2022: an applicant has **60 calendar days** from the date it receives a notice of a determination or first Appeal decision to submit an Appeal. These Appeals must be submitted via email to DisasterRecovery@caloes.ca.gov.
- If the Regional Administrator partially or fully denies the first Appeal, Subrecipients may submit a second Appeal through Cal OES to the Assistant Administrator for the Recovery Directorate at FEMA Headquarters.

In an Appeal, the Subrecipient must include:

- Documented justification supporting its position;
- The specific funding amount (or amounts if there are multiple issues being appealed) in dispute, as applicable; and
- The specific law, regulation, or policy applicable to the respective disaster, that the Subrecipient believes FEMA applied inconsistently or incorrectly in its determination.

At any point in the Appeal process, a Subrecipient may withdraw its Appeal by submitting a written request simultaneously to Cal OES and FEMA.

PUBLIC ASSISTANCE

PA Phase VII

Final Reconciliation and Closeout Job Aids



PA PHASE VII — Final Reconciliation and Closeout Job Aids

42.	Final Reconciliation and Closeout Overview
43.	PA Project Payment Overview

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
FINAL RECONCILIATION AND CLOSEOUT OVERVIEW

This document provides a high-level overview of the Closeout process and provides best practices for PA Subrecipients to support efficient and effective Closeout of PA projects.

CLOSEOUT SUMMARY

Closeout occurs at the end of FEMA PA Program Delivery and is the final PA Process Step after ***ALL*** project work is completed and documentation is submitted into Grants Portal (GP). During Closeout, Cal OES and FEMA review projects for the following:

- Scope of Work (SOW) completion;
- Work completion within project deadlines;
- Actual vs. estimated Project costs incurred; and
- Demonstration of compliance with any applicable grant conditions (e.g., Hazard Mitigation (HM)) and / or procurement & insurance requirements.

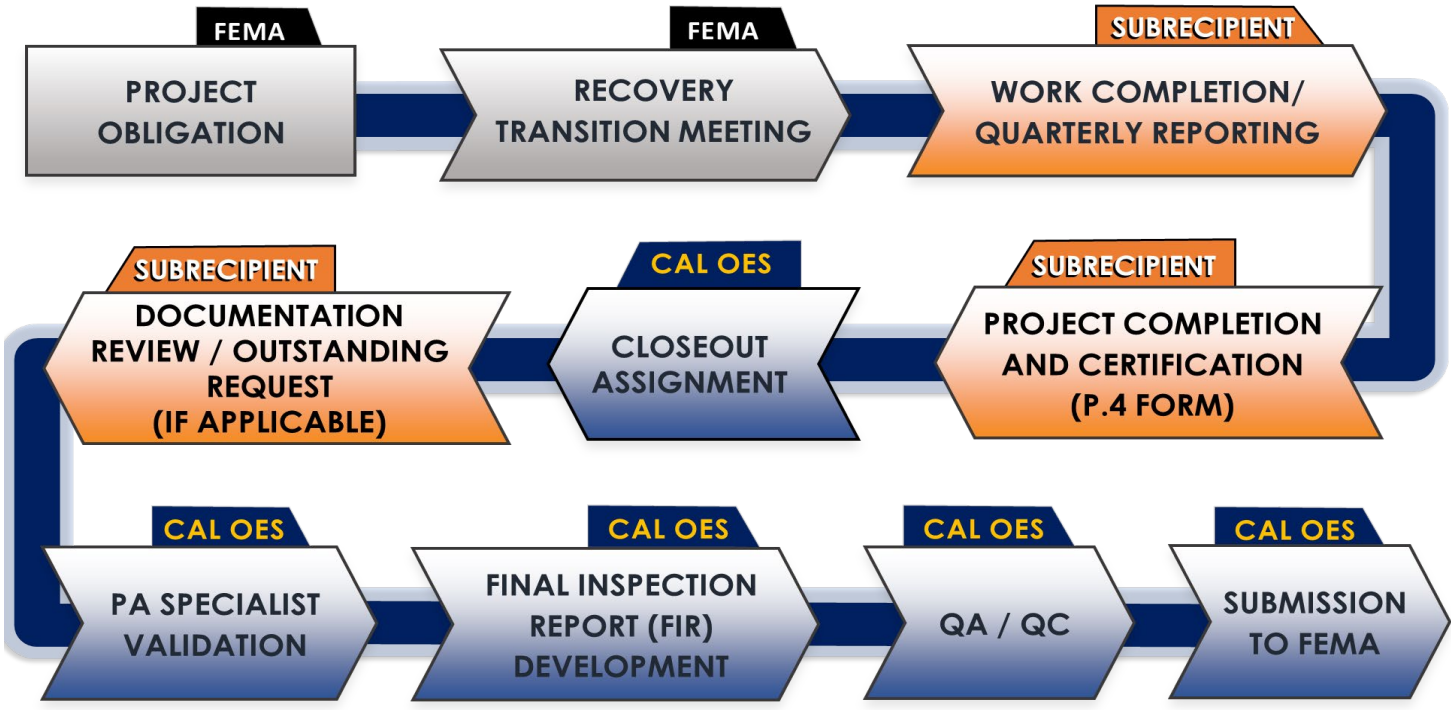
After completing review of the project(s), Cal OES provides a project funding recommendation to FEMA for final determination and closeout.

WHEN DOES CLOSEOUT BEGIN

Closeout begins after completion of Phase VI (Project Monitoring and Amendments) when the following requirements are met:

- For Large Projects, **within 90 days of SOW completion**.
- For Small Projects, (whichever is later):
  - Within 90 days of completion of the last SOW deadline or within 90 days of Obligation of the last Small Project; or
  - Within 60 days of SOW completion if a Net Small Project Overrun (NSPO) exists, or within 60 days of Obligation of the last Small Project.

The illustration below depicts the Closeout process beginning at the completion of Project Obligation and the Recovery Transition Meeting (RTM) through final submission to FEMA.



For additional information or questions, contact:
DisasterRecovery@CalOES.ca.gov

Cal OES GOVERNOR'S OFFICE OF EMERGENCY SERVICES

FINAL RECONCILIATION AND CLOSEOUT OVERVIEW

The information below summarizes documentation preparation and processes for requesting Closeout and briefly describes payment processes.

PREPARING CLOSEOUT DOCUMENTATION

Prior to requesting Closeout PA Subrecipients should confirm necessary supporting documentation is completed and organized.

- Prepare a Cost Summary for each project to identify costs incurred for each cost type (i.e., Force Account Labor, Contracts, Rental Equipment, Material Receipts).
- Confirm all Cal OES compliance documentation (e.g., Cal OES Forms 89 / 130, SAM.gov Active Registration, FFATA Financial Disclosure) is on file with Cal OES Financial Processing Unit (FPU) **prior to initiating closeout.**
  - For financial and payment related questions, contact Cal OES Financial Assistance Branch (FAB) (RecoveryPayments@caloes.ca.gov).
- Subrecipients need to submit a Cal OES Form 130 (Designation of Subrecipient's Agent Resolution), or for State Agencies, a Cal OES Form 130SA.
  - **NOTE**: For non-State Agencies Subrecipients (**particularly Private Non-Profits (PNP)**) a Board of Directors / Executive approval is needed to designate an Authorized Agent to execute Closeout on behalf of the Subrecipient.
  - This process often takes time and if not completed in advance of Closeout may delay distribution of funds.

INITIATING CLOSEOUT

The Closeout process is initiated by the submission of the Project Completion and Certification Report, commonly referred to as the P.4. The P.4 includes claimed project costs, project completion date, and whether the project was completed utilizing Force Account or Contract services, or both. Typically, Cal OES will explain the P.4 during the Recovery Transition Meeting (RTM) and provide a copy to the Subrecipient for completion when appropriate.

- The P.4 submission typically triggers Cal OES Closeout Specialist to review and request final documentation form the Subrecipient.
- Subrecipients can support timely Closeout by proactively preparing all work and cost documentation for each Project relative to their claim on the P.4 Form.

Large projects can be closed out on an individual project basis or combined with other large projects. Large projects are closed at their actual documented cost to complete the approved SOW.

Small projects are typically closed together, however, based on disaster specifics FEMA may allow for Closeout of Small Projects on an individual basis. Subrecipients should consult their assigned Cal OES PA Specialist for disaster specific information.

KEY POINT: If an aggregate NSPO exists, the P.4 must be submitted to Cal OES within 60 days of SOW completion or Obligation of the last small project to be considered. Questions specific to NSPOs may be directed to: disastercloseouts@caloes.ca.gov

For additional information summarizing NSPOs, review the ***Net Small Project Overrun Fact Sheet*** in the PA Applicant Toolkit.

FINAL RECONCILIATION AND CLOSEOUT OVERVIEW

PAYMENTS

Following project Obligation, Subrecipients will receive a Notification of Obligation from the Cal OES Financial Assistance Branch (FAB). This letter includes essential information on the payment process & required documents for payment. Payments are issued on a state warrant (physical check) to the address listed on the STD 204 Form.

- For **all Small Projects and Large Projects written as 100% complete**, Cal OES will automatically pay the federal share following Obligation.
- For **Large Projects written as less than 100% complete and Category Z** Projects, Subrecipients need to submit a Reimbursement Request (Form 132). A Reimbursement Request Form is also included in the Notification of Obligation package for Large Projects.

NOTE: There is a10% retention held for most Projects. However, retention amounts may vary per Project and event. The State warrant does not provide Project specific payment details, and typically only specifies payment for the overall incident.

For additional information specific to payments and retention amounts, review the ***Project Payment Overview*** document in the PA Applicant Toolkit.

LARGE PROJECT QUARTERLY REPORTING

Each quarter, subrecipients will be contacted by Cal OES to report on the status of all open (obligated), Large Projects not yet complete. Subrecipients will be requested to provide information on:

- Expenditures to date
- Approved Completion Date
- Is there a current Time Extension on file (if the original completion deadline has passed)?
- Projected Completion Date
- Percent of Work Complete
- Actual Completion Date (if work is 100% complete)

KEY POINT: While Closeout represents the final step in the FEMA PA process, Subrecipients are still required to meet Cal OES requirements such as Quarterly Progress Reporting (QPR), as well as maintaining compliance with documentation and audit requirements after Closeout.

COMPLIANCE DOCUMENTS AND RECORD RETENTION

To receive payments from Cal OES, the required documents for payment must be on file. Information on these forms and their status will be included in the Notification of Obligation. Any questions related to these forms can be sent to RecoveryPayments@CalOES.ca.gov

Subrecipients must maintain all source (financial and program) documentation for 3 years after the date indicated on the Recipient's Audit Waiver Letter. This letter is sent by the Cal OES FAB following financial closeout.

PROJECT TIME EXTENSION REQUESTS

If additional time is needed to complete the work in an approved SOW, Subrecipients must submit a written Time Extension Request to Cal OES.

For additional information summarizing the RTM, review the ***Time Extension Overview*** in the PA Applicant Toolkit.

FINAL RECONCILIATION AND CLOSEOUT OVERVIEW

CHANGE IN SCOPE OF WORK

Subrecipients must ensure PA funding is used exclusively for eligible work specified in the approved Project. To request a change in Scope of Work subrecipients must submit a written request to the Recipient, including both detailed justification of why the change is necessary and supporting documentation.

For additional information summarizing the RTM, review the ***Project Versioning Job Aid*** in the PA Applicant Toolkit.

BEST PRACTICES FOR SUBRECIPIENTS

The information below provides best practices for Subrecipients specific to Closeout.

- Organize and upload supporting Project documentation to GP on a continuous basis throughout the PA Phases.
- Monitor Project progression through the PA process in GP to prepare for Closeout.
- Projects should be advanced to closeout as soon as possible.
  - If additional time is needed to complete the SOW, submit a written request for a time extension to Cal OES.
- Respond to Quarterly Project Reporting (QPR) requests from Cal OES.
  - QPRs are an important tool for Cal OES to manage the progress of Large Projects through the PA process, track potential time extension requests, and plan for closeout.
- Confirm all Cal OES compliance documentation (e.g., Cal OES Forms 89 / 130, SAM.gov Active Registration, FFATA Financial Disclosure) is on file with Cal OES FAB prior to initiating closeout.
  - For financial and payment related questions, contact Cal OES FAB (RecoveryPayments@caloes.ca.gov).
- Submit the P.4 to initiate closeout once the SOW for an individual Large Project, or last Small Project, is complete.
  - For questions related to submission of the P.4 and/or initiating closeout, contact Cal OES Disaster Closeouts Unit (DisasterCloseouts@caloes.ca.gov).
- Track Small Project costs to determine if a Net Small Project Overrun (NSPO) exists.
  - An NSPO exists when the aggregate total costs incurred exceed the aggregate total amount obligated for all Small Projects, and the Subrecipient may request funding through the NSPO appeal process.

KEY POINT: Traditionally, Closeout processes remain consistent. However, based on disaster specifics FEMA and / or Cal OES may implement process revisions / adjustments / adjustments to meet immediate need or policy changes.

Subrecipients should consult their assigned Cal OES PA Specialist for disaster specific information.

PA PROJECT PAYMENT OVERVIEW

This document provides a high-level overview of the PA Payment process from Notice of Obligation through Disaster Financial Closeout.

PAYMENT OVERVIEW

Notice Of Obligation: Following Project Obligation, the Cal OES Financial Administration Branch (FAB) issues an official Notification of Obligation to the Subrecipient's primary Authorized Agent and Approved Contacts. This communication provides essential information on the payment process.

1. **Compliance Documents:** The Notification of Obligation includes technical guidance for completing any required compliance documentation. Payments cannot be issued, and Projects are placed on hold if compliance items are incomplete or outdated.

2. **Reimbursement Requests:** For all Small Projects and Large Projects (100% complete) at Obligation, FAB automatically initiates payment processing once the Notice of Obligation is issued, required compliance documents are confirmed, and any required Cal OES validation review is complete. For Large Projects (not 100% complete) at Obligation and Category Z Projects, Subrecipients must submit a Reimbursement Request (OES-FPD-132 Form) to request reimbursement of eligible costs incurred.

3. **Cal OES Review & Supporting Documentation:** All Large Projects and Category Z Projects undergo a Cal OES validation process (i.e., VAYGo), during which Project supporting documentation is reviewed before payment is issued. To complete the VAYGo process and have funds released, Subrecipients must upload all supporting documentation to Grants Portal, including proofs of payment.

4. **Disbursement:** Payment disbursement and retention amounts vary by Project size and the percentage of work complete at the time of obligation. As the Recipient of PA funds, Cal OES typically retains 10% of Project disbursements. Retention amounts are identified in the Notification of Obligation.

Disaster Financial Closeout: After all Projects and Final Inspection Reports (FIR) are closed and approved—including California Disaster Assistance Act (CDAA) FIRs, if applicable—FAB begins Financial Closeout to reconcile payments, retention, adjustments, and any debts. A final Financial Closeout Package is then issued to the Subrecipient to document completion of the disaster grant.

NOTE: Traditionally, Payment and Financial Closeout processes remain consistent; however, based on disaster requirements, FEMA and / or Cal OES may adjust these processes to meet immediate needs or policy changes.

KEY POINT: Projects are not eligible for payment until they are officially obligated. Applicants with questions about Projects not yet obligated should contact their assigned PA Specialists.

PA PROJECT PAYMENT OVERVIEW

The following sections provide additional details for main steps in the payment process.

1. **Compliance** — Compliance documents must be on file with Cal OES.
2. **Requests** — Payment request initiated based on Project type.
3. **Review** — All cost supporting documentation must be uploaded to GP.
4. **Disbursement** — Payments are issued on a state warrant (physical check).

COMPLIANCE DOCUMENTS

FAB reviews each Subrecipient's compliance documents during payment processing to confirm all required items are current and valid. If documents are missing or outdated, the Project is placed on hold and the Subrecipient is notified of outstanding items. Payment cannot proceed until all compliance requirements are met. Typical compliance documents include:

- Designation of Applicant's Agent Resolution for Non-State Agencies (OES-FPD-130); or Signature Authority for California State Agencies (OES-FPD-130SA)
- List of Authorized Agents (OES-FPD-012)
- FFATA Financial Disclosure (OES-FPD-011)
- SAM.gov Registration
- Payee Data Record (STD 204)
- Project Assurance for Federal Assistance (OES-FPD-089)

NOTE: All compliance documents should be submitted to RecoveryPayments@CalOES.ca.gov

REIMBURSEMENT REQUESTS

Large Projects (100% complete) at Obligation and Small Projects do not require a Reimbursement Request, and the payment process is automatically initiated by FAB.

- Large Projects (100% complete) automatically undergo VAYGo review.

Large Projects (not 100% complete) at Obligation and Category Z Projects require a Reimbursement Request (OES-FPD-132 Form) for Subrecients to drawdown on funds.

- Projects undergo VAYGo review once a Reimbursement Request is received.
- Subrecipients may request incremental reimbursements (i.e., Drawdowns) as eligible work is completed and costs are incurred. Each Drawdown must include supporting documentation, including proof of payment, for costs being claimed. Drawdowns allow reimbursement prior to final Project completion; however, each request is subject to a separate VAYGo review and compliance documentation verification prior to payment.

NOTE: Incomplete reimbursement requests will be placed on hold, which may result in payment delays. FAB will contact Subrecipients to obtain corrections, missing information, and additional supporting documentation as needed.

PREPARING SUPPORTING DOCUMENTATION

Supporting documentation should be collected and prepared throughout the course of Project work so all documentation is readily available when requesting payments. The table below lists examples of supporting documentation typically required for reimbursement requests.

Labor/Services	Materials/Equipment
• Payroll records / wage certifications • Timesheets • Benefit documentation	• Invoices from suppliers • Purchase orders / delivery receipts • Equipment rental agreements
Proof of Payment	**Proof of Work**
• Bank / credit card statements • Cancelled checks • Wire transfer confirmations	• Before / after photos • Inspection reports / logs • Project completion certificates

KEY POINT: Supporting documentation required for payment processing may be different from what is required for programmatic Project Closeout. For Closeout questions, contact your assigned Cal OES Closeout Specialist or email DisasterCloseouts@CalOES.ca.gov.

VALIDATE AS YOU GO (VAYGO)

VAYGo is FEMA's payment review process designed to confirm proper use of PA funds and reduce closeout-related debt recovery. FEMA performs quarterly VAYGo audits on a sample of drawdowns. To maintain compliance with these audits, Cal OES conducts its own VAYGo validation for all Large Projects and Category Z Projects.

The Cal OES VAYGo process involves validation of Project cost and supporting documentation to ensure expenditures are accurate, appropriate, and accounted for before disbursing funds to subrecipients. This proactive approach strengthens payment integrity, reduces the likelihood of improper payments, and supports efficient closeout.

DISBURSEMENT

Following completion of all applicable PA payment process and verification steps, FAB issues a Notification of Payment Package, which includes the Notification of Payment and either the P.5 report summarizing project status, obligations, and costs (for automatic payments) or the completed Reimbursement Request form (for reimbursement-based payments).

Payment disbursements are issued on a state warrant to the address listed on the Payee Data Record (STD 204), which must match the address included on SAM.gov Registration. The warrant identifies the associated disaster number, Project Worksheet, and whether the payment is related to the federal or state cost share. Payment is typically received approximately 6-8 weeks after the Notification of Payment Package is issued.

NOTE: Payment disbursements will be placed on hold if any outstanding issues, such as missing or invalid compliance documents, need to be resolved. Once issues are addressed, the hold is removed, and the Notification of Payment Package can be issued.

PA PROJECT PAYMENT OVERVIEW

The information below summarizes Disaster Financial Closeout and provides additional technical guidance for Subrecipients.

DISASTER FINANCIAL CLOSEOUT

The Disaster Financial Closeout process begins once all of a Subrecipient's Projects are closed in Grants Portal by FEMA and all FIRs—including CDAA FIRs, if applicable—are finalized and received by FAB. FAB then conducts a full financial reconciliation for the disaster. This reconciliation may include:

- Paying out retention;
- Paying remaining funds on Large Projects that were less than 100% complete at obligation and on Category Z Projects not previously drawn down;
- Issuing final payments based on FEMA or Cal OES adjustments; and / or
- Recovering debts from prior de obligations or final FEMA/Cal OES adjustments.

After reconciliation is complete, the Subrecipient receives a final Financial Closeout Package containing an Audit Waiver Letter, Financial Reconciliation Letter, notification of any final payment, a history report, and the final FIR.

KEY POINT: Compliance documents must remain valid through final payments.

TECHNICAL GUIDANCE FOR SUBRECIPIENTS

- FAB is only permitted to accept documents with either a wet signature, or an electronic signature accompanied by a signing certificate. Electronic signatures can be done through applications such as DocuSign or Adobe certified. Wet signatures can be scanned and electronically submitted via email or physically submitted via mail.
- To facilitate a smooth Payment and Financial Closeout process Subrecipients:
  - Should confirm all Cal OES compliance documentation is on file with FAB **prior to Project Obligation and initiating Reimbursement Requests.**
  - Must submit OES-FPD-130 (Designation of Applicant's Agent Resolution), or for State Agencies, OES-FPD-130SA (Signature of Authority).
  - **NOTE**: For non-State Agency Subrecipients, Governing Body approval is needed to designate an Authorized Agent (AA) to sign final documents and administer PA grant processes on behalf of the Subrecipient. Board approval processes often take time. Without an AA designated and on file with Cal OES, reimbursement payments may be delayed.
- Subrecipients must maintain all source (financial and program) documentation for no less than three (3) years after the date indicated on the Subrecipient's Audit Waiver Letter. This typically exceeds federal record retention requirements.

For additional information specific to Project documentation, review the ***PA APPLICANT CLOSEOUT OVERVIEW*** in the PA Applicant Toolkit.

PA PROJECT PAYMENT OVERVIEW

The table below summarizes how federal and state funds are released based on project type and completion status.

Project Status at Obligation	Reimbursement Request (Form 132) Required?	Cal OES VAYGo / Supporting Documentation Required?	Federal Funds Disbursement	State Funds (CDAA) Disbursement
Small Project LESS THAN 100% complete	No	No – supporting documentation required upon Cal OES request only.	Automatic advance of federal share **0% Retention Held**	Automatic advance of state share and administrative allowance. **10% Retention Held**
Small Project 100% complete	No	No – supporting documentation required upon Cal OES request only.	Automatic payment of federal share **0% Retention Held**	Automatic payment of state share and administrative allowance **10% Retention Held**
Large Project LESS THAN 100% complete	Yes – required for each reimbursement request.	Yes – supporting documentation must be uploaded to Grants Portal before a request is made and funds can be released.	Federal Share paid on reimbursement basis **10% Retention Held**	Automatic advance of administrative allowance only. State share paid on reimbursement basis **10% Retention Held**
Large Project 100% complete	No	Yes – supporting documentation must be uploaded to Grants Portal before funds can be released.	Automatic payment of federal share **0% Retention Held**	Automatic payment of state share and administrative allowance. **0% Retention Held**
Category Z Project	Yes – required for each reimbursement request.	Yes – supporting documentation must be uploaded to Grants Portal before a request is made and funds can be released.	Federal share paid on reimbursement basis **10% Retention Held**	N/A

NOTE: Compliance documents are required for all Projects. Payment processing will be paused and Projects placed on hold at any point during the process if compliance documents are not current and valid.

For additional information specific to Project documentation, review the ***PA SUPPORTING DOCUMENTATION OVERVIEW*** in the PA Applicant Toolkit.

For Subrecipients that have Obligated Projects, payment questions should be directed to: RecoveryPayments@CalOES.ca.gov

For Subrecipients that are at Financial Closeout, financial closeout questions should be directed to: FPUCloseouts@CalOES.ca.gov

For additional questions, related to processes prior to payment, contact: **DisasterRecovery@CalOES.ca.gov**

Cal OES GOVERNOR'S OFFICE OF EMERGENCY SERVICES

PUBLIC ASSISTANCE Toolkit Appendix



TOOLKIT APPENDIX

Toolkit Appendix

A.	PA Program Key Terminology
B.	PA Acronym List

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
PA PROGAM TERMINOLOGY

Alternate Project - A Project where the Applicant chooses not to restore the original facility and instead uses eligible funding for another FEMA-approved purpose.

Appeal - A formal request asking FEMA to reconsider a determination regarding eligibility, funding, or another Public Assistance decision.

Applicant - An eligible State, Tribal Nation, local government, or certain Private Nonprofit (PNP) organization requesting FEMA Public Assistance funding.

Applicant's Briefing – A meeting conducted by the Recipient to explain PA requirements and application procedures.

Benefit – Cost Analysis (BCA) – An analysis comparing a mitigation measure's expected benefits with its costs.

Budgeted Labor – Employee labor costs an applicant budgets for and incurs regardless of whether a disaster occurs.

Closeout - The final phase of the Public Assistance process, during which FEMA verifies that all eligible work has been completed and all funding requirements have been satisfied.

Consensus Based Codes, Specifications, and Standards – Voluntary national or international standards incorporating hazard resistant designs.

Contract Costs – Costs incurred for eligible disaster related work performed under contracts.

Cost Estimate (CE) - An estimate of the reasonable costs necessary to complete the eligible Scope of Work.

Cost Estimating Format (CEF) – FEMA's methodology for estimating costs for qualifying large permanent work projects.

Cost Reasonableness -

Cost Share - The percentage of eligible Project costs paid by FEMA and the percentage that remains the responsibility of the Recipient and/or Applicant.

Damage Description and Dimensions (DDD) - The detailed documentation that describes the disaster-related damage, their location, and the measurable extent of the damage.

Deobligation – A reduction or withdrawal of previously obligated federal funding.

Designated Area – A geographic area designated in the presidential declaration for specified types of federal assistance.

PUBLIC ASSISTANCE (PA) TOOLKIT FOR APPLICANTS
PA PROGAM TERMINOLOGY

Determination Memorandum (DM) – FEMA's written explanation of an eligibility determination, including the reasons for a denial and applicable appeal rights.

Direct Federal Assistance (DFA) – Eligible assistance delivered directly by a federal agency rather than through an applicant's grant funded project.

Donated Resources – Volunteer labor, donated equipment, or donated materials used to perform disaster related work.

Duplication of Benefits – Funding provided by two sources for the same item of work.

Emergency – An occasion when the President determines federal assistance is needed to supplement response efforts and protect lives, property, or public health and safety.

Emergency Management Assistance Compact (EMAC) – An interstate mutual aid agreement facilitating assistance among participating jurisdictions.

Emergency Protective Measures – Actions taken before, during, or after an incident to protect lives, public health and safety, and improved property.

Emergency Work – Work necessary to protect lives, public health and safety, or improved property, or to avert or reduce the threat of a major disaster.

Environmental and Historic Preservation (EHP) – Applicable federal environmental and historic preservation requirements governing PA funded activities.

Exigency – An urgent need to prevent or reduce serious harm or injury, including financial harm.

Expedited Project – A PA Emergency Work project (Category A or B) that meets the Large Project threshold and receives accelerated funding based on estimated eligible costs. FEMA initially funds 50% of the estimated federal share, with additional funding subject to applicable documentation and review requirements.

Facility – A building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature.

Federal Cost Share – The portion of total eligible project costs funded by the federal government.

Force Account – An applicant's own personnel and equipment used to perform work.

Force Account Labor (FAL) – Labor performed by an applicant's employees rather than contracted personnel.

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Force Account Equipment (FAE) – Applicant owned equipment used to perform disaster related work.

Grants Portal – FEMA's online system for submitting, reviewing, and managing PA applications and projects.

Hazard Mitigation Proposal (HMP) – A proposal identifying measures intended to reduce the potential for future damage to a disaster damaged facility.

Immediate Threat – A threat of additional damage or destruction from and event reasonably expected to occur within five years.

Impact List – An applicant's initial list of damaged facilities, debris impacted sites, and emergency protective measures.

Improved Project – A project that restores a facility's predisaster function while incorporating improvements or changes to its predisaster design.

Incident Period – The time span during which the disaster causing incident occurs.

Insurance Proceeds – Insurance payments received or anticipated for covered disaster related losses.

Large Project – A project with a final obligated amount at or above the annually adjusted small project threshold.

Legal Responsibility – The applicant's legal obligation to perform the disaster related work for which assistance is requested.

Major Disaster – A qualifying catastrophe that the President determines warrants supplemental federal disaster assistance.

Management Costs (Category Z) – Eligible indirect, direct administrative, and other expenses associated with administering a PA award.

Mutual Aid Agreement – An agreement between two agencies or jurisdictions to provide personnel, equipment, materials, or other assistance.

Net Small Project Overrun (NSPO) – A request for additional funding when an applicant's combined actual eligible Small Project costs exceed the combined approved amounts, subject to applicable requirements.

Non-Federal Cost Share – The portion of eligible project costs not funded by FEMA.

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Obligation – FEMA's commitment of the approved federal share of eligible project costs to the Recipient.

Obtain and Maintain (O&M) – The requirement to obtain and maintain applicable insurance coverage for eligible facilities as a condition of receiving certain PA funding.

Overtime Labor – Time worked beyond an employee's scheduled hours, as established in the applicant's predisaster written labor or pay policy.

Period of Performance (POP) – The period during which an entity may incur new obligations to perform the work authorized under a federal award.

Permanent Work – Repairs or replacement necessary to restore an eligible facility based on its predisaster design and applicable codes and standards.

Predisaster Condition – A facility's condition before the declared incident, used to evaluate eligible disaster related damage.

Predisaster Design – A facility's size or capacity as originally constructed or subsequently modified.

Predisaster Function – The function a facility was performing immediately before the disaster.

Preliminary Damage Assessment (PDA) – A process for assessing disaster impacts and estimating damage and costs to support a declaration request.

Private Nonprofit (PNP) – A qualifying nongovernmental nonprofit organization with acceptable documentation of its nonprofit status.

Private Property Debris Removal (PPDR) – Debris removal from private property when applicable PA eligibility and approval requirements are met.

Program Delivery Manager (PDMG) – FEMA's primary point of contact for coordinating an applicant's project development.

Procurement – The process of acquiring goods or services in accordance with applicable federal, state, and local requirements.

Project – A logical grouping of work required because of a declared disaster or emergency.

Project Amendment – A modification to an approved project, including an authorized change to scope or funding.

Project Versioning – The process of documenting revisions to an existing PA project.

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Project Worksheet (PW) – FEMA's project documentation used to record eligible work and costs and support PA funding.

Public Assistance (PA) – Supplemental federal grant assistance to eligible governments and certain private nonprofit organizations for disaster related emergency work and restoration of damaged facilities.

Public Facility – An eligible government owned facility, including certain buildings, infrastructure, utilities, roads, and parks.

Recipient – A non-federal entity receiving a federal award directly from FEMA.

Record of Environmental Consideration (REC) – FEMA documentation of the environmental and historic preservation review for a proposed action.

Recovery Scoping Meeting (RSM) – A meeting to discuss reported disaster impacts, supporting documentation, and project development.

Request for Information (RFI) – An official written means of requesting information or documentation from an Applicant necessary to make an eligibility determination or validate claimed scope and costs of a project.

Request for Public Assistance (RPA) – Applicant's official notification to FEMA of intent to apply for PA monies following declaration of a disaster. It is a short form that asks for general identifying information about an applicant.

Reasonable Cost – A cost that does not exceed what a prudent person would incur under the circumstances.

Resilience – The ability to prepare for hazards, adapt to changing conditions, withstand disruptions, and recover rapidly.

Scope of Work (SOW) – The eligible work necessary to address an immediate threat or restore a facility, as documented in the project.

Section 406 Hazard Mitigation – Cost effective measures incorporated into eligible repair work to reduce the potential for future disaster damage.

Site – An individual building, structure, or section of a system where disaster related impacts or damage occurred.

Site Inspection (SI) – An inspection to document and verify disaster related damage and collect project development information.

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Site Inspection Report (SIR) – Documentation of observations and information collected during a site inspection.

Small Project – A project with a final obligated amount below the annually adjusted small project threshold.

Standard Project – A project developed and funded under FEMA's standard PA procedures.

Straight Time Labor – An employee's regular pay rate when working normal hours.

Soft Costs – Project expenses outside direct construction, such as engineering, architectural, and project management costs.

Subaward – Funding provided by a pass-through entity to a Subrecipient to carry out part of a federal award.

Subrecipient – An entity receiving a subaward through a Recipient to carry out part of a federal program.

Substantial Damage – Damage for which the cost of restoration equals or exceeds 50% of the structure's predisaster market value.

Supporting Documentation – Records substantiating claimed damages, work, costs, and compliance with applicable program requirements.

Time and Materials Contract – A contract combining fixed hourly labor rates with the actual cost of materials.

Time Extension – An approved extension of the applicable deadline for completing eligible work.

Unbudgeted Labor – Employee labor costs an applicant does not normally budget for and incurs directly because of a disaster.

Work Completion Date – The date the applicant finishes the approved scope of work and satisfies associated compliance requirements.

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AB	**Applicant's Briefing**
BCA	**Benefit – Cost Analysis**
CE	**Cost Estimate**
CEF	**Cost Estimating Format**
CFR	**Code of Federal Regulations**
CRC	**Consolidated Resource Center**
DDD	**Damage Description and Dimensions**
DM	**Determination Memorandum**
DAC	**Direct Administrative Costs**
DFA	**Direct Federal Assistance**
DDMP	**Disaster Debris Management Plan**
EMAC	**Emergency Management Assistance Compact**
EOC	**Emergency Operations Center**
EPM	**Emergency Protective Measures**
EHP	**Environmental and Historic Preservation**
EIS	**Environmental Impact Statement**
EPA	**Environment Protection Agency**
EEI	**Essential Elements of Information**
FMAG	**Fire Management Assistance Grant**
FAL	**Force Account Labor**
FAE	**Force Account Equipment**
GAR	**Governor's Authorized Representative**
GP	**Grants Portal**
GM	**Grants Manager**
HM	**Hazard Mitigation**
HMGP	**Hazard Mitigation Grant Program**
HMP	**Hazard Mitigation Proposal**
HHM	**Household Hazardous Materials**
IL	**Impact List**
IA	**Individual Assistance**
IDE	**Initial Damage Estimate**
JFO	**Joint Field Office**
MDD	**Major Disaster Declaration**
NEPA	**National Environmental Policy Act**
NFIP	**National Flood Insurance Program**
NHPA	**National Historic Preservation Act**
NSPO	**Net Small Project Overrun**
POP	**Period of Performance**
PDA	**Preliminary Damage Assessment**
PNP	**Private Nonprofit**

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PPDR	**Private Property Debris Removal**
PDMG	**Program Delivery Manager**
PW	**Project Worksheet**
PA	**Public Assistance**
PAGS	**Public Assistance Group Supervisor**
PAPPG	**Public Assistance Program and Policy Guide**
QPR	**Quarterly Progress Report**
REC	**Record of Environmental Consideration**
RSM	**Recovery Scoping Meeting**
RTM	**Recovery Transition Meeting**
RFI	**Request for Information**
RPA	**Request for Public Assistance**
ROW	**Right-of-Way**
SOW	**Scope of Work**
SI	**Site Inspection**
SIR	**Site Inspection Report**
SBA	**Small Business Administration**
SHPO	**State Historic Preservation Officer**
T&M	**Time and Materials**
THPO	**Tribal Historic Preservation Officer**
USACE	**U. S. Army Corps of Engineers**
USC	**United States Code**