

Navigating FEMA— What Do You Need to Know?

The following provides some guidance and information about disaster preparedness reprinted with permission from the Federal Emergency Management Agency's (FEMA) Public Assistance Policy Digest, FEMA Publication No. 321 and the Public Assistance Guide, FEMA Publication No. 322. While the guidance documents focus on all affected areas, this reprint focuses on wastewater collection and treatment systems.

Sequence of Events:

The following list outlines the general Sequence of Events during a disaster. This sequence may vary based on the circumstances of the disaster.

- Disaster occurs
- Local response – emergency operations center activation – declaration of state of emergency
- Continue emergency work – maintain records (labor, equipment, materials, and contracts)
- Compile initial estimated damage and report to State emergency management agency
- Evaluate needs and request State/Federal assistance
- Federal/State survey of need: Preliminary Damage Assessment
- Governor's request for Federal assistance
- Presidential declaration
- Designate Applicant's agent
- Attend Applicants' Briefing and submit a Request for Public
- Attend Kickoff Meeting with Public Assistance Coordinator (PAC) – discuss project formulation
- Prepare Project Worksheets – work with the PAC
- Address applicable Special Considerations (floodplain management, insurance, hazard mitigation and compliance with environmental and historic preservation laws)
- Complete application for Federal funds
- Maintain required documentation (labor, equipment, materials, and contracts)
- Receive payment of small projects - for Federal share and possibly State share
- Complete approved disaster work within time allowed
- Request final inspections
- Submit documents for final inspection, program review and close-out
- Receive reimbursement – final payment on large projects
- Keep all documentation for three years after Applicant final expenditure report

Categories of Work:

There are three general types of work that may be eligible, with different criteria for each:

- debris removal
- emergency protective measures
- permanent restoration

Debris removal and emergency protective measures are considered emergency work, and permanent restoration is considered permanent work. Three general criteria apply to all types of work and to all applicants.

Direct Result

Work must be required as a direct result of the declared disaster. The declaration by the President will designate the event, such as severe storms, tornados, or floods, for which the declaration is being made. Damage that results from a cause other than the designated event, or from pre-disaster damage, is not eligible.



Photo by Sandra Lizans, NYSDEC Region 7

At the Deposit Sewage Treatment Plant in Broome County, debris brought by the flood-crested Susquehanna River (in background) is shown caught in its final clarifier.

Designated Disaster Area

When a declaration of a major disaster is made for a State, FEMA will designate those counties of the State that are eligible for assistance. Except for unusual situations, counties or independent cities are designated. The damaged facility must be located, or the work must be performed, within the designated area to be eligible for public assistance.

Legal Responsibility

As with eligible facilities, work must be the legal responsibility of the applicant at the time of the disaster to be eligible. Ownership of a facility is sufficient to establish the responsibility for work to repair the facility. However, if an applicant leases a facility as a tenant, repairs to that facility are not eligible unless the lease states that the lessee is responsible for the repairs.

To facilitate the processing of public assistance grants, FEMA has divided disaster-related work into seven categories. These categories are divided into emergency work and permanent work. For wastewater treatment plants, the following three categories apply:

Emergency Work:

Category A – Debris Removal

Eligible debris removal activities include the clearance of:

- trees and woody debris
- building wreckage
- sand, mud, silt, and gravel
- vehicles
- other disaster-related material

To be eligible for public assistance, such activities must be necessary to do one of the following:

- eliminate immediate threats to lives, public health and safety
- eliminate immediate threats of significant damage to improved public or private property, or
- ensure economic recovery of the affected community to the benefit of the community-at-large

Category B – Emergency Protective Measures

Emergency protective measures are those activities undertaken by a community before, during, and following a disaster that are necessary to do one of the following:

- eliminate or reduce an immediate threat to life, public health, or safety, or
- eliminate or reduce an immediate hazard that threatens significant damage to improved public or private property

In general, emergency protective measures must be cost-effective to be eligible.

Permanent Work:

Category F – Utilities

Utilities include:

- water treatment plants and delivery systems



Photo by Sandra Litalov, NYSDEC Region 7

A portable pump runs to bypass sewage at the Deposit, NY plant.

- power generation and distribution facilities, including generators, substations, and power lines
- sewage collection systems and treatment plants

The owner of a facility is responsible for determining the extent of damage. FEMA does not provide funds for random surveys to look for damage, such as video inspection of sewer lines. If disaster-related damage is evident, however, FEMA may pay for inspections to determine the extent of the damage and method of repair. When disaster-related damage is discovered during a random survey, inspection of the damaged section only is eligible. When evaluating the repair of damage at multiple locations in a pipeline or other continuous facility, the possibility of replacing a whole section should be investigated. If the breaks are close together, replacing the entire section may be more economical than piecemeal repair.

While FEMA will pay for restoration of damaged utilities, FEMA does not provide funds for increased operating expenses resulting from a disaster. Similarly, FEMA cannot provide funds for revenue lost if a utility is shut down. However, the cost of establishing temporary emergency services in the event of a utility shutdown may be eligible.

The Project Worksheet (PW)

The Project Worksheet (PW) is a tool used by the Applicant and FEMA to develop projects. The PW is used to record the following information:

- Pre-disaster description of the facility and its condition
- The scope of eligible work for the project, including the cause of damage, dimensions of damage, and the work necessary to repair the damage
- Estimated or actual costs necessary to complete the work
- Special considerations associated with the project, such as insurance and hazard mitigation

For small and large projects, the Applicant is responsible for maintaining supporting documentation. For selected large projects, FEMA may collect supporting documentation and store that information in the Case Management File.

Record Keeping

It is critical that the Applicant establish and maintain accurate records of events and expenditures related to disaster recovery work. The information required for documentation describes the “who, what, when, where, why, and how much” for each item of disaster recovery work. The Applicant should have a financial and record keeping system in place that can be used to track these elements. The importance of maintaining a complete and accurate set of records for each project cannot be over emphasized. Good documentation facilitates the project formulation, validation, approval, and funding processes.

All of the documentation pertaining to a project should be filed with the corresponding PW and maintained by the applicant as the permanent record of the project. These records become the basis for

verification of the accuracy of project cost estimates during validation of small projects, reconciliation of costs for large projects, and audits.

Applicants should begin the record keeping process before a disaster is declared by the President. To ensure that work performed both before and after a disaster declaration is well documented, potential Applicants should:

- designate a person to coordinate the compilation and filing of records
- establish a file for each site where work has been or will be performed
- maintain accurate disbursement and accounting records to document the work performed and the costs incurred.

The Federal Office of Management and Budget requires grant recipients to maintain financial and program records on file for three years following final payment. Records of grant recipients may be subject to the provisions of the Single Audit Act.

Time Limits

There are time limits established for the completion of eligible work. These are set by regulation and are measured from the declaration date of the major disaster or emergency. The initial deadlines are established according to the type of work as shown in the following table:

Completion Deadlines	
Type of Work	Months
Debris Clearance	6
Emergency Work	6
Permanent Work	18

The State may grant extensions of the above deadlines in situations of extenuating circumstances. For debris clearance and emergency protective measures, an additional six months may be granted. For permanent restoration work, an additional 30 months may be granted. Requests by applicants for time extensions should include identification of the project by PW number, the dates and provisions of any previous extensions granted for the particular project, a detailed justification of the delay, and a projected completion date. The justification should be based on extenuating circumstances or unusual project requirements beyond the control of the applicant. FEMA may review the State’s actions on time extensions on a periodic basis to ensure compliance with the regulations.

If an Applicant requests a time extension beyond the limit of the State’s authority, the State must submit the request to the Regional Director (RD) for approval. Information to be contained in the request is the same as in a request submitted for State approval. The RD will make a determination as to whether some or all of the requested extension should be granted and will inform the State in writing. The RD has authority to grant extensions appropriate to the situation. The RD may impose requirements upon the State to ensure that the project will be completed within the approved time limit.

The Applicant will be reimbursed only for those costs incurred up to the latest approved completion date for a particular project. However, the project must still be completed for any funding to be eligible for that project.

The Public Assistance Policy Digest, FEMA Publication No. 321 is available online at: <http://www.fema.gov/pdf/government/grant/pa/321print.pdf>

The full Public Assistance Guide, FEMA Publication No. 322 is available online at:

http://www.fema.gov/pdf/government/grant/pa/pagprnt_071905.pdf