Public Assistance Alternative Procedures Pilot Program – Debris Removal Standard Operating Procedures

FEMA

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Standard Operating Procedures

A. Purpose and Applicability

This Public Assistance (PA) Alternative Procedures Pilot Program for Debris Removal (Debris Pilot) - Standard Operating Procedures (SOP) applies to debris removal subgrants in all major disasters and emergencies declared on or after June 28, 2013. The Debris Pilot will remain in place for one (1) year, at which point the Federal Emergency Management Agency (FEMA) will assess the pilot's effectiveness at achieving its goals.

This SOP outlines procedures for documenting and processing requests for federal disaster assistance under the Debris Pilot. The requirements and procedural information outlined in this document are to ensure that the program is consistently implemented and resulting information is captured in a manner that will allow for effective data collection and analysis. Data will be gathered and used to determine whether to discontinue the Debris Pilot until regulations are promulgated, or extend it for an additional performance period. Therefore, it is critical that the tools and processes outlined throughout this SOP be used for data tracking and reporting purposes.

B. Subgrantee Participation

The Public Assistance Crew Leader (PACL) will explain the Debris Pilot at the Kickoff Meeting in order to ensure a thorough discussion of the Subgrantee's options. Upon completion of the Kickoff Meeting, the Subgrantee should indicate if it is interested in participating in the Debris Pilot and sign the *Public Assistance Alternative Procedures Pilot Program for Debris Acknowledgement* (Appendix A). The PACL must attach the signed form to the first applicable Subgrant Application/Project Worksheet (subgrant) and the Case Management File (CMF). The PACL must note in the CMF that the Subgrantee is "Participating in Alternative Procedures for Debris Removal" or "Not Participating in Alternative Procedures for Debris Removal".

The Subgrantee can reverse or modify its decision to participate up to the point the subgrant is obligated. If the Subgrantee initially decided to participate in a procedure and later (prior to subgrant obligation) decides to not participate, the PACL needs to record this in the CMF. The Subgrantee may rescind its participation by submitting the *Rescind Participation in the Alternative Procedures Pilot Program – Debris Removal* letter (Appendix B). Once the subgrant is obligated, the Subgrantee may not rescind from the procedure.

C. Project Formulation

1. EMMIE Project Title Number/Cost Codes/Standard Comments

FEMA has established national standard project title numbers, cost codes and standard comments to capture and report data and **must** be used at all Joint Field Offices and Regional Offices. Project Title 120 Debris Alternative Procedures must be used for any subgrant that includes any of the alternative procedures for debris removal.

Title Number	Subgrant Title
120	Debris Alternative Procedures

The following Debris Pilot cost codes must be used in the cost section on all applicable subgrants. If a de-obligation is necessary, use the appropriate corresponding cost code and a negative dollar amount.

Cost Codes for Debris Pilot		
Cost Code Number	Cost Code Description	
9221	PAAP Accelerated Debris Removal 0-30 days – 85% Federal Share	No value
9222	PAAP Accelerated Debris Removal 31-90 days – 80% Federal Share	No value
9223	PAAP Accelerated Debris Removal 91-180 days – 75% Federal Share	No value
9224	PAAP Debris Recycling Revenues	$$
9225	PAAP Debris Recycling Revenue Offset	$$
9226	Force Account Labor (Straight-Time) – Debris Removal*	$$
9227	Force Account Labor (Over-Time) – Debris Removal*	$$
9228	PAAP One-Time 2% Incentive for Debris Management Plan	No value
9229	Force Account Labor (Straight-Time) – Debris Monitoring*	$$
9230	Force Account Labor (Over-Time) – Debris Monitoring*	$$
9231	Contract – Debris Removal*	$$
9232	Contract – Debris Monitoring*	$$

*The six (6) new cost codes for force account and contract debris removal and monitoring must be used on all debris removal subgrants, not just those participating in the Debris Pilot.

See Appendix C for the standard comments to be used for Debris Pilot subgrants.

Staff must continue to use the standard cost codes that are in EMMIE (common cost codes are shown below). Cost Code 9999 is NOT to be used as it will cause inaccurate data collections.

Cost Codes for Commonly Claimed Costs	
Cost Code Number	Cost Code Description
9004	Rented Equipment
9008	Equipment (Force Account)
9009	Material
9901	DAC Subgrantee
9902	DAC Grantee

2. Accelerated Debris Removal--Increased Federal Cost Share (Sliding Scale) Procedure

When a Subgrantee has elected to participate in the Accelerated Debris Removal – Increased Federal Cost Share (Sliding Scale) Procedure, the debris removal work performed within each timeframe specified in the table must be documented either on separate subgrants or versions in order to obligate the costs with the appropriate Federal cost share. FEMA must select the appropriate cost share for each subgrant/version in the final review queue in EMMIE. FEMA must validate that the Federal cost share is accurate prior to obligating the subgrant.

All subgrants and/or versions must be prepared based on the actual costs of the debris removal work completed during each timeframe. They should not be prepared based on estimates. The corresponding cost code must be used for reporting purposes. The applicable standard comment from Appendix C (19, 20, or 21, depending on the timeframe) must be noted in subgrants that include the Sliding Scale Procedure.

Cost Code	Debris Removal Completed (Days from Start of Incident Period)	Federal Cost Share
9221	0-30	85%
9222	31-90	80%
9223	91-180	75%
No federal dollars for debris removal after 180 days (unless extended by FEMA)		

The following is an example when documenting each timeframe with versions instead of separate subgrants (for this example, the Subgrantee removed the debris with contract labor and used force account to monitor the debris removal):

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9999	***Version 0***	1	LS	N/A	N/A
9221	PAAP Accelerated Debris Removal 0-30 days - 85% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	$actual costs	$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9999	***Version 1***	1	LS	N/A	N/A
9222	PAAP Accelerated Debris Removal 31-90 days - 80% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	$actual costs	$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9999	***Version 2***	1	LS	N/A	N/A
9223	PAAP Accelerated Debris Removal 91-180 days - 75% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	$actual costs	$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
				Total Cost:	**$**

3. Straight-Time Force Account Labor Procedure

When a Subgrantee has elected to participate in the Straight-Time Force Account Labor Procedure, the base wages with associated fringe benefits must be captured under cost codes 9226 (debris removal) and 9229 (debris monitoring). The overtime wages with associated fringe benefits must be captured under cost code 9227 (debris removal) and 9230 (debris monitoring). Subgrantees must keep detailed hourly records for each employee and extra hire assigned to debris removal activities. This procedure can be applied to both large and small subgrants. Standard comment 22 must be noted in any subgrant that includes the Straight-Time Force Account Labor Procedure.

Example using Straight Time Force Account Labor Procedure (showing both force account debris removal and force account monitoring of a debris removal contractor):

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9008	Equipment	1	LS	$actual costs	$actual costs
9226	Force Account Labor (Straight-Time) – Debris Removal	1	LS	$actual costs	$actual costs
9227	Force Account Labor (Over Time) – Debris Removal	1	LS	$actual costs	$actual costs
9231	Contract – Debris Removal	1	LS	$actual costs	$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9230	Force Account Labor (Over Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
				Total Cost:	**$**

4. Recycling Revenue Procedure

When a Subgrantee elects to use the Recycling Revenue Procedure, it should provide documentation of any revenue received no later than 30 days after completion of the debris removal operation. In order to retain revenue received, the Subgrantee must use the revenue prior to the period of performance deadline toward an approved purpose. Any use of revenue for expenditures such as equipment or training would not require additional EHP review; however, should funds be applied for a project that involves ground disturbing activities would require EHP review prior to construction. Additionally, when applicable, Subgrantee must provide documentation demonstrating compliance with the Resource Conservation and Recovery Act (RCRA). The Subgrantee should provide an accounting of how the revenue was used no later than 30 days after the period of performance deadline.

The Recycling Revenue Procedure **requires both an obligation line item (9224) and a de-obligation/offset line item (9225)**. The net total of the two line items must "zero" out, unless the Subgrantee receives revenue that they are not using for an authorized purpose in which case the net result would be a negative amount. This provides a method to capture data in EMMIE in order to report the outcome and usage of the Recycling Revenue Procedure. Standard comment 23 must be noted in any subgrant that includes the Recycling Revenue Procedure.

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9224	PAAP Debris Recycling Revenues	1	LS	$actual costs	$actual costs
9225	PAAP Debris Recycling Revenue Offset	1	LS	(-$actual costs)	(-$actual costs)
				Total Cost:	**$0**

5. Debris Management Plan Procedure

If a Subgrantee has a FEMA-accepted Debris Management Plan (Plan) and one (1) or more pre-qualified debris removal contractors by the date of declaration and elects to receive the one-time two percent Federal cost share increase incentive, the PACL must attach a copy of FEMA's *Debris Management Plan Acceptance Letter* to the CMF. Reference the *Debris Management Plan Review Job Aid* and FEMA 325 *Public Assistance Debris Management Guide* for details regarding development and review of a Plan.

As this procedure is limited to the first 90 days of debris removal, beginning the first day of the incident period, any debris removal costs incurred after day 90 must be captured on a separate subgrant or version.

The federal cost share will be increased by two percent during the final review phase in EMMIE, not in the cost section of the subgrant. However, cost code 9228 must still be used (with no dollar amount listed) for the purpose of automated data collection. Use of this code allows a report to summarize how many subgrants include the use of this procedure. Standard comment 24 must be noted in any subgrant that includes the Debris Management Plan Procedure.

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9228	PAAP One-Time 2% Incentive for Debris Management Plan	1	LS	N/A	N/A
9231	Contract Costs – Debris Removal	1	LS	$actual costs	$actual costs
				Total Cost:	**$**

6. Using Multiple Debris Removal Alternative Procedures

All four (4) procedures (or any combination therein) may be combined on a subgrant. The Subgrantee must determine which procedures they wish to pilot prior to the obligation of subgrants. If multiple procedures are applied to a single subgrant, all applicable cost codes must be included for each procedure.

The following example shows three (3) procedures being used: Accelerated Debris Removal from Day 0-30; Debris Management Plan, and Straight-Time Force Account Labor (for this example, separate subgrants are being prepared for each timeframe and the Subgrantee did not use any contract labor during the first 30 days):

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9009	Material	1	LS	$actual costs	$actual costs
9221	PAAP Accelerated Debris Removal Actual Costs Day 0-30	1	LS	N/A	N/A
9228	PAAP One Time 2% Incentive for Debris Management Plan	1	LS	N/A	N/A
9226	Force Account Labor (Straight-Time) – Debris Removal	1	LS	$actual costs	$actual costs
9227	Force Account Labor (Overtime) – Debris Removal	1	LS	$actual costs	$actual costs
				Total Cost:	**$**

APPENDICES

Appendix A – Public Assistance Alternative Procedures Pilot Program for Debris Removal Acknowledgement

Appendix B – Rescind Participation in the Public Assistance Alternative Procedures Pilot Program for Debris Removal

Appendix C – Standard Comments for Debris Pilot

Appendix D – Example Subgrant with Combined Debris Removal Alternative Procedures

Appendix E – Debris Pilot Data Collection

APPENDIX - A

Public Assistance Alternative Procedures Pilot Program for Debris Removal Acknowledgement

In accordance with the Sandy Recovery Improvement Act of 2013, the Federal Emergency Management Agency (FEMA) is implementing alternative procedures for the Public Assistance (PA) Program through a pilot program. As a representative of the Subgrantee, I understand the following.

1. The pilot includes the following elements for debris removal:
   - ☐ An incentive for accelerated debris removal by providing an increased federal cost share (sliding scale)
   - ☐ Subgrantee retention of income from debris recycling without a grant offset
   - ☐ Financial incentive for a FEMA-accepted debris management plan and identification of at least one pre-qualified contractor
   - ☐ Reimbursement of straight time force account labor costs for debris removal
2. The pilot is voluntary, and a Subgrantee may participate in alternative procedures for one or more subgrants.
3. For debris removal, the Subgrantee acknowledges applicable timelines, including the requirement to complete debris operations within six months; and that FEMA may request joint quantity evaluations and details regarding Subgrantee operations.
4. All contracts must comply with local, State, and Federal requirements for procurement, including provisions of 44 CFR Part 13.
5. The Subgrantee must comply with all Federal, State and local environmental and historic preservation laws, regulations, and ordinances.
6. The Office of Inspector General may audit any Subgrantee and/or subgrant.
7. Once a subgrant is awarded/obligated using a debris removal alternative procedure, the subgrant cannot revert back to standard procedures.

Signature of Subgrantee's Authorized Representative Date

Printed Name and Title

Subgrantee Name PA ID Number

☐ We elect to participate in the Alternative Procedures for Debris Removal selected above.

☐ We elect to **not** participate in the Alternative Procedures for Debris Removal.

APPENDIX - B

Rescind Participation in the Alternative Procedures Pilot Program for Debris Removal

(DATE)

(ADDRESS)

To FEMA:

As a Public Assistance (PA) Subgrantee (LIST NAME OF SUBGRANTEE, PA ID Number: _____), and in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), we have decided to **rescind** our participation in the PA Alternative Procedures Pilot for Debris Removal for the following procedures:

- ☐ Accelerated Debris Removal Incentive [incentive for accelerated debris removal by providing an increased federal cost share (sliding scale)]
- ☐ Recycling Revenues (Subgrantee retention of income from debris recycling without a grant offset)
- ☐ Reimbursement for Straight-Time Force Account Labor
- ☐ One-Time Incentive for Debris Management Plan

We recognize that rescinding is only available prior to obligation of the debris removal subgrant.

_____ _____
Signature of Subgrantee's Authorized Representative Date

_____
Printed Name and Title

_____ _____
Signature of Grantee's Authorized Representative Date

_____
Printed Name and Title

APPENDIX - C

Standard Comments for Debris Pilot

Standard Comment Number:	Standard General Comment:
19	**Accelerated Debris Removal (85% Federal Share)**: Subgrantee has chosen to participate in the Accelerated Debris Removal Alternative Procedure. This covers debris removal activities from day 0-30 after the start of the incident period reimbursable at the authorized 85% Federal Share.
20	**Accelerated Debris Removal (80% Federal Share)**: Subgrantee has chosen to participate in the Accelerated Debris Removal Alternative Procedure. This covers debris removal activities from days 31-90 reimbursable at the authorized 80% Federal Share.
21	**Accelerated Debris Removal (75% Federal Share)**: Subgrantee has chosen to participate in the Accelerated Debris Removal Alternative Procedure. This covers debris removal activities from day 91-180 reimbursable at 75% Federal Share.
22	**Force Account Labor (Straight-Time):** Subgrantee has chosen to participate in the Straight-Time Force Account Labor Alternative Procedure for Debris Removal. As a result, straight-time force account labor, including fringe benefits, will be reimbursed on the PW.
23	**Recycling Revenues:** Subgrantee has chosen to participate in the Recycling Revenue Alternative Procedure. There will be no salvage value deducted for debris recycling revenue. The Subgrantee will provide an accounting of revenue received from the recycling of debris and an accounting of how the revenue was spent.
24	**One-time Incentive for Debris Management Plan**: This Subgrantee has a FEMA accepted Debris Management Plan. For this event, the Subgrantee has requested to use the Debris Management Plan Alternative Procedure and will receive a one-time Federal cost share increase of 2% for its debris removal operations during the first 90 days from the start of the incident period.

APPENDIX – D

Example Subgrant with Multiple Debris Removal Alternative Procedures

The following example Subgrant combines three (3) Alternative Procedures (Debris Management Plan, Accelerated Debris Removal and Straight Time Force Account Labor):

Project Description	
Disaster Number:	4125
Pre-Application Number:	PA-08-SD-4125-RPA-0010
Applicant ID:	014-49211-00
Applicant Name:	MOORE
Subdivision:	Participating
Project Number:	MOO1ARP
Standard Project Number/Title:	120 - Debris Alternative Procedures
Please Indicate the Project Type:	Neither Alternate nor Improved
Application Title:	Accelerated Debris Removal, Debris Management Plan Incentive, and Straight-time
Category:	A.DEBRIS REMOVAL
Percentage Work Completed?	36.0 %
As of Date:	08-04-2013

Example Damage Description and Dimensions – Multiple Alternative Procedures:

As a direct result of severe storms, flooding and tornadoes occurring during the incident period of July 1 through July 14, 2013, the Town of Moore sustained widespread C&D debris, downed trees, hazardous hanging limbs, hazardous trees, white goods, e-waste, and hazardous house hold materials on public property and right-of-ways within the Town, which posed a threat to public health and safety and inhibited emergency vehicles from responding to the emergency. Estimates compiled by field inspections indicate approximately ## tons (## CYs) of debris throughout the area.

This PW only addresses the first thirty day period from July 1 through July 31, 2013. Additional PWs will be prepared to facilitate the various cost shares.

Example Scope of Work – Multiple Alternative Procedures with Accelerated Federal Share from 0-30 Days:

Work Completed through July 31, 2013, (30 days from the start of the incident period):

The Subgrantee elected to participate in the Alternative Procedures Pilot Program for Debris Removal (see CMF for signed acknowledgement). The Subgrantee wants to participate in Accelerated Debris Removal, Debris Management Plan; and Straight Time Force Account Labor Procedures.

Debris Removal: The Town hired Contractor to remove debris throughout the Town. Contractor Name hauled ## CYs vegetative debris, ## CYs C&D, ## CYs White Goods, and ## CYs sand. They extracted ## stumps greater than 24 inches (photos & GPS are attached). They removed ## hazardous leaning trees greater than 6 inches (listing with photos & GPS attached). They removed ## hanging limbs greater than 2 inches in diameter (photos & GPS attached.

Monitoring: They used force account labor and equipment to monitor the contracted debris operations at both the pick-up site and the temporary staging site. Cost incurred in this 30 day period was $## for XX hours.

Disposal (attach permits): The vegetative debris was taken to a temporary staging area located at xxxx. It was chipped at the temporary staging area and then hauled to x for final disposal. The C&D and White Goods were hauled to a permanent landfill located at (Latitude and Longitude - address) Permit number if known for final disposal.

Leased landfill (attach lease): XX landfill is being leased. A copy of the lease is attached.
Contracts (attach copies, including any bid documents): The applicant's contract with Contractor Name was a competitively bid, unit price contract.

Documents reviewed: FEMA reviewed a sampling of the following supporting documentation (attached): Load Tickets, Monitoring Reports, Permits, Timesheets, Overtime Policy, Bid documents, Contracts, Task Orders, Lease Agreements, Mutual Aid Agreements, Invoices, Photographs and GPS Locations of Hazardous Trees, Photographs and GPS Locations of Hanging Limbs, Photographs and GPS Locations of Stumps, Other…

Insert Standard Comment Numbers 19, 22, and 24

Code	Material and/or Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
9008	Equipment	1	LS	$actual costs	$actual costs
9221	PAAP Accelerated Debris Removal Actual Costs Day 0-30	1	LS	N/A	N/A
9228	PAAP One Time 2% Incentive for Debris Management Plan	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	$actual costs	$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	$actual costs	$actual costs
9230	Force Account Labor (Overtime) – Debris Monitoring	1	LS	$actual costs	$actual costs
				Total Cost:	**$**

APPENDIX – E

Debris Pilot Data Collection

A Subgrantee must track and provide detailed information about its debris operation.

The same level of detail is required regardless of whether the Subgrantee utilizes its own force account or contractors to remove the debris. Subgrantee's straight-time labor and equipment usage related to debris removal must be tracked separately from straight-time labor and equipment usage related to debris monitoring.

The following data must be provided, as applicable:

- Contracts and procurement process
- Start date of debris removal operation
- Completion date of debris removal operation
- Whether location is rural or urban
- Pick-up locations
- Type(s) of eligible debris removed
  - Vegetative
  - C&D
  - White Goods
  - Hazardous stumps (#, sizes, whether it was extracted and GPS locations)
  - Hanging Limbs (#, sizes, GPS locations)
  - Leaning Trees (#, type, sizes, GPS locations)
  - Vehicles/Vessels
  - Household Hazardous Waste
  - Waterway Debris
- Quantity of each type of debris
- Temporary Debris Staging and Reduction Site
  - Location
  - Haul distance (e.g. 0-15, 15-30, 31-60, 61+ miles)
  - Reduction method
  - Quantity reduced
  - Environmental permits
- Landfill/Final disposal
  - Location
  - Haul distance
  - Environmental permits
  - Quantity disposed of

- Recycling facility
  - Location
  - Haul distance
  - Type(s) of debris recycled
  - Quantity of each type of debris
- Force account Labor/Equipment:
  - Timesheets
  - Employee logs to support the activities performed by each employee
  - Equipment logs
  - Overtime policy