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Review of FEMA's Public Assistance National Delivery Model

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This report is an assessment of the Public Assistance (PA) Program's National Delivery Model and whether it met the original intent as designed in 2017. This report was developed in collaboration with the Public Assistance Task Force established by the PA Assessment Charter signed March 4, 2022. This report focuses on the implementation and subsequent performance of the National Delivery Model process using program data from 2018 through July 2022 and stakeholder feedback from April 2022 through July 2022. It is not a review of actions taken by other federal agencies or state, local, tribal, territorial, nongovernmental, or private-sector partners.

Approved by:

January 2023



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Abstract

Federal Emergency Management Agency (FEMA) Headquarters Office of Response and Recovery (ORR) created the Public Assistance Task Force (PATF) and engaged CNA to objectively assess the Public Assistance (PA) National Delivery Model. CNA undertook an assessment of FEMA's PA Program from March through July of 2022. The purpose of the project was to assess whether the PA National Delivery Model met its original intent in increasing accuracy, efficiency, and simplicity and improving timeliness and accessibility. The PATF designated these as the qualitative areas that would be used to judge the new model.

The CNA Contractor Assessment Team (CAT) worked cooperatively and concurrently with the PATF to share data, clarify objectives, and discuss the required outcomes. CNA's role included several tasks: conducting an independent assessment of the National Delivery Model, facilitating extensive stakeholder engagement listening sessions, and conducting numerous joint CAT-PATF work sessions to review data.

The Assessment's results are mixed.

The Assessment is inconclusive about the model's effects on increasing accuracy or efficiency. There appear to be fewer substantiated appeals, which is an indicator of accuracy. However, a longer assessment period is needed to draw definitive conclusions and to capture the impact of recent changes in the appeals process. The model also has mixed results with efficiency, as shown in the amount of project reworks and requests for information.

The National Delivery Model has increased simplicity with the improved transparency provided by the cloud-based Grants Manager/Grants Portal user interfaces. However, other elements of the PA Program, such as policy, remain overly complex and difficult for stakeholders, especially applicants and staff, to understand.

The Assessment concludes that the National Delivery Model has not met its original intent for improving timeliness and stakeholder accessibility. Comparing data from 2018 to the present with data from 2010 to 2014 shows that the new model takes significantly longer from the request for public assistance (RPA) to obligation (a median time of 116 days longer); however, the data that resulted in this conclusion do not consider additional variables, such as project complexity or an increase in workload, which could also affect timeliness. The National Delivery

Model is also not meeting its accessibility goals, based upon applicants' expressed hesitancy in applying for PA funding because of the program's complexity.

The Assessment also includes recommendations for improving the PA Program. For 2023, the FEMA Administrator's Annual Planning Guidance directs ORR to advance recommendations from the PA Program Assessment to better deliver the PA Program.

Table of Contents

Abstract.....	i
Table of Contents.....	iii
Executive Summary	1
Assessment	1
Recommendations.....	7
Introduction to FEMA’s PA Program.....	9
Public Assistance Program Intent	9
Assessment Methodology.....	13
National Delivery Model Successes and Best Practices	16
Policy.....	16
Communications	16
Process	17
Roles and Responsibilities	18
Assessment and Gap Analysis	19
Section 1: Policy.....	19
Section 2: Communications and Culture.....	41
Section 3: Process	48
Section 4: Roles and Responsibilities	64
Conclusion.....	83
Abbreviation List.....	84
Appendix A: Methodology	86
Research Structure	86
Data Collection and Analysis.....	88
Findings Development.....	94
Recommendations.....	94
Appendix B: References.....	95

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Executive Summary

In 2014 and 2015, FEMA reengineered the Public Assistance (PA) Program into a “new delivery model.” The program goals were to increase accuracy and efficiency, bring consistency and simplicity, and improve timeliness and accessibility to the PA Program (see Figure 1). Introducing an “assembly line” standardization of project development, FEMA created nodes called Consolidated Resource Centers (CRCs), where technical aspects of the PA projects would be performed in seven distinct phases, from request for public assistance (RPA) to obligation. The four CRCs were responsible for supporting specific geographic regions but were also required to support incident operations outside of those areas as national needs dictated. They were designed to validate, develop, review, and process PA Program grant applications based on information and documentation provided by the field staff via a new cloud-based information management system—Grants Manager/Grants Portal—that served to connect the CRC nodes with state recipients/applicants and project applicants, as well as regional PA and field office PA operations.

FEMA initiated this concept in Oregon in 2016. An initial assessment of the program was conducted in late 2016 but proved inconclusive as to whether the new model was successful in its original intent. In 2017, the program—renamed the National Delivery Model—was launched nationally in time for the record-breaking 2017–2018 disaster season, followed by the 2020–2022 COVID-19 pandemic. This report assesses whether the National Delivery Model has met its original intent in increasing accuracy, efficiency, and simplicity and improving timeliness and accessibility.



Source: FEMA PA Division

Figure 1: New Delivery Model Goals

Assessment

Reviewing the five goal areas, the Assessment’s results are mixed. The National Delivery Model has increased simplicity with the improved transparency provided by the cloud-based Grants Manager/Grants Portal user interfaces. However, other elements of the PA Program, such as policy, remain overly complex and difficult for stakeholders, especially applicants and staff, to understand.

The Assessment is inconclusive about the model’s effects on increasing accuracy or efficiency. There appear to be fewer substantiated appeals, which is an indicator of accuracy. However, a longer Assessment period is needed to draw definitive conclusions and to capture the impact of recent changes in the appeals process. The model also has mixed results with efficiency, as shown in the amount of project reworks and requests for information (RFIs). While many applicants cited RFIs as

the cause for delays in project development and while the data showed projects with RFIs may take longer to obligate (median of 85 days), the data also revealed that the RFI by itself is insufficient to explain the difference in obligation times.

The National Delivery Model has not met its original intent for improving timeliness and accessibility. Comparing data from 2018 to present with data from 2010 to 2014 shows that the model takes significantly longer from RPA to obligation (a median time of 116 days longer¹); however, the data that resulted in this conclusion do not account for additional variables, such as complexity or an increase in workload, which could also impact timeliness. The National Delivery Model is not meeting its accessibility intent; applicants expressed hesitancy to apply for PA funding because of the program's complexity.

National Delivery Model Successes

Much of the positive feedback received from stakeholders focused on technology, specifically Grants Manager/Grants Portal systems, which greatly increased the transparency of the PA process. There was also positive feedback on the streamlining of project requirements and the consolidated Public Assistance Program and Policy Guide (PAPPG). Stakeholders appreciated the expedited COVID-19 PA process. It was also noted that without the CRCs, FEMA would not have been able to meet the demand for the nationwide COVID-19 response.

Enormous PA Effort under Nationwide COVID-19 Response

The National Delivery Model and the associated streamlined application process for COVID-19 enabled FEMA to obligate \$28 billion to 8,500 applicants over 20,000 projects in just over 18 months, starting in March 2020.

In a survey of the PA field staff, most of the positive feedback from respondents stated that they had a complete understanding of their roles and responsibilities. Likewise, when asked whether their day-to-day responsibilities aligned with their job descriptions and/or Position Assist, most agreed. Stakeholder feedback noted the knowledgeability and responsiveness of PA staff. The availability of training was also lauded as a benefit.

Gap Analysis and Findings

In reviewing the stakeholder input, a more nuanced picture of the program emerges in which the challenges became more apparent. The gap analysis portion of this Assessment is organized into four sections—Policy, Communications and Culture, Process, and Roles and Responsibilities. Each section has specific findings supported by analysis and associated recommendations.

Policy

Since the 2017 adoption of the National Delivery Model, FEMA has made changes in policy, primarily through the PAPPG, within the context of natural disasters and the COVID-19 pandemic project delivery. While consistency within that context is highlighted as a priority, FEMA does not define the

¹ A comparison of funding obligation times finds that the median time to obligate a non-COVID-19 project in the current delivery model is 267 days, while the legacy delivery model time to funding obligation was 151 days.

term, nor does it have a system to track, measure, reward, or enforce for consistency. Moreover, although the PA Program has successfully delivered billions of dollars to affected U.S. communities since the adoption of the National Delivery Model, PA policy changes have frustrated FEMA staff, recipients, and applicants.



Workers install a new utility pole in Everglades City after Hurricane Irma. (FEMA, 2017)

The agency does not have a change management process to help guide the successful implementation of new policies to ensure that policy is consistently understood from the front office at HQ to Program Delivery Managers in the field. When combined with the size and diversity of the FEMA Regions and the states they support, this contributes to inconsistency in policy interpretation and implementation. It also renders PA policy more complex for FEMA field staff, recipients, and applicants, and makes the program less accessible to communities that do not have the resources to navigate a large, complex, policy-driven process. This is compounded by inadequate training and mentoring on PA policy delivered before and since the initial launch of the National Delivery Model.

PA policy does not apply principles of risk management when dealing with applicants (e.g., the size and complexity of their projects, the experience of applicants, or the nature of the project itself and its potential environmental impacts). Too often, a focus on risk to the program resulting from applicant noncompliance trumps the PA mission itself, which is to help communities recover from disasters. This misalignment is rooted in a culture of fear of reprisal across the agency for any mistakes made by FEMA staff as well as any mistakes or concerns about fraud engaged in by applicants. This incentivizes low risk tolerance behaviors among FEMA staff (e.g., “spending dollars to chase pennies” and demanding excessive documentation to move a project forward). A summary of key findings for Policy is presented in Table 1.

Table 1: Summary of Key Findings for Policy

Summary of Key Findings
<p>1.1: Implementation of PA policy in a consistent manner that allows for flexibility when appropriate is hindered by the size and diversity of FEMA Regions; frequent changes to PA policy with limited input from FEMA staff, recipients, and applicants; and a lack of understanding of that policy and its underlying intent among FEMA staff, recipients, and applicants, which is rooted in insufficient quality and quantity of training and a lack of experience and mentoring among FEMA PA staff.</p>

Summary of Key Findings
1.2: PA Program policy is too voluminous and highly technical for applicants to comprehend. That policy has gone through too many changes, too fast, and too often, all of which has made it more complex for FEMA personnel, recipients, and applicants. Applicants struggle with navigating the program and accessing the assistance.
1.3: The National Delivery Model has met with limited success in improving accessibility and customer experience due, in part, to a lack of capacity and resources among some communities to navigate the PA Program's complex policies and procedures, resulting in their inability to successfully access the assistance.
1.4: The PA Program lacks a risk management framework to govern implementation of the National Delivery Model that includes a consistent definition of risk and how risk should be managed across Regions, CRCs, and HQ, particularly among small and large projects, resulting in a one-size-fits-all approach that leads to a less scalable and overly complex PA Program.

Communications and Culture

Communication plays an essential role in achieving FEMA's National Delivery Model goals by delivering correct and straightforward information to FEMA staff, recipients, and applicants. The Assessment identified gaps in information sharing around policy change; challenges in the intra-group communication among FEMA, recipients, and applicants within the context of the National Delivery Model; and communication breakdown that impacts FEMA culture and mission through the disintegration of trust. The key finding for Communications and Culture is presented in Table 2.

Table 2: Summary of the Key Finding for Communications and Culture

Summary of Key Findings
2.1: Gaps in information sharing, inadequate communication methods, and inconsistent messaging in communication cause breakdowns in the National Delivery Model, which lead to delays in project development and obligation and the disintegration of trust among FEMA, recipients, and applicants.

Process

The Assessment focused on three aspects of the process: accuracy, efficiency, and timeliness. The review of accuracy examined the impact of resource constraints and the functionality of Grants Manager/Grants Portal on consistent implementation of the PA Program. Accuracy during PA project formulation suffers because of (1) limitations in available support from FEMA during the application process; (2) too many FEMA personnel hand-offs; and (3) timelines that are not aligned to applicant or project needs. Furthermore, limitations in Grants Manager/Grants Portal can prevent quick corrections and updates to PA applications.

Under efficiency, the Assessment reviewed the National Delivery Model's complexity, which impacts the customer experience of recovering communities and creates delays in the PA implementation process steps in both the field and in CRCs. Targeted modifications to a limited number of critical PA implementation process steps could simplify and accelerate the PA Delivery Model.

The intent of FEMA's PA Program is to support the recovery of disaster-affected communities; however, applicants reported considering not going through the PA process again finding it burdensome, lengthy, and "not worth the time."

Finally, for timeliness, stakeholders expressed concerns about the timeliness of certain delivery model processes and data analysis confirms that the current program fails to meet FEMA's mission to provide timely disaster recovery funding. A summary of key findings for Process is presented in Table 3.

Table 3: Summary of Key Findings for Process

Summary of Key Findings
3.1: Accuracy during PA project formulation suffers because of (1) too many FEMA personnel hand-offs and poor communication, (2) timelines that are artificially rushed; and (3), limitations that prevent quick corrections and updates to PA applications, including in Grants Manager/Grants Portal.
3.2: The National Delivery Model's complexity impacts the customer experience for recovering communities and creates delays in the PA implementation process in both the field and CRCs. Targeted modifications to a limited number of critical PA implementation process steps could improve efficiency by simplifying and accelerating the National Delivery Model.
3.3: Stakeholders expressed concerns about the timeliness of certain National Delivery Model processes and data analysis confirms that the current program fails to meet FEMA's mission to provide timely disaster recovery funding.

Roles and Responsibilities

The Assessment reviews the key roles and responsibilities associated with the PA process—the Field Program, the CRCs, and the applicant—and explores root causes of issues and inconsistencies in carrying out their responsibilities and analyzes their interactions throughout the project lifecycle.

The first key finding focuses on the lack of clarity on roles and responsibilities including how particular roles fit into the PA process. This contributes to performance shortfalls, including delays in completing assignments, high rates of reworks, and a lack of clear boundaries regarding key tasks such as eligibility determinations. Excessive siloing of roles and responsibilities, coupled with a failure of applicants and field staff to provide high-quality, accurate, and complete information and documentation required by the CRCs to fulfill their assigned responsibilities remains a serious and persistent problem and is likely responsible for a significant portion of the key performance problems within the National Delivery Model.

Many challenges can be attributed to deficiencies in capabilities and qualifications of FEMA PA personnel. The second key finding analyzes high attrition rates, the declining ability to recruit and

retain qualified personnel, shortcomings in the PA training program, and the lack of a comprehensive career development program. The Assessment identified recurring practices, such as the ongoing recruitment of staff lacking the experience, education, training, and qualifications needed to carry out the PA Program to the standards necessary to achieve its objectives.

At the program level, FEMA is taking steps to create clearer job descriptions and performance standards to ensure that the right people are assigned to the right positions to meet the objectives of the PA Program. FEMA is also taking steps to enhance training and to create a formal mentoring program. These are steps in the right direction, but PA would likely benefit from a comprehensive, systematic approach to recruiting, training, supporting, developing, and retaining PA personnel. A summary of key findings for Roles and Responsibilities is presented in Table 4.

Table 4: Summary of Key Findings for Roles and Responsibilities

Summary of Key Findings
<p>4.1: Though most field staff report understanding their roles and responsibilities and the alignment of these with existing job aids, the PA Program would nevertheless benefit significantly from (1) greater alignment of roles and responsibilities with the objectives of the National Delivery Model; (2) more clearly defined role definitions; (3) greater consistency in job execution; (4) more effective data collection processes; and (5) improved interactions between FEMA field personnel, the CRCs, and applicants. Collectively, deficiencies in these areas are significantly hindering the ability of the PA Program to meet its timeliness, accuracy, efficiency, simplicity, and programmatic objectives.</p>
<p>4.2: Though PA maintains a large cadre of capable personnel, an effective basic PA training program, and is working at enhancing career development for its personnel, high attrition rates, declining ability to recruit and retain qualified staff, deficiencies in the PA training program, and the lack of a comprehensive career development program offer areas for improvement to address PA's ongoing performance problems and improve PA Program delivery.</p>

Recommendations

Despite the challenges observed, there are no data, either qualitative or quantitative, to support eliminating the National Delivery Model. However, the Assessment identifies 7 overarching and 35 specific recommendations to assist the agency as it continues to improve the PA Program.

Recommendations were developed based on the gap analysis findings and observations collected by the Assessment Team and PA Task Force members during the Assessment. The recommendations were socialized with relevant offices and FEMA leadership through a second phase of stakeholder engagement and reflect insights and suggestions gathered from these engagements. They are not solely based on data analysis. Specific recommendations related to each of the findings are provided in the Gap Analysis and Findings section. Those findings were grouped by themes (see Figure 2) and then further summarized into seven areas for improvement, as presented in Table 5.



Figure 2: Recommendation Themes

Table 5: The Overall Recommendations Encompass Seven Areas for Improvement

1. Change Management, Communications, and Culture
FEMA should establish a PA division-specific culture-building initiative that unites the workforce under one mission; promotes collaboration; builds trust within PA and among other FEMA divisions and state, local, tribal, and territorial partners through a consistent communications campaign; and adopts a human-centered change management program for all policy and process improvements.
2. Risk Management & Accountability
FEMA should move the PA Program to a risk-based management and monitoring strategy that prioritizes and incentivizes the simple and timely delivery of assistance to affected communities over managing program risk and technical compliance and empowers the field staff to operationalize this concept. This risk management strategy should be built upon FEMA's core values of compassion, fairness, and respect.
3. Consistency & Flexibility
To enhance the customer experience, FEMA should deliver consistency in the application of policy and among its personnel who engage applicants, while improving flexibility in how FEMA engages those applicants in the different phases of the delivery model process. This should include tracking policy implementation across disasters to better understand how policy is being applied among FEMA Regions, maintaining the same FEMA personnel to support applicants throughout each phase of the process, and

empowering FEMA staff to tailor the engagement based on the unique needs of applicants, accounting for applicants' capacity, experience, and resources for executing a successful PA application.

4. Accuracy

FEMA should enhance its CRC quality assurance protocols for PA projects that ensures the requisite level of project information and documentation is being requested and included in Grants Manager; that ensures there is appropriate oversight and support of personnel executing the program; and that embraces a hybrid-delivery model to allow flexibility in the type of support an applicant receives based on PA Program guidelines.

5. Accessibility (Simplicity)

FEMA should simplify its policy, language, and corresponding documents, such as the PAPPG, and tailor its support to applicants based on disaster effects and each applicant's level of capacity and resources to access PA. This should include reducing excess requirements imposed by FEMA that go beyond Stafford Act requirements, increasing the use of Section 428 Public Assistance Alternative Procedures (PAAP), funding mitigation at no cost to the applicant, and the exploration (along with Congress, the states, and other FEMA partners) of replacing the current PA Delivery Model with a block grant program.

6. Timeliness

The goals for timeliness should be reoriented towards customer service and should facilitate meaningful disaster recovery for program applicants. The establishment, management, and monitoring of realistic timelines should be developed collaboratively between FEMA, recipients, and applicants, in consideration of the disaster size and impact, and based on project size and complexity. Performance metrics should be aligned to those timelines to ensure staff are working cohesively toward those goals, including the integration of critical elements like hazard mitigation and environmental and historic preservation (EHP). FEMA and stakeholders, as partners, should collectively monitor performance metrics and adjust processes, as necessary to accomplish the process goals. The collaboration of stakeholders on timeliness-related processes will help to address accessibility, as well as assist in holding the state and applicants accountable for issues related to timely project documentation. Additionally, improving the functionality and accessibility of Grants Manager/Grants Portal to address delaying issues will improve National Delivery Model timeliness.

7. Workforce Improvements

Address persistent workforce deficiencies in the PA Field Program by attracting, recruiting, training, developing, advancing, and retaining a capable, efficient, high-quality workforce centered on a core cadre of experienced, highly qualified subject matter experts serving in permanent full-time (PFT), Cadre of On-call Response/Recovery Employees (CORE), and Incident Management CORE (IMCORE) employee positions, complemented by a larger cadre of supporting field specialists who are developing their own knowledge, skills, and experience under the close supervision of PA management with the aim of continuously replenishing, enhancing, and sustaining the PA workforce. For Program Delivery Managers (PDMGs) and other field personnel who have not yet developed the requisite knowledge, training, and experience to carry out their roles and responsibilities under the National Delivery Model, FEMA should adopt a team approach to bring additional expertise and resources to bear to aid PA field personnel as they interface with the applicants and otherwise fulfill their responsibilities.

Introduction to FEMA's PA Program

The purpose of this Assessment is to present the findings of a comprehensive program evaluation, conducted in coordination with the Public Assistance (PA) Task Force,² to determine if the National Delivery Model is meeting its original intent to increase accuracy and efficiency, bring consistency and simplicity, and improve timeliness and accessibility to the PA Program.

Public Assistance Program Intent

The mission of the Federal Emergency Management Agency's (FEMA) PA Program is to provide assistance to state, local, tribal, and territorial (SLTT) governments and certain types of private nonprofit (PNP) organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President, according to the Public Assistance Program and Policy Guide (PAPPG).ⁱ Under the PA Program, FEMA provides supplemental federal grant assistance for activities such as debris removal, emergency protective measures, the restoration of disaster-damaged publicly owned facilities and certain PNP organizations, and assistance for hazard mitigation measures.

Statutory Authority for the PA Program

The statutory authority for the PA Program predates the creation of FEMA³ with the Disaster Relief Act of 1974, PL 93-288, that contained many of the provisions of today's PA Program. The statute that prescribes the PA Program is the Robert T. Stafford Disaster Relief and Emergency Assistance Act, PL 93-288, as Amended (Stafford Act),ⁱⁱ providing FEMA with specific authorities that create the foundation and rules that govern the activities of the Recovery Directorate as it implements the PA Program. Guiding the PA Program, the Stafford Act defines assistance that is "essential to meeting immediate threats to life and property resulting from a major disaster" (Sec. 403); the rules governing repair, restoration, and replacement of damaged public facilities and private nonprofit facilities (PNF), and the associated eligible costs (Sec. 406); and rules relating to debris removal (Sec. 407). In addition, Section 428, *Public Assistance Program Alternative Procedures*, outlines the alternative procedures to achieve the following goals:

- Reduce the costs to the federal government of providing such assistance;
- Increase flexibility in the administration of such assistance;
- Expedite the provision of such assistance to state, local, tribal, and territorial (SLTT) government or owner or operator of a PNF; and

² The PA Task Force (PATF), established on March 3, 2022, under a *Collaborative Agreement for Assessment of the Consolidated Resource Center (CRC) and Public Assistance National Delivery Model* was comprised of two sponsors—a Regional Administrator and the Director of Public Assistance; co-leads—a CRC Deputy Director and a Federal Coordinating Officer; plus 31 individuals from across the PA enterprise with expertise. PATF provided guidance and expertise to the Contractor Assessment Team throughout the conduct of the Assessment.

³ FEMA was created on March 31, 1979, through Executive Order 12148.

- Provide financial incentives and disincentives for a SLTT government or owner or operator of a PNF for the timely and cost-effective completion of projects with such assistance.ⁱⁱⁱ

This Assessment does not seek to assess the execution of all facets of the PA Program as contained in the Stafford Act.

New Delivery Model and 2016 Assessment

In 2014, FEMA's Recovery Directorate conducted an internal review and analysis of the PA Program's application and delivery process. It identified the need for improvements in accuracy, efficiency, accessibility, and timeliness. Consequently, PA worked with stakeholders from the National Emergency Management Association (NEMA), 43 states, four tribes, and FEMA and contractor subject matter experts to develop the New Delivery Model to address the identified needs and improve the delivery of disaster assistance to SLTT governments and certain PNP organizations.^{iv} Improvements included an updated model that would use project management and tracking systems, updated roles and responsibilities, modern tools and templates, and expanded communication focusing on FEMA customers and partners. The implementation of the New Delivery Model began on February 29, 2016, in Oregon during DR-4258, a severe winter storm with straight-line winds, flooding, landslides, and mudslides impacting 14 counties.

In August 2016, FEMA conducted an assessment of the New Delivery Model implementation in Oregon.^v The assessment anticipated that projects would move through the process at a faster rate. However, the analysis of work projects revealed that it actually took longer; thus, the model was not meeting its timeliness targets. While the evaluation of the other goals around simplicity, accuracy, efficiency, accessibility identified some improvements, the results were inconclusive.

National Delivery Model

Despite the results of the 2016 assessment, the New Delivery Model—renamed the National Delivery Model—was rolled out nationally in 2017, which also saw a historic hurricane season. Three major hurricanes—Harvey, Irma, and Maria—made landfall on U.S. coasts and exacted a large toll on affected communities, emergency responders, and state and federal government agencies. According to the National Oceanographic and Atmospheric Administration (NOAA), Harvey, Maria, and Irma are the second, third, and fifth most costly U.S. hurricanes on record, respectively. Costs from just these storms exceed \$265 billion, with \$125 billion attributable to Harvey alone. It was in this environment that FEMA shifted to the National Delivery Model.

Principles of the National Delivery Model

Segmentation—Clear phases with projects processes based on complexity and type of work.

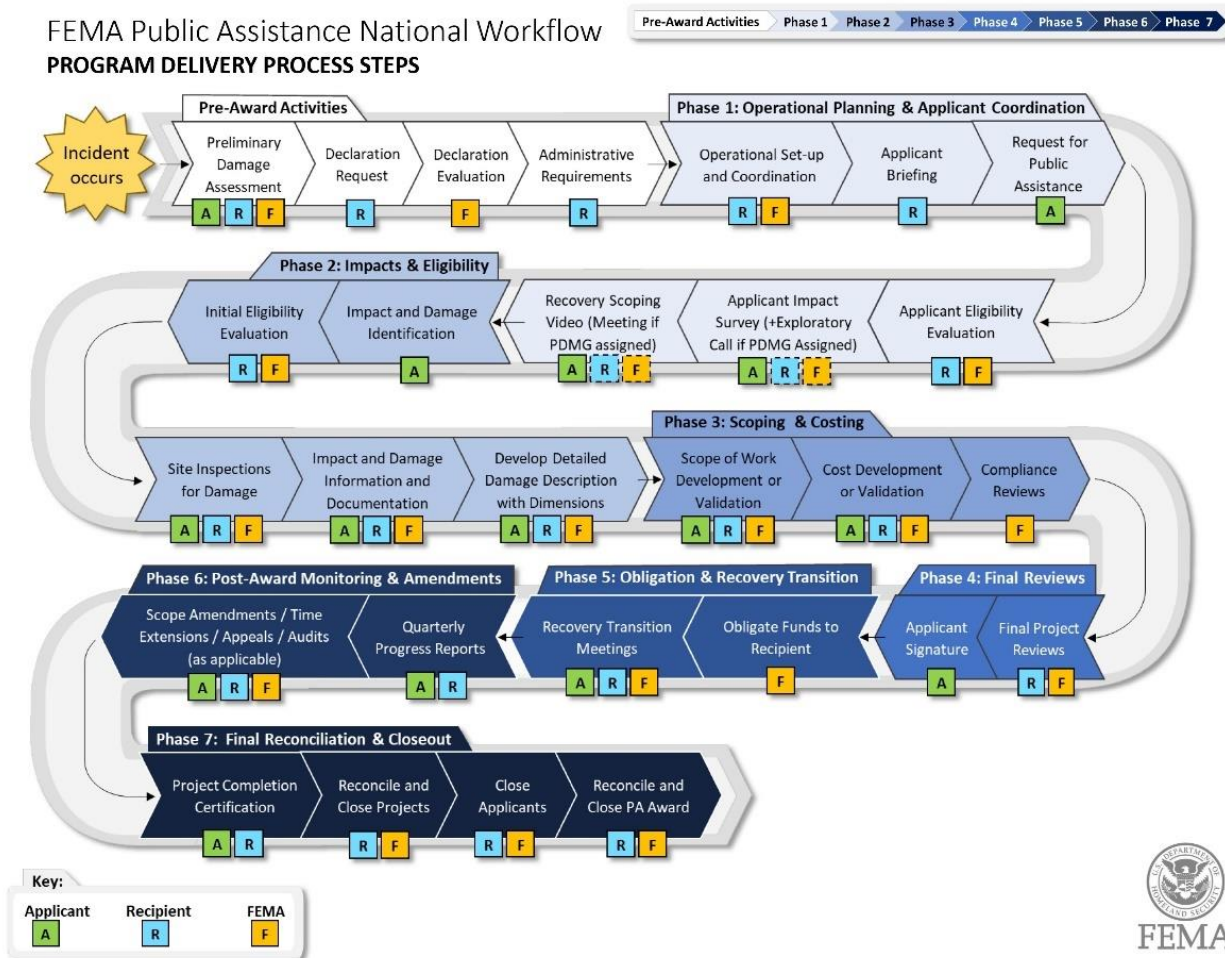
Standardization—Consistency through systems with defined workflows, templates and checklists, and change control processes.

Specialization—Roles and responsibilities based on right skill sets for applicant requirements. Staff are specifically trained in their role and provided detailed guidance and templates to be successful in their roles.

Consolidation—Experts and specialized resources are pooled and available for wider use across the operations.

Source: Poster in CRC-Central

The National Delivery Model was designed to segment projects into lanes—Standard, Specialized, or Completed—by the amount of work completed, documentation available, and complexity of the project. The PA process is further mapped into phases, as depicted by “the PA snake” diagram in Figure 3, which shows the many activities required by different parties and stakeholders throughout the program delivery lifecycle. In addition, a project management tracking system—Grants Manager—was developed to track the project path to completion by phase.^{vi}



Source: Public Assistance’s Consolidated Resource Centers’ New Hire Training, PA 101 (March 2022)

Figure 3: The FEMA Public Assistance National Delivery Model Workflow “Snake”

A significant change in the PA Program with the National Delivery Model was the creation of the Consolidated Resource Centers (CRCs), which are permanently staffed locations aimed toward consolidating activities that can be done external to the Joint Field Office (JFO). The intent of the CRC is to manage multiple disasters from various Regions simultaneously and reduce the duration of recovery efforts and number of staff deployed to disasters, which in turn should reduce administrative costs. The CRC was also intended to reduce the number of reworked projects worksheets and appeals and increase customer satisfaction.^{vii}

There are four CRCs supporting the PA Program—CRC Atlantic Section (CRC-A), CRC Central (CRC-C), CRC East Section (CRC-E), and CRC West Section (CRC-W). They are responsible for validating, developing, reviewing, and processing PA Program grant applications based on information and documentation provided by the field staff. This process was designed to provide accurate and near-real-time data, as displayed in operational dashboards and in interactive reports, to improve timeliness of decision-making and increase transparency for internal and external stakeholders.

Over the past five years, since the implementation of the National Delivery Model, PA has processed 71,651 projects, of which 17,316 are closed, and obligated more than \$69 billion in federal funding (see Figure 4). This Assessment looks closely into these data to analyze whether the National Delivery Model is meeting its goals.



Source: Public Assistance Summary Dashboard, accessed July 4, 2022.

Figure 4: National Delivery Model Processes Numerous Projects over Five Years

Effect of the COVID-19 Pandemic on the PA Program

On March 13, 2020, the Presidential declaration of a nationwide COVID-19 emergency increased the level of federal response from FEMA, as well as support to state, local, tribal, and territorial (SLTT) partners across the nation. This whole-of-government response to COVID-19 and the operating environment for FEMA quickly changed. The agency’s response to COVID-19 was unprecedented. When the White House directed FEMA to lead operations, COVID-19 became the first national pandemic response that FEMA has led since it was established in 1979. It was also the first time in U.S. history the President declared a nationwide emergency under Section 501b of the Stafford Act and authorized Major Disaster Declarations for all states and territories for the same incident. FEMA, through its 10 Regions, managed 57 concurrent Presidential Major Disaster Declarations for COVID-19 and worked with 91 tribal nations.

In response, FEMA created a streamlined Public Assistance Direct Application process to address the COVID-19 pandemic and scale the PA Program to ensure eligible applicants receive funding quickly.^{viii} The Direct Application process allowed applicants to submit RPAs directly through Grants Portal without a Program Delivery Manager (PDMG) assigned for Debris Removal (Category A), Emergency Protective Measures (Category B), and Management Costs (Category Z) using a Streamlined Project Application (SPA).

Stakeholder feedback reported that this streamlined process was effective because FEMA was able to scale and respond to the national emergency. This was in no small part because of the support

from the CRCs. However, this process did reveal significant inconsistencies within the program as eligibility was determined and tracked across the Regions.

Assessment Methodology

This 2022 Assessment of the National Delivery Model identifies the successes and areas for improvement. The PA Task Force (PATF), in collaboration with the Contractor Assessment Team (CAT), established a data-driven, mixed-methods approach to the Assessment that focused on collecting data from internal and external PA stakeholders and assessing that feedback against quantitative and qualitative data sources. The PA goals of accessibility, accuracy, efficiency, simplicity, and timeliness provided an initial framework for evaluating the National Delivery Model. As the Assessment progressed, the PATF further defined the focus areas to evaluate—Policy, Communications and Culture, Process, and Roles and Responsibilities. The PATF and Assessment Team determined these four areas of evaluation were important themes for further exploration based on initial stakeholder engagement and because each area had unique effects on the PA objectives over the course of program execution.

Data Collection and Analysis

Background analysis began with a literature review of existing PA policy guidance, previous independent assessments, evaluations conducted by the FEMA National Advisory Council (NAC) in December 2021^x and National Emergency Management Association (NEMA) in September 2021,^x and transcripts of congressional oversight hearings. To establish a baseline for the Assessment, the PATF conducted initial outreach with internal PA stakeholders and asked four questions:

1. What are 3 to 5 things that have been positive from the “Delivery Model”?
2. What are 3 to 5 things that could still be improved in the delivery of PA?
3. How do you feel the coordination is going between your Region and the CRC?
4. Do you have any suggestions for improvement with the CRCs, in general?

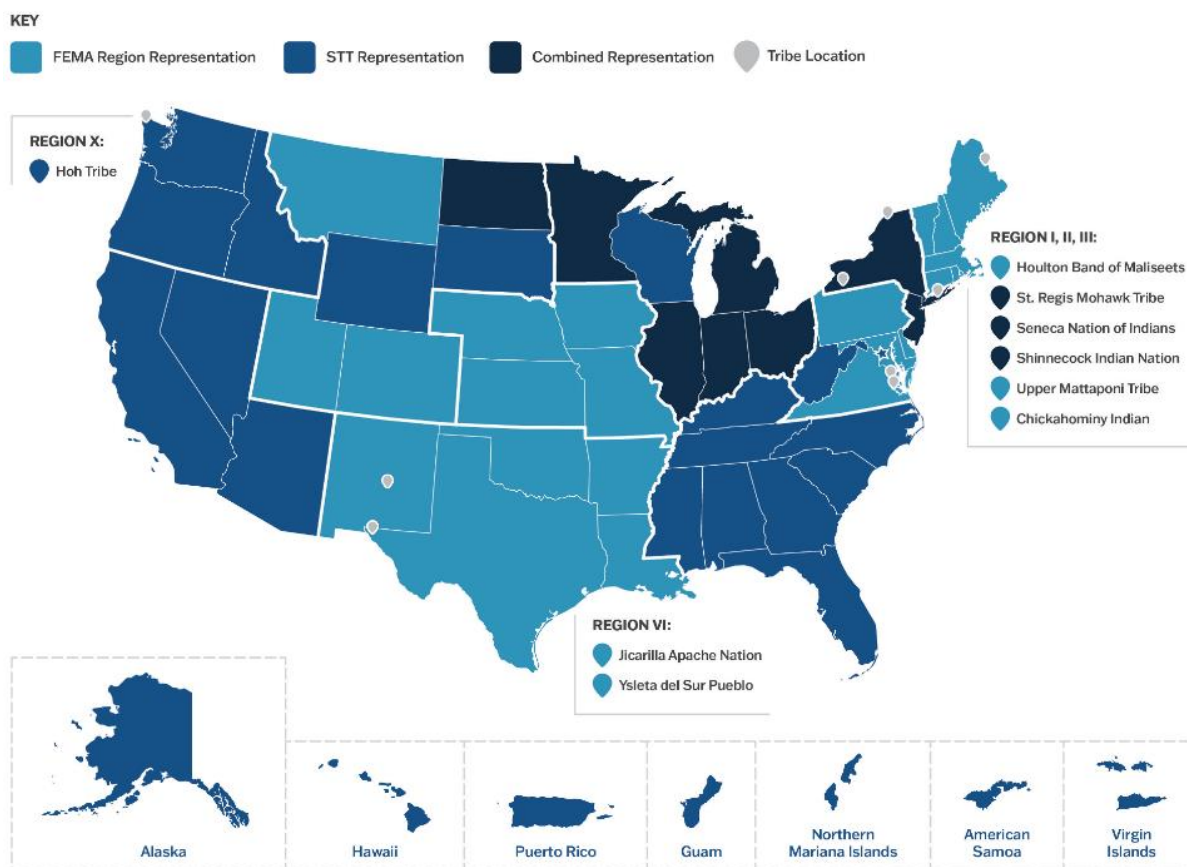
The Assessment Team planned to use these baseline questions as a starting point for its formal stakeholder engagement plan and developed an expanded list of questions to identify root cause. However, the PATF determined that these four questions were sufficient for all stakeholder engagement, which was the central effort of the Assessment. Stakeholder engagement was conducted in two phases (see Figure 5). During Phase 1, the Assessment Team engaged internal and external stakeholders to understand how SLTT customers experience the program and to identify internal operational challenges. During Phase 2, the Assessment Team re-engaged with FEMA PA field



Figure 5: Stakeholder Engagement

personnel to review the findings and recommendations during 9 separate listening sessions with 1,450 participants.

There were three main lines of effort for Phase 1 of stakeholder engagement: (1) interviews and listening sessions with FEMA leadership, regional staff, CRC staff, field staff, and external representatives across all 10 Regions; (2) a select field staff survey, and (3) applicant interviews conducted by FEMA’s Customer Survey and Analysis (CSA) section. Data collection was conducted from February 2022 to June 2022. For the interviews and listening sessions, the Assessment Team met with representatives from all 50 states, 5 U.S. territories, and 9 tribes (see Figure 6).



Source: CNA

Figure 6: Stakeholder Engagements, February–June 2022

The field staff survey was designed to gauge FEMA employees’ (full time, part time, reservist, CORE, contractor, and local hires) sentiments regarding their training, guidance they received pertaining to their roles and responsibilities, understanding of PA policy and process, and how well they feel they are prepared to do their jobs. The Assessment Team developed a 29-question survey that was administered to Program Delivery Managers (PDMGs), Public Assistance Group Supervisors (PAGS), Infrastructure Branch Directors (IBDs), CRC Specialists, Task Force Leader (TFLs), and Site Inspectors from FEMA’s 10 Regions, HQ, CRCs, and JFOs. The survey received 1,272 responses.

The outreach to FEMA applicants was conducted by CSA. CSA conducted 31 PA applicant interviews to collect feedback on the PA National Delivery Model. Some interviews included multiple participants; thus, 42 people participated in the interviews which included city, county, regional, statewide, tribal, nonprofit, and special district entities.

The Analysis Team developed a standardized process to ensure accurate and thorough data collection and analysis of stakeholder feedback. The Assessment Team organized the inputs in line with the objectives and priorities in the collection analysis plan. During the analysis phase, the Assessment Team also worked with FEMA's Recovery Analytics Division (RAD) to verify and validate information collected from stakeholders with RAD's quantitative datasets. The information was then categorized by area of evaluation and pushed to the gap analysis team to inform their findings and recommendations. This process provided a consistent method for quantifying large volumes of disparate qualitative data received from multiple stakeholders. The Assessment Team controlled for assumptions and human error by having multiple analysts review the matrix for accuracy and consistency.

Findings Development and Recommendations

The Assessment Team identified key findings from the data collection and analysis processes. The gap analysis team used structured findings worksheets to analyze the details of the issues, strengths, and areas for improvements identified during the three stakeholder engagement lines of effort and were able to link their findings to the data. Preliminary findings were shared with the PATF, and an all-Assessment Team offsite was dedicated to reviewing the findings for validity, accuracy, and potential recommendations. From this process, the section leads further developed their analysis, with an emphasis on root cause analysis, in order to develop actionable recommendations.

Once recommendations were developed based on the gap analysis findings, the Assessment Team socialized the recommendations with relevant offices and FEMA leadership in July 2022 (Phase 2 of stakeholder engagement). The recommendations in this report reflect insights and suggestions gleaned from this engagement and are not solely based on data analysis. This collaborative engagement helped ensure that the recommendations were developed at the right level, were directed at the correct audience, and provided guidance for the implementing office or leader on courses of action for potential implementation.

Appendix A provides more detail on the Assessment's approach and methodology.

National Delivery Model Successes and Best Practices

Qualitative analysis of stakeholder feedback identified some key successes and best practices in the National Delivery Model. The use of technology in the form of Grants Manager/Grants Portal and how it enabled better communication, transparency, and coordination between applicants and different roles within CRCs was the most-cited specific positive feedback. Other feedback highlighted knowledgeability of staff, streamlining project requirements, customer service, and training. To assess the PA Program's performance under the National Delivery Model, stakeholder feedback was collected in three separate engagements: (1) interviews and listening sessions (2) a select field staff survey, and (3) applicant interviews conducted by CSA. Overall, between 4 and 20 percent of the records, depending on engagement type, contained positive feedback.⁴ Despite the limited amount of positive feedback, these stakeholder findings should be considered when assessing the overall performance of the National Delivery Model.

"FEMA's PDMG was very helpful. They provided all the information. They provided great assistance. My experience with FEMA was positive."

-Region 9 applicant

Policy

The positive policy themes focused on the consolidated PAPPG, the unified approach, and how consistent, efficient, and dynamic the policy is in aiding the public. One area that stood out from the stakeholder feedback was the topic of simplicity. While the issue was larger than just policy, surveyed applicants reported a relatively high satisfaction rate of 64 percent with the National Delivery Model's level of simplicity, and an even higher satisfaction rate of 74 percent with the overall simplicity of the PA Program. One stakeholder noted, "I appreciate having the PA policy guide, and the Grant Manager process makes sense to me in providing documentation of expenses, process, etc. I actually feel it is minimal and very reasonable in light of most grant processes and the size of the funding." Another noted, "I like that the model is organized and is broken down by phases, which makes it easier to explain it to applicants, local leaders, and external affairs folks."

Communications

From the listening sessions, stakeholders appreciated the coordination between staff at CRCs, particularly as projects move through different stages, and applicants appreciated the customer

⁴ Listening sessions had 55 positive comments out of 1,343 feedback records; CSA applicant interviews provided 129 positive comments; and PA Field Staff Survey feedback provided 117 strengths and best practices responses from 581 answers.

service and assistance in clarification of PA policy and process. Applicants in the customer surveys provided positive communications feedback about excellent customer service and helpfulness in explaining the process. They mentioned that they were treated equitably and fairly and noted that communications were helpful for jurisdictions without a lot of resources to expend on a federal disaster grant application. A Region 10 applicant stated, “I felt like FEMA kept me



Road repairs in Mexico Beach, FL. (FEMA, 2018)

well informed. Everything was well documented from the meetings, and they explained things well. It was a good flow of information. They also asked us several times if we had questions. They even asked us just how we were doing. They were good people.”

Positive communications feedback in the National PA Field Staff Survey was similar, including the transparency between the CRCs and applicants, the frequency of meetings, communication from leadership, the continuity of information through the PA process, and the respect and customer service that they showed and gave to applicants. One stakeholder said, “For the most part, PDMGs have been good at including us at each step so we have awareness on all applicants/projects. Region 8 staff have been very helpful in answering our questions and addressing any issues that arise.”

Process

Process received the most amount of positive feedback among the three datasets (37 to 60 percent of positive feedback). Process themes focused heavily on the technology and Grants Manager/Grants Portal computer systems. In the listening sessions, over half of the positive feedback around process was related to technology and Grants Manager/Grants Portal. Other respondents offered general sentiments, saying that they thought the delivery model was streamlined, “great,” and “the best part of the PA process.” The expedited COVID-19 PA process (Direct Application and Streamlined Project Application (SPA)), was mentioned as a benefit, with some respondents adding that without the CRCs, FEMA would not have been able to meet the demand during the COVID-19 response.

In the applicant interviews, applicants articulated that the PA process was fair, quick, and worked the way it should. One applicant stated, “I like the new format. Online is a lot easier with the portal. For example, especially for debris removal, we have 100 pictures to download. We can do that in minutes now as opposed to a few days before. The portal is definitely streamlining things.” In the PA

Field Staff Survey, respondents mentioned that they appreciated Grants Manager’s technology and user-friendliness and how it was simplified and a vast improvement over the old delivery model. They appreciated that it was a place where all parties could collaborate transparently. Others felt positively about the CRCs. One respondent noted, “I think the CRCs have done a fantastic job of building out a more consistent approach to project formulation.”

Roles and Responsibilities

In the listening sessions, training for staff was a major component, with respondents mentioning the availability of training, how the courses are taught by great personnel, and the overall professionalism and responsiveness of CRC staff. In the National PA Field Staff Survey, respondents had positive feedback about the team and mission-focused staff at the CRCs, the level of staff knowledgeability, and well-trained supervisors. “In the CRC, we have a great team and strong collaboration across all the areas,” noted one respondent. Another noted, “Maybe I am lucky but my field leadership is extremely supportive and help keep things moving along.”

Because the CSA Feedback Matrix consisted of feedback from applicants, the positive roles and responsibilities feedback focused on applicants’ relationships with PA staff. Some applicants commented that staff were knowledgeable about their needs, particularly applicants from rural or resource-constrained jurisdictions and felt that they were treated well and were given the level of assistance they needed. A Region 8 applicant stated, “We had a great team from FEMA that guided us. FEMA came in and told us what we needed. We were appreciative for the help.”

Assessment and Gap Analysis

As the previous section focused on the key successes, this section focuses on the areas for improvement identified over the course of the 2022 Assessment of the National Delivery Model. Using structured findings worksheets to work through the details of the issues and areas for improvement identified during the three stakeholder engagement levels of effort, the Assessment Team identified key findings and major themes in stakeholder sentiment, coupled with Recovery Reporting and Analytics Division (RAD) and other data sources. Stakeholder quotes in this section are used to illustrate the major and repeated themes that the Assessment Team’s analysis of stakeholder feedback identified.

Section 1: Policy

Policy serves as the foundation upon which the PA Program is built and for which the National Delivery Model is designed to help provide public assistance to communities impacted by disasters. Since the adoption of the PA National Delivery Model in 2017, FEMA has made changes in policy primarily through the PAPPG within the context of natural disasters and the COVID-19 pandemic. However, during that time, FEMA has struggled in the areas of consistency, simplicity, accessibility, and in applying principles of risk management to implementing PA Program policy in general and under the National Delivery Model in particular. This section presents four key findings.

Key Finding 1.1: Implementation of PA policy in a consistent manner that allows for flexibility when appropriate is hindered by the size and diversity of FEMA Regions; frequent changes to PA policy with limited input from FEMA staff, recipients, and applicants; and a lack of understanding of that policy and its underlying intent among FEMA staff, recipients, and applicants, which is rooted in insufficient quality and quantity of training and a lack of experience and mentoring among FEMA PA staff.

Inconsistency in the Application of Policy

The primary document that sets FEMA PA policy is the PAPPG. The PAPPG’s central purpose is to “guide decision-making and ensure consistent implementation of the PA Program across the Nation” (emphasis added). While the PAPPG does not define consistency, itself a major shortcoming, the general definition of that term within this context means FEMA personnel, regardless of role or location, accurately address policy questions or issues that are of a similar nature (i.e., eligibility) in the same fashion. In essence, similarly situated applicants are treated similarly under the PA policy, while recognizing that flexibility to address unique or novel situations is also vital.

According to stakeholder feedback, FEMA does not currently apply PA policy consistently, including for eligibility determinations and other policy interpretations. In fact, beyond a failure to define consistency, FEMA has no internal mechanism to track the application of PA policy for consistency

and only becomes aware of inconsistencies when recipients, applicants, and FEMA staff report it through anecdotal experience. Because the agency does not measure, reward, or enforce for consistency, there is an absence of quantitative data in this context, which should not be construed as evidence of the absence of a problem. Signals, both past and present, in the reporting data from all stakeholders—FEMA, states, and applicants—indicate there are consistency challenges in PA policy that have existed for some time.

Throughout the Assessment, stakeholders observed that inconsistency exists both between FEMA Regions and within FEMA Regions. The language and vague terminology in FEMA PA policies makes for broad interpretation and application by FEMA PA staff, resulting in “different sets of stakeholders driving PA delivery toward different definitions of what they want to be consistent,” which is tantamount, in some cases, to FEMA Regions setting their own policies. For example, FEMA staff, recipients, and applicants reported how the CRCs provide different answers to virtually identical questions (e.g., a payroll project in 2022 was subjected to numerous RFIs despite a nearly identical project in 2020 being submitted and approved by the same CRC). Others pointed to inconsistent application of tree removal policy, inconsistent treatment of houses of worship, inconsistent levels of documentation required of applicants for small project certification, inconsistent eligibility determinations based on the hazard that caused the damage, and inconsistent eligibility determinations concerning damage done to the same structure (e.g., a single road that had damaged areas yards apart and where the documentation was the same).⁵

As shown in Figure 7, concerns over consistency in PA policy interpretation across the FEMA Regions was the number one issue among national field survey respondents and was a major theme in other stakeholder feedback.^{xi} The other two top concerns in the national survey were the need for clearer guidance on eligibility and the need for more training. Read in tandem, these results indicate that consistency in general is a challenge, consistency in eligibility

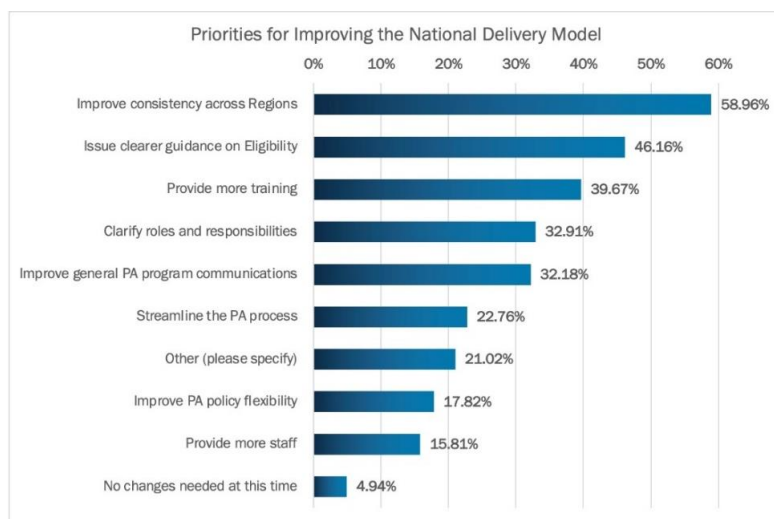


Figure 7: Consistency in PA Policy Interpretation Across Regions is a Top Concern

⁵ Region 2, for example, is currently working through an appeal where there are multiple trees that were snapped in half by a tornado. The crowns were all removed to open the roads, but the site inspector deemed removal of the trees down to the ground level ineligible. However, FEMA’s own policy expresses that when the hardwood is exposed to the tree, it can be cut down to the ground, even removing the stump. As a result of site inspectors’ inconsistency with FEMA’s own policy for this kind of debris removal, the state must now go through an appeal process.

determination is a particular challenge, and more training to address consistency may help address both challenges.

Survey data also indicate that among respondents, when it comes to flexibility versus consistency, achieving consistency across the FEMA Regions was the higher priority. To that end, FEMA will need to prioritize between consistency and flexibility and reconcile how the two values can co-exist in managing and implementing PA policy. In that context, consistency should not be conflated with rigidity. Some degree of flexibility and discretion in a program as large as PA and a nation as diverse as the U.S. will be essential, but that flexibility should be rooted in the policy itself and less in the individuals who implement it.

Despite these reported challenges with consistency, a majority of field survey respondents agreed that guidance on policy in general has been comprehensive, sufficient, and flexible, as noted in Figure 8. This indicates there is potential to improve consistency using enhanced policy guidance in this particular area as one of several approaches.

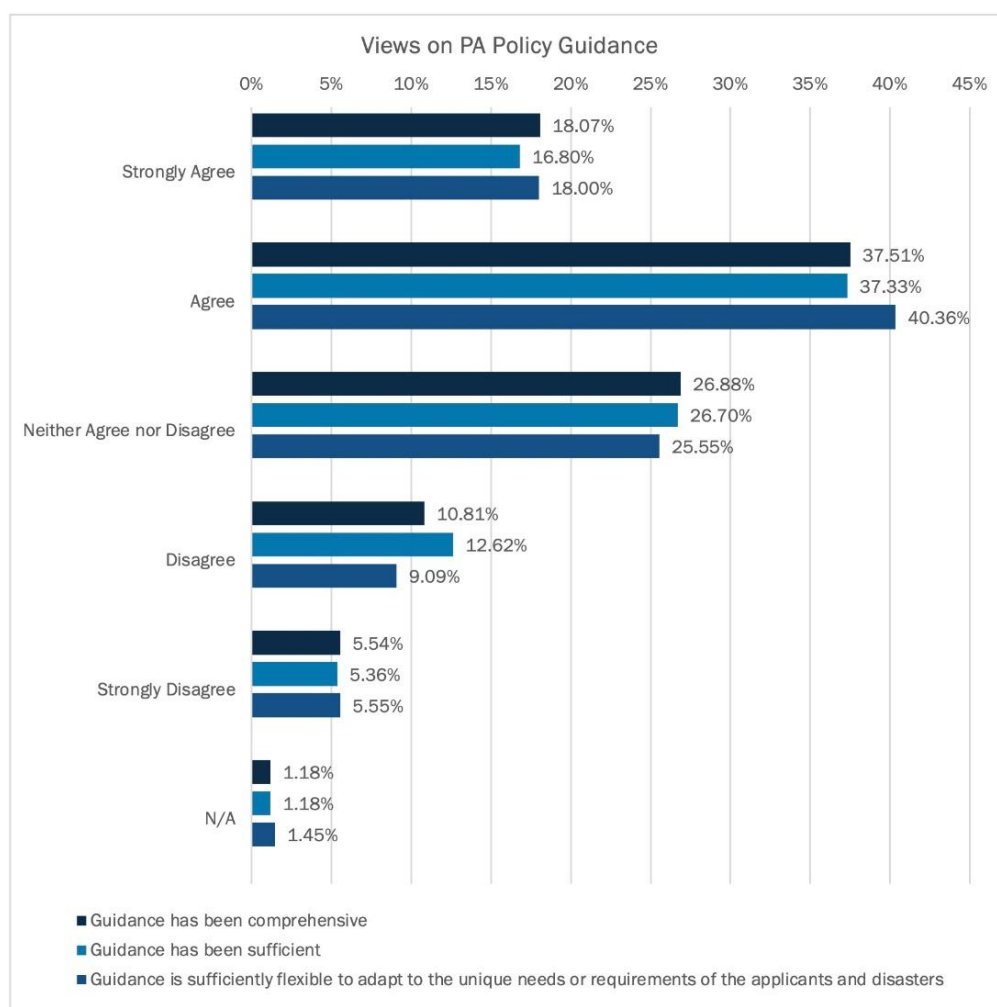


Figure 8: Views on Policy Guidance are Favorable

National survey data also showed that consistency in policy implementation would help FEMA PA personnel better perform their jobs, and that enhancing consistency across the FEMA Regions in the implementation of policy would be a key factor to improving the National Delivery Model.

That PA policies are sometimes ambiguous and interpreted subjectively, resulting in the inconsistent application of policy, is not new to the PA Program or unique to the National Delivery Model. This issue was identified in 2014–2015, when the last major assessment of the PA Program was conducted. Then, as now, even FEMA expert personnel often cannot agree on what PA policy means or requires (e.g., the requirements of section 428 – Public Assistance Alternative Procedures (PAAP)—discussed in more detail later in this section).^{xii}

Compounding the challenges with achieving consistency across FEMA Regions is the diversity and autonomy across and within each of the states and territories. To varying degrees, each state has its own requirements that may not align with FEMA’s requirements (e.g., for reconciliation of small projects, states can require actual costs while FEMA requires costs estimates). To improve consistency, FEMA will have to balance state autonomy with national PA policy goals and communicate to applicants that different policies may and likely will exist at the state level within the same FEMA Region.

The Impact of COVID-19 on Consistency and Stakeholder Concerns

While consistency is a major concern among FEMA personnel, recipients, and applicants, those concerns were likely influenced by COVID-19, given the size and novelty of the recent and ongoing response, which led to inconsistent policy determinations across the FEMA Regions, especially early on. For example, the original policy regarding eligibility requirements was constantly evolving, not standardized across FEMA Regions, and updated written policy was not released until approximately six months after the disaster declaration date. This negatively affected applicants’ ability to navigate the PA process and expedite disaster assistance. Applicants received varying requirements, answers, and determination decisions for similar requests, only to be told later in the process that the project was ineligible.

Those factors may be increasing current concerns over consistency beyond the scope of the actual problem outside of COVID-19. COVID-19 was/is not a typical disaster. PA delivery for COVID-19 was nationwide and primarily virtual; eligibility was both limited to Category B and involved criteria and determinations that do not typically apply in other disasters. However, as noted above, consistency challenges concerning COVID-19 should not deflect from the broader challenges FEMA faces in developing PA policy that can be consistently applied across a variety of scenarios and regions.

Despite challenges in delivering PA during COVID-19, the National Delivery Model and the associated streamlined application process for COVID-19 enabled FEMA to obligate \$28 billion to 8,500 applicants over 20,000 projects in just over 18 months, starting in March 2020 (FEMA PA Direct Application Performance Summary, July 2021). The National Delivery Model also allowed FEMA to rapidly approve critical COVID-19 projects when necessary. Nebraska, for example, developed a vaccine project in less than 4 hours by working with FEMA Infrastructure Branch Director (IBD) and CRC West. Without the National Delivery Model, many stakeholders noted that COVID-19 would have likely overwhelmed FEMA.

Stakeholder Engagement in Policy Development

While FEMA does have a formal guide that directs the agency on how to develop or amend policy, there is no formal documented policy or process to engage the Regions, states, and applicants in PA policy reviews and development—beyond public comment or informal previews of policy changes provided to Regions. Nor is there a consistent process to explain policy to FEMA personnel, states, and applicants once a policy decision has been made. It is ad hoc and policy changes are often rushed based on the belief,



Debris from Hurricane Irma is picked up by the county, St. Simon's Island, GA. (FEMA, 2017)

according to stakeholders, that the changes needed are critical and obvious. This contributes to both a lack of understanding of policy and associated processes and procedures in the field, and in unintended consequences; for example, the National Delivery Model, which was itself rushed (discussed below), was supposed to increase timeliness but rather most projects are taking longer to complete (although the reasons for this may vary and include factors outside the delivery model itself).

Changes in policy will often have a “ripple effect” downstream that will affect the need to communicate to stakeholders, update the PA process, and modify roles and responsibilities in ways that may not be obvious until well after the policy change is made. Such interconnectedness requires significant change management by FEMA leadership to ensure program integration and that all stakeholders understand and ultimately embrace policy and other changes to the PA Program. For example, implementation of the National Delivery Model did not follow a change management plan, resulting in inadequate vetting of the model among FEMA personnel, recipients, and applicants after its initial trial run in Oregon in 2016. Instead, the model went national in 2017 without FEMA explaining and deliberately implementing the intended reforms.

Staff Turnover, Inexperience, & Misunderstanding as Contributing Factors to Inconsistency

A theme in the stakeholder feedback was that inconsistent application of policy is exacerbated by high turnover rates among FEMA staff, especially among PDMGs, resulting in, for example, ineligible costs on projects that had already been obligated. Stakeholders perceive that FEMA staff with less experience are more likely to deny applications when there is uncertainty about eligibility, although quantitative data to support this assertion have not been identified.^{xiii} The more expertise the FEMA personnel have, the more quickly they can recognize when they have the documentation needed.

Generally, policy intent is often less understood the lower down the chain of command it is applied, especially at the field level. This is a byproduct of those lower on the ladder having less interaction with leadership, policy, and strategic planning and goal setting. When reservists, contractors, and other part-time personnel are accounted for, there is less of a connection with the agency as a whole

and its intent and goals for PA. This disconnect between staff and policy intent was deemed chronic by stakeholders, especially among PDMGs, but also among PDTFLs and SIs, as they all have less of a connection with policy goals and have a relatively high rate of turnover. However, stakeholders also observed that lack of understanding of PA policy can involve more senior FEMA officials as well.

Stakeholders also noted lack of PA policy understanding at the CRCs. For example, insufficient technical expertise at the CRCs, and limited knowledge transfer between older and newer staff undermines consistent policy implementation. At the same time, CRCs were criticized for applying policy in a “cookie-cutter” or assembly line manner and failing to account for varying situations and circumstances.

Training, Education, and Mentoring for Policy Understanding and Consistency

On the question of training, stakeholder feedback was overwhelming that the current PA Program lacks the right staff with the right skills developed through the right training.^{xiv} However, that feedback itself appeared inconsistent with FEMA staff feedback as part of the national field survey. In the survey, FEMA personnel were asked if they are provided with timely and adequate training to complete their tasks. A strong majority of respondents, over 70 percent, said yes, as indicated in Figure 9.

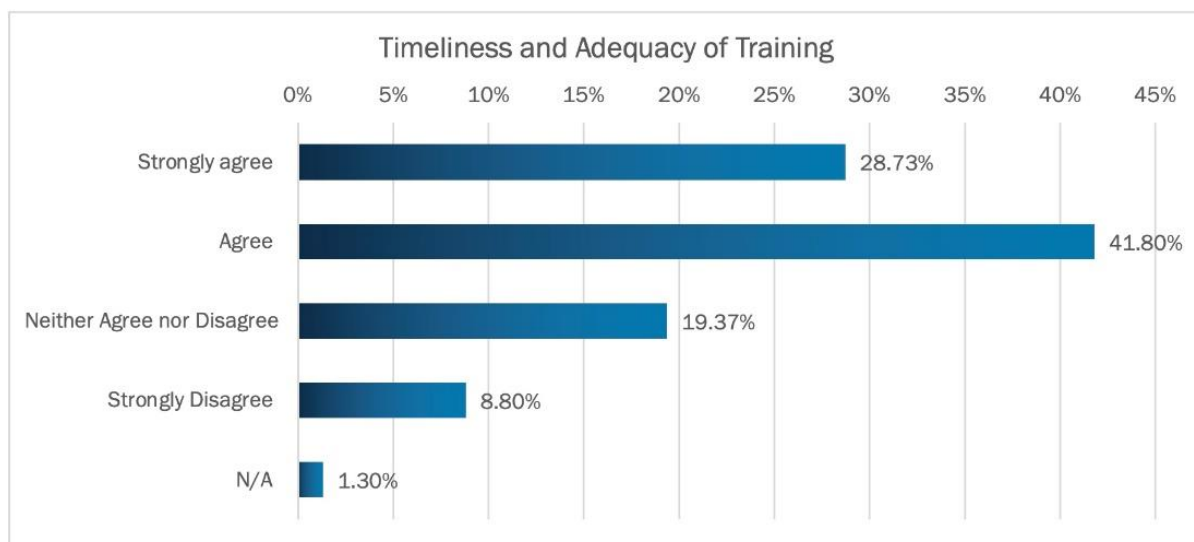


Figure 9: National Field Survey Found Training Timely and Adequate

This discrepancy may be a result of how FEMA personnel perceived the question, which did not solely ask about training on policy. Instead, these answers may have more to do with understanding the functional tasks associated with each position and not the efficacy of implementing policy throughout each of those tasks. When read in tandem with the results of the survey question asking for ways to improve the National Delivery Model, where respondents listed more training as a top-three priority, this analysis can help square the apparent differing results.

When it comes to training, stakeholders were clear that virtually all FEMA staff (and recovery contractors) need training. The emphasized the need for more effective training on a subjective

program that reaches well below the branch chief level, and focused particularly on overall policy intent, eligibility, project management, cost estimates, site inspections, etc., to increase consistency and avoid excessive RFIs and determination memos. Gaps in these areas were especially noted among PDMGs, which places increased pressure on PDTFLs up to the Public Assistance Group Supervisor (PAGS) and Infrastructure Branch Director (IBD) to compensate, even though at those levels, there is also a perceived lack of sufficient training.

National survey respondents were clear that Phase 2 of the National Delivery Model is the area where training is most needed, with over 68 percent choosing that phase, as highlighted in Figure 10. Phase 2 is also the area where the timeliness of small projects is most negatively impacted, so there may be a correlation between the slowdown and the need for more training among staff in that area (see risk management finding).

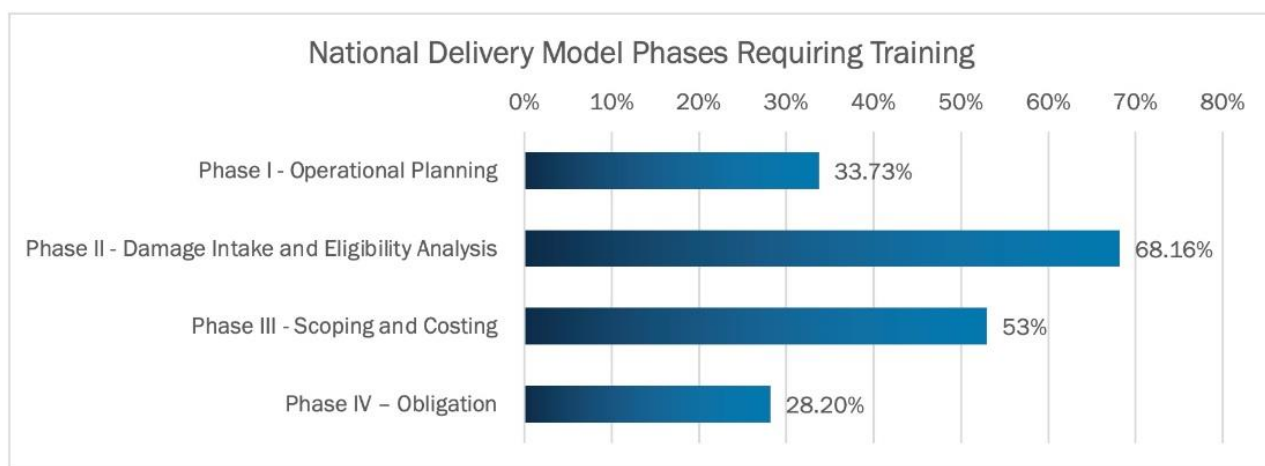


Figure 10: Consistency in PA Policy Interpretation Across the FEMA Regions is a Top Concern

Stakeholders also commented that classroom training, while also necessary, is not enough and that FEMA personnel, especially PDMGs, require more one-on-one training/mentoring on events, so that staff experience disaster recovery decision-making in real time while being guided by an experienced and knowledgeable mentor. In the national survey, PA Program staff expressed a desire for more professional development and mentoring (see Figure 11).

While most training needs were focused on FEMA personnel, stakeholders did note that training and resources to do that training are also needed at the state level. This includes resource allocations to states for training based on their size and needs. In that regard, new applicants in particular need more training on the PA Program and its policies. As detailed in the simplicity section of this report, applicants too often cannot comprehend or stay current with all the policies and guides FEMA creates and implements. Current training for applicants is too basic and does not address the key policy (or process) aspects of the program an applicant needs to know to be successful.

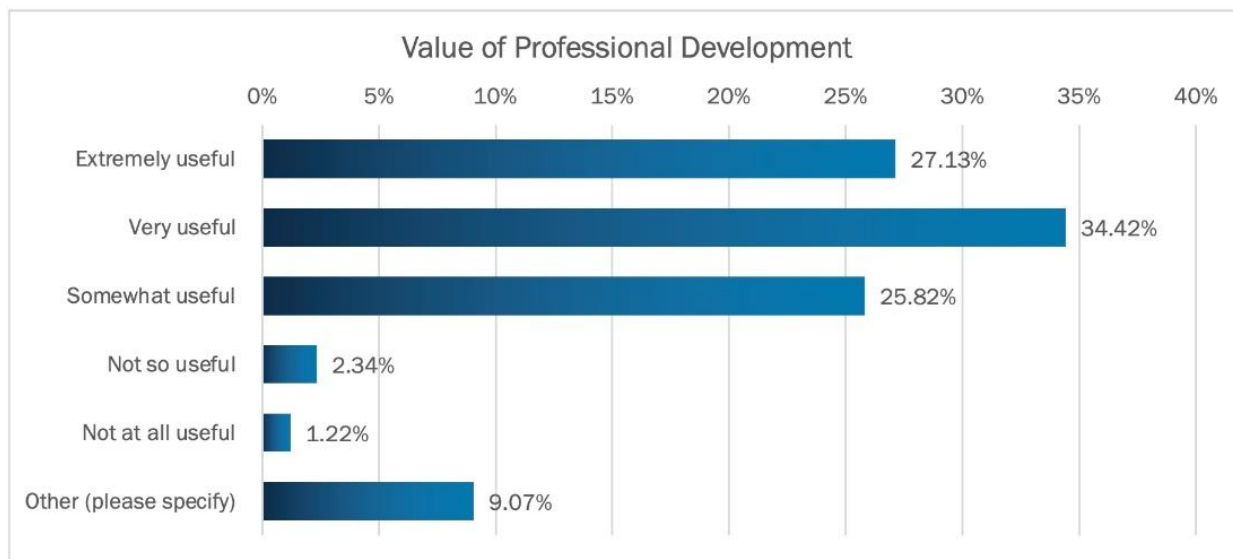


Figure 11: FEMA Staff Value Professional Development

Recommendations for Finding 1.1

Recommendation 1.1.1: For every policy or process change, undertake training and mentoring for FEMA personnel, recipients, and applicants. This includes delivery of an associated training course or module that incorporates policy/process intent and direction on how to implement changes. Such training should be continuous. To promote such training among recipients and applicants, any training delivered by FEMA to recipients and applicants should not be accounted for as an administrative cost against the recipients or applicants.

Recommendation 1.1.2: Develop a Virtual Knowledge Center to increase PA policy and project knowledge for FEMA employees with a tiered implementation. Level 1 would be a document repository, Level 2 would entail coordinated peer learning, and Level 3 would be an interactive learning and training center platform. Documents in the repository would include public facility, infrastructure, and PNP site inspection reports (SIRs); project sheets; and general information about public facility and infrastructure development, as well as policy and appeals information. The center would also house critical RAD and other data related to policy and program management, such as the results of post-disaster policy implementation reviews for consistency analysis.

Recommendation 1.1.3: FEMA should clearly define consistency in the PAPPG, outline expectations for what consistency should look like across the FEMA Regions, track and measure consistency, and each FEMA Region should assign or designate a senior person to review policy/eligibility “inconsistencies” throughout the course of program delivery during disasters. As part of this effort, the agency should examine historic data (artificial intelligence (AI) and machine learning could be used to increase speed) to look for variability in eligibility determinations in particular and assign percentages to it. The goal would be to lower percentage variations and solve for them and advance to the more complicated examples, while building trust and reliability in the model used. To help measure consistency going forward, FEMA will have to acknowledge the “human factor” and its associated biases and build systems to account for and check those biases. To address that, FEMA

should review how other federal agencies that make eligibility determinations across a regional construct address the question of consistency (e.g., the Department of Housing and Urban Development’s (HUD) Community Development Block Grant program (CDBG)). This should also include FEMA HQ personnel from Continuous Improvement and RAD, working with the senior regional policy person following each disaster (e.g., when the JFO closes) by conducting PA reviews to record how policy was implemented. Those data would then be stored and analyzed at the national level to conduct a trends analysis over time to track consistent and inconsistent application of policy and develop any necessary corrective actions, up to and including updates to policy. PA leadership should define roles/responsibilities, train Continuous Improvement personnel in PA, and operationalize Continuous Improvement personnel to undertake this initiative.

Key Finding 1.2: PA Program policy is too voluminous and highly technical for applicants to comprehend. That policy has gone through too many changes, too fast, and too often, all of which has made it more complex for FEMA personnel, recipients, and applicants. Applicants struggle with navigating the program and accessing the assistance.

Surveyed Applicant Satisfaction with National Delivery Model Simplicity is High

Stakeholders are relatively satisfied with the overall simplicity of the PA process (64 percent satisfaction score) and even more satisfied with the overall PA Program (77.4 percent satisfaction score), according to respondents to the RAD PA Initial Survey (PAI). Figure 12 shows responses to question Q13 and Q14 from over 9,500 records that have been collected in the PAI since 2018.^{xv} While overall satisfaction with PA Program simplicity among surveyed applicants is relatively high, there are challenges that remain. Moreover, further analysis is required to determine if there is a variation in satisfaction scores among types of applicants (e.g., large, well-resourced applicants versus smaller, less resourced applicants).

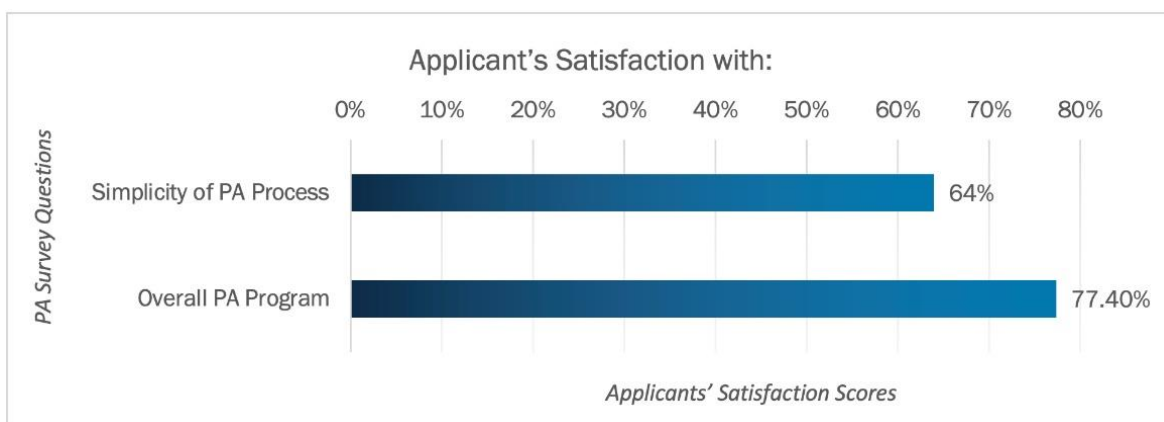


Figure 12: Select PAI Survey Results

In the latest addition to the PAI survey FEMA surveyed 406 applicants to understand the level of complexity of the PA Program. The following reasons were responses to Q16a: *In what way was the PA process not simple?*: registering for assistance (4 percent), collecting documentation (17 percent), coordinating with PA staff (9 percent), understanding eligibility (11 percent), using GP (9 percent), and other (12 percent). For answers in the “Other” category, applicants most frequently

mentioned changing requirements, changing deadlines, the turnover of FEMA staff, timeliness, excessive documentation, navigating the website (GP), inexperienced staff and conflicting guidance. The remaining 38 percent of the surveyed applicants either did not consider the system to be complex or chose not to give the reason.^{xvi}

Figure 13 is based on RAD’s Public Assistance Assessment Survey (PAA) data from over 6,000 records. Responses to selected survey questions indicate high level of applicants’ satisfaction with documentation requirements and FEMA overall. However, as noted above, further analysis is required to determine if there is a variation in satisfaction scores among types of applicants.^{xvii}

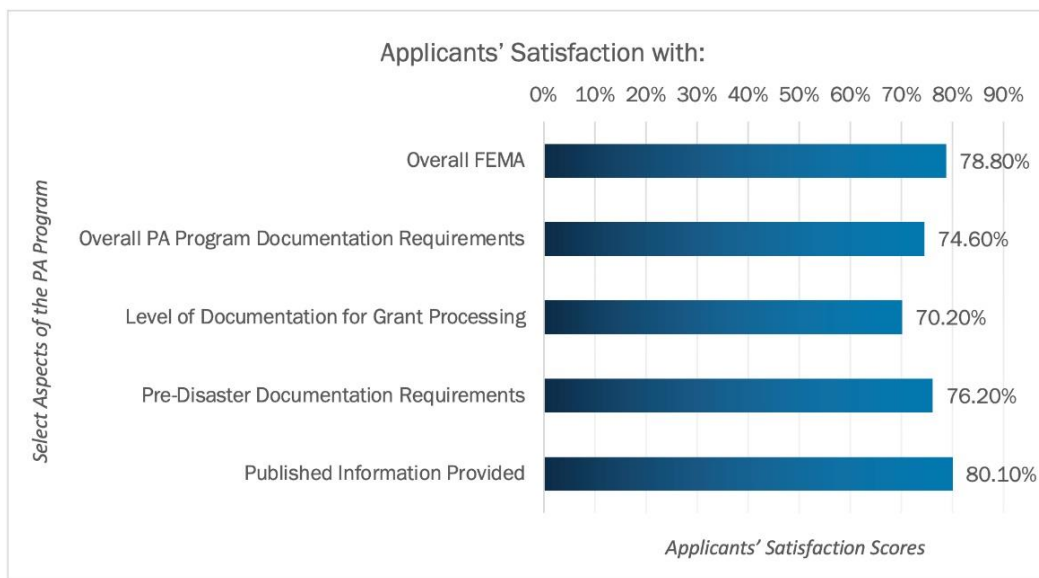


Figure 13: Select PAA Survey Results

In the latest addition to the PAA survey, FEMA surveyed 232 applicants with the intent to understand some of the reasons applicants were dissatisfied with the simplicity of the PA process. To Q25a: *What is the reason you are not satisfied with the simplicity of the PA process?* applicants responded with: responding to RFIs (13 percent), developing cost estimates (9 percent), coordinating with PA staff (9 percent), understanding program requirements (16 percent), using GP (14 percent), and other (10 percent). Among the reasons in the “Other” category, most applicants noted timeliness, overall complexity of the program, and inexperienced FEMA staff. The remaining 29 percent of surveyed applicants either did not consider the program to be complex or chose not to identify the reason for complexity.^{xviii}

Policies are Constantly Changing and/or Being Rushed

PA policy has changed significantly since the National Delivery Model’s adoption in 2017. While COVID-19 played a major role in some recent changes, policy considerations were changing before the pandemic, often in reaction to an event, such as an audit or congressional investigation, making it difficult for FEMA field personnel, applicants, and recipients to stay current. The net result is a complex PA policy framework. As stakeholders noted, the rapid and inconsistent pace of policy changes creates “a huge burden to try to communicate these ad hoc” to applicants. This has created

an impression that FEMA is “still building the plane as we fly it” and prompts criticism of the PA Program by applicants.

Some of the policy churn may be attributed to changes in leadership, which is often linked to changes in administration, something PA Program personnel have no control over. For example, the current policy focus on equity and climate change is new and linked largely to the change in administration in 2021. Additionally, the recent change in administration resulted in retroactive eligibility changes in policy for COVID-19, which was a benefit to the states and applicants, but was nonetheless an administrative burden for all parties involved.

Constant Changes in Policy Increase Complexity

Changes in policy and guidance are reported by stakeholders to be too quick, geared toward internal FEMA improvements, and occur during project development, all of which increase the complexity of the program and potential eligibility.

Guidance is usually issued after a policy has gone into effect or a few days prior, at best, according to survey respondents. Often, PA policy simultaneously responds to questions about current policy while trying to reform that same policy. According to stakeholders, FEMA expects applicants to know the PA process and navigate a new system “that keeps changing” regardless of their familiarity with the PA Program. For example, the policy to no longer upload backup documentation to project worksheets in Emergency Management Mission Integrated Environment (EMMIE) is affecting FEMA Regions. Since they can only do closeouts via that platform, they need to have all backup documentation placed in both systems. Such new guidance is often ambiguous, leaving determinations to field personnel to address on their own.

Stakeholders also noted that changes in policy often seem geared toward simplifying the process for FEMA, with less consideration for the applicants. Stakeholder-provided examples included the expedited project obligation for COVID-19, which was presented as a way of “getting money on the streets;” however, recipients still had to go through the entire review process before funds could be disbursed. The change created false expectations with some applicants, and often shifted the burden/blame onto the recipient.

Many changes also occur mid-way through a project’s development, further affecting the eligibility of some items or delaying the project going through closeout because of the retroactive implementation of changes. For example, the RPA requirement was recently modified to require an estimated total cost of damages from the applicant. Although this information is not required by law to apply for PA, potential applicants cannot submit their applications without it. As applicants may not always know the approximate costs of their damages, some eligible applicants are hesitant to apply out of fear of consequences for incorrect estimates.

Complexity of PA Policy Undermines the Intended Simplicity of the National Delivery Model

While the PAPPG has been consolidated and streamlined, it is still over 275 pages long, highly technical, complex, and challenging for many applicants who only have a 2- to 3-hour applicant

briefing before engaging in the process. In addition to the PAPPG, applicants must be knowledgeable on a 1,200-page Code of Federal Regulations (CFR) document.

Stakeholders observed that the PAPPG can create challenges even for experienced emergency managers. For example, in one large state there are 200–300 staff who report needing years of experience to be able to determine what is and is not eligible under the PAPPG.^{xix} The



FEMA obligated more than \$631,900 to help state, local, and tribal communities recover costs for cleaning up debris and emergency measures to protect Alaskans before, during, and after the spring floods. (FEMA, 2013)

PAPPG has many exceptions, special cases, and workarounds (e.g., virtual site inspections that take place months or years after the event, streamlined applications that applicants cannot handle on their own and still require a PDMG, etc.). During consolidation of policies into the PAPPG, stakeholders point out that FEMA left out helpful information critical to consistent application of policy. For example, a landslide policy that used to be 8 pages long is now half a page in the PAPPG. The PAPPG also has no policy or guidance in relation to houses of worship.

Under the National Delivery Model, applicants have indicated they have a harder time understanding how the projects are now written. In the new model, applicants can have 400 sites in a single project, making it difficult to differentiate what work is intended for what site. Previously each project would include the maximum of 10 roads, for example. In another example, documentation for Category C projects are now 8–12 pages in length when they were each a paragraph previously. FEMA personnel have stated that there are a variety of resources available for applicants, such as a dedicated customer service line, email address, YouTube channel, webinars, policy guidance, etc. From the applicant's perspective, while helpful in explaining the process, the YouTube videos available are geared toward a younger generation.

PA Policy is not well Suited for All Threats and Hazards

The PAPPG does lay out various disaster examples, but most of the policy is written for floods and hurricanes, which are historically the most expensive disasters that most states experience and for which the Stafford Act was primarily written. However, some Western states are seeing an increase in larger and more costly wildfires, which is creating challenges in policy. For example, the current PA policy concerning stumps, hangers, and leaners is rooted in a hurricane causing this type of damage, while the damage caused by a wildfire might be outside the scope of the policy and eligibility guidelines. Another example involves public health emergencies during wildfires, which allows one

Western state to treat debris removal as a public health emergency due to ash residue. However, the PAPPG is specific about getting permission before clearing commercial property if the state plans to seek reimbursement. It may take weeks or months for FEMA to issue such permission. If there is an imminent threat of rain carrying ash into the watershed, the state may have no choice but to move forward with removal, knowing it may not get approved for reimbursement.

Damage estimates create additional challenges throughout the PA process. Maintenance records have proven difficult for applicants because not everyone has the requisite photographs of their structures pre-disaster to prove disaster-related damages. Applicants are often not aware of the types of documentation required for the application process and it may be challenging, if not impossible, for applicants to track it down. Some things require more detail than applicants are prepared for (e.g., cheque stubs, tonnage, etc.), and other things require less detail than the applicants anticipated (and spent time chasing down). Without certain information (e.g., GPS coordinates for the work already done or hours worked on each project) FEMA may rule the project ineligible despite applicants following the PAPPG guidance.

Use of Section 428 - Public Assistance Alternative Procedures (PAAP)

While it has proven to be an effective recovery mechanism following some disasters with limited damage, several stakeholders have voiced concerns that the PAAP program is far from meeting the original intent set forth in Sandy Recovery Improvement Act (SRIA), particularly on the simplicity and speed with which projects are funded. This includes FEMA adding administrative requirements that hinder the congressional intent.^{xx}

As they continue to recover from Hurricane Maria, the Commonwealth of Puerto Rico (through the Central Office for Recovery, Reconstruction, and Resiliency) has stated that the 428 process has been far more complicated than the traditional 406 PA programs. It is taking in excess of five years in some cases to come to agreement on cost estimates, let alone begin permanent work. Having applicants assume the financial risk of cost overruns under PAAP may slow and further complicate recovery efforts. Applicants that do not possess adequate capital to begin projects before receiving reimbursement from FEMA will be unlikely to complete eligible work in a timely manner.^{xxi}

Applicants are also concerned with assuming the financial risk in the event that construction and management costs exceed the fixed cost estimate. The cost of construction projects and associated materials commonly fluctuate throughout even minor construction projects, to say nothing of large infrastructure repair and replacement. In some cases, neither FEMA nor the applicant have the requisite technical expertise required to complete accurate cost estimates for complex infrastructure work, which can lead to reluctance to agree to those estimates and in delays in obligating funding.^{xxii} In addition, widespread catastrophic damage in a condensed area may result in a high volume of site inspections, with a limited staff, that must be completed prior to agreeing on cost estimates.

Finally, arbitrary deadlines put in place by policy-makers (White House, OMB, Congress, FEMA HQ, etc.) may result in both the applicant and FEMA field staff making concessions on scopes of work for fixed cost estimates that may have been eligible under traditional 406 programs.

Recommendations for Finding 1.2

Recommendation 1.2.1: Create a companion document to the PAPPG that will include simplified language directed to the perspective of the applicant on eligibility from an all-hazards perspective, for all programs, including debris removal, and create decision trees for policies that need to be further simplified. Review the PAPPG and identify all requirements that are not required in the Stafford Act or regulations and consider removing such language. Additionally, FEMA should refrain from issuing verbal policy guidance that is not supported by written directives.

Recommendation 1.2.2: Once the applicant briefing and RPAs are submitted, PA personnel, including the Federal Coordinating Officers (FCOs) and IBD, should collaborate with the state/tribe/territory to determine the support required for each applicant in order to ensure efficient and effective delivery of PA. The applicant should be advised that Streamlined Project Applications (SPAs) are best utilized when the applicant has significant prior experience with the PA Program. If applicants still choose to pursue an SPA, FEMA should provide a PDMG to guide inexperienced applicants through procedures.

Recommendation 1.2.3: Identify policy adjustments that will increase applicant interest in Section 428 Public Assistance Alternative Procedures (PAAP). Review PAPPG to ensure that additional requirements that may impede the purpose and intent of the program (that are not in the Stafford Act), such as the one-year timeline, are removed. Within the PAPPG, set realistic and mutually agreed-upon (stakeholder) timeframes to establish fixed cost estimates. Establish criteria for a onetime adjustment in the fixed cost estimate due to unforeseen circumstances (subsequent disasters in same area/affecting the same applicant, material cost fluctuations, other factors out of the applicant's control).

Recommendation 1.2.4: To simplify the overall PA Program, FEMA should explore, with Congress, the states, and other FEMA partners, replacing the current PA Delivery Model with a block grant program, similar to HUD's CDBG. Such a program should be flexible and scalable. It should also include a cost-benefit analysis of replacing the current delivery model with a block grant, such as deployment costs, audits, and program oversight. Similar to Section 428, the total grant award should be based on a reasonable estimate. As such, any implementation of a block grant should be done slowly and initially tested in a disaster-prone state with established, robust recovery resources such as Florida, Texas, or California, as well as a small to medium-sized disaster to limit risk to both FEMA and the recipient.

Key Finding 1.3: The National Delivery Model has met with limited success in improving accessibility and customer experience due, in part, to a lack of capacity and resources among some communities to navigate the PA Program's complex policies and procedures, resulting in their inability to successfully access the assistance.

Applicants in Historically Underserved Communities

Based on a wide variety of stakeholder feedback, the National Delivery Model is less accessible to lower income communities that need assistance the most because of the extensive documentation

the applicants are required to produce while still responding to an emergency. The National Delivery Model is not sufficiently scalable, and there is little flexibility for small townships with low annual budgets (sometimes as low as \$5,000) and few staff, some of whom are volunteer and have full-time jobs outside of their responsibilities in their volunteer roles.

According to RAD data, more vulnerable counties (with a higher SVI) go through the Preliminary Damage Assessment (PDA) process less frequently than counties with lower vulnerability (lower SVI). When more vulnerable counties go through the process, they are less likely to be designated as part of the disaster declaration than less vulnerable counties (see Figure 14).^{xxiii} Similarly, according to RAD data, on average, it takes more days from the Declaration date to the Obligated date for more vulnerable applicants (with higher SVI). Figure 15 shows that applicants with the lowest and low vulnerability (SVI <24 percent and 25–49 percent, respectively), on average, wait 325 and 369 days, respectively, from declaration to obligation, while applicants with moderate and the highest vulnerability (SVI 50–74 percent, >75 percent respectively), on average, wait 439 and 405 days, respectively.^{xxiv}

Small communities often cannot afford consultants and have very limited access to outside resources unlike more sophisticated urban applicants that can afford all the necessary support. Complexity and the amount of documentation that applicants are required to submit is amplified by the timelines which present barriers to applicants with limited resources. For example, one of the Region 8 tribal governments reported withdrawing its PA application because it was unable to provide correct information by the deadlines and felt penalized for it; it pursued Coronavirus Aid, Relief, and Economic Security Act funding, which was more accessible and had fewer restrictions on what the funds could cover. A poor county in

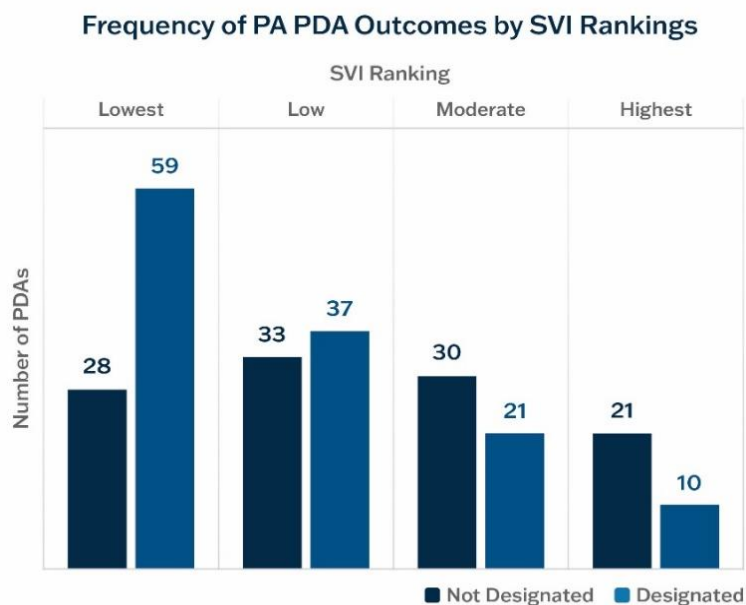


Figure 14: More Vulnerable Counties (with High SVI) Have Less Frequent Preliminary Damage Assessments

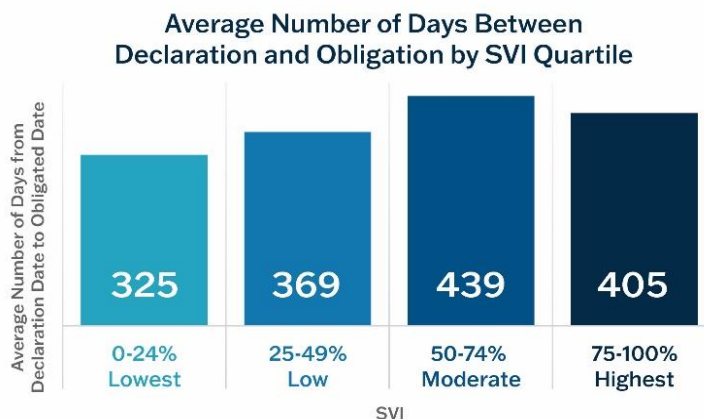


Figure 15: Vulnerable Counties (with High SVI) Wait Longer from Declaration to Obligation

Appalachia reported forfeiting over \$4 million in assistance because of the inability to handle the complexities of the PA process.

FEMA Recovery programs in general lack information that would allow FEMA to identify potential access barriers and disparate recovery outcomes.^{xxv} However, FEMA is working to establish processes to address this. For example, the revised set of forms from the information collection initiative includes questions related to underserved communities to enhance equity for all disaster survivors. The new simple and itemized approaches to requesting and processing applications are designed to provide an equitable consideration for communities with limited resources or knowledge of the PA Program.

Mitigation

The FEMA PA Mitigation program is currently more weighted to urban areas, with 75 percent of mitigation funds going to urban communities.^{xxvi} Small towns with high SVI and without tax revenue are often forced to make hard decisions because they cannot afford to pay the mitigation costs on top of their share for pre-disaster repairs and replacements. Moreover, the mitigation formula is limited based on the costs of restoration back to pre-disaster conditions and many smaller communities cannot afford the required costs for mitigation.

As currently implemented, FEMA's benefit-cost analysis (BCA) policy favors jurisdictions with high density and expensive infrastructure because larger projects often have higher benefit to cost ratio. The discount rate of 7 percent used in FEMA's BCA Toolkit is far higher than current U.S. Treasury rates and it arbitrarily reduces the estimated present value of mitigation project benefits. OMB's annually updated discount rates are far below 7 percent, since they are based largely on current U.S. Treasury interest rates and inflation. Use of the current 7 percent discount rate in FEMA's BCA undervalues the future estimated benefits and avoided damages of projects. It has set an effective barrier to the participation of smaller jurisdictions that are mathematically unable to accumulate sufficient large benefits (damages averted in the BCA methodology) to withstand 30–50 years of discounting to the present value at a 7 percent rate. This barrier runs contrary to the administration's equity policies and the intent of mitigation programs.^{xxvii} At the same time, according to numerous reports, the BCA process is challenging, and applicants are forced to hire consultants to complete it, if they can afford the consultants.

Applicants with Limited Incident Experience or Limited Staff Capacity

FEMA's shift toward the Direct Application and streamlined processes has at times negatively impacted PA Program's customer service experience. The SPA was intended to assist with information collection during COVID-19 in order to process applications and improve policy and process alignment. While it was necessary for delivering the PA Program in the COVID-19 environment, the streamlined process substitutes deployed personnel with checklist forms, in effect shifting the responsibility onto the applicant. Many applicants do not have the professional experience to gather information correctly and properly complete the grant application. Similarly, virtual site inspections heavily burden small applicants, who tend to be the most impacted by disasters, who are least experienced, and who have fewer resources. For example, California applicants had to perform their own site inspections during the wildfires in 2020. While the state's

most experienced applicants were able to complete their site inspections, small rural applicants struggled with the process.

Applicants with Technology or Internet Issues

One of the most important and applauded features of the National Delivery Model is the Grants Manager/Grants Portal web system. However, some applicants lack the necessary technological tools and/or overall technological literacy to successfully use it. For example, in Illinois, Michigan, Minnesota, Ohio and Wisconsin, around 10 percent (in some rural counties, as high as 30 percent) of all applicants have technological issues that present barriers for a PA application.

Some rural applicants do not have internet access, a computer, a smart phone, or an email address to fully participate in the PA application process. In South Dakota, for example, many individuals on township boards are senior citizens who do not engage in text messaging or emailing. They are farmers who may only check their official email once a week. PDMGs rely heavily on emails or text messages for communication, even though the best way to reach rural applicants is via phone. Some rural communities struggle with GP even after the state-provided training, and continue to use paper relying on the recipient to upload their data for them. Finally, many rural locations cannot record accurate GPS readings for their required documentation and damage descriptions. At the same time, appeals can only be submitted electronically which disadvantages applicants who have technological issues.

Recommendations for Finding 1.3

Recommendation 1.3.1: The National Delivery Model should strike a balance between using both “high tech and high touch” techniques for successful implementation of the PA Program by recognizing that applicants have varying capacity to deal with disaster recovery. FEMA should train PA personnel to use non-tech solutions to assist applicants with technological limitations. This will better enable FEMA to meet applicants where they are through the equitable blending of technology and human interaction where it is most needed. FEMA should tailor its support based on its understanding of applicants’ objectives for recovery up front, disaster effects, and their level of capacity, recommending the best path forward (e.g., SPA, virtual site inspections, etc.) and giving special consideration to: (1) applicants in historically underserved communities, (2) applicants with limited experience or limited staff capacity, (3) applicants with technology or internet issues, and (4) applicants who self-identify, or whom the recipient has identified, as requiring additional assistance.

Recommendation 1.3.2: Consistent with the Administrator’s strategic plan on resiliency policies, FEMA should fund mitigation at no cost to the applicant and expand Appendix J in the PAPPG to include more approved mitigation efforts. At the same time, FEMA should revisit its BCA, as the current methodology, with its 7 percent discount rate, is not equitable and presents an effective barrier to the participation of smaller jurisdictions without dense and expensive built infrastructure. FEMA should provide technical assistance to the applicants who need help with the BCA and who cannot afford to hire consultants.

Key Finding 1.4: The PA Program lacks a risk management framework to govern implementation of the National Delivery Model that includes a consistent definition of risk and how risk should be managed across Regions, CRCs, and HQ, particularly among small and large projects, resulting in a one-size-fits-all approach that leads to a less scalable and overly complex PA Program.

Defining Risk

When it comes to managing the PA Program, there is no agency-wide, agreed-upon, clear definition of either “high-risk” or “low-risk” projects. Further, while risk in various forms is mentioned in the PA Program Delivery Guide (PDG), and *considerations* for identifying complex and high-risk applicants and projects are provided, the terms are not fully defined. While risk may be defined differently by different stakeholders, there are multiple potential types of risk that FEMA needs to identify and define that go beyond mere dollar amounts. These include:

- **Financial risk** relates to the potential for loss of money, funds, and default (i.e., do the applicants have the practices and internal controls to spend the money properly?). This includes the risk of fraud, waste, and abuse.⁶
- **Reputational risk** relates to threats to the positive public perception of stakeholders.
- **Resource risk** pertains to threats to environmental (natural and cultural) resources (this risk is one that is largely considered by environmental and historic preservation (EHP) in the process).
- **Applicant risk** refers to an applicant’s ability (or inability) to comply with rules and regulations.^{xxviii}
- **Threat and hazard risk** pertain to evolving or increasing threats and hazards such as cyber-attacks, biological incidents, climate change, etc. Recognizing the changing nature of hazards and threats, FEMA should consider future types of risks or hazards (and their changing intensity) and return to its basic authorities to construct a response and recovery framework from the onset, rather than, as one stakeholder said, “making it up as you go”—the way COVID was handled.

Understanding risk is complex. A single applicant/project could entail any one or more of these types of risk, and the PA Program does not have the policies in place to address that range. For example, the degree of applicant experience with, and knowledge of, the PA Program and process will often be a factor linked to risk. In that regard, streamlined projects have been deemed helpful where the applicant has the experience and knowledge to navigate the system on their own, but a direct applicant that does not understand PA policy and process can actually hinder or delay, due to errors or omissions, FEMA’s ability to deem a project eligible.

Applying Risk Management Principles

Current FEMA policy guidance on cost principles under 2 CFR Section 200.400 places responsibility, and by default the assumption of risk, on the applicant.^{xxix} The current PAPPG addresses risk management, albeit in a piecemeal manner. For example, it places some risk management

⁶ It is recommended that FEMA conduct an agency-wide analysis of fraud, waste, and abuse to understand the actual risk.

responsibilities on the state by requiring the state to review and approve each RPA and provide its assessment of the Applicant's risk of noncompliance as required by 2 CFR § 200.331(b).^{xxx} Current rules also describe time and materials contracts without a ceiling price or cost-plus-percentage-of-cost or percentage-of-construction requirements as high risk for noncompliance with the PA Program requirement that all costs be "reasonable."^{xxxi} Beyond those two references, risk is most often described in the PAPPG as the PA Program reducing the risk of damage from disasters and other situations.



FEMA Officials Survey Damage on Highway A1A near Saint Johns County, Florida (FEMA, 2016)

Culturally, based on a wide variety of stakeholder feedback, FEMA's current approach to risk management under the PA Program is to place designated projects under heavy scrutiny based on the assumption that the applicant will either intentionally or unintentionally misuse the PA funds and that FEMA personnel will be held accountable for that misuse. This is compounded by the fear that any mistakes made by FEMA PA personnel will be met with heavy penalties within the agency. This permeates much of the PA Program management culture, impacting everything from the number of steps in the process, the number of RFIs, the level of document review, closeout requirements, etc., often resulting in a culture of low risk tolerance or "no" and increased overhead and costs. For example, stakeholders noted that policy is now dictating that FEMA will not close out one small project until all projects are closed out. This was driven by the result of an audit.

The current draft of the PA PDG does outline the importance of risk management and sets out factors for what may constitute a high-risk applicant, and a complex project. However, the draft does not describe how FEMA should manage those applicants and projects depending on the level of risk and complexity the applicant and project pose.^{xxxii} Further, the current draft PDG's list of what constitutes a high-risk or complex applicant does not explain why certain applicants are high-risk or complex, and what exactly the risk they pose entails.^{xxxiii} While the intent of providing considerations for complex and high-risk applicants and projects is to help with "prioritizing resources against competing needs" and to "enable timely recovery outcomes,"^{xxxiv} by singling out underserved communities, tribes, and certain named jurisdictions and entities, the draft PDG may cause FEMA PA personnel to place those entities under higher scrutiny without additional justification. Again, since the draft does not tell FEMA PA personnel how to manage high-risk and complex applicants, it's hard to know how PA personnel will respond to such a list. Along these same lines, policy guidance also often lacks an indication of implementation, leaving the lowest levels of "unsupported" PA staff to "figure it out."

In thinking about a risk management approach, risk needs to be divided between mission risk and mission support risk. The mission of the PA Program is to provide an orderly and continuing means of assistance to help communities recover from disasters.^{xxxv} To support that mission, FEMA has

designed the National Delivery Model. However, FEMA too often lets mission support risk trump mission risk by requiring FEMA staff, states, and applicants to go through various steps (such as requiring various forms of documentation) to lower mission support risk, all the while inadequately helping communities recover. As a result, the mission support documentation is in perfect order, but the larger mission to support community recovery is hindered.

Stakeholders reported that, over time, FEMA has required applicants to provide more and more documents, all of which far exceeds what the regulations require, or any real or perceived fraud, and drastically increases administrative costs. For example, in Region 8, 47 sample projects under VAYGO totaling \$84,248,698.04 was reviewed in October 2021 with a finding that only .00196 percent resulted in improper payments. Despite such findings, FEMA currently requests detailed, line-item summaries from applicants and then validates those summaries. This is a time-consuming process for both applicants and the agency, which, as presented in more detail in the Process Section, has likely contributed to more time for small projects from RPA to obligation. However, the National Delivery Model performs better than the old model for very large projects over \$10 million, of which there are relatively few (approximately 1.5 percent of the total obligated projects between 2018 and 2022).

Causes for the slowdown among smaller projects vary. For example, to substantiate that a specific piece of equipment was used, FEMA will cross-reference that piece of equipment with an employee working, which slows the delivery of PA when there is very low compliance risk to the government^{xxxvi}. Additionally, stakeholders have noted that when a project is deemed approved at obligation there should be a mechanism by which FEMA is required to honor its decision (Section 705 of the Stafford Act protects applicants from this scenario in certain situations), in the absence of fraud or significant changes, at closeout.

Acceptable Error Rate

In any program there will be an error rate. FEMA has thus far not defined an acceptable error rate for the PA Program. Even in the most comprehensive application submissions it is not uncommon for the applicant to have some minor errors, such as transposed numbers on a cost line or a missing invoice.^{xxxvii} However, with no acceptable error rate, FEMA will spend dollars to chase pennies (i.e., as one stakeholder noted, the agency nitpicks an applicant about \$1,000 on a project but spends millions of dollars “administering” that project). According to another stakeholder, FEMA does not differentiate costs, so the level of scrutiny for a \$500 expense is the same as for a \$500,000 expense; FEMA requires the same amount of documentation regardless of the size of the project.^{xxxviii} Moreover, there is a view that quality assurance will accept no errors (i.e., if documentation is off by \$0.25, it will not be accepted).

This same challenge was identified in 2014–2015, when the PA Program last underwent a major assessment and review. At that time, it was identified that project worksheets (PWs) were being sent back that had cost estimate errors down to the penny. The same level of scrutiny was applied for small and large PWs leading to overprocessing relative to risk.^{xxxix} To address the issue in 2014, it was recommended that the PA process be simplified for small projects;^{xl} however, RAD data (see below) indicate that this has not yet been achieved.

Small vs. Large Projects

There has been ongoing discussion about what the ideal financial threshold is for small projects, which are generally considered lower risk than large projects. Determined and adjusted by Consumer Price Index (CPI) and inflation, the original number for low-risk projects was \$30,000. The new small project threshold of under \$1 million is rooted in the data that 94 percent of all PA projects are under \$1 million, and that those 94 percent of total projects only account for a small percentage of all PA funding.

Today, large projects take slightly longer than small projects. Large projects spend slightly more time in Phase 2, while small projects spend the same amount of time in Phases 2 and 3. For both small and large projects using SPA, most of the time is spent in phase 3 (see Figure 16).^{xii} RAD data also shows that current “small projects” (under \$132,000) spend the same amount of time in Phases 2 and 3 as do large projects. Bucket 6 (over \$10 million) reflects a small group of projects, and the trends depicted are not statistically significant.^{xiii}

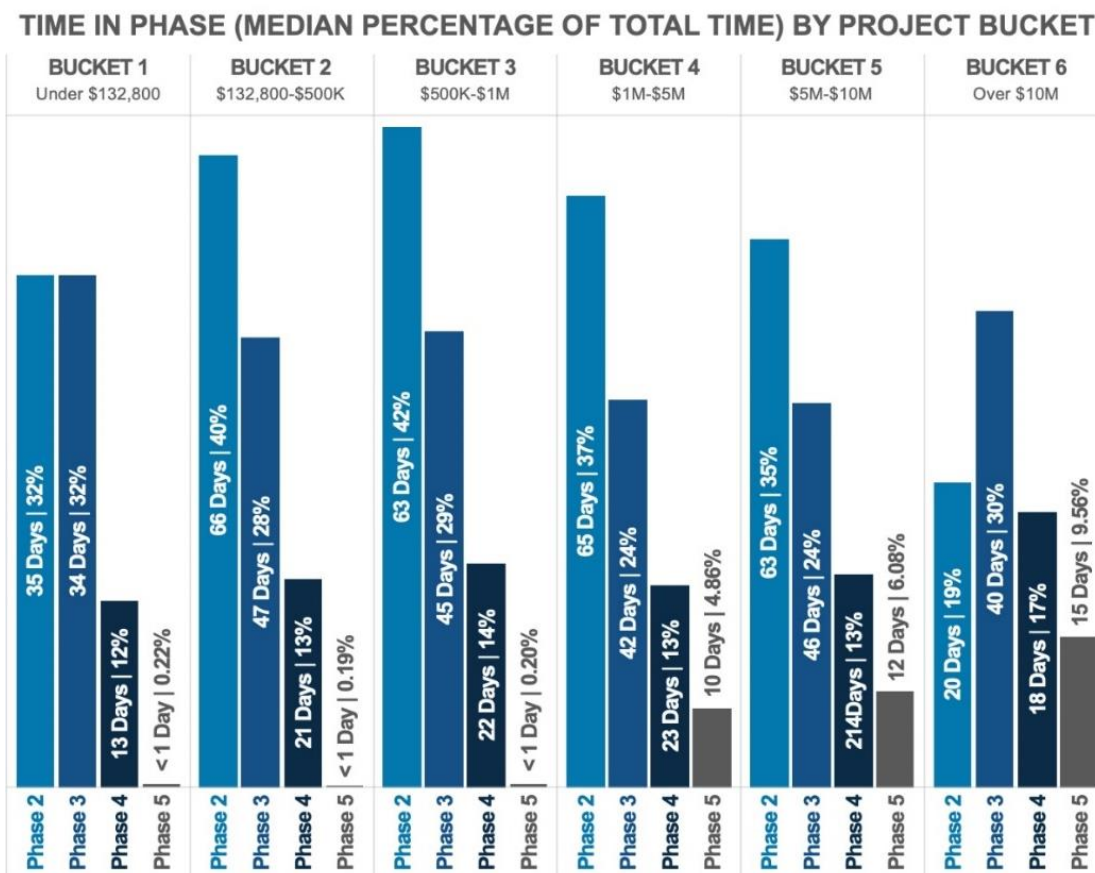


Figure 16: Time in Phase by Project Bucket (Median Percentage of Total Time)

When not using SPA, projects in the buckets 2–5 spend more time in Phase 2 (see Figure 17). When using SPA, projects (including COVID data) spend more time in Phase 3. A similar fact was identified in 2014. At that time, it was noted that PWs can take the same amount of time to complete regardless of size, though approximately 20 percent of very large PWs took over 500 days.^{xliii}

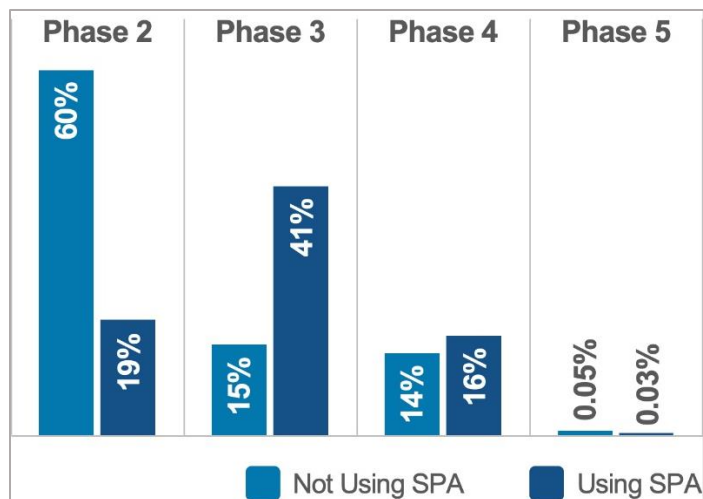


Figure 17: Time in Phases by Use of Streamlined Project Application (Median Percentage of Total)

Recommendation for Finding 1.4

Recommendation 1.4.1: FEMA should move the PA Program to a risk-based management and monitoring strategy that prioritizes delivering assistance to affected communities over managing program risk and technical compliance. This should include detailed guidance in the PA PDG on how the agency defines financial, resource, and applicant risk and a risk-based program. For example, as a principle of risk management, FEMA should avoid spending dollars to chase down pennies when closing out projects, develop acceptable error rates in projects, and move the culture away from blame and reprisals and toward one of mentorship, communication, and trust.

FEMA will also have to develop strategies and tactics on how to implement a risk-based program that incentivizes simplicity, timeliness, and efficiency in delivering PA to impacted communities. To that end, the agency will need to deliver specific training on implementing principles of risk management to ensure front-line field staff can operationalize this concept and managers and leaders understand how to oversee it.

Section 2: Communications and Culture

Communication plays an essential role in achieving FEMA’s National Delivery Model goals of increased accuracy and simplicity for a PA Program that delivers correct and straightforward information to FEMA staff and SLTT stakeholders. Consistent, precise, and timely communication supports the FEMA objectives of accelerating time-to-project obligation and ensuring a positive customer experience.

PA Assessment research indicates communication within the context of the National Delivery Model performs with marginal success. In the National PA Delivery Model Select Staff Survey, only 52 percent of respondents agreed with the statement that communications with their SLTT stakeholders and the broader internal partners in FEMA regional offices, the CRCs, and other field staff were collaborative and consistent. The staff survey data also showed that nearly half of the respondents disagreed with survey statements of communication collaboration, consistency, and efficiency.

This section focuses on the PA Program’s gaps in communicating policy and process changes; the intra-group communication challenges among FEMA, and SLTT stakeholders within the context of the National Delivery Model; and the impact of communication breakdown on the FEMA culture and mission through the disintegration of trust.

Key Finding 2.1: Gaps in information sharing, inadequate communication methods, and inconsistent messaging in communication cause breakdowns in the National Delivery Model, which lead to delays in project development and obligation and the disintegration of trust among FEMA, recipients, and applicants.

Policy Communications

The FEMA Directive “Development and Management of FEMA Policy” (FD-112-12) outlines the requirements for a transparent and coordinated agency-level process to propose, prioritize, develop, revise, and maintain doctrine, policy, directives, and instructions. Specifically, “Phase 6 –Release and Posting” includes coordinating with the Office of External Affairs on the development of communications materials, and “Phase 7 – Monitoring & Review” maintains a standardized process to monitor policies to ensure they remain relevant and achieve their desired effect.^{xliv} FEMA PA tends to disregard FD-112-12 and implements “huge changes” in policy without notification or adequate supporting guidance, resulting in confusion and inconsistent interpretation among FEMA PA staff. Only 51 percent of staff survey respondents agreed that policy changes issued by leadership are adequate, consistent, and timely; nearly 22 percent of staff survey respondents disagreed with the statement (see Figure 18). The lack of adequate communication on policy causes FEMA PA staff to struggle in keeping up with the complexities of changes in the system, policy, and requirements.

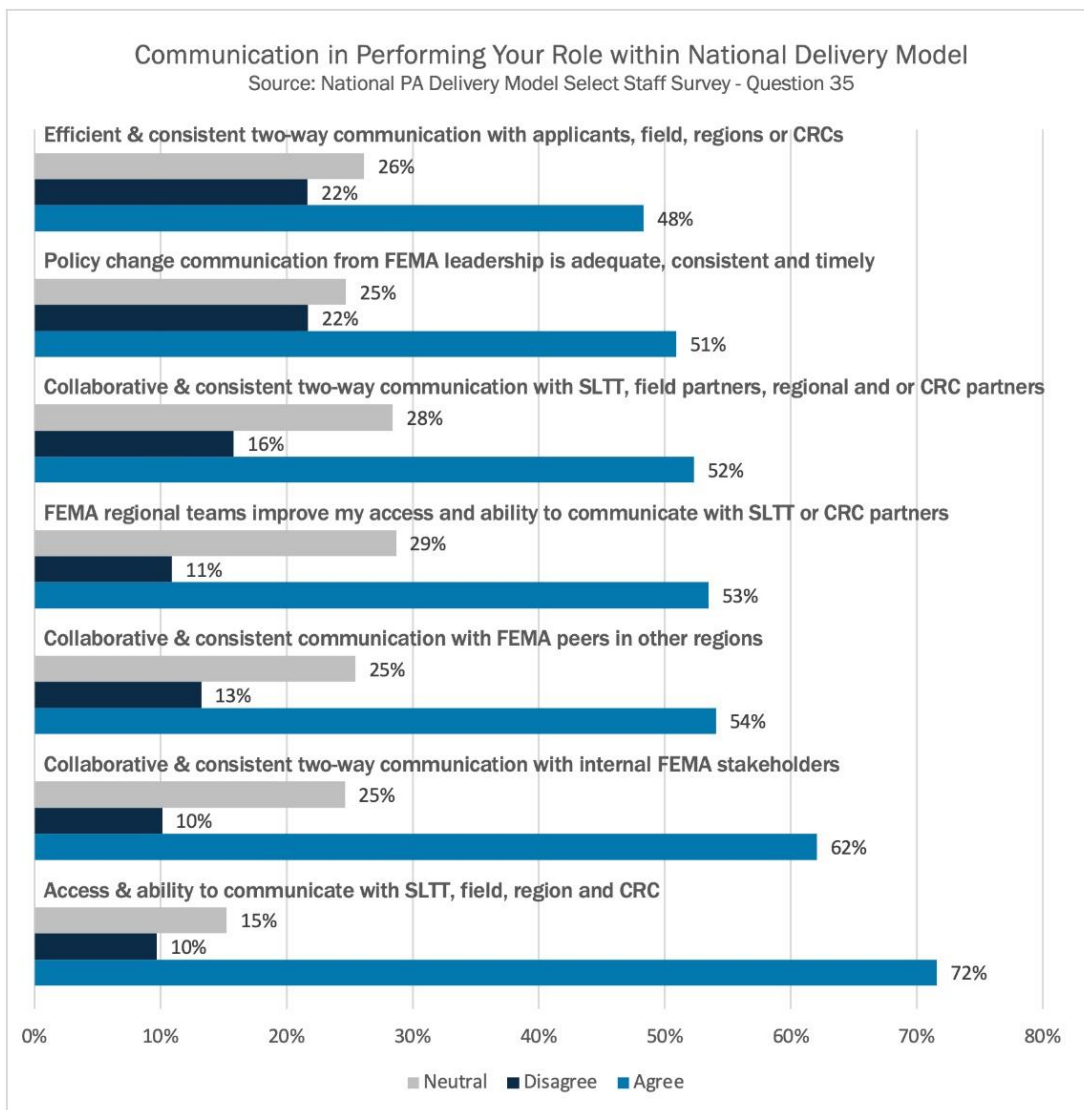
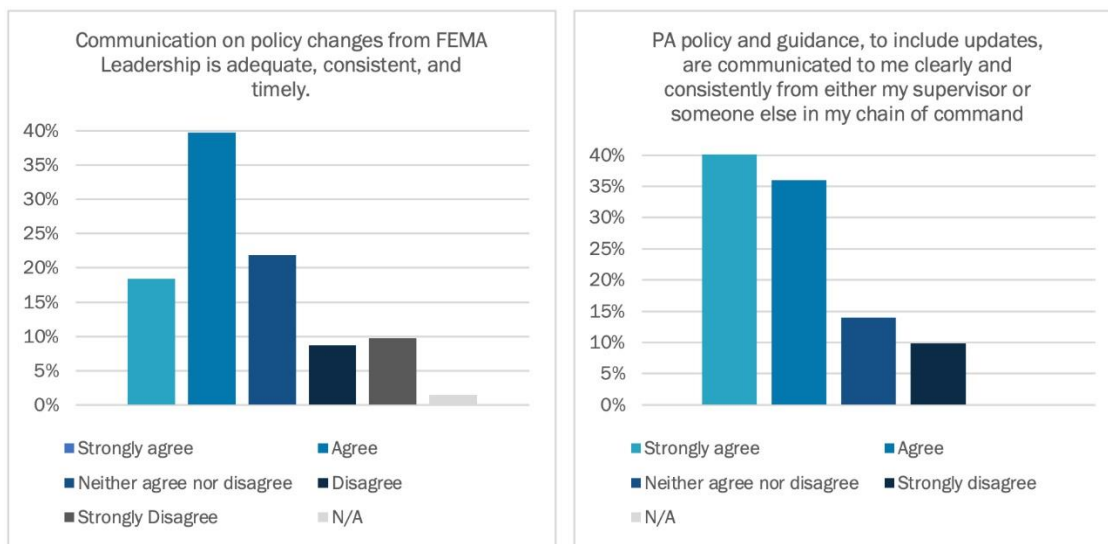


Figure 18: National Field Survey demonstrate communication within FEMA PA is mixed

FEMA PA typically announces policy change through an email to selected FEMA PA staff who face the burden of interpreting and communicating the new policy to their working groups, resulting in their varying individual interpretations of policy and deadlines passed onward to others.

The inconsistent distribution of policy communication causes gaps and omissions in FEMA PA leadership messages directly reaching all affected FEMA PA staff, especially field or PDMG staff. While CRCs communicate mostly with PDMG, PAGS, and IBD staff, they inconsistently pass along clear information on policy or share the original policy emails. Only 58 percent of PDMG staff survey respondents agreed that communication on policy changes from FEMA leadership is adequate, consistent, and timely (see Figure 19). The majority of PDMGs receive policy communications from their supervisors and not from one primary source, i.e., FEMA PA leadership. In contrast, nearly 76 percent of PDMGs respondents agreed that their supervisors provide clear and consistent policy communications.



National PA Delivery Model Select Staff Survey

Figure 19: PDMG Respondents on Policy Communications

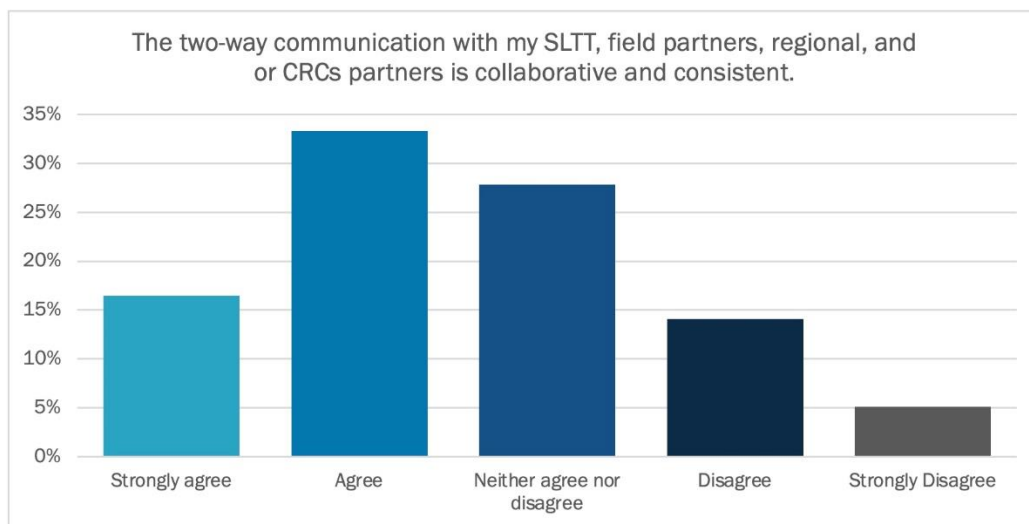
Staff survey respondents cited insufficient time and training as examples that there is “little time spent on policy conversations.” An assessment or measurement of policy comprehension by FEMA PA staff is not included as part of policy communications. FEMA PA lacks an effective two-way feedback loop with PA staff through virtual or in-person sessions to share information, gain their input, answer their questions, and adjust communications accordingly to clarify. The gaps in policy communications to FEMA PA field staff impacts their decision-making process, resulting in bottlenecks, project delays, and inconsistencies. As a FEMA PA interviewee commented, “It can take four months to get a policy decision – the HQ delay forces inconsistency because the Regions need to make decisions and move on.”

Intra-Group Communications

Only 52 percent staff survey respondents agreed with the statement that communications with their SLTT stakeholders and the broader internal partners in FEMA regional offices, the CRCs, and other field staff were collaborative and consistent. The staff survey data also showed that nearly half of respondents disagreed with survey statements of communication collaboration, consistency, and efficiency. When FEMA PA established the CRC as a separate organization, it caused a heightened need for communication. In a stakeholder listening session, FEMA leadership identified communication gaps as the root cause of complaints about the CRCs.

CRC and Region staff do not consistently implement coordinated communication channels to provide comprehensive, accurate information, resulting in delays and confusion that permeate the customer experience. Only half of the CRC staff survey respondents agreed that FEMA regional teams improve [their] access and ability to communicate with CRC partners and SLTT stakeholders. In some instances, Region staff impede communication flow from CRCs to the field. While 60 percent of CRC staff survey respondents agreed that two-way communication with [their] internal FEMA stakeholders is collaborative and consistent, they also expressed frustration with their communication and collaboration with other FEMA PA staff, particularly field staff. Examples provided by CRC staff

include an inconsistency on guidance between the CRC and the field, and differences in accountability for customer service. Collaborative communication between CRC staff and customers can contribute to reducing unnecessary delays. Consistent, interactive communications with these customers, such as regular weekly meetings, develop a rapport of collaboration that is “effective to a great degree.” However, the communication between CRC staff and SLTT stakeholders is inconsistent. Less than 50 percent of CRC staff survey respondents agreed that the two-way communication with SLTT stakeholders and field, regional, and/or other CRC partners is collaborative and consistent” (see Figure 20). According to a PA Assessment Task Force member, “There are different set of rules for different states within Regions. [The] CRC must force collaboration among states in their customer set.”



National PA Delivery Model Select Staff Survey

Figure 20: CRC Respondents on Two-Way Communications

FEMA PA leadership acknowledges that impediments to direct CRC-SLTT communication reduce transparency in the customer experience. SLTT stakeholders with inadequate communication or access to CRC staff in the project development process have a negative customer experience. These interviewed stakeholders regard communication with the CRC as “the biggest challenge” and “the largest delay.” The vast majority of PDMG staff survey respondents, more than 79 percent, agreed that they have the access and ability to communicate with their SLTT stakeholders and, field, regional, and/or CRC partners. However, only 62 percent of PDMG respondents agreed that two-way communication among this same group is collaborative and consistent. When asked how FEMA could improve the PA employee experience in implementing the PA National Delivery Model, nearly 30 percent of PDMG respondents selected “improve general PA Program communications” as one of their top three choices.

Communication breakdowns occur between PDMG and CRC staff. Interviewed FEMA PA management identified one cause of these breakdowns as the National Delivery Model’s division of the Program Delivery Manager responsibilities into three discrete new roles—Site Inspector, PDMG, and CRC technical specialist — which created siloes and a heightened need for consistent and

accurate communication internally between these roles. Additionally, both PDMG and CRC staff point to differences in policy guidance content and delivery as a cause of the broken coordination and confusion on the required project information, leading to further project delays as the PDMG is the single point of contact responsible to obtain project information from the SLTT stakeholders.

The FEMA document “PA Delivery Process PDMG Position” provides guidance under the work plan of the “Program Delivery Plan” for the PDMG to conduct regular follow-up meetings (minimum weekly) with applicants to get them through grant development and to obligation; however, it lacks a recommendation of the type of meeting, i.e., in-person, virtual or hybrid, at the selection of the Applicant based upon their project needs.

In practice, the PDMG-SLTT meetings and communications vary in method and frequency. The introduction of COVID-19 protocols led to inconsistency in direct high-touch communication and meetings between PDMGs and SLTT stakeholders. One SLTT stakeholder commented, “We did not have a lot of personal touches, like site visits, one-on-ones, and face-to-face interactions. Not having someone in front of you makes it a little tougher.” More than two years later, inconsistent virtual contact continues in many PDMG-SLTT interactions, resulting in a shift of the burden of project development to the SLTT stakeholders.

FEMA-SLTT stakeholder communication comprises a balance of high-touch and high-tech solutions. Grants Portal helps knowledgeable customers to communicate and share material and information with FEMA. However, gaps of information exist because Grants Portal does not capture communication via email and other applications. Technology access and user knowledge continue to pose challenges for some PA customers. Without frequent input sessions or user conferences, FEMA misses valuable input from its customer base.

Culture

Research shows that employees are most likely to trust and cooperate with decisions—even those they disagree with—when they believe that the process used by leadership to make the decision was fair. According to business management expert and author of “The Trusted Advisor” David Maister, the extent of trust given to an individual or organization is determined by four key components: credibility, reliability, intimacy, and self-orientation. However, the FEMA culture lacks a continuous flow of accurate information, consistent communication and transparency which further disintegrates trust, unity, and cultural alignment.

The inadequate communication on policy change generates among FEMA PA staff the perception of an indifference by FEMA PA management above them to the downstream impact of change. FEMA PA staff expressed that they feel expected to adjust to change without an opportunity to provide feedback on how the change impacts their work efforts; and that, when they are asked to provide feedback, their feedback is ignored, and changes do not seem to follow. Ineffective communication on policy changes results in suspicion by FEMA PA field staff at the end of the communication chain. As a staff survey respondent commented, “I’ll beat the dead horse – communication on policy changes is so bad at the ground-level that people believe it’s intentional.”

An insufficient adjudication process leads some FEMA PA staff to conclude that policy development “happens within a small group” that controls the decision-making process. In addition, FEMA’s Directive 112-12 on policy development excludes a step on follow-up with FEMA PA and stakeholders on the results of policy adjudication and their feedback.^{xlv}

FEMA PA management appear self-oriented to lower-level staff when they hold onto extensive decision-making, resulting in project bottlenecks that slow down the delivery process. As one survey source elaborated, “Empowering staff to make decisions would speed the process along, but leadership are hesitant to trust their people and empower their people for fear of losing their own power.”

When self-oriented FEMA PA supervisors control their group’s communication, their reporting FEMA PA staff face role restrictions, resulting in diminished collaboration and respect between them. In PA field staff engagement session, multiple participants described feeling “micromanaged,” “unsupported,” and afraid of reprisals or reprimands for making mistakes. The wrong messaging tone and communications between FEMA PA groups also hurt working relationships and the broader, one-team “FEMA friendly” culture. As one engagement session participant summarized, “Customer service begins from inside the agency.”

FEMA creates a reputation of “not listening” when failing to apply two-way communication and feedback among SLTT stakeholders. In some instances, the pace of change adversely impacts FEMA’s opportunity to adequately gather feedback and later share the results. For example, Recipients had provided feedback on Grants Portal, yet FEMA neglected to provide them with follow-up information on the outcome of their suggestions. The lack of transparency by FEMA on the results of feedback contributes to the breakdown of credibility with its customers.

The expectations by disaster-stricken communities of FEMA’s ability to support them and deliver PA typically extend beyond FEMA’s capacity. FEMA inadequately communicates the limitations of the FEMA PA Program and the complexity of the grant process, resulting in the unrealistic expectations and frustrations of SLTT stakeholders. As an example, FEMA PA loses credibility and reliability when they fail to emphasize from Day One of a disaster that obtaining a federal grant is a significant undertaking which requires active SLTT stakeholder engagement.

When an SLTT stakeholder’s project status changes from eligible to ineligible, the trust fractures between FEMA PA and the SLTT stakeholders who have followed FEMA PA steps and requests, only to face audits or the return of funds. In addition, the marked contrast of strict submission deadlines with penalties of project ineligibility facing applicants, and no corresponding deadlines with consequences for FEMA, creates the perception among customers of a double standard. The damaged customer relationship may continue to adversely impact projects for years following the original incident.

FEMA’s approach of one-sided transparency on projects — requiring full transparency from applicants yet withholding FEMA system visibility — results in an erosion of confidence between [stakeholders] and FEMA that contributes to project delays. As an interviewed stakeholder observed, “FEMA has

moved from 'we trust you' to 'I'm not going to give you money until you show us exactly what you're going to do with it.'"

Numerous comments shared by listening session and survey participants indicate that broken trust extends to relationships between FEMA PA and SLTT stakeholders' contractors. FEMA PA staff perceive contractors, including legal teams, cause intentional project delays in their self-interest of generating additional billable hours for revenue. A true, measurable, long-term commitment by FEMA PA leaders to a culture-focused program would provide an opportunity for the PA organization to strengthen internal and external stakeholder relationships through quality service and rebuild trust. As a FEMA leader observed, "We (PA) should make culture one of our shining stars."

Recommendations for Finding 2.1

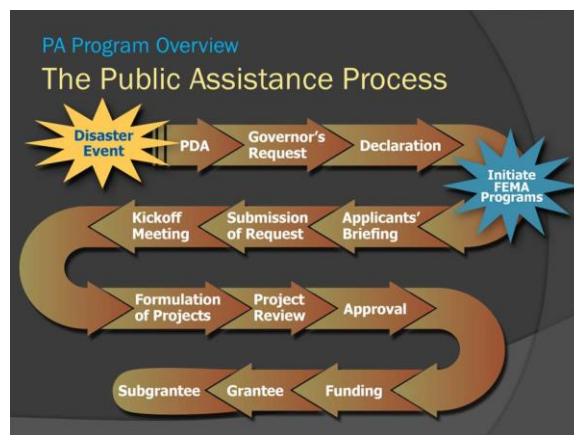
Recommendation 2.1.1: Implement consistent communication with SLTT customers about their project development experience through a mix of FEMA-driven strategic content, an applicant hotline, Grants Portal user conferences and training, and PDMG two-way meetings with the option of virtual, in-person or hybrid formats. These communication improvements will keep customers informed, increase transparency about the status of decisions, and build trust.

Recommendation 2.1.2: FEMA should develop and execute a cultural internal communications campaign to unify the entire PA workforce around FEMA's Recovery Office mission: "to provide assistance to individuals and communities overwhelmed by all hazards, including acts of terrorism, natural disaster or other emergencies." The focused internal communications campaign will promote collaboration on improved PA delivery and build trust within PA and among other FEMA divisions.

Recommendation 2.1.3: Develop, adopt, and execute a human-centered change management program that builds trust among all stakeholders, and greater understanding of the PA Program among FEMA, recipients, and applicants. This should include engaging FEMA Regions, CRCs, FEMA HQ staff, recipients, and applicants in PA policy development, development of process related changes and documents, and policy testing/vetting prior to nationwide implementation. The change management process and procedures should be followed in all but the most exigent circumstances whenever proposed changes to policy, program guidance, and process are contemplated. The engagement process must allow sufficient time for all stakeholders to participate and provide and receive feedback on their inputs. The engagement procedures should include statement(s) of leadership intent that describe why change is needed. Change management should become the standard mechanism used across FEMA Regions as a regular feedback loop with stakeholders and should include frequent communication with Recovery Division Directors and Cadre Managers.

Section 3: Process

The PA Program involves numerous overlapping of discrete, sequential, and concurrent processes. This collection of processes evolved over many years and reflects significant regulatory and policy changes since program inception. Substantial updates and revisions include the Disaster Recovery Reform Act (2018), as well as those made to accommodate specific needs created by emerging crises, such as COVID-19. The National Delivery Model processes are broken into phases, which are often depicted as “the PA snake” (see Figure 3 in the Introduction). Each phase has numerous subphases and actions for FEMA, recipients, and applicants to deliver and receive PA Program assistance. Program guidelines and standard operational procedures for each phase are outlined in the PAPPG for use by all FEMA staff, including federal personnel and contractors. This overall process has been portrayed as a “snake” diagram for many years (see historical diagram in Figure 21).



Source: Public Assistance’s Consolidated Resource Centers’ New Hire Training, PA 101 (March 2022)

Figure 21: The Previous FEMA Public Assistance Delivery Model Workflow “Snake”

While earlier PA Program delivery models included numerous distinct phases and requirements for applicants prior to major changes implemented in 2017, the previous version of the snake depicted only a high-level process overview. The evolution of the PA Program, including the 2017 shift to the National Delivery Model, is depicted in detail on the following page in Figure 22. This diagram visually presents how various delivery models compare and relate to one another.

The comparison outlines the process steps for the legacy and current PA delivery models. Included in the graphic is FEMA’s “direct application” approach to the current delivery model, which bypasses some process steps for certain project types using a “streamlined” project application. Although the current delivery model process flow diagram appears to be significantly longer and more complex than the original, it essentially includes the same number of steps. The key differences relate to who is responsible for what and where the responsible organization conducts the process activity (e.g., field versus CRC personnel).

The Assessment of the National Delivery Model focuses on three aspects of the process: accuracy, efficiency, and timeliness.

FEMA Public Assistance Program Assessment

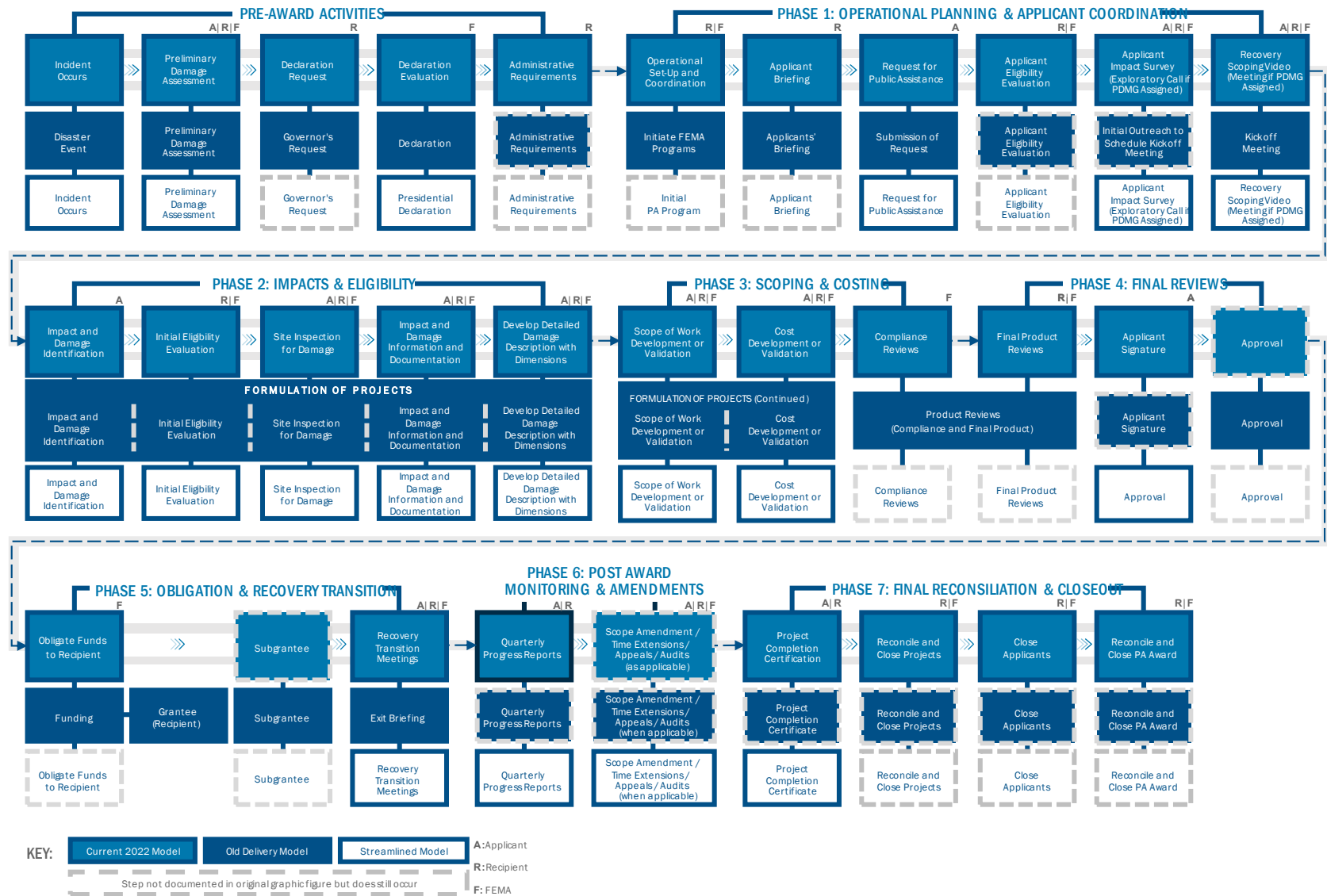


Figure 22: Comparison of the Current, Old, and Streamlined Models of the PA Program

Key Finding 3.1: Accuracy during PA project formulation suffers because of (1) too many FEMA personnel hand-offs and poor communication, (2) timelines that are artificially rushed; and (3), limitations that prevent quick corrections and updates to PA applications, including in Grants Manager/Grants Portal.

Accuracy is defined as performing the project and application task correctly the first time, including having consistency in eligibility determinations, obligation/funding amounts, and communications, resulting in lower de-obligation rates and reversals either at the CRCs or upon first- and second-level appeals. Figure 23 provides detail about the percentage of key tasks completed right the first time, several of which are below the baseline expectation set by PA leadership. The Assessment found that accuracy within the New Delivery Model was affected by too many personnel hand-offs, poor communication between the field staff and applicants, rushed processes, limited ability for corrections and modifications to a project; and limitations in Grants Manager/Grants Portal.

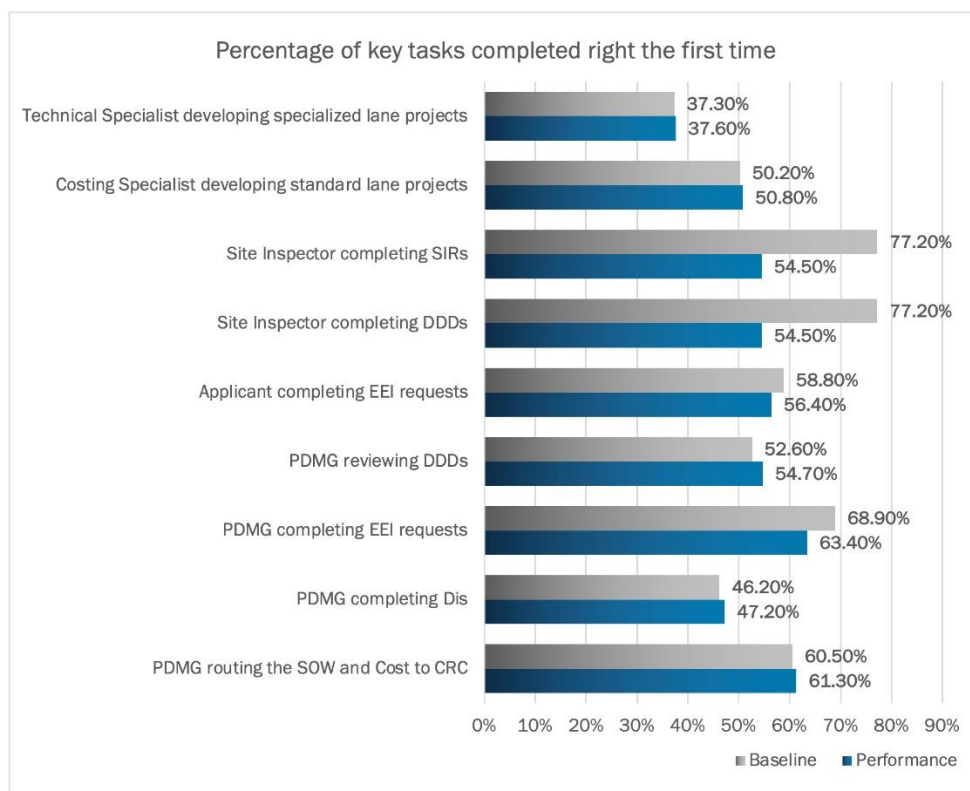


Figure 23: Percentage of Key Tasks Completed Right the First Time

Too Many Hand-Offs During Application Resulting in Missed Requirements

Many external stakeholders reported an overall perception that the PA process is too complicated and, as summed up by one interviewee, “overly engineered and complex, with too many hand-offs within a basic process.” Interviewees reported that numerous hand-offs between different personnel created conflicting guidance and redundant information collection, often in the form of RFIs. Turnover in support personnel can cause applicants to miss application requirements, and new staff joining ongoing projects lack institutional knowledge about projects’ applicants and context for

decision-making prior to their onboarding. Limiting the number of hand-offs and staff transitions and centralizing eligibility determinations could support consistency in program implementation.

PA Field Program Interaction with Applicants

Problems encountered with interactions between FEMA field personnel and applicants have also contributed to challenges and performance problems with the PA process, at times leading to substantial delays, reworking of tasks, and other issues. Based on RAD's examination of these interactions, and especially PDMGs and Site Inspector interactions with applicants, shortcomings in this process are also contributing to some of the key issues identified in the RAD performance metrics. For example, communication problems in relations between field personnel and applicants are contributing to the low percentage of Essential Elements of Information (EEl)s completed within 50 days by the PDMG (38.1 percent), the low degree of accuracy in EEl)s (56.1 percent), and the similarly low metrics associated with Site Inspectors in terms of preparing/approving their SIRs and Damage Descriptions and Dimensions (DDD)s on time (59.1 percent) and with sufficient accuracy (54.5 percent).

Rushed PA Process Creates Inaccuracies

Interviewees reported that portions of the PA process had artificially rushed timelines. For example, Joint Field Office (JFO) personnel can prematurely wind down field operations and accelerate closure of the JFO because of pressure from HQ. Rushed completion and submission of PA project applications related to this type of JFO closure results in poorly written projects, inaccuracies, and more work on the process back-end to correct previous mistakes. Additionally, expedited approval did not always provide quick relief for applicants. Even with expedited project approval processes due to COVID-19, interviewees reported that many recipients have still had to go through the entire standard review process before funds could be disbursed, and interviewees reported that in their experiences, the COVID-19 changes "did not expedite anything."

Challenges When Making Corrections & Updates

Interviewees reported that correcting mistakes in PA applications is perceived as unduly burdensome. For example, interviewees reported that since no one outside of the CRC can edit the scope of work, even misspelled words or other simple changes require applications to be sent to the CRC. Interviewees suggested that IBDs/PAGS should have some ability to edit for the sake of increased accuracy, since "rework" updates and edits are currently sent back to the CRC from the PDMG, rather than to applicants. Since PDMGs are not looking at an application's scope and cost before the CRC moves the project forward, each project is sent through multiple queues with the possibility of being inaccurate. Providing additional access or privileges in the Grants Manager/ Grants Portal user interfaces for states or field staff could enable quick accuracy-related updates.

Grants Manager and Grants Portal Limitations

Interviewees reported that while the Grants Manager/Grants Portal user interfaces provide many benefits, several improvements are desired, especially by external non-FEMA entities. In general, interviewees perceived the Grants Portal user experience as being designed for high-capacity states and applicants with both access to and literacy in technology. Interaction with Grants Portal is challenging when PA applicants do not have consistent internet access and state emergency

management agencies must assign their own personnel to upload documents on behalf of applicants. This is especially challenging for states with smaller budgets and fewer personnel.

Multiple interviewees reported perceptions that rural and tribal community stakeholders face unique challenges with Grants Portal, as it requires knowledge of the software to navigate, and some applicants do not have the relevant skills. Some populations do not perceive Grants Portal as user friendly, especially in rural communities that are accustomed to paper processes rather than online forms. Some state emergency management agencies developed workarounds where they have applicants fill out a simplified paper form “with questions in plain English, which is then translated into FEMA speak at the region” and is then uploaded into Grants Manager on behalf of applicants. Multiple interviewees also reported perceptions that tribal communities have not received the same level of support—including technical assistance and resources—as state governments have for navigating the Grant Portal system.

External stakeholders reported that SLTT users would like to have additional access privileges in Grants Portal since they cannot readily edit applications and sort files, which can slow down the overall PA process. As one interviewee reported, “It feels like we’re not trusted to manage our own disasters; we don’t have the visibility and autonomy we feel we’re entitled to because we’re ‘not allowed’ to use GM.” Interviewees expressed the desire for increased functionality, including a fix for “something as simple as the inability to add a flag in the system to show an applicant they have something due soon.” Differences in access to the Grants Portal system and the Grants Manager system can also cause confusion for external parties when they are seeking support. For example, FEMA representatives asked a tribe to revise an application online when the office did not have that (Grants Manager) functionality in its system (Grants Portal), and this instructional error resulted in significant delays.

Recommendations for Finding 3.1

Recommendation 3.1.1: The FEMA PA Program should leverage human resources (HR) authorities and workforce management policies wherever possible to enable consistent FEMA PA personnel for applicants to engage with throughout the entire PA process. Keeping PDMGs engaged with applicants for the duration of their project will maintain “institutional knowledge” about the nuances of complex projects. An enduring engagement structure could be implemented through a hybrid of initially deployed in-person PDMG engagement, followed by remote support as the initial disaster response activities transition into longer-term recovery operations. Removing additional restrictions posed by the 50-week rule could also enable longer in-person engagements. Furthermore, FEMA PA leadership could coordinate PDMG assignments with the recipient counterparts. If recipients know in advance which applicants may potentially take longer in grant development, an early assignment of a regional/local PDMG to that applicant could improve the process.

Recommendation 3.1.2: The Grants Manager user interface should be updated to enable edits and documentation uploads by state level offices of emergency management. Limited, controlled, and monitored access in Grants Manager by approved members of state-level emergency management agencies would enable updates and clarification by additional stakeholders to ensure accuracy and

timely responses to RFIs. GM and GP should also allow for a recipient to generate an RFI if the recipient has internal documentation requirements above and beyond the FEMA protocols.

Recommendation 3.1.3: Information collection and analysis in the Grants Portal and Grants Manager workflow platforms should leverage artificial intelligence and machine learning tools to assess and approve documentation submissions. Proposals that require “Other Documentation” requirements can easily be missing and may then necessitate RFIs from the CRCs. Artificial intelligence and machine learning tools can support near-instantaneous feedback to applicants and FEMA personnel about the completeness of a PA application package. Furthermore, increased direct engagement by the IT team that builds and supports the Grants Manager/Grants Portal applications with external stakeholders could enable the design and implementation of a more accurate application process, especially with regard to information collection.

Key Finding 3.2: The National Delivery Model’s complexity impacts the customer experience for recovering communities and creates delays in the PA implementation process in both the field and CRCs. Targeted modifications to a limited number of critical PA implementation process steps could improve efficiency by simplifying and accelerating the National Delivery Model.

Process and Technology Limitations Create Inefficiencies

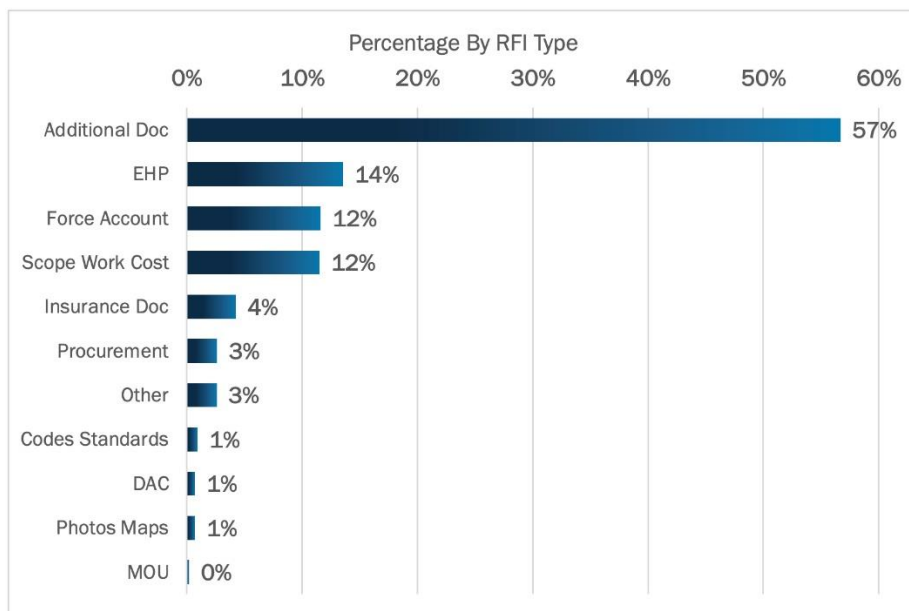
The National Delivery Model process and related Grants Manager limitations on who can access, update, edit, and facilitate applications and projects create process inefficiencies resulting in disconnects between the PA staff with responsibility for statements of work and those with direct project knowledge and programmatic know-how.

Under the National Delivery Model, only CRC staff can edit a PWs scope of work (SoW). Stakeholder input and data both indicate that treating the SoW as a team effort between the field and CRC would improve the efficiency of implementing the PA process. The field (PDMG and/or Site Inspector) should have primary responsibility for a Damage Inventory (DI), as they currently do, as well as SoW and eligibility determinations (Phase 2), as they “have firsthand knowledge of the damages,” while “the CRC is very far removed from the actual site.” Then, the Project Worksheet (PW)—including DI and SoW—should transition to the CRC for costing and review queues. The CRC would also retain responsibility for final review and confirmation that the PW package, including the SoW, is complete.

In addition to this field/CRC team approach, latitude in who can modify the SoW would improve process flow and efficiency of administering the PA Program. For example, currently, only CRC staff can modify the SoW narrative section. If, during final review, the IBD finds an error in the SoW, the project must be reworked back to the CRC for the modification, no matter how minor. Even a misspelled word, applicant name, or other simple change must be sent back to the CRC, IBD, and PAGS. Interviewees also mentioned that Quality Assurance Specialists should have some ability to edit. This could be achieved by adding dropdowns to the Send Back button, so the edit request is directed to the most logical individual who can fix it with the least amount of redirection through multiple queues.

Documentation Requirements

RFIs can be an indication of an inefficiency in document collection earlier in the processes. Figure 24 shows percentage by RFI type. Most RFIs are classified as additional documentation, followed by environmental and historic preservation (EHP), force account, and scope work cost.



Source: RAD

Figure 24: RFI by Type

Interviewees reported that FEMA documentation requirements, such as force account labor, materials, and equipment, can be burdensome and go beyond standard accounting processes that applicants ordinarily use, adding time and cost to applications and projects. FEMA currently requests detailed, line-item force account labor summaries from applicants and then validates those summaries. While some minimum documentation standard is needed to ensure consistency across disasters, ability to train for a standard requirement, and minimization of grounds for appeal, identifying a less burdensome approach to substantiating force account labor, materials, and equipment in a risk-based way that avoids line-item information requests could facilitate a more efficient information exchange with applicants and lead to greater efficiency in the PA process.

Compounding the administrative burden associated with detailed and rigid PA documentation requirements, the current validation process is a time-consuming process for both applicants and FEMA, resulting in long delays in getting disaster funding to affected jurisdictions. For example, to substantiate that a specific piece of equipment was used, FEMA will cross-reference that piece of equipment with an employee’s assigned tasks. In addition to slowing the delivery of PA, the costs associated with these document validation procedures can exceed any real or perceived fraud and drastically increase administrative and operational complexity for all-hazards events. As noted in the policy section, identifying and allowing for a specified margin of error within FEMA risk tolerance bounds would reduce the burden on both applicants and FEMA personnel, not delay applications with RFIs for relatively insignificant issues, and provide flexibility when it comes to minor validation issues.

Grants Manager and Grants Portal Inefficiencies

Stakeholders widely view Grants Manager/Grants Portal as improving the efficiency of PA implementation. Benefits resulting from Grants Manager/Grants Portal include transparency, information sharing, miscommunication risk reduction, and streamlined process and related time savings. Even so, stakeholders widely agreed that both systems also have aspects that hinder program implementation.

Some aspects of Grants Manager/Grants Portal are complex. For example, if a project needs to be redirected, Grants Manager is rigid and requires specific routing that may result in unnecessary steps. Stakeholders also reported the system requires unnecessary information to be uploaded before it will allow a user to proceed. Additionally, the systems do not currently allow for adding a flag to alert an applicant that they have something due soon, and there is no way to name or sort files within the system.

There is also existing capability in Grants Manager/Grants Portal that is unrealized and/or unauthorized; therefore, it is not benefitting the program. For example, some users are unaware of the messaging capability in Grants Manager/Grants Portal, so they do not use it. PDMGs and recipients/sub-recipients currently find emails more efficient, and Grants Portal does not capture communication via email or other applications, resulting in information gaps and potential miscommunications. Within Grants Portal, SLTT users can only see limited reports, cannot edit applications or sort files, and cannot currently enter RFI extensions or leadership approvals.

Functionality and utilization gaps in Grants Manager/Grants Portal are further complicated by inconsistencies between the two systems and users of each system are not consistently aware of these differences. This leads to confusion, communications breakdowns, and program implementation delays. For example, Grants Portal allows SLTT users access to limited system functionality compared to Grants Manager, which slows applicants down significantly, and limited visibility of system reports, which makes applicants feel that they are being denied access to tools that are necessary for them to fully implement PA and manage their own disasters.

Closeout Process Knowledge Gaps Create Inefficiencies

Interviewees reported that the closeout process is disconnected from the field formulation and CRC processes and takes too long. One objective of the National Delivery Model was to expedite project creation and to prepare and vet projects on the front end to minimize delays and negative findings at closeout, but interviewees indicated that this has not been their experience.

One driver of this challenge is that closeout staff are, by and large, not the same personnel as those who formulate projects, and project formulation teams are not generally experienced in closeout. One stakeholder aptly summarized the disconnect: “Too many times, [project] development team members provide applicants with well intentioned, but inaccurate or incomplete information regarding reimbursement and closeout. Everything seems well until it gets to the closeout team. As a result, the closeout team looks for certain items required to do closeout and amendments, only to discover that the information was neither identified nor requested from applicants by FEMA personnel during project formulation.”

To be able to correctly advise applicants on documentation requirements and to avoid such disconnects, field and CRC personnel should have a reliable understanding of closeout requirements. Stakeholders suggested several potential ways to close knowledge gaps regarding closeout: embedding a closeout advisor in field Phase 2 activities for knowledge transfer regarding the closeout process and technical advice regarding specific PWs; closeout team monitoring of and/or briefings to field personnel; providing more closeout training to acquaint field and CRC personnel with the closeout process so they set up projects in a way that is meaningful relative to closeout requirements; and having field and/or CRC personnel work with reviewers as they review closeout packages in order to provide real-time clarifications and to help ensure that packages get approved.

UX System Limitations

Regional stakeholders indicated that their ability to administer PA is bottlenecked by Regions having responsibility for closeout functions and for doing versions on closeout projects, even though most regional staff do not have access to EMMIE, which is the only system in which these actions can be performed. In addition, the only way to appeal the decision on a project that is found to be ineligible during closeout is to write a determination memo, which limits an applicant's recourse. To address these inefficiencies, stakeholders advocated for Regions to have the ability to process closeout actions and amendments.

Recommendations for Finding 3.2

Recommendation 3.2.1: FEMA should give field personnel tools to initiate an RFI process in Grants Manager (Phase 2). This systematic change of action will reduce "queue" redundancy on Grants Manager and speed up the process. The ability to generate field RFIs will also assist in preventing field staff from submitting incomplete packets to the CRC.

Recommendation 3.2.2: FEMA should add a closeout functionality in Grants Manager and provide related training for CRC and PA personnel, which will help to complete the transition from EMMIE to Grants Manager and will ensure that all project information is in one portal.

Key Finding 3.3: Stakeholders expressed concerns about the timeliness of certain National Delivery Model processes and data analysis confirms that the current program fails to meet FEMA's mission to provide timely disaster recovery funding.

Timeliness is the establishment of definitive timeframes that are communicated, understood, and met for each step in the process, from RPA to final closeout. The data show that the National Delivery Model takes longer than the prior model and is considerably slower at processing small projects. Interviewees cited five major areas impacting timeliness of PA Program delivery:

- 1) A rigid, complex process implementation model causes delays in program delivery.
- 2) CRCs cause delays by issuing RFIs for information that has already been provided, is not necessary, or is unclear; the current RFI process being primarily a CRC function is inefficient.
- 3) Waiting for applicants to provide supporting documentation can be a frequent cause of delays.

- 4) The EHP review process takes too long.⁷
- 5) The closeout process takes too long.

Data Analysis on National Delivery Model Timeliness

A primary data point for FEMA to measure timeliness of the National Delivery Model is the time between RPA approval and funding obligation. A comparison of funding obligation times for each delivery model finds that the median time to obligate a non-COVID-19 project in the current delivery model is 267 days, while the legacy delivery model time to funding obligation was 151 days (Error! Reference source not found.25). However, the data do not account for additional timeliness variables, such as project complexity or an increase in workload.

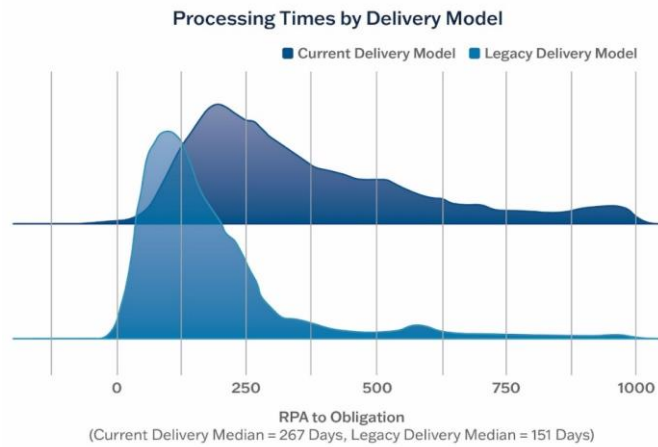
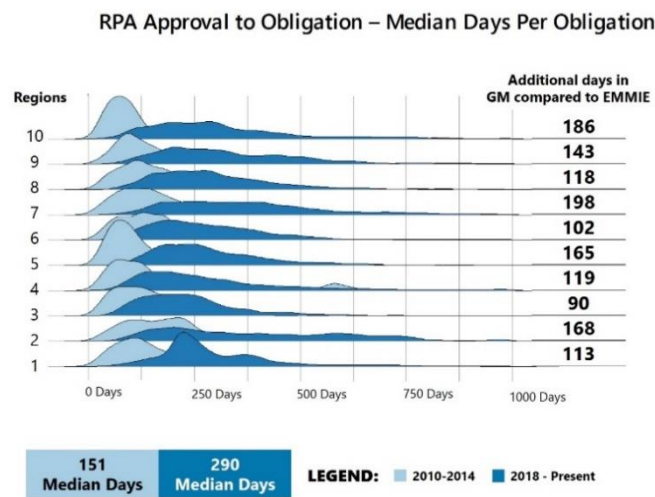


Figure 25: National Delivery Model Takes Longer (excludes COVID-19 data)

To determine if there were regional influences in project obligation timelines, FEMA compared the legacy and current delivery model project obligation timelines by Region. Figure 26 illustrates the comparison, which demonstrates no regional bias in the obligation timeline.



DATA SET USED: PA Project Details (2010-2014 compared against 2018-present)

Figure 26: National Delivery Model Takes Longer in All Regions (includes COVID-19 data)

⁷ The Assessment did not identify quantitative data to confirm this assertion.

Table 6 provides a comparison of the legacy and current delivery model obligation timing by category of work and project size. This more detailed analysis demonstrates that the National Delivery Model is considerably slower processing small projects.

Table 6: National Delivery Model Takes Much Longer in Most Work Categories for Small Projects

Work Category	Project Size	2010-2014		2018-Present		Average % Diff	Median % Diff
		Average	Median	Average	Median		
A - Debris Removal	LARGE	573.0	235.1	401.1	329.1	-30%	40%
	SMALL	173.6	117.7	287.4	230.4	66%	96%
B - Protective Measures	LARGE	560.1	219.7	423.4	395.0	-24%	80%
	SMALL	147.2	96.7	337.7	285.4	129%	195%
C - Roads and Bridges	LARGE	772.6	379.1	609.7	463.1	-21%	22%
	SMALL	214.8	136.1	388.8	288.4	81%	112%
D - Water Control Facilities	LARGE	891.7	537.8	599.6	512.4	-33%	-5%
	SMALL	279.4	161.2	369.4	328.4	32%	104%
E - Public Buildings	LARGE	984.8	684.1	821.6	782.8	-17%	14%
	SMALL	297.5	162.9	523.9	461.1	76%	183%
F - Public Utilities	LARGE	708.1	398.0	435.4	339.3	-39%	-15%
	SMALL	212.1	140.9	343.2	268.5	62%	91%
G - Recreational or Other	LARGE	983.0	696.5	827.5	896.6	-16%	29%
	SMALL	261.8	154.0	536.5	420.4	105%	173%
Z - State Management	LARGE	1048.4	736.9	546.4	511.0	-48%	-31%
	SMALL	900.3	546.1	401.4	339.3	-55%	-38%

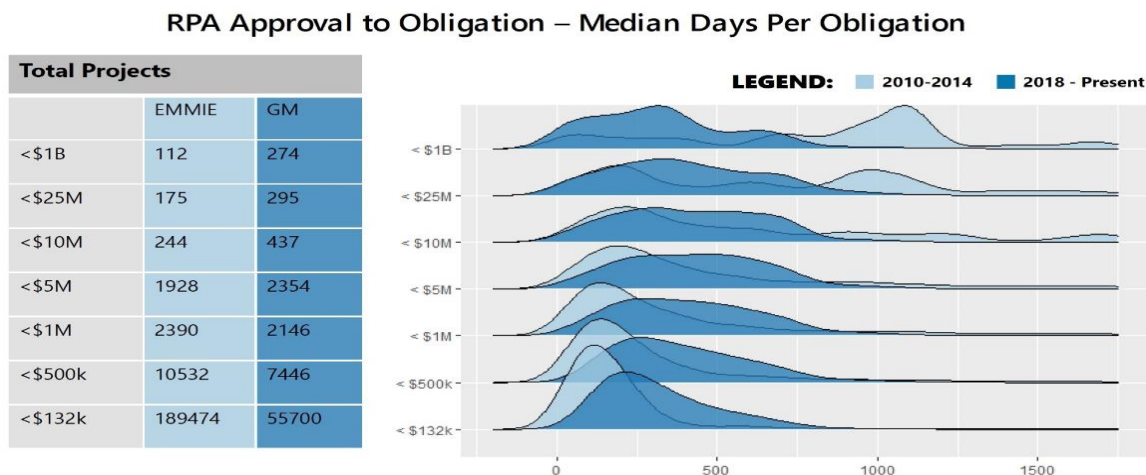
In compliance with the Government Performance and Results Act (GPRA), FEMA established performance goals for phase completion and project obligation under the current delivery model. The obligation goal for PA Program projects is 176 days. The rationale behind the timeliness goals for the individual phases is unclear and the timelines appear to be somewhat arbitrary. Phase 1, for example, has a processing goal of 26 days, which does not align with the regulatory deadline of 30 days for an applicant to submit an RPA. While some Regions reported timelines that exceed GPRA goals in certain phases, most were able to meet GPRA goals by phase (see Table 7).

Table 7: Phase 2 is the Longest Project Development Work Phase

Region	Phase 1	Phase 2	Phase 3	Phase 4
Region 1	24.9	42.9	14	15.2
Region 2	59.2	74.2	16.1	21.2
Region 3	40.3	40.9	20	7.9
Region 4	35	69.7	22.9	15.9
Region 5	61.7	51.5	26.2	14.8
Region 6	34	51	23.2	10.7
Region 7	46.8	69	21.3	19.1
Region 8	59.2	57	18	12.7
Region 9	26.6	55.9	30.9	36.9
Region 10	44	78.9	17.6	11.1
Incident	Phase 1	Phase 2	Phase 3	Phase 4
COVID-19	44	15.7	25.2	12.2
Other	44	75.9	20.9	15.8
Overall	44	59.9	21.3	14.9
Goal	26 days	100 days	30 days	20 days

Legend: Meeting Goal Over Goal Well over Goal

The primary take-away from project obligation data is that while the current delivery model is mostly meeting FEMA’s timeliness goals, it takes significantly longer to process projects and obligate funding for disaster recovery work now than under the previous delivery model, especially for smaller projects under \$5 million, as shown in Figure 27.



Source: RAD, PA Project Details (2010-2014 compared to 2018-present)

Figure 27: Time to Obligation Based on Project Size (\$)

Process Implementation Model

Feedback from stakeholders identified numerous issues related to the rigidity of the National Delivery Model. Many believe that processes introduced to implement the model increase administrative burden and, in what was already considered a complicated program, added bureaucracy that reduces procedure and policy transparency. The segmented, linear process and limited number of individuals authorized to develop projects inhibit the flexibility necessary to deliver meaningful and timely disaster recovery to program applicants. Furthermore, delays in obligation are perceived as caused or exacerbated by artificial constraints and bottlenecks resulting from a rigid and segmented workflow process and Grants Manager architecture.

The overall linear process of project evaluation delays the process; some processes could be executed in parallel instead. Despite the ability to collaboratively create in a digital environment, current program implementation guidance requires that projects remain in queues until all required information is available before moving through the next process “gate.” Waiting long periods of time for the FEMA Recovery Scoping Meeting, for example, may result in an applicant forgetting program and process nuances explained to them by the state. Other stakeholders reported that FEMA regional leadership schedules are perceived as taking priority over the applicants’ schedules, delaying decision-making, while “PDMGs are not being empowered to make decisions and the need for multiple levels of FEMA staff to be on each call, complicates the process and contributes to delays.”

FEMA regional representatives stated that more flexibility in the delivery model will allow them to more efficiently support SLTT partners, particularly those with capacity, technology, or communication challenges. Stakeholders desire a simplified process that allows for more project

development collaboration between the subgrantee, grantee, and FEMA staff assigned to the field and CRC. For example, placing a project specialist on site to write a project according to policy was reported to be “a more expeditious model” and collaborative method for developing projects.

Effect of Requests for Information on Timeliness

Many applicants cited RFIs as the cause for delays in project development. Grantees and applicants frequently reported that FEMA issued RFIs for information that had already been provided, sometimes multiple times. Some RFIs were inconsistent, with document requests varying among FEMA project review staff. Field staff complained that the RFI issuance and resolution process being limited to the CRC creates issues with efficiency, timeliness, and customer service. Interviewees attributed limitations in communication and coordination between applicants, Site Inspectors, PDMGs, regional staff, and the CRC as root causes of burdensome RFIs. These factors result in conflicting guidance on eligibility and situations where one FEMA entity or individual overrules another (e.g., CRC versus PDMGs). This disjointed process results in duplicative RFIs to applicants, which delays project approvals. Interviewees reported that the number of supporting documents loaded into Grants Portal can be overwhelming and information seems to be overlooked, resulting in additional RFIs. Interviewees also reported that occasionally, an RFI is either not applicable or not clearly defined, requiring further communication that can cause delays. Additionally, some RFIs could be answered more quickly in a virtual meeting or phone call, rather than the formal process that allows applicants 15 days to respond.

Stakeholders mentioned that the “length of time in queues” as a performance metric for FEMA staff incentivizes moving projects without resolving underlying issues, resulting in RFIs later. Additionally, CRC validation of completed work for large projects was reported as extremely inefficient, with many redundant RFIs or simply requests that appear to have no purpose other than “resetting the clock” on internal project review “timers.”

To investigate stakeholder complaints on RFIs, FEMA evaluated project data in Grants Manager to assess the actual effect of RFIs on the project development timeline. It found that the overall project RFI rate is 16 percent and, on average, a project with an RFI is in that state for 24 days (see Table 8). With respect to obligation timeline, the analysis found that an RFI increases project processing time by approximately 20 days, and that there is a median difference of 99 days processing time between projects with and without an RFI (Figure 28). The data show that an increase in workload does not necessarily correspond with an increase of time a project spends in the RFI stage, and that RFIs for large and small projects perform similarly.

Table 8: RFIs Average 24 Days

Category of Work	Project with RFI	Total Projects	RFI Rate	Average Time in RFI
A	796	6,207	0.13	26
B	9,323	37,019	0.25	22
C	1,196	16,411	0.07	21
D	102	1,086	0.09	25
E	876	5,285	0.17	25
F	423	3,498	0.12	21
G	341	3,230	0.11	21
Z	5	8,610	0	32

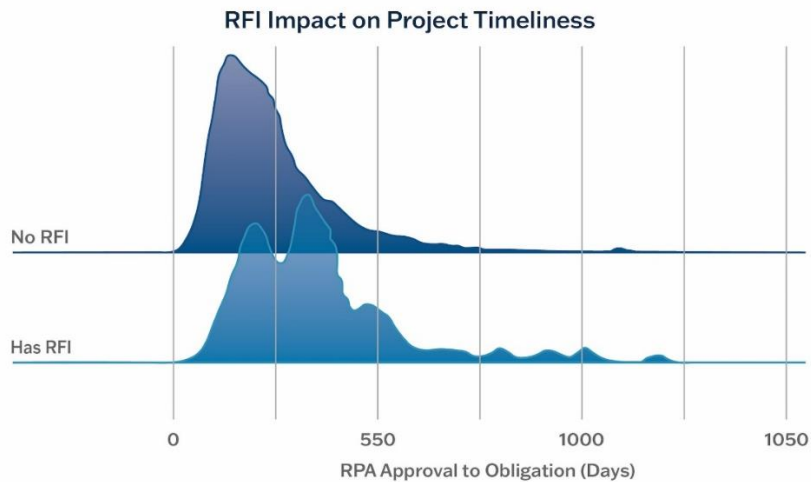


Figure 28: RFI Impact on Project Timeliness

FEMA also evaluated RFIs impact on obligation timing by evaluating the obligation times above and below the GPRA stated obligation goal of 176 days. This analysis, graphically represented in Figure 29, showed a median 85-day longer processing time for projects with RFIs that were above the GPRA goal. However, a statistical analysis of the impact of RFIs on project obligation timing using a two-way ANOVA test resulted in a minimal effect size ($e^2 = 0.02$), which means the RFI itself fails to explain the difference in obligation time. In conclusion, the data and analysis indicate that projects with RFIs may take longer to obligate, particularly those that are above the processing timeliness goal, but the RFI itself is insufficient to explain the entirety of the difference in obligation times.

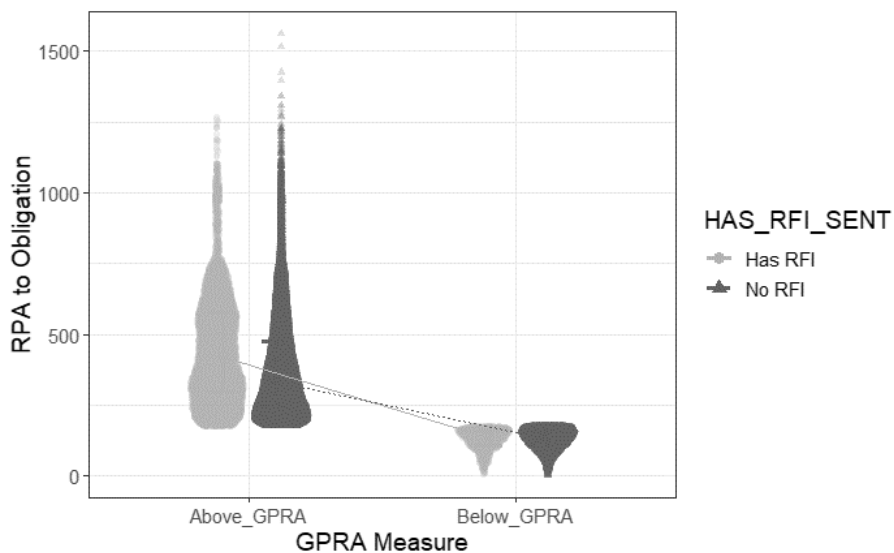


Figure 29: RFI Process Fails to Explain the Difference in Obligation Time

Applicant Provided Supporting Documentation

Supporting documentation is fundamental to project processing. Many FEMA interviewees reported that applicants are the primary cause for project delays by not providing timely project

documentation. In the words of one FEMA interviewee, “The slowness of applicants providing the correct documentation slows the process of obligation into years instead of months.” Applicants and FEMA perceptions of urgency often differ. As one interviewee reported, “There is urgency on the applicant side, but FEMA doesn’t seem to share that urgency and it causes frustration.” Furthermore, there are perceptions that “there are stringent deadlines for the applicants and recipients which impact applicants’ eligibility, while there are no deadlines for FEMA,” especially with the end of FEMA’s previously enforced 90-day deadlines.

The EHP Review Process

Interviewees reported feeling helpless when it comes to understanding why an EHP review might be necessary or how long it might take. “There are no controls over how long something takes at the CRC or in EHP. I don’t know if there’s a way for them to review it simultaneously or if there’s a way to streamline that. The biggest delay for us tends to be EHP.”

The FEMA RAD group evaluated the available data on EHP review with respect to obligation timeliness and found the average and median days required for FEMA to complete an EHP review to be 16.9 and 6.1, respectively. EHP data, however, noted that of the 15,842 project reviews completed to date in FY22, the average time for EHP review was 13 days and only 3 percent of projects were over 90 days. While FEMA does not have a published goal for completing an EHP review, RAD and EHP data appear to demonstrate that FEMA generally provides a timely EHP project review.

It appears that the stakeholder feedback is focused on the outlier projects that can remain in the EHP review queue for tens to upwards of hundreds of days. While EHP is often cited by interviewees as the cause of the longest delays during the PA process, of the 530 respondents in a customer service survey of PA applicants for FY23 Q2, 81 percent were satisfied with special considerations (including EHP) and only 7 percent were dissatisfied.

Project Closeout

As a project matures and is implemented, the early urgency during application is perceived as lost by the project’s conclusion, creating reports from FEMA personnel of bottlenecks during closeout. As reported by one interviewee, “there is a lot of pressure put on the applicant in the beginning — a 2-week deadline — but closeout takes at least 6 months after that.” An exemplar problematic closeout is the State of Hawaii having a disaster declaration in 2012 and a project that closed out in November 2020, but a determination that was not issued until March 2022.

Recommendations for Finding 3.3

Recommendation 3.3.1: FEMA must reevaluate timelines associated with the National Delivery Model phases to determine and set performance metrics for each activity of the process that will result in more timely funding obligation. For example, PDMGs could work with recipients and applicants to develop agreed-upon project development timelines relevant to specific disaster circumstances and applicant needs and abilities. The reevaluation should include stakeholder outreach and input to define a meaningful recovery timeframe for various stakeholders and how the

National Delivery Model can be structured to meet the timeframes including stakeholder actions required to achieve this goal.

Recommendation 3.3.2: The FEMA IBD assigned to a PA disaster recovery operation currently has the authority to set deadlines for documentation submission. FEMA should create and institute a protocol to assist IBDs in determining and setting documentation deadlines based on the size and effects of the event, project types and categories of work common to the event, and stakeholder resource capacity. IBDs should consult and obtain agreement from the grantee, and consequences of not meeting the deadline should be clearly defined and communicated.

Recommendation 3.3.3: FEMA should modify RFI-related processes, including communication and request protocol, deadlines, and related Grants Manager and Grants Portal functionality, in order to improve program implementation timelines. FEMA should revise RFI protocol and guidance to encourage RFI deadlines that are tailored to the information complexity and applicant capacity. Instead of the system standard 15-day deadline, provide the CRC Specialist that creates the RFI the ability to select a shorter RFI response timeline when requesting simple information and allowing for longer timelines for complex requests. Incorporating this flexibility at the initial creation of the RFI—by the person who best understands the information needs—will allow for simpler projects to move more quickly.

Recommendation 3.3.4: To introduce more continuity in the review process and increase timeliness, FEMA should discontinue the use of CRC EHP for “pre-review,” and instead use regional EHP staff to conduct all EHP-related project analysis, including “pre-review.”

Section 4: Roles and Responsibilities

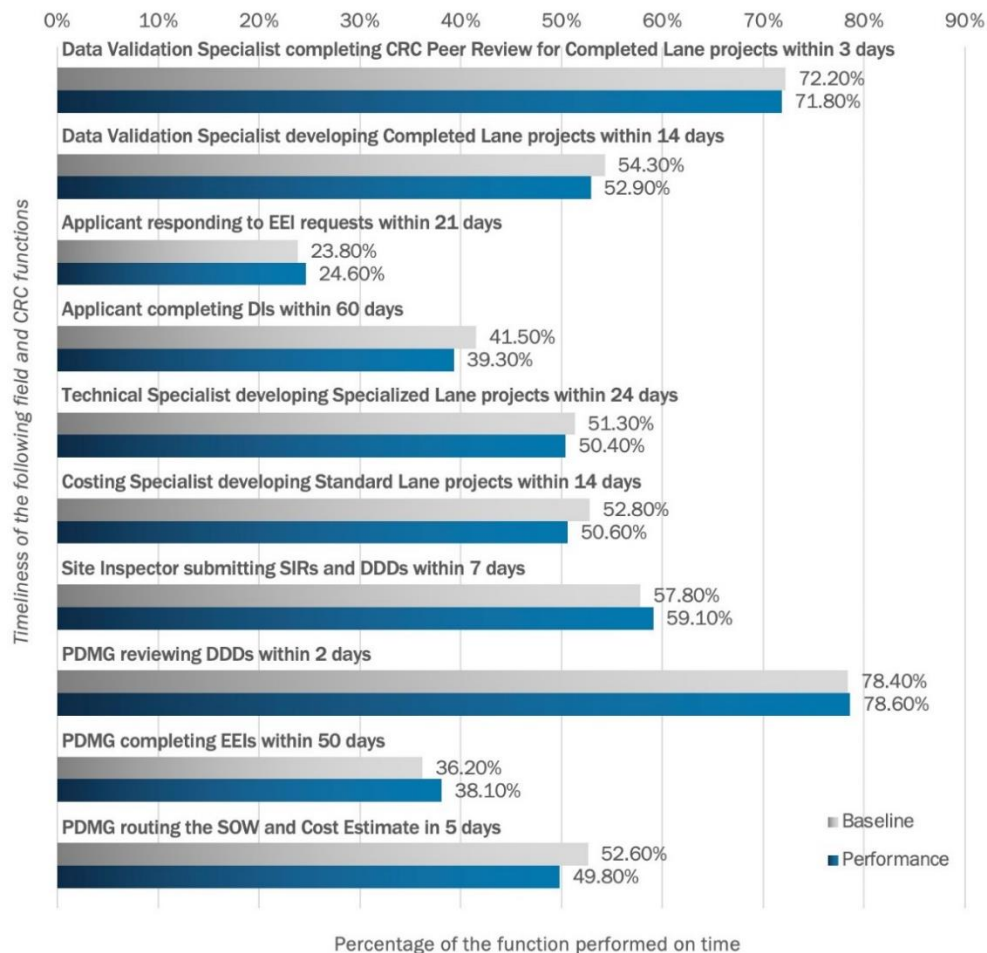
The PA Program's biggest and most important asset is its personnel. The Assessment clearly identified that FEMA must invest greater time, money, and resources to attract the best and brightest personnel, provide them the resources and tools they need for success, and create a culture to retain and cultivate them—with the ultimate goal of creating an efficient, motivated workforce dedicated to the core mission of assisting applicants in their recovery.

This section of the Assessment focuses on two distinct aspects of PA roles and responsibilities within the National Delivery Model: (1) the alignment of roles and responsibilities across the PA Program to support the PA mission; and (2) the capabilities of the workforce to fill the roles and perform their associated responsibilities. The following analysis of the key roles and responsibilities associated with the National Delivery Model focuses on the two principal organizations involved in the PA process—the Field Program and the CRCs—and their interactions with each other and with the applicant.

Key Finding 4.1: Though most field staff report understanding their roles and responsibilities and the alignment of these with existing job aids, the PA Program would nevertheless benefit significantly from (1) greater alignment of roles and responsibilities with the objectives of the National Delivery Model; (2) more clearly defined role definitions; (3) greater consistency in job execution; (4) more effective data collection processes; and (5) improved interactions between FEMA field personnel, the CRCs, and applicants. Collectively, deficiencies in these areas are significantly hindering the ability of the PA Program to meet its timeliness, accuracy, efficiency, simplicity, and programmatic objectives.

Alignment of Roles and Responsibilities of Field Staff

Based on feedback from the field survey, most field staff believe that they have a reasonably good understanding of their roles and responsibilities, with 53.7 percent strongly agreeing with this statement and another 35.0 percent agreeing with it in general. Moreover, 83.6 percent of field staff polled said they believe their roles and responsibilities are reasonably well aligned with the PA Position Assists/job aids. This demonstrates in general that the primary positions associated with the Field Program, at least in the view of most personnel, are reasonably well defined and understood and tailored to the PA Program. Nevertheless, there are strong indications of continuing problems with role definition of FEMA PA field staff and the way they perform their primary responsibilities. Collectively these problems continue to hinder the PA mission. This is most evident when examining the RAD data, outlined in Figure 31, which highlight continuing shortcomings in the performance of the Field Program,^{xvi} including frequently missed deadlines and inaccurate and incomplete project documentation and work product. The field survey also found, despite the positive survey findings referenced above, that a sizeable percentage of respondents (33 percent) believed that the PA Program would benefit by clarifying roles and responsibilities.



Source: RAD data⁸

Figure 31: Timeliness of Completion of Key Tasks by PA Field Personnel and CRC Staff

The data also indicate that more needs to be done to ensure roles and responsibilities are better defined and elaborated and that all participants in the FEMA PA Program have a clear understanding of the roles and responsibilities of their PA Program counterparts. Moreover, the views of FEMA field staff regarding the adequacy of their role definitions are not widely shared by other FEMA stakeholders, as indicated by the many contrary views expressed in stakeholder feedback and other sources. PA performance problems have been linked in various ways to the need for greater clarity regarding the roles and responsibilities of field staff and their alignment to the PA mission. Collectively, the continuing problems identified with the roles and responsibilities of field staff have contributed to the performance shortfalls identified throughout this report, including the substantial delays in completing assignments (see Figure 31) and the significant rework required to correct initial deficiencies as highlighted in the RAD data (see Figure 23 in Section 3.1, Process).

⁸ Baseline is the calculated score for the metric over the time period for initial analysis. The baseline period for the analysis in this report is fiscal years 2017 to June 2020; performance is the calculated score for a metric based on actual performance over a selected period. PA RPF Dashboard legend, 2021.

Several sources singled out the PDMG role in particular as one that needed to be more clearly defined and better tailored to the mission, both because the PDMG role is so central to the PA process and because PDMGs tend to rely more on clear guidance to compensate for persistent deficiencies in their training and experience. However, issues involving the Site Inspector, Task Force Leader (TFL), and Public Assistance Group Supervisor (PAGS) positions were also reported. Thus, despite the favorable indicators in the field survey, the PA Program would benefit significantly through further clarification and refinement, and better execution, of roles and responsibilities.

Data also indicate a need for clearer parameters in Position Assist documentation to guide interactions between FEMA field staff and state representatives and for clear lines of communication and more appropriate documentation/data formats to improve interactions between FEMA, the Regions, and CRCs. Although expectations regarding applicable lines of communication and documentation formats are typically established during the Disaster Operations Brief (DOB), stakeholder feedback indicates this does not always occur and this process should be reinforced.

One source noted the PDMG Position Assist documentation has critical gaps and lacks detail on topics ranging from applicant assignment to the Recovery Transition Meeting. It is also reportedly short on coverage of how to input data into Grants Manager. While Grants Manager user guides/tools are available, comments such as this indicate staff are not always aware of their existence or may not be fully taking advantage of them. FEMA guidance also reportedly lacks sufficient technical details to support the PDMGs' role given its wide-ranging nature. For example, stakeholder feedback cited the need for more guidance on specific disaster projects (e.g., wildfires.)

In areas where clear guidance is lacking, PA field staff have, at times, struggled to fulfill their assignments and to provide adequate guidance for applicants regarding the PA process, which in turn has hindered the mission. Stakeholders cited the need for FEMA field staff to acquire a better understanding of policy and grant requirements to better advise applicants. As a result, personnel at other stages of the PA process have had to spend additional time separating eligible costs from ineligible costs, causing delays and rework. Another source urged FEMA to provide better guidance for field staff to better understand their closeout responsibilities and to make closeout requirements clearer for applicants.

Shortcomings in role definition have also emerged during interactions of field staff with other FEMA groups. One source noted that many field staff do not have a clear understanding of the roles and responsibilities of EHP and Mitigation, and that this has contributed to delays in completing the EHP review and insufficient support to help communities to become more resilient during recovery. The "EHP Specialist" title has also caused consternation for some applicants who, having submitted proper documentation to an EHP Specialist, often believe that they have completed their EHP compliance review, only to find out later that this is a separate step in the process.

Inadequate guidance has also contributed to inconsistencies in the way in which field staff are performing their assigned tasks. Stakeholders reported PA staff are often applying inconsistent interpretations of policy, for example using different processes for awarding funds to grantees, or inconsistently asking for the same supporting documentation on "100% completed projects." This

raises questions regarding sufficiency of the process and the reliability of cost eligibility determinations. However, inconsistent treatment was not always cited as a problem, with stakeholders indicating some PDMGs do much more to help applicants.

Inconsistency in carrying out assigned responsibilities is not always attributable to lack of clear role definition. Based on stakeholder feedback, in some cases field staff failed to fulfill their assigned tasks because they were not fully aware of what was authorized or required. For example, some PDMGs were unaware that they could “write a project on estimate,” leading them to wait unnecessarily for the insurance determination. Inconsistencies are also occurring because field staff have neglected to follow their own guidelines and processes. In other cases, FEMA personnel failed to act due to insufficient training or confidence or fear of risks and repercussions, in spite of having clear decision-making authority.

Beyond issues of role definition, field staff also reported problems with the “excessive siloing” of roles and responsibilities under the current National Delivery Model, which were seen as overly restrictive in certain areas. For example, feedback from field staff indicated their projects could be completed faster if they were allowed to perform certain tasks outside their assigned roles, such as PDMGs being allowed to conduct site inspections or write the SoW for non-complex projects. Another stakeholder criticized the bifurcation of roles and responsibilities between PDMGs and Site Inspectors, which eliminated the efficiency of having a single point of contact for each applicant. Another indicated the program has been segmented to the point that it is no longer a coordinated process. Statements such as these likely overstate the problem to some extent, since data collected by FEMA indicate that, for most projects, segmentation has achieved greater efficiencies by helping to focus skillsets and reduce variation in approach.

Finally, several sources referenced the need to simplify roles and responsibilities at various points. As noted in the policy section, PDMGs were highlighted in particular as a role with too many responsibilities, which in turn has made it difficult for them to properly carry out their many assigned tasks. At the program level, one FEMA stakeholder highlighted the need to streamline roles and responsibilities in connection with the new 422 changes, which raises the threshold for smaller projects to \$1 million. In his view, projects falling below this threshold should be staffed with just three people, including a PDMG, a designated CRC representative, and an EHP Specialist.

Alignment of Roles and Responsibilities of Consolidated Resource Center Personnel

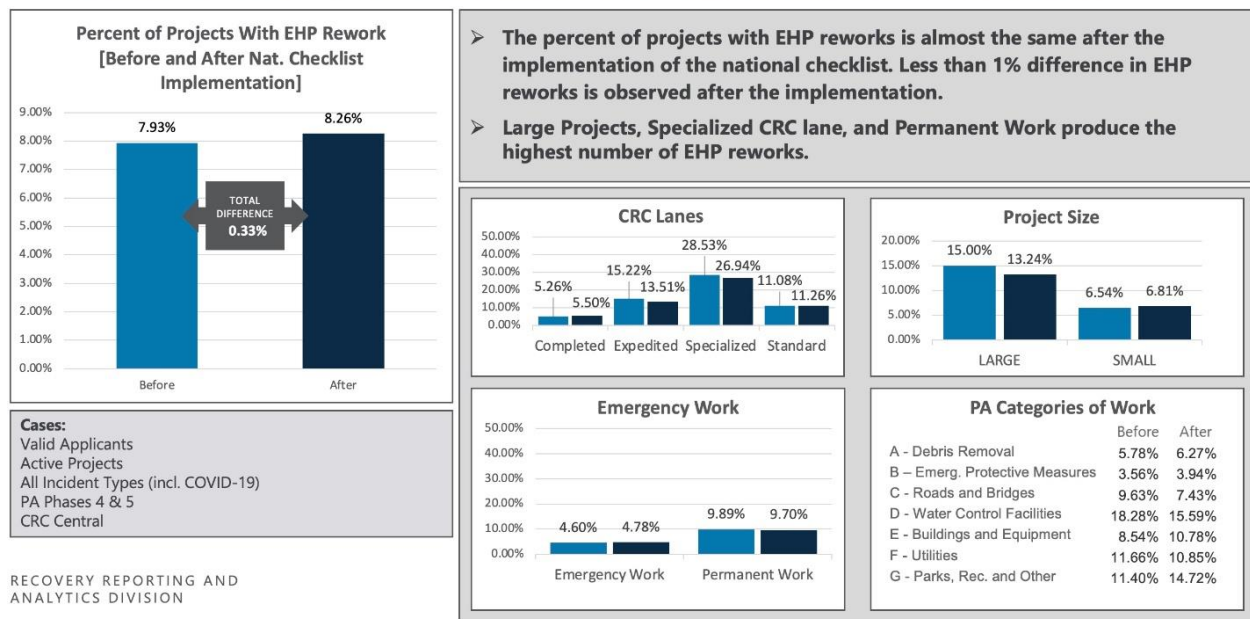
The CRCs are facing challenges of their own due to the need for better alignment between assigned roles and responsibilities of CRC personnel and PA mission objectives. Mismatches in this area are creating bottlenecks and other challenges, resulting in delays, and necessitating additional rework.

The roles and responsibilities of key CRC positions would also benefit by being defined more clearly in some cases, in either the PAPPG, Position Assist, or another tool, since they do not currently provide sufficient guidance in every area.

The National Delivery Model has also been hindered at times by issues with the CRC’s own internal processes. One PA official indicated CRCs may be relying too heavily on checklists and templates,

and do not always have sufficient understanding of how to execute a particular program to recognize when they need to deviate from their scripts. EHP has also continued to experience performance problems under the National Delivery Model (see Figure 32). These include persistent high levels of reworked EHP assigned tasks regardless of project type with the exception of large projects, which have shown a distinct improvement in accuracy.

PA PRESENTATION | PA PROJECTS EHP REWORKS | CRC CENTRAL



Source: RAD Analytics Division

Figure 32: EHP Rework Analysis

Another CRC member noted that CRC operations could be improved significantly by encouraging CRC staff to fill more deputy manager positions to support the CRC lane managers, a problem that has persisted in part because of the limited financial incentives afforded to those filling these roles. As a result, CRC lane managers continue to shoulder most of the burden limiting their effectiveness.

Problems related to interactions between the CRCs and EHP have also been raised at times as adversely affecting the CRC’s back-end processing duties. Some issues reportedly stem from EHP’s status as an entity outside the ORR-Recovery and ORR reporting chains. One CRC stakeholder claimed that EHP’s separate reporting status has reduced its accountability to the PA Program, which in turn has created issues with the PA process. Specifically, they claimed, EHP can raise questions at any point, forcing the project to revert to an earlier stage in the process to undergo rework.

The CRC’s performance issues have also been linked to shortcomings in Grants Manager. CRC personnel have had challenges applying Grants Manager in its current form to meet their management and processing requirements and have faced delays as a result. To address these issues, CRCs have had to develop workarounds in Grants Manager to keep their projects moving. Moreover, change requests submitted to address these issues were reportedly not being processed quickly enough.

CRC's have also had challenges at times with capacity limitations, which have affected their ability to keep pace with the most complex incidents, and this has affected their ability to meet schedule requirements. Related to this, the relatively high rates at which cost estimates are being reworked is also linked to the complexity of certain projects. Collectively, these problems account, at least to some extent, for the persistent performance metrics applicable to the CRCs. These include the low percentage of standard lane projects developed correctly the first time (50.8 percent) and within the 14-day target period (50.6 percent), although delays incurred due to inadequate field documentation are likely playing a far larger role in these problems.^{xlvii} On a more positive note, the CRC's have taken collective action to address their capacity issues by putting in place workload sharing arrangements across all four CRCs with the intent of surging capacity to meet increased demand during larger incidents.

PA Field Program Interaction with Applicants

Problems encountered during interactions between FEMA field staff and applicants have also contributed to challenges and performance problems with the National Delivery Model, leading at times to substantial delays, reworking of tasks, and other issues. Most of these problems are linked to the inadequate collection of data from applicants as needed for field staff to create accurate and complete work product for submission to the CRCs and other PA operating units. According to various sources, at times, the quality of work product provided by PDMGs, Site Inspectors, and other field staff was inadequate, incomplete, and/or of relatively low quality, and thus not sufficient for the CRCs to complete their required processing.

Such problems have led to substantial delays in processing while often requiring projects to be sent back to earlier stages in the process for rework. In many cases, such problems have also resulted in the excessive issuance of RFIs. The poor quality of collected data has in turn resulted in additional information requests, delays, and substantial rework. Such problems can be linked in part to insufficient training and preparedness of field staff assigned to PA. For example, stakeholder feedback indicated field staff are sometimes ill-trained and often unaware of the resources available to them. Problems have been further fueled by performance metrics that incentivize field staff to meet deadlines for submission to the CRCs regardless of the readiness of their application packages.

Another important problem underscored by stakeholder feedback centers on the applicant's frustrations with their interactions with field staff. One source noted, for example, that inexperienced field staff were at times following scripts too closely, asking the same questions repeatedly. Somewhat more serious were reports of PDMGs asking applicants for the same information, even though the information had already been provided. Problems such as this were partially linked to the high turnover rates among field staff, often causing serious delays, with some applicants reporting that they had to essentially restart the process because of poor transition during turnover. High turnover rates also reportedly led to problems at project closeout, due to a lack of clear understanding of how the project evolved since its inception.

Applicants also expressed frustration at interfacing with multiple FEMA personnel, performing tasks for which they lacked experience, and having to endure long delays in processing applications. As an

example, applicants in certain rural areas had to support virtual site inspections during the 2020 wildfires and sometimes had to conduct the inspections themselves, even though many lacked the knowledge and resources to handle the task, according to stakeholder feedback. The long delays associated with processing amended applications were also cited as a source of frustration for some applicants.

PA Field Program Interaction with CRCs

Problems associated with interactions between field staff and the CRCs staff have also contributed to the performance problems cited in the RAD data and stakeholder feedback, causing substantial delays, reworking of tasks, and other issues. The roles and responsibilities associated with these two central PA organizations and, more importantly, the quality of their interactions, are not always conducted in a manner best suited to support the PA mission, resulting in significant issues for both organizations.

Persistent problems with field staff, particularly with PDMGs not always collecting and submitting accurate, complete information and documentation as required for the CRCs to fulfill their assigned roles and responsibilities, remains a serious issue for the PA Program. While other factors have also contributed to these problems, such as the applicants' lack of clear understanding of what data is required, problems linked to field staff appear to be the most important contributing factor. Although this issue was addressed in part in the preceding section, this section includes further analysis of the adverse impacts on CRCs and other organizations, including, most notably, EHP.

CRC personnel have been quite vocal about not receiving the necessary and appropriate information and documentation from the field as needed to conduct their technical and cost assessments and to fulfill their other assigned responsibilities. The lack of sufficient field information has had important implications for the PA Program as a whole, causing delays in processing, the reperformance of tasks, and substantial additional work for the applicant and for the Field Program as well. These problems are serious, persistent, and likely responsible for a significant portion of the key performance problems identified in the RAD data. This data includes the large percentage of SoW and Cost Estimates not completed correctly the first time (38.7 percent) and the number of RFIs that are submitted to collect missing data (4.6 RFIs per applicant) (see Figure 23 and Table 8, respectively). Similar problems have arisen during exchanges between CRCs and Site Inspectors.^{xlviii}

Deficiencies in the information provided by field staff to the CRCs is creating additional work for operating units throughout the PA organization while resulting in delays, additional meetings, reworking of tasks, and, in some cases, suboptimal project awards. Ironically, the problem has been further complicated by the transition to automated systems, with issues that were formerly resolved quickly through meetings now taking weeks of digital back and forth.

To compensate for these shortcomings, CRCs have started mentoring new PDMGs, helping to guide them through the early phases of the PA process. At least one CRC is now planning to send CRC Specialists to the field at the beginning of disasters to gain greater situational awareness, to convey information on what data are required, and to improve interactions with field personnel.

The high turnover rates for field staff were also cited as an important contributing factor. This is confirmed by the RAD data, which show that 97.2 percent of all PA applications have found themselves working with more than one PDMG during the course of their projects.^{xlix} To ameliorate these problems, CRC personnel in some Regions have been providing direct support for incoming Site Inspectors, explaining what is required and helping them navigate their way through the damage assessment process.



Debris removal during the wildfires. (FEMA, 2020)

There are also more fundamental reasons for these persistent data shortfalls, some of which can be traced back to the inception of the National Delivery Model, which envisioned a simplified Field Program to provide streamlined data collection and interaction and with the applicant. However, this new paradigm also had unintended consequences, such as incentivizing the field staff to limit their scrutiny of the applicant's application materials to ensure that project packages were submitted by their submission deadlines, while relying on the CRC to identify data gaps.

The CRCs bear some responsibility for problems associated with their dealings with field staff, having at times submitted unnecessary data requests to the PDMGs and to the applicant. In some cases, CRCs have also failed to provide PDMGs and PAGS with the information and approvals they needed to complete assigned field functions. Field staff have also reported a lack of transparency within the CRCs, and in Grants Manager, making it difficult for them to track the status of their projects once they reach the CRCs. Tensions between field staff and the CRCs can also be traced to disputes over policy. For example, the CRCs have reportedly overreached their authority at times by making eligibility determinations, a decision reserved for the field.

Issues Related to the RFI Process

Problems associated with the RFI process have also contributed to performance problems at the project level, which include delays, reworking of tasks and project documentation, and problems in relations between field staff, CRCs, and applicants. Problems with the RFI process are often attributable to the insufficiency of data submitted by field staff to the CRCs. In such cases, CRCs usually try to address the problem by issuing informal requests for supplementary information to the PDMG and to other responsible field staff. If this request fails to yield the desired information, CRCs are empowered to issue formal RFIs directed toward the applicant. Formal RFIs are initially sent to the PDMGs, who are then required to deliver them to the applicant with responses due within 15 days of receipt.

However, the RFI process has also generated significant problems for all three entities involved, including field staff, CRCs, and applicants. For one, by allowing the CRC to force the PDMG's hand, the RFI process can create challenges for the PDMG who has primary responsibility for managing the applicant relationship during the pre-award phase. According to one regional official, the RFI process

can be disruptive for field staff who have to drop other tasks to handle RFIs often on short notice, which requires additional engagement with the applicant and coordination with the CRC.

Ironically, this problem has been exacerbated with the switchover to Grants Manager/Grants Portal. Whereas before, problems with data were often resolved through direct interactions between the CRC and the PDMG and in some cases the applicant, increasingly, CRCs are sending automated notifications, which reduces interpersonal connection.

RFIs can also create problems for the applicants and indirectly for field staff as well. RFIs are often unwelcome surprises for applicants since they typically arrive after the applicant has already submitted their application. As a result, the arrival of a new RFI can be disturbing and frustrating. RFIs can also be confusing, overly broad, impossible to answer, and in some cases unnecessary. Stakeholders cite highly technical wording and deficient photos and content as some of the confusing and frustrating elements of RFIs for applicants.

RFI discussions with applicants are not always handled properly, according to stakeholder feedback. For example, inexperienced applicants often feel compelled to prematurely respond to RFIs without understanding fully what is being requested. As a result, CRCs have had to issue additional RFIs for clarification. Other feedback indicates that applicants have struggled to respond to RFIs due to lack of adequate support from FEMA personnel. The latter problem was even more prevalent during COVID-19, which limited onsite interaction between FEMA and the applicant.

On a more fundamental level, many of these problems can be traced back to the central tenets of the National Delivery Model, which by design, separated CRC staff from the applicant, forcing them to interact with the applicant indirectly through field staff. As a result, CRC personnel are no longer able to gain as clear an understanding of the applicant's situation. Thus, while most RFIs are handled without too much difficulty, the problems described above are causing significant challenges for the National Delivery Model. Ultimately, the RFI process has also contributed at times to an adversarial relationship between the field staff and the CRCs.

Key Finding 4.2: Though FEMA PA maintains a large cadre of capable personnel and an effective basic PA training program and is working at enhancing career development for its personnel, high attrition rates, declining ability to recruit and retain qualified personnel, deficiencies in the PA training program, and the lack of a comprehensive career development program offer areas for improvement to address PA's ongoing performance problems and improve PA Program delivery.

According to stakeholder data, FEMA PA maintains a large cadre of capable personnel, an effective basic PA training program, and is working at enhancing career development for its personnel. The PA workforce is centered on a core cadre of seasoned PA personnel with the experience and subject matter expertise necessary to formulate and carry out the disaster response effort. Moreover, FEMA Qualification System (FQS) basic training provides the rudimentary knowledge and skills necessary to prepare incoming personnel for their initial assignments; however, such training is not yet available for certain key positions, such as PAGS and IBDs. Under the leadership of the recently appointed

Training and Development Branch Chief, PA is in the process of developing an expanded PA training program and a career development program to include mentoring and other supporting activities. Collectively, these measures appear to be well tailored to help stem the recent decline in PA workforce capabilities addressed below.

Qualifications of PA Personnel

Maintaining a capable and well qualified workforce begins with recruiting qualified personnel with the background, skills, experience, and other traits needed to meet the challenges of administering the PA Program. According to several reports, the PA Program is falling short in terms of recruiting qualified personnel, especially for the Field Program. According to Government Accountability Office (GAO) congressional testimony, one of FEMA PA's principal challenges is properly qualifying staff.ⁱ Internal FEMA reports affirm this view.

According to stakeholder feedback, the inability to hire well-qualified PDMGs in a timely manner has also hindered disaster response. For example, inexperienced PDMGs were more likely to deny applications due to eligibility limitations, per one source.ⁱⁱ Another source noted that Site Inspectors often lack the construction experience needed to complete damage assessments. Stakeholders have noted the hiring of TFLs and IBDs with limited experience and knowledge of the PA Program as a contributing factor to the RAD performance problems. The failure to hire and develop enough qualified personnel is also contributing to substandard performance, delays, and substantial rework. According to one CRC source, a substantial percentage of "FEMA field staff are [inexperienced] and ill-trained and tend to stress quantity over quality." An EHP source cited examples in which work product produced by the field lacked sufficient detail for EHP to ensure project compliance with environmental laws.

On a more positive note, the Field Program and CRCs have begun to implement practices to assist inexperienced field personnel in better understanding CRC processing requirements. One source reported that the CRCs have begun to proactively share information with inexperienced PDMGs on what information to collect for the CRC to complete their tasks. CRC personnel have also encouraged calls from field personnel about how to interact more effectively while walking them through the process virtually, although this reportedly took significant time.

Excess reliance on inexperienced and underqualified field personnel has also created long-term challenges for PA. The need to hire quickly to respond to emerging incidents, has led FEMA, in some cases, to compromise on qualifications. Even when new field personnel are properly qualified, it typically takes them three years to develop proficiency. The increased hiring of inexperienced and underqualified personnel is exacerbating this issue. Overall, a substantial percentage of these new hires never reach proficiency. As one source put it, "If you look at the time people who shouldn't be in positions stay in them, you'll agree that people should be vetted [more carefully beforehand]."

Failure to match qualifications to requirements is also taking place during the assignment of staff to a particular disaster. As one source noted, the model needs to be revised so the right people are assigned to the right positions. Yet, such assignments often take place with little thought to a candidate's suitability, prior experience, or need for specialized skills and expertise. Instead, people

are often assigned based on the qualifications listed in their Position Task Books (PTBs), which are not always accurate due to insufficient validation of knowledge, skills, and experience. Without a proper method for tracking the actual qualifications of PA personnel, FEMA managers often elect to do a “sit-with” with each candidate prior to assignment to discuss their previous PA experience and identify the states they have worked in and the types of disasters they have handled.

FEMA PA would also benefit from having a clearer and more realistic understanding of the actual qualifications of the key PA positions, especially as they have evolved under the National Delivery Model. Without clear parameters, it is difficult to hire properly qualified personnel. While many longtime FEMA personnel have a close and continuing familiarity with the PA process, there is evidence that this has not always translated into a clear and actionable understanding of the required qualifications for hiring key PA personnel. There is a pressing need to update the qualification requirements in the PTBs to accurately reflect the required skills and capabilities for each position. Similarly, the Position Assists are no longer aligned with requirements.

Yet, there are more fundamental reasons for FEMA’s continuing struggles to recruit and retain qualified personnel, especially for the Field Program, relating to the underlying premises of the National Delivery Model. One of the prime objectives of the National Delivery Model was to simplify the tasks of field staff by consolidating much of the technical expertise in the CRCs. Field staff would then focus on eligibility determinations, site inspections, data collection, and customer service while leaving the harder cost and technical assessments to the CRCs and other back-end teams, such as EHP. As a consequence, the National Delivery Model would, in theory, allow FEMA to maintain a streamlined, less costly field cadre to handle this narrower set of responsibilities.

FEMA stakeholder data indicate the PA Program has been less than successful in simplifying the responsibilities of the Field Program. The role of PDMG in particular is often described as being too complex under the National Delivery Model, requiring project management, customer service, facilitation, research, training, and ombudsman skills concurrently. Compounding this issue, PDMGs often require specialized skills. For example, assigning PDMGs who have experience with specific facilities, such as water treatment plants, is essential for handling claims affecting such facilities effectively. PDMG’s lacking such expertise are reported to have caused applicants to lose eligible funding.

On the other hand, FEMA PA has had some notable success in improving customer service, with stakeholders reporting they witnessed FEMA personnel going out of their way to help applicants. The PA Program has occasionally paid a price for failing to give proper weight to the PDMGs’ customer service role. PDMGs need to be good ambassadors with the ability to represent FEMA and PA and sell the PA Program. However, PDMGs on their first disaster may not know how to do this because they don’t yet have the skills to effectively guide applicants through the PA process.

FEMA is facing similar problems in hiring qualified Site Inspectors with field-based training. Site Inspectors often lack engineering or construction experience, making it difficult for them to perform proper damage assessments. Moreover, FEMA must hire specialists to conduct site inspections of water, gas, electrical, and transportation infrastructure, further complicating the problem. Others

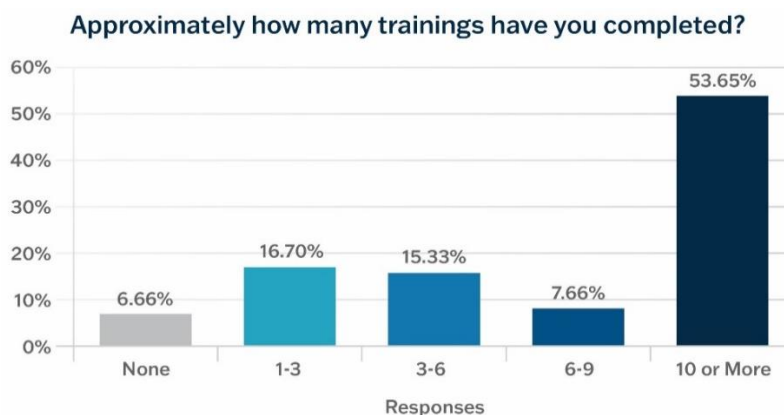
have identified budget limitations as a root cause of PA’s continuing problems with unqualified personnel. As one source put it, “We are asking [field staff for] the same things from the applicants. [Yet FEMA] is lowering the pay scales for the field [so] you get what you pay for.”

Training

FEMA’s PA training program provides basic training for new PDMGs, Site Inspectors, and the CRC staff, providing them with a foundational overview of PA practices and procedures while orienting them to the National Delivery Model. FEMA PA training has been received quite favorably delivering the basic skills and knowledge needed for new hires to build a solid foundation. As one senior FEMA official put it, “We have no problem “training.” We have great courses taught by great people.” However, PA training for PDMGs and Site Inspectors is insufficient to allow them to perform their roles and responsibilities at the standards needed to meet more complex aspects of the PA Program including larger complex projects. More troubling, PA training for PAGS, IBDs and certain CRC roles is currently nonexistent requiring more on-the-job learning. Overall, the lack of a comprehensive PA training program is contributing to the performance problems identified in the RAD data.

For example, without comprehensive training, new and inexperienced field staff are frequently mishandling their tasks, making processing mistakes, and producing deficient work product. This is causing supervisors and CRCs to spend extra time bringing staff up to speed, performing quality control, and correcting errors. This training issue is also resulting in substantial delays. One source said they always seem to be playing catch up once an event has started, trying to teach everyone at the same time. At the program level, the lack of a fully trained PA workforce after five years under the National Delivery Model remains a significant barrier to improving the agency’s support to applicants.

More than 93 percent of survey respondents had participated in training courses or events sometime during the early stages of their PA career (see Figure 33). Nearly 50 percent of the 1,087 field staff surveyed received FQS training prior to their first deployment, while most of the remaining field staff either received FQS training immediately following deployment or received some other form of training during the early stages of their PA career. Beyond their initial training, 66.9 percent of PA personnel reportedly received additional training either through PA Independent Study (IS) or through material posted on YouTube.ⁱⁱⁱ



Source: FEMA National PA Delivery Model Survey, May 2022; Question 12.

Figure 33: Training Attendance Rates

However, several sources indicate that there are significant gaps in the current PA training that leave staff unprepared to perform many of their program-related tasks. First and foremost, the training needs to do more to prepare field staff to engage applicants and collect and submit the required project data and documentation needed by the CRCs and other PA groups to complete their assigned tasks.

Enhanced training for Site Inspectors is especially important. As one source noted, “The most important job for the CRCs is to get a good site inspection. If you get a good Site Inspection report the [rest of the] project will flow easily.” However, since new Site Inspectors qualifications have declined, enhanced training, including more real-world examples and onsite training with a senior Site Inspector, is needed.

PDMG training has also been criticized for insufficient coverage of project management, eligibility determinations, more coverage of the National Delivery Model and FEMA core values.ⁱⁱⁱⁱ PDMGs receive solid foundational training on Grants Manager during their initial two-week training program, although some survey respondents found it difficult to digest without a better understanding of the PA Program and policy. Others highlighted inadequate coverage of Grants Portal in PDMG training, which would aid PDMGs in their interactions with applicants.

CRC personnel have their own training program, which includes PA 101, Validation, and Cost Estimating Format training. They also use HQ-developed training, which has been tailored for the CRCs. CRC training has come under some criticism as well. One survey respondent urged more coverage for CRCs on interfacing with recipients, validation of completed work, and RFI development. Another cited a general insufficiency of training for CRC Specialists, while also advocating to extend Site Inspector and PDMG training to the CRCs to better understand the roles of field staff. By contrast, formal training for other PA personnel is currently nonexistent, forcing them to learn their functions on the job. PD TFLs and PAGS have a critical role in managing field staff in responding to disasters; therefore, developing training programs for these positions should be an agency priority. While PDMGs have to take an “Elements of Supervision” course, TFLs are exempted from this course. FEMA PA has plans to address these gaps through new training courses for PD TFLs, PAGS, and IBDs.

Some sources have advocated for practical training to complement PA classroom training to allow personnel to experience “real life” scenarios under the guidance of a seasoned staff member. Others have advocated for capstone training and/or a tabletop exercise, where staff could gain direct experience with the PA process in a simulated environment using actual data. Refresher training through Advanced Individual Training courses, supplemental weekly training using field and CRC SMEs; and topical units were also stressed as options to improve proficiency.

Stakeholders in both the field and CRCs have also advocated for more cross-training, in which field staff attend CRC training and vice versa. While one CRC has informally begun to train field specialists at the JFOs on the PA process and CRC requirements, the PA Program would benefit by formalizing

this process. While these measures would help, FEMA must ultimately address underlying issues with PA training, such as persistent budget constraints and high staff turnover. Deficiencies in PA training appear to be linked to FEMA's culture of hands-on learning, which has led PA, at times, to dispatch personnel to the field to address disasters without adequate training and preparation.

Shadowing, Mentoring and Supplemental Support

Given continuing deficiencies in the recruiting of qualified PA personnel and in the initial PA training, the need to provide ongoing support for those relatively new to the PA Program has become paramount. As an example, without sufficient support, inexperienced FEMA staff are more likely to deny applications and place calls for assistance to CRCs when there is uncertainty on what they should do. As noted in the policy section, this can be disconcerting to experienced applicants who sometimes conclude that FEMA is inconsistent in its rules and procedures.^{iv}

FEMA PA personnel have taken several actions to address these challenges, with some approaches working better than others. Just-in-time training programs are used by some JFOs to provide supplemental training for new or recent hires. Another source said that just-in-time refresher training should be provided at the beginning of a disaster and at certain intervals between deployments. Yet, PA is not taking full advantage of just-in-time training. Previously, FEMA would assign an expert training cadre to support each JFO; under the current model, this option is not frequently used.

FEMA field staff are supposed to rely on their PD TFLs and others in the command chain for support with their projects. While PD TFLs are supposed to be knowledgeable enough to serve as mentors, this is not always the case. PD TFLs often have too many responsibilities to provide effective support for the number of field staff assigned. To compensate for this, some sources recommend that JFOs rely more on shadowing, in which junior field staff are paired with a more experienced staff member.

While this mentoring approach is happening informally, some have advocated for a more institutionalized approach, in which new staff are formally assigned a mentor through their first three months. On a similar note, CRCs are informally providing second-level remote support for new and less experienced FEMA field staff, and in some Regions, CRCs are looking to take a more active role in this area. Responding to such actions, FEMA is now in the process of establishing a formal career mentoring program for PA personnel to aid them in career development.

Career Development

FEMA PA continues to face challenges in maintaining a qualified workforce centered on a core cadre of seasoned senior personnel due both to high turnover rates and the need for an improved career development program. Problems in recruiting qualified personnel and shortcomings in FEMA's training programs have also contributed to the problem. One longtime FEMA interviewee reported a long-term decline in the average level of PA expertise, with fewer subject matter experts to mentor staff and provide the supplemental support needed. High turnover is also impacting knowledge transfer due to the loss of institutional knowledge.

Stakeholder feedback indicates that an improved career development program designed to systematically advance the knowledge and proficiency of PA personnel would be an important step

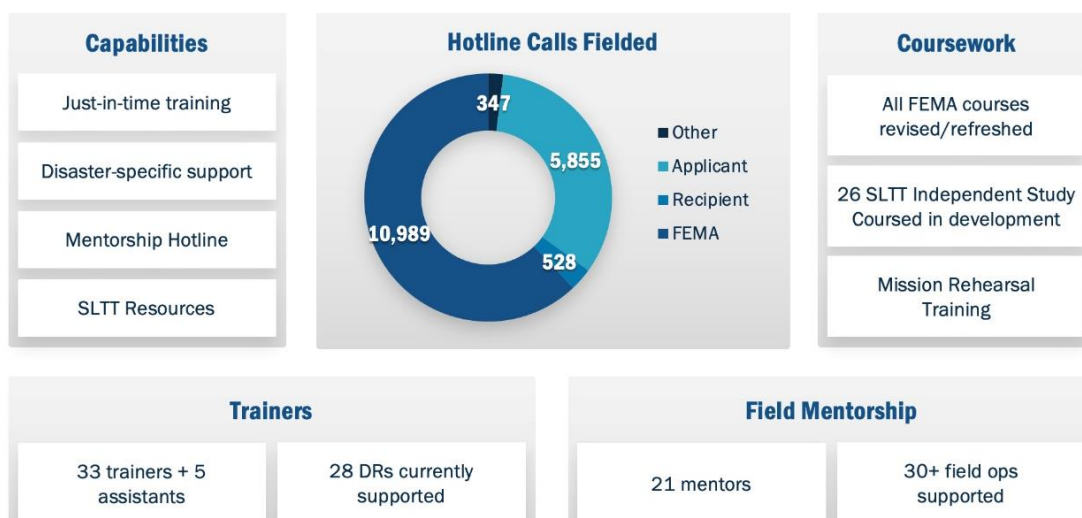
forward. Notably, FEMA PA has already made substantial progress in this area, having recently appointed a forward-looking branch director who has a clear vision of what is required. Under his leadership, the rollout of a new training and development program is already well underway. Over time, the new program should help to advance the careers of FEMA PA personnel, while also helping to reverse recent declines in the capabilities of the PA workforce.

Stakeholders also cited the need for better criteria for measuring employee performance and to support promotion decisions. Based on current practice, promotions are often granted without confirmation that the prerequisites have been satisfied. PA personnel are also able to maintain their status as qualified PDMGs or Site Inspectors despite lack of recent experience. In response, PA is planning to require staff to recertify on a regular basis to maintain their PTB status.

Stakeholder data suggested that PA workforce capabilities could be improved by expanding the range of assignments for PA personnel. Rather than keeping them assigned for long periods to the same Region handling the same set of disasters, personnel should be assigned to other Regions and other kinds of disasters. To address this issue, FEMA is reportedly looking at typing staff based on the kinds of disasters they are qualified to handle.

At the program level, FEMA is taking steps to create clearer job descriptions, starting with a review and update of all PTBs. PA is also updating task descriptions while aiming to create better metrics for coach evaluators to assess employee performance. In the long run, these tools should help considerably to enhance career development by establishing a clear roadmap for career advancement.

FEMA is also planning to establish a continuing education program for PA employees, a high priority for the Training and Development Branch. This new program is reportedly being designed to allow PA personnel to develop new skills, increase their knowledge base, and progressively advance their overall level of proficiency. Personnel will be expected to complete several hours of continuing education each year. FEMA PA recently launched a series of new initiatives to help realize these ambitions (See Figure 34).



Source: FEMA Training and Development Branch

Figure 34: Highlights of Current and Recently Completed Training and Development Activities

Recommendations

Below are two sets of alternative recommendations for addressing potential areas for improving the PA workforce, improving quality assurance, and reducing or mitigating high turnover of PA field staff. Alternative A includes a set of recommendations for addressing these combined challenges by attracting, building, and retaining a high-quality workforce. Given the many constraints on FEMA's ability to implement Alternative A, we have proposed a second set of measures, Alternative B, aimed at retaining the current staffing model while focusing on shoring up support for PA field staff using a team-based approach.

4.1.A (Alternative A): Attract, recruit, train, develop, and retain a capable, efficient workforce centered on a core cadre of experienced, highly qualified subject matter experts responsible for supporting a larger cadre of field specialists with the aim of developing their proficiency and continuously replenishing and sustaining the PA workforce through the following measures:

- **Recommendation 4.1.A.1:** Develop an enhanced set of PA Field Program job descriptions and a set of detailed qualification requirements to improve recruitment. Highlight desired knowledge, skills, and experience needed to respond more effectively to the full range of disasters and the unique requirements of each applicant and locality and ensure sufficient flexibility to remain competitive in applicable labor markets.
- **Recommendation 4.1.A.2:** Maximize the appeal of the PA Program to increase FEMA's ability to attract, recruit, and retain the best-qualified candidates, including the following:
 - Develop a compelling case narrative for a career in PA, emphasizing the factors most likely to influence a potential candidate's career decision-making.
 - Develop a series of attractive career roadmaps for those entering PA that emphasize opportunities for career development and advancement with options tailored for a range of career development preferences.
 - Develop competitive salary and benefits package to match the requirements of recruiting and sustaining a high-quality PA Field Program workforce taking account of prevailing job markets.
 - Normalize pay scales for PA positions across the various labor pools (i.e., reservists, contractors, and full-time employees).
 - Maintain a permanent core cadre of veteran professionals and subject matter experts as a foundational workforce for the PA Program to include PFT PDMGs, which have a crucial role in the National Delivery Model.
- **Recommendation 4.1.A.3:** Adopt measures to attract more internal candidates to the PA Program focusing especially on those already familiar with PA to bring transferable knowledge, skills, and experience to enhance PA workforce capabilities.
- **Recommendation 4.1.A.4:** Develop and offer an industry-leading entry-level training program for incoming field staff, including real-world simulation of their typical duties; enhance training to ensure field staff are able to apply policies and procedures and deliver high-quality project

applications compliant with PA quality standards; ensure PA personnel receive adequate training on Grants Manager and Grants Portal prior to their initial deployments.

- **Recommendation 4.1.A.5:** Refocus the role of the PD TFL on properly overseeing the activities of PA field staff to ensure that they are receiving the level of support they need to carry out their assigned roles and responsibilities in accordance with PA performance standards and quality assurance objectives.
- **Recommendation 4.1.A.6:** Validate the need to maintain a CRC EHP position to eliminate duplication of effort by the Field EHP position.
- **Recommendation 4.1.A.7:** FEMA should modify timeliness and accuracy performance standards to provide greater incentives for PA field staff to give equal weight to both metrics. FEMA should also adjust external-facing metrics to promote collaboration and cooperation with recipient and applicants with field personnel and the CRC.

4.1.B (Alternative B): Transition to a team-based approach in PA delivery to provide enhanced support for field staff, and address capability shortfalls, quality assurance problems and high turnover through targeted recommendations, as set forth below.

- **Recommendation 4.1.B.1:** Review and revise the PA recruiting program with the aim of attracting and recruiting a high-quality workforce while balance the practice of hiring to meet urgent disaster response requirements with the deliberate recruitment of better quality personnel, including the following measures:
 - Complete a thorough assessment of the FEMA PA workforce to identify key capability gaps; use the results to update DTS to better capture the capabilities and experience of existing PA personnel and facilitate staffing for future disaster responses.
 - Coordinate with PA Training and Development Branch to identify minimum required qualifications and skill levels; use these to develop hiring criteria while maintaining the flexibility to recruit promising candidates with other desirable characteristics.
 - Utilize the criteria developed under recommendation 4.1.B.3 to update the FQS and PTBs to better reflect FEMA PA processes, roles, and responsibilities.
 - Establish a clear, objective, and timely process with assigned responsibility for approving updates to PTBs.
 - Ensure the recruiting program emphasizes tangible and intangible benefits of working in PA including, to the extent feasible, a more competitive salary and benefits package.
 - Offer high-performing staff who excel at working with complex applicants higher pay to aid in staff retention.
- **Recommendation 4.1.B.2:** Offer enhanced training for the PA workforce, emphasizing the Field Program, so staff are better prepared to carry out assigned roles and responsibilities under the National Delivery Model, to include the following:
 - Incorporate the lessons learned from existing regional training programs (e.g., Region 7 PDMG training).
 - Expand the initial two-week PDMG training course to include project management, highlighting unique challenges facing PDMGs, and practical training designed to expose incoming staff more thoroughly to the actual challenges they will face in the field.

- Ensure training and mentoring for incoming Site Inspectors to include creation of associated documentation with supporting photos, data, and other materials. Build in the opportunity for new Site Inspectors to participate in a real-world damage assessment under the guidance of a senior Site Inspector.
- Develop a suitable cross-training program to allow FEMA field staff to be trained by visiting CRC staff at JFOs, and for field staff to provide similar training for CRC staff at the CRCs. FEMA should establish similar cross-training for Regions, HQ, and others.
- **Recommendation 4.1.B.3:** Provide additional support for PDMGs and other field staff, especially those who have not yet developed the requisite knowledge, training, and experience to carry out their roles and responsibilities under the National Delivery Model.
 - Develop a resource typing standard for PDMGs to differentiate their level of knowledge and experience and assign them disasters and projects accordingly.
 - Analyze the variation in job performance of field staff, noting regional differences in requirements, to formalize standardized, optimized, and repeatable processes.
 - Develop more in-depth job descriptions for key roles and responsibilities, enhanced job aids and tools, improved scripts, and data collection tools. FEMA should continue to develop IAPs at the beginning of each incident to reflect local and/or regional considerations or barriers to access and equity.
 - Arrange for experienced field staff to support PDMGs remotely as needed.
 - FEMA should create a new PA staff position—PA Special Tasks Advisor—to serve in a key policy/advisory role, support leadership in day-to-day decision-making, and be available to provide routine policy/program support to field staff.
 - FEMA should maintain a dedicated cadre of senior FEMA PA subject matter experts assigned to each JFO at the beginning of an incident to provide just-in-time training.
 - Establish a second-level support service available to field staff to be operated by the CRCs with support from other FEMA PA centers of expertise.
 - Establish a cross-functional team of senior representatives from the field organization and the CRCs to develop ways to improve interactions between the two groups and resolve issues more quickly and effectively.
- **Recommendation 4.1.B.4:** Enhance the quality assurance program for PA projects by having the Field Program work more collaboratively with the CRCs to improve training and project development to include the following:
 - Improve oversight to ensure that PD TFLs are fulfilling their responsibilities to provide appropriate training, mentoring and oversight for PDMGs on quality assurance requirements.
 - Arrange for experienced PA personnel to provide remote support for PDMGs to conduct quality assurance reviews prior to document submissions to the CRCs.
 - Jointly establish the Administrative Plan between the FCO, IBDs, the CRC Manager, and the state/tribe/territory consistent with the quality assurance recommendations stated above.
 - Develop field-oriented micro-training aids that can be offered to JFO staff on demand.
 - Develop contingency plans between the FCO, Infrastructure Branch Chief and PD TFLs to address potential turnover of PDMGs and other field staff. Reduce the impact of the

50-week rule on out-of-state field assignments by employing a mix of onsite and remote support over the duration of the project. Enable applicants to select the level of support they desire to include onsite, hybrid onsite/offsite, and remote PDMG support based on their level of experience with FEMA PA.

Conclusion

The National Delivery Model was introduced nationally in 2017 during a record-breaking season for disasters that included Hurricanes Harvey, Irma, and Maria, three of the costliest U.S. hurricanes on record. This period of historically high FEMA operational tempo was exacerbated by the COVID-19 pandemic, which resulted in the first simultaneous Stafford Act declaration for all states and territories. It was in this unprecedented environment that FEMA PA implemented its new program model that successfully obligated more than \$60 billion in public assistance funding for more than 71,000 projects. PA Program accomplishments include the \$28 billion obligated to 8,500 applicants over 20,000 COVID-19 projects in just over 18 months.

This new model to increase accuracy, efficiency, and simplicity and improve timeliness and accessibility through an “assembly line” standardization of project development resulted in some notable best practices. The use of technology in the form of Grants Manager/Grants Portal enabled better communication, transparency, and coordination between applicants and different roles within CRCs. Other cited successes of the program include the streamlining of project requirements, consolidation of the PAPPG, knowledge and customer service of staff, along with availability of trainings. However, the Assessment identified a number of areas for improvement:

- **Organizational Culture:** The analysis of stakeholder feedback revealed significant breakdowns in trust within FEMA and between FEMA and its external customers in the states and territories regarding implementation of the PA Program. Complaints centered on the focus on administrative processes that are disconnected from mission outcomes.
- **Undefined Risk Tolerances:** There is no strategically coherent understanding of agency-desired PA Program outcomes and risk tolerances among FEMA leaders or program staff. The lack of a commonly accepted risk management approach impedes the program. As currently designed, the program is overly segmented and does not effectively advance recovery projects toward the stated intent of the program.
- **Training & Roles:** Workforce issues are two-fold. First, field staff are not adequately trained and/or qualified and lack the experience for their assigned roles. Additionally, PA field staff are not receiving sufficient support from other parts of the PA organization to compensate for these shortcomings. As a result, work product produced by the field fails at times to meet the program goals of quality, accuracy, and efficiency. Second, issues exist with the misalignment of roles, responsibilities, resources, and competencies.

Despite the challenges, there are no data to support eliminating or replacing the National Delivery Model. Going forward, FEMA needs to articulate and fully communicate policy preferences for relative value between key program outcomes and agency risk tolerances; strike a balance between high-tech and high-touch solutions for customer service; and reassess PA Program staff roles and responsibilities, including the training required for all PA staff to perform effectively.

Abbreviation List

BCA	Benefit-Cost Analysis
CAP	Collection Analysis Plan
CAT	Contractor Assessment Team
CFR	Code of Federal Regulations
COR	Contracting Officer Representative
CRC	Consolidated Resource Centers
CSA	Customer Survey and Analysis, FEMA
DDDs	Damage Description and Dimension reports
DI	Damage Inventory
DIU	Document Integrity Unit
DMs	Determinations Memos
DOB	Disaster Overview Briefing
DOP	Disaster Operating Profile
DVS	Document Validation Specialist
EC	Exploratory Call
FCO	Federal Coordinating Officer
EEl	Essential Elements of Information
EHP	environmental or historic preservation
EMAC	Emergency Management Assistance Compact
EMMIE	Emergency Management Mission Integrated Environment
FEMA	Federal Emergency Management Agency
FQS	FEMA Qualification System
GM	Grants Manager
GP	Grants Portal
GPRA	Government Performance and Results Act
IBD	Infrastructure Branch Director
IC	Information Collection
JFO	Joint Field Office
LOE	lines of effort
NAC	National Advisory Council
NEMA	National Emergency Management Association

NIBS	National Institute of Building Sciences
NOAA	National Oceanographic and Atmospheric Administration
OMB	Office of Management and Budget
ORR	Office of Response and Recovery
PA	Public Assistance
PAA	Public Assistance Assessment Survey
PAAP	Public Assistance Alternative Procedures
PAGS	Public Assistance Group Supervisor
PAI	PA Initial Survey
PAPPG	Public Assistance Program and Policy Guide
PATF	PA Task Force
PDA	Preliminary Damage Assessment
PDG	Program Delivery Guide
PDMG	Program Delivery Manager
PNF	private nonprofit facilities
PNP	private nonprofit
POAM	Plan of Action and Milestones
PTBs	Position Task Books
PW	project worksheet
RAD	Recovery Analytics Division
RFI	Request for Information
RFO	Recovery Front Office
RPA	Request for Public Assistance
RPF	Recovery Performance Framework
RTM	Recovery Transition Meeting
SCO	State Coordination Officers
SI	Site Inspector
SIRs	Site Inspection Reports
SLTT	State, Local, Tribal and Territorial
SoW	Scope of Work
SPA	Streamlined Project Application
SRIA	Sandy Recovery Improvement Act
SVI	Social Vulnerability Index
TFL	Task Force Leader
WO	Work Orders

Appendix A: Methodology

In 2017, FEMA launched the Public Assistance (PA) “New” Delivery Model. The “Delivery Model,” as it is currently titled, changed process, roles, and responsibilities, and established new tools and templates based on a systems approach to PA grant program administration. The Delivery Model goals were to enhance PA Program accessibility, accuracy, efficiency, simplicity, and timeliness. In 2022, FEMA recognized the need to assess the Delivery Model to see what was working and where improvements could be made. To this end, FEMA established the Public Assistance Task Force (PATF), which was charged with conducting a gap analysis to determine what

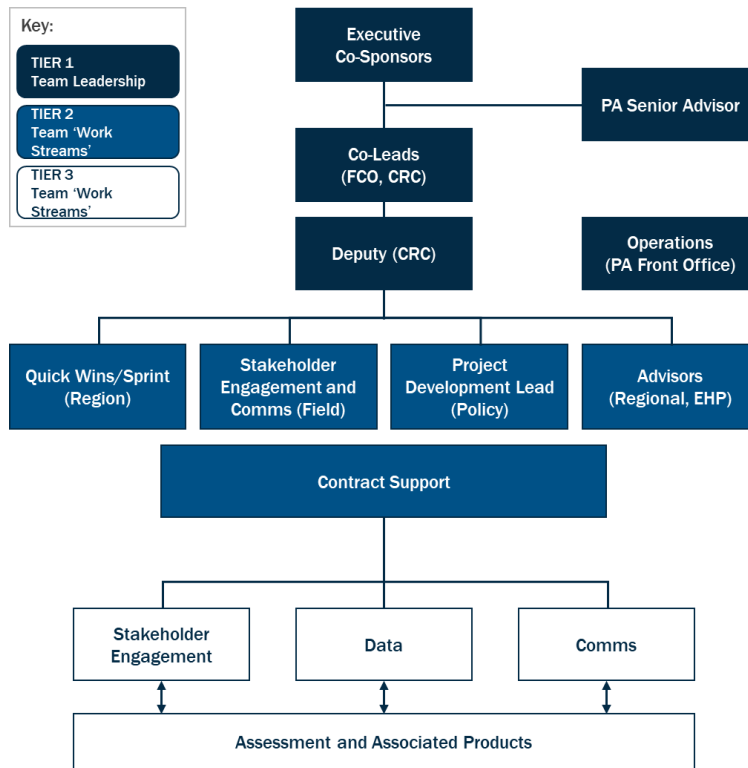
This gap analysis report assesses the successes and areas for improvement identified over the course of the 2022 Assessment of the Delivery Model. The PATF in collaboration with the Contractor Assessment Team (CAT) established a data-driven, mixed-methods approach to the Assessment that focused on collecting internal and external PA stakeholders and assessing that feedback against quantitative and qualitative data sources. The PA goals of accessibility, accuracy, efficiency, simplicity, and timeliness provided an initial framework for evaluating the Delivery Model. As the Assessment progressed, the PATF further defined the focus areas to evaluate: Policy, Communications, Process, and Roles & Responsibilities. The PATF and Assessment Team determined these four areas of evaluation were rich targets for further exploration based on initial stakeholder engagement and that each area had unique impacts on the PA objectives over the course of program execution.

Research Structure

Assessment Team Structure and Collaboration

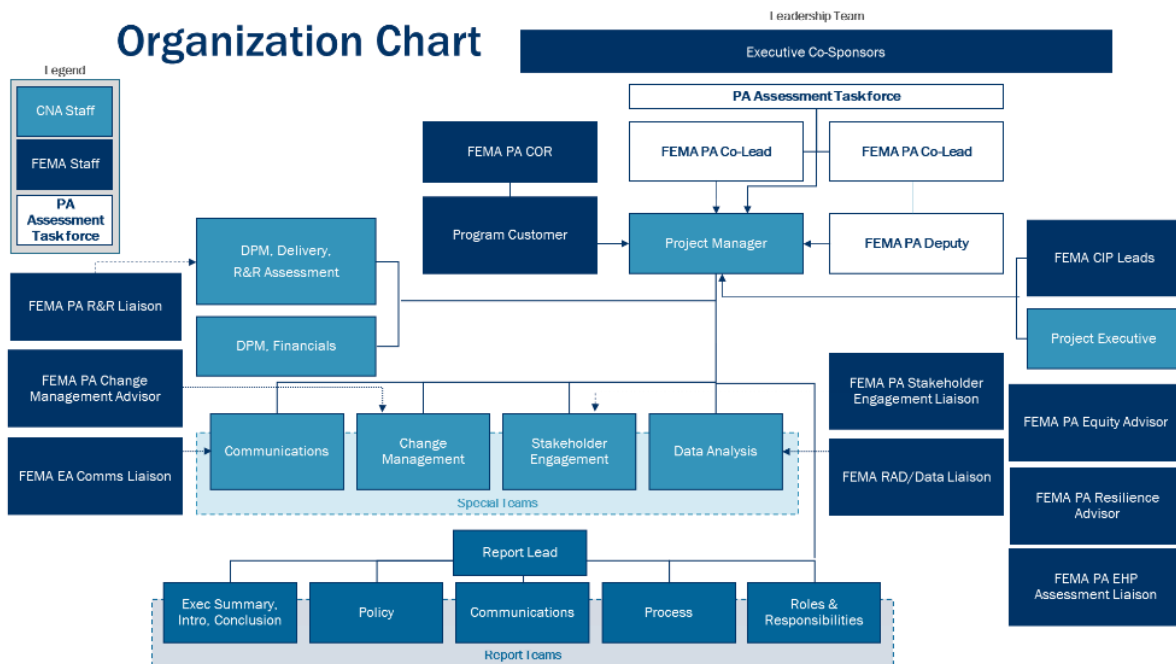
The PATF was established to oversee the PA Program Assessment. Led by senior FEMA PA leadership, the PATF comprised 31 individuals from across the PA enterprise to leverage expertise from the Regions, Consolidated Resource Centers (CRC)s, field, and Recovery Analytics Division (RAD), and HQ. Figure 35 provides the overall structure of the PATF.

Contract support, or Contractor Assessment Team (CAT) was comprised of a team of emergency management professionals, former PA Program specialists, disaster planning and response operations specialists, communications professionals, and qualitative and quantitative analysts. The CAT worked closely with the PATF to design the data collection plan, synthesize the data, and conduct analysis to develop findings and recommendations for the PA Program Assessment. Figure 36 shows the CAT structure and its relation to the PATF.



Source: FEMA Public Assistance Division

Figure 35: PATF Organizational Chart



Source: CNA

Figure 36: Contractor Assessment Team Organizational Structure

The PATF and CAT established a robust meeting cadence and schedule of standard reports to ensure collaboration and to keep PA leadership apprised of Assessment goals and progress (Table 9). Standard reports included:

- Plan of Action and Milestones (POAM)
- Weekly Update for ORR (Office of Response and Recovery)
- 3x3 Weekly Accomplishments
- Ad hoc reports

Table 9: PA Program Assessment Meeting Cadence

Meeting	Cadence	Attendees
Task Force Meeting	Daily	All TF members
Project Management Touchbase	3xWeekly	Co-Leads, PM, Advisor
Leadership Check-in	2xWeekly	Co-Sponsors, Co-Leads, Advisor, PM
Office of Response and Recovery Brief	Bi-Weekly	Co-Sponsors and PATF Co-Lead
Recovery Front Office (RFO) Pre-Brief	Bi-Weekly	Co-Sponsors and PATF Co-Lead
PA Senior Leadership Meeting	Monthly	PA Leadership, BCs, Section Chiefs

In addition to the regular meeting cadence, three all-PATF-CAT offsites were held (two onsite, one virtual). These offsites provided an opportunity for the full Assessment Team to go over data collection and methods, refine Assessment goals and priorities, and closely examine the development of findings and recommendations via CAT-led facilitated, structured discussions.

Data Collection and Analysis

Background analysis began with a literature review of existing PA policy guidance such as *The Public Assistance Program and Policy Guide* Version 4⁹ (PAPPG), previous independent assessments of the PA Program – most notably the 2016 *Public Assistance New Delivery Model Assessment – Stage 1*,¹⁰ as well as evaluations conducted by the FEMA National Advisory Council (NAC), National Emergency Management Association (NEMA), after action reports, and transcripts of previously held congressional oversight hearings. The PATF conducted initial outreach with internal PA stakeholders,

⁹ [FEMA PAPPG V4.pdf](#)

¹⁰ [PA New Model Assessment Report 2016-09-06 Stage1.pdf](#)

which was intended to gauge a baseline for the PA Program Assessment. PA stakeholders at the regional level were asked to respond to the following questions:

- What are 3 – 5 things that have been positive from the “Delivery Model”?
- What are 3 – 5 things that could still be improved in the delivery of PA?
- How do you feel the coordination is going between your Region and the CRC?
- Do you have any suggestions for improvement with the CRCs, in general?

Stakeholder responses to the initial PATF engagement effort and data from the literature review were collected by the CAT and entered into the first iteration of the Stakeholder Feedback Matrix. The CAT organized and synthesized these inputs, analyzing the data set for common themes, sentiment, and key takeaways. This analysis helped the Assessment Team refine the areas of evaluation and provided insights into the development of the Collection Analysis Plan (CAP) for the gap analysis. The CAP was developed by the Assessment Team in order to define the scope of the gap analysis and parameters of the methodology. The CAP focused on the original framework for evaluation using the PA Delivery Model goals, linking the objectives to specific question sets related to process, roles, policy, and customer experience. The question sets within the CAP were designed to evaluate program performance against the existing PA performance metric framework – the Recovery Performance Framework (RPF) maintained by FEMA’s Recovery Analytics Division (RAD). As the areas of evaluation evolved from Delivery Model goals to Process, Roles and Responsibilities, Communications, and Policy, the CAP remained a tool to ground the analysis and link the Assessment to the intent of the Delivery Model goals.

Stakeholder Engagement

The central effort of the PA Program Assessment was stakeholder engagement. The Assessment Team developed a stakeholder engagement plan with built out lines of inquiry, however, the PATF determined that the initial stakeholder engagement questions would remain the basis for stakeholder engagement in order to provide consistency. The PA Assessment Team engaged internal and external stakeholders to understand how SLTT customers experience the program as well as to identify internal operational challenges. The stakeholder engagement process provided an opportunity for the Assessment Team to gain in-depth, nuanced, and inclusive insights in the PA customer experience and provided stakeholders a role in participating actively in discussions about continuous improvement to PA Program delivery. There were three main lines of effort (LOE) for stakeholder engagement: Interviews and listening sessions, a select field staff survey, and applicant interviews conducted by FEMA’s Customer Survey & Analysis section. Figure 5 in the Executive Summary shows the size and reach of the stakeholder engagement process.

Interviews and Listening Sessions

The first, and largest effort, was the stakeholder facilitated engagements (interviews and listening sessions). This effort was conducted in 2 phases. During the first phase, the Assessment Team conducted interviews and listening sessions with FEMA leadership, region, field employees, and external representatives across all 10 Regions. Over the course of the Assessment, the Assessment

Team met with representatives from all 50 states, 5 U.S. territories, and 9 tribes. Data collection was conducted from February 2022 to June 2022.

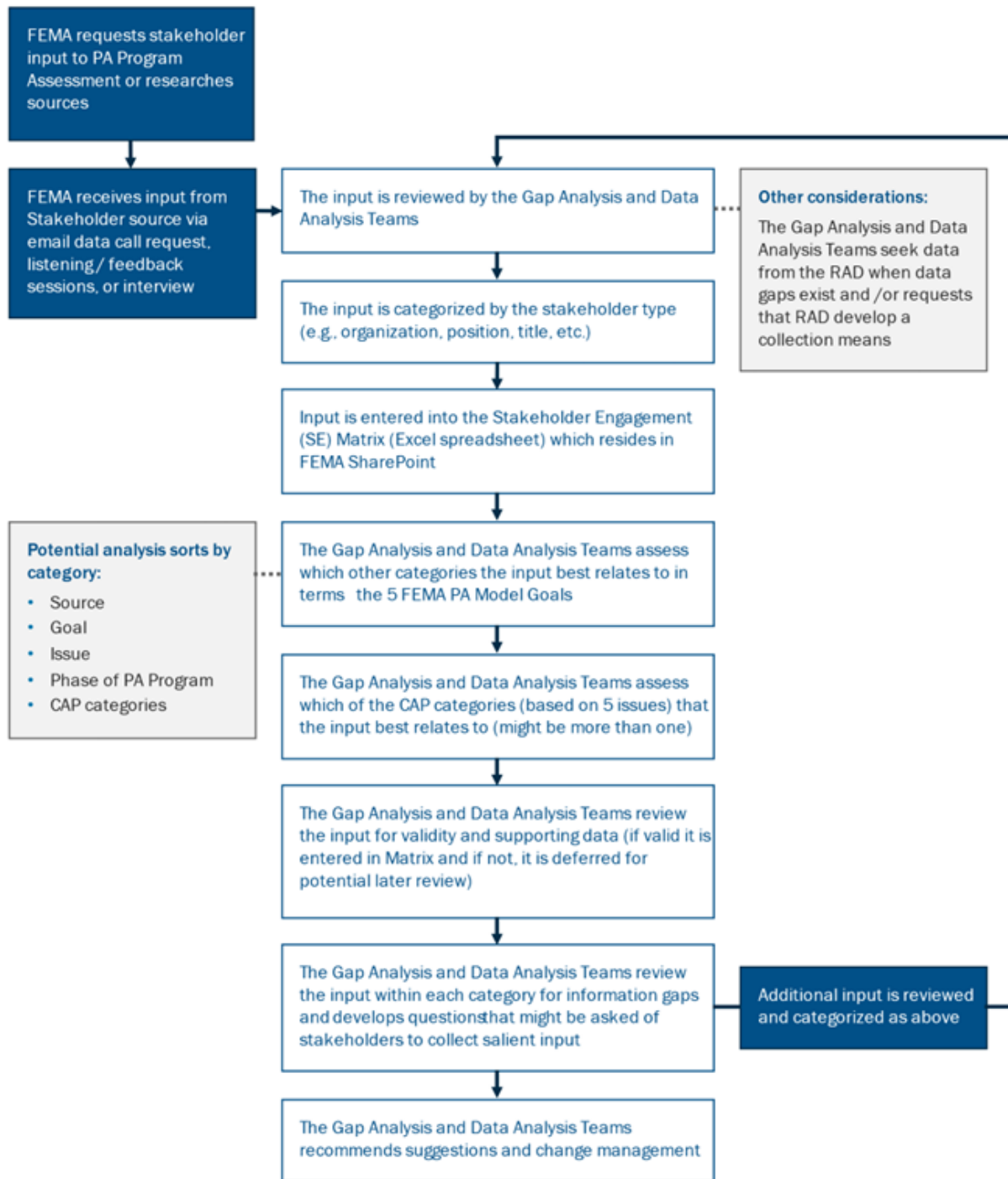
Examples of internal stakeholders engaged as part of this effort include:

- Regional Administrators, Regional Recovery Division Directors, Regional PA Branch Chiefs, EHP Branch Chiefs
- Consolidated Resource Center (CRC) Directors
- Joint Field Offices (JFO)
- Federal Coordinating Officers (FCO)
- Program Delivery Manager Task Force Leads (TFL) for Program
- Site Inspector TFLs
- CRC Lane Leads
- Program Delivery Managers (PDMGs)
- Site Inspectors (SI)
- CRC Specialists (e.g., development lanes, EHP, insurance, quality assurance, etc.)
- Mitigation Specialists
- EHP Specialists (field/Region)

Examples of SLTT stakeholders the Assessment Team engaged include:

- State Emergency Management Directors & Staff
- State Staff Counterparts (state-led events)
- State Coordination Officers (SCO)
- County Emergency Management Directors & Staff
- City Emergency Management Directors & Staff
- Tribal Applicants
- Tribal Emergency Management Directors & Staff
- Territorial Applicants
- Territorial Emergency Management Directors & Staff

The CAT developed a standardized process to ensure accurate and thorough data collection and analysis of stakeholder feedback. The Stakeholder Feedback Matrix, originally developed during the initial outreach effort, was further built out capture the many nuanced insights that were collected during this period. The Data Analysis Team within the CAT organized the inputs in line with the objectives and priorities in the CAP. During the analysis phase, the CAT worked with RAD to verify and validate information collected from stakeholders with RAD's quantitative data sets. The information was then categorized by area of evaluation and pushed to the gap analysis team to inform their findings and recommendations. This process provided a consistent method for quantifying large volumes of disparate qualitative data received from multiple stakeholders. The CAT controlled for assumptions and human error by having multiple analysts reviews the matrix for accuracy and consistency. The stakeholder input and data collection process is outlined in Figure 37.



Source: CNA

Figure 37: Process of Stakeholder Input into Data

A second phase of stakeholder engagement was initiated after the Assessment Team had drafted a set of recommendations. Phase 2 was intended to provide stakeholders with an opportunity to comment on the Assessment Team’s findings and recommendations. The Assessment Team held 9 listening sessions which included approximately 1,450 participants to solicit this feedback, which helped shape the final gap analysis recommendations.

Select Field Staff Survey

The second line of effort of the stakeholder engagement process was the select field staff survey. The Assessment Team developed a 29-question survey which was administered to PDMGs, PAGS, IBDs, CRC Specialists, TFLs, and SIs from FEMA's 10 Regions, HQ, CRCs, and JFOs. The survey received 1,272 responses. The survey was designed to gauge FEMA employees' (full time, part time, reservist, CORE, contractor, and local hires) sentiments regarding their training, guidance they received pertaining to their roles and responsibilities, understanding of PA policy and process, and how they feel they are prepared to do their job. The survey was also designed to engage employee sentiments about what they see as the main benefits and areas of improvement regarding the Delivery Model. Responses from the survey were collected and analyzed by the Assessment Team. Open-ended responses were coded using NVivo software against the areas of evaluation. Survey respondents were also invited to participate in the Phase 2 listening sessions in order to provide a field perspective on the draft findings and recommendations.

Applicant Interviews

The third line of effort under stakeholder engagement was outreach to FEMA applicants. This portion of the Assessment was conducted by FEMA Customer Survey and Analysis (CSA). CSA conducted interviews to collect applicant feedback on the PA National Delivery Model.

The Customer Survey and Analysis (CSA) Section was responsible for survey design and administration in order to be an independent, third party to evaluate the Delivery Model. In-depth interviews with PA applicants were conducted in May 2022 to support the Assessment Team's data gathering process.

CSA's selected criteria for disaster selection was as follows:

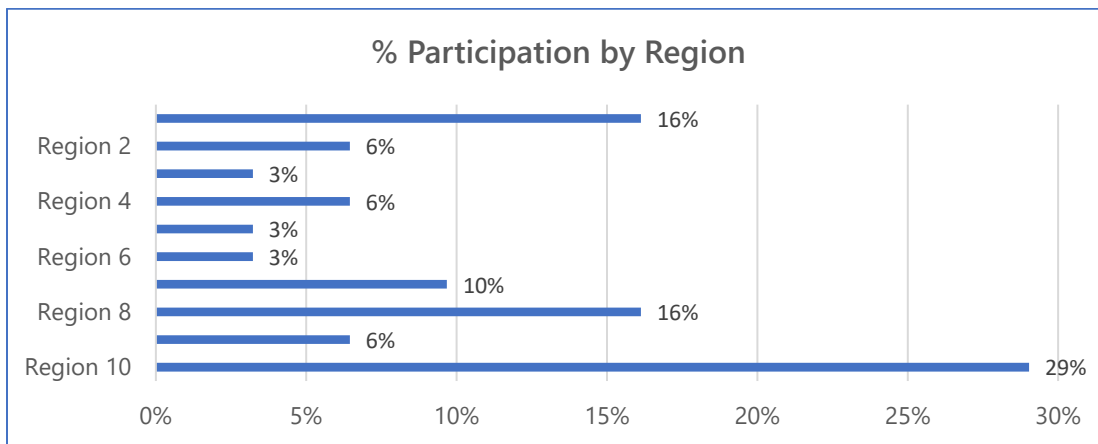
- Disasters that were declared from 2019 to 2022 were considered. This is to ensure the applicants interviewed still could recall events, will be less likely to confuse their memory with other disasters, and have experienced the program as it is currently implemented.
- Two disasters per Region were included. This is to ensure all Regions had as equal chance to participate as possible.
- Four COVID disasters were added to the list.
- One extra tribal disaster was added to the list. There was also one other tribal event included that was randomly selected during the process of selecting two disasters per Region. There was also some representation of tribal applicants that were randomly selected for participation from other disasters.
- The final list was reviewed to ensure most disaster types were represented.
- This finalized list was approved by the PA Assessment Team as the basis for participant selection.

Criteria for participant selection was as follows:

- The applicant must have been involved in declared event using the National Delivery Model. Twenty-five declarations were chosen for participation (Appendix A). This sample included events representing all Regions, with varying event sizes and disaster types included.
- The applicant must have at least one project obligated, to ensure they have been through as much of the process as possible and could speak on their entire experience.
- The applicant must have a phone number on file, to ensure they could be contacted to schedule an interview.

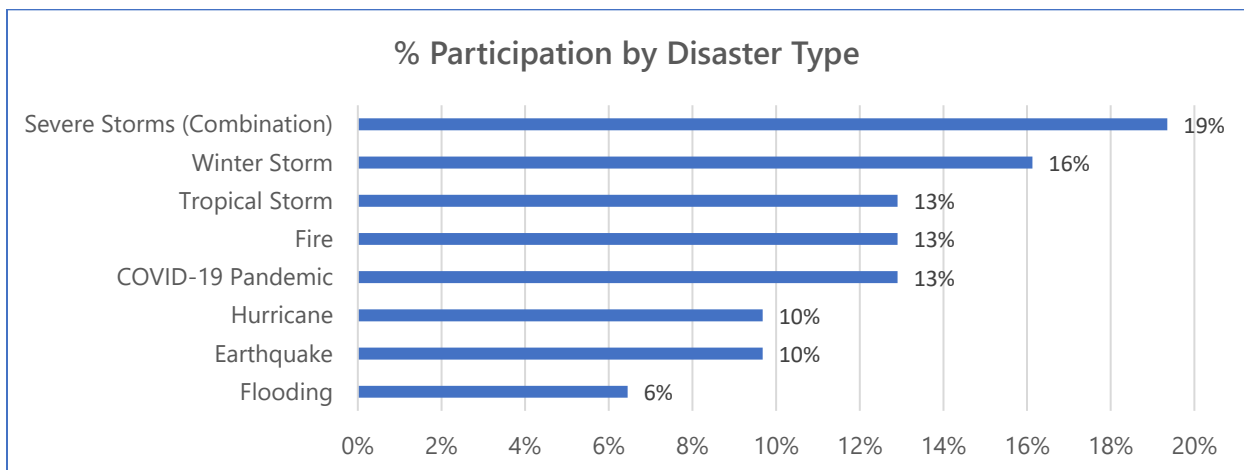
Thirty-one applicants were interviewed, while some interviews included multiple participants each. In total, 42 people participated in the interviews. Interviews were comprised of city, county, regional, statewide, tribal, nonprofit, and special district entities.

Figures 38-40 highlight CSA’s capture of participation by region, disaster type, and social vulnerability index.



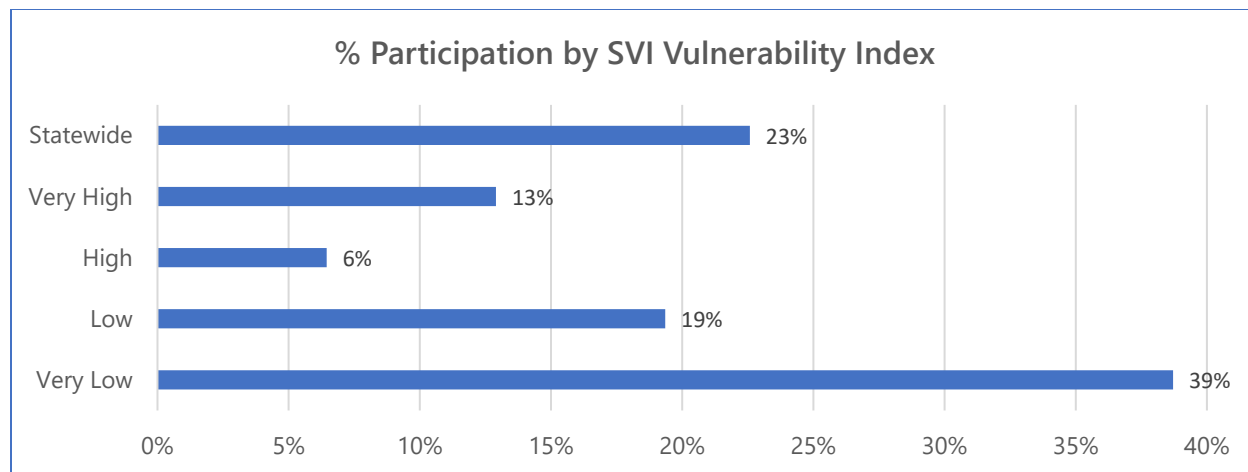
Source: FEMA Customer Surveys and Analysis

Figure 38: CSA Applicant Interviews % Participation by Region



Source: FEMA Customer Surveys and Analysis

Figure 39: CSA Applicant Interviews % Participation by Disaster Type



Source: FEMA Customer Surveys and Analysis

Figure 40: CSA Applicant Interviews % Participation by SVI Vulnerability Index

The Assessment Team created a separate feedback matrix for CSA interview data which was in parallel to the stakeholder engagement feedback matrix. This was done to ensure that the information gleaned from applicants was kept distinct and handled separately from other stakeholder feedback. The CAT applied the same methods for organizing and synthesizing applicant data, including multiple reviews for organizational consistency and assumptions checks.

Findings Development

The Assessment Team identified key findings from the data collection and analysis processes. The gap analysis team used structured findings worksheets to work through the details of the issues, strengths, and areas for improvements identified during the three stakeholder engagement levels of effort. This structured approach to findings development helped the gap analysis teams to link their findings to the data. Preliminary findings were shared with the PATF, and the second all-Assessment Team offsite was dedicated to reviewing the findings for validity, accuracy, and potential recommendations. From this process, the section leads further developed their analysis, with an emphasis on root cause analysis, in order to develop actionable recommendations.

Recommendations

Once recommendations were developed based on the gap analysis findings, the Assessment Team socialized the recommendations with relevant offices and FEMA leadership (Phase 2 of the stakeholder engagement interviews/listening sessions). The recommendations in this report reflect insights and suggestions gleaned from this engagement and are not solely based on data analysis. This collaborative engagement helped ensure that the recommendations were developed at the right level, were directed at the correct audience, and provided guidance for the implementing office or leader on courses of action for potential implementation.

Appendix B: References

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- i Public Assistance Program and Policy Guide, Version 4; June 1, 2020 (FP 104-009-2)
- ii The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as Amended (Stafford Act), Title 42 of the United States Code (U.S.C.) (www.fema.gov/disasters/stafford-act)
- iii *Ibid.*
- iv Public Assistance New Delivery Model Assessment – Stage 1, August 31, 2016
- v *Ibid.*
- vi *Ibid.*
- vii *Ibid.*
- viii Public Assistance Direct Application Process Assessment Report, FEMA Continuous Improvement Program, June 2021
- ix National Advisory Council (NAC) Report to the Administrator, December 2021
- x Recommendations to Streamlining FEMA Public Assistance, National Emergency Management Association, September 2021
- xi NEMA Recommendation Letter
- xii PA Program Reengineering: Share Phase Discussion, January 2015
- xiii NAC Report.
- xiv Congressional Hearing - Stakeholder Perspectives (2.16.22)
- xv RAD RPF data
- xvi RAD PAI Survey Q16a
- xvii RAD RPF data
- xviii RAD PAA Survey, Q25a
- xix NAC Report
- xx Congressional Hearing: Stakeholder Perspectives, 2.16.22; FEMA Meeting, May 2022
- xxi Congressional Research Service: FEMA's Public Assistance Program: A Primer and Considerations for Congress. 4.1.21
- xxii Government Accountability Office: Puerto Rico Hurricanes: Status of FEMA Funding, Oversight, and Recovery Challenges, 3.2019
- xxiii RAD PA Equity Analysis, 2021.
- xxiv RAD PA Equity Analysis
- xxv Congressional Hearing Stakeholder Perspectives notes
- xxvi Rep. Guest – MS/ Congressional Hearing Stakeholder Perspectives notes
- xxvii NAC Report
- xxviii, Public Assistance Program Delivery Guide March 2022 (Operational Draft)
- xxix 2 CFR section 200.400
- xxx Public Assistance Program and Policy Guide, v4, 2020, p.36.
- xxxi Id at 77
- xxxii Public Assistance Program Delivery Guide March 2022 (Operational Draft), Chapter 2; & Appendix F.
- xxxiii Public Assistance Program Delivery Guide March 2022 (Operational Draft), Appendix F
- xxxiv *Ibid.*
- xxxv Stafford Act
- xxxvi NAC Report
- xxxvii NAC Report
- xxxviii FEMA Meeting, April 2022
- xxxix McKinsey Report, Nov. 2014
- xl McKinsey Report, Nov. 2014
- xli RAD, Public Assistance Assessment Time In Phase Analysis For Phases 2 To 5.
- xlii RAD, Public Assistance Assessment, Time In Phase Analysis For Phases 2 To 5
- xliii McKinsey Report, Nov. 2014
- xliv FEMA Directive #112-12 version 2, pp. 1, 10-12
- xlv FEMA Directive #112-12 version 2, Phase 4: Adjudication and Revision, pp.7-8
- xlvi Rad PA Performance Data
- xlvii RAD PA Performance Data
- xlviii RAD PA Performance Data

xlix RAD PA Performance Data

l Congressional Hearing - Stakeholder Perspectives (2.16.22) - Notes.

li NAC Report

lii RAD PA Performance Data

liii NAC Report

liiv NAC Report

This report was written by CNA's Safety and Security Division (SAS).

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