



*Federal
Emergency
Management
Agency*

Public Assistance Program

**Standard Operating
Procedure**

Validation of Small Projects

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Federal Emergency Management Agency

VALIDATION OF SMALL PROJECTS

Standard Operating Procedure

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VALIDATION OF SMALL PROJECTS

Standard Operating Procedure

This Standard Operating Procedure (SOP) has been written for FEMA's Public Assistance Program for use at the Disaster Field Office during the recovery phase of operations.

Purpose

The purpose of this SOP is to explain the process to be used to validate small projects and to provide instructions for the applicant, the State, the Public Assistance Coordinator (PAC) and the Specialist conducting the validation.

Scope

This SOP covers the procedures used for validation of small *Project Worksheets (PWs)* completed by the applicant. It does not address large projects or validation procedures used for small project *PWs* completed by FEMA or FEMA assigned personnel. These types of projects will be validated individually during project development.

Tools necessary to complete validation

- 1) Complete project file
 - a) Completed *Project Worksheet* (FEMA Form 90-91)
 - b) *Special Considerations Questions* (FEMA Form 90-120)
 - c) Insurance policies (if applicable)
 - d) Photos of damage
 - e) Documentation
 - Receipts
 - Time / Equipment records
 - Contracts
- 2) *Validation Worksheet* (FEMA Form 90-118)
- 3) *Project Validation Form* (FEMA Form 90-119)

OVERVIEW

This SOP describes the action taken by the applicant to request validation, the steps taken by the Liaison and PAC to start the validation process and the procedures used by the Specialist to validate small projects.

The purpose of validation is to confirm the eligibility, compliance, accuracy and reasonableness of small projects formulated by an applicant. Validation is a review of all aspects of the project, including the site(s), estimating method and all documentation related to the project. FEMA conducts validation to confirm that projects are in compliance with all laws, regulations, and agency policy. Validation also ensures the project provides the maximum assistance available under the law.

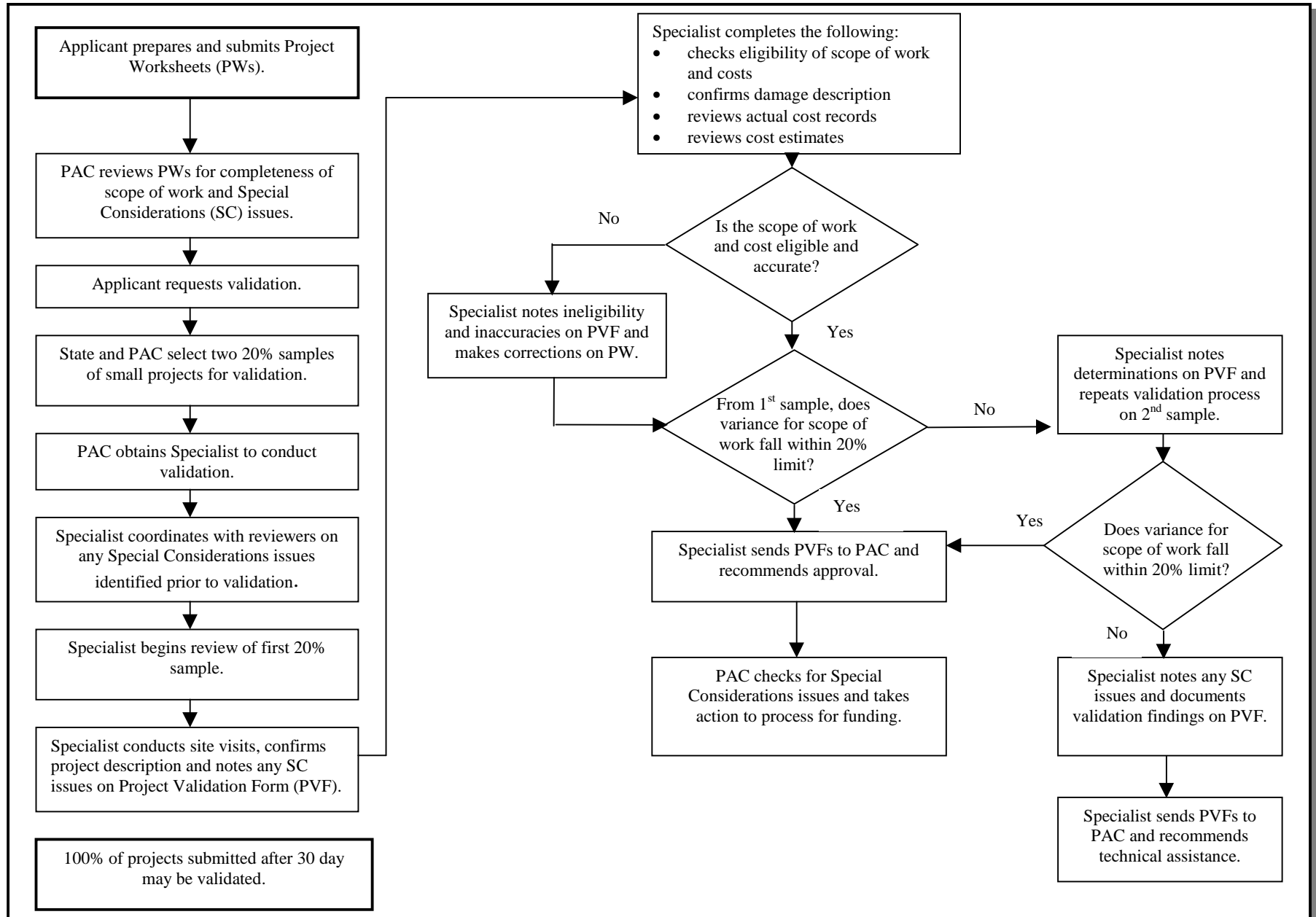
At the Kickoff Meeting, the PAC will provide the applicant with the tools and guidance to formulate small projects. From the date of the Kickoff Meeting the applicant has 60 days to submit all *PWs*. In order to provide assistance in a timely manner and meet the needs of the applicant, an expedited validation process will be used for all projects submitted within 30 days of the Kickoff Meeting. All projects submitted after 30 days may be validated individually. The expedited validation process will use a random sampling of all submitted small projects.

If an applicant has routinely submitted formulated small projects within the first 30 days and has justified extenuating circumstances that prevent the completion of all small projects within the first 30 days, the PAC may extend the expedited validation deadline. These extensions should be made on a case by case basis and may not extend beyond 60 days from the Kickoff Meeting.

The PAC will obtain a Specialist to validate a sampling of all small projects. The Specialist will complete a *Validation Worksheet* for each project validated. When using the expedited validation process, the Specialist will also complete a *Project Validation Form* to determine the variance of the sample. The allowable validation variance in estimated cost is 20%.

The Specialist will discuss all identified problems with the applicant, State, and PAC. The PAC is responsible for resolving any issues that surface during validation.

VALIDATION PROCESS FLOWCHART



THE PROCESS

Background

- Under the Public Assistance Program, applicants may develop their own small projects. Validation of the applicant's small projects is FEMA's process of confirming that projects are in compliance with all laws, regulations, and agency policy.
- This validation process applies to all small projects, including emergency work, permanent work and small projects with Special Considerations.
- Large projects will not be validated through this process. They will be validated separately during individual development.
- The Public Assistance Coordinator (PAC) and the Applicant Liaison (Liaison) will discuss project development and work documentation with the applicant at the Kickoff Meeting.
- The applicant will submit projects to the PAC using the *PW*.
- The PAC will review projects to ensure complete scopes of work.
- The PAC will initiate the validation process at the applicant's request, once the applicant indicates that all or most of the projects have been submitted. Validation can also occur as the applicant submits groups of small projects.

Selecting the sample

- The PAC and Liaison will select two 20 percent samples for validation from all the submitted small projects.
- Two separate samples are selected so that the Specialist will have a second sample to validate if the first sample does not pass validation.
- Small projects with Special Considerations will be included in the sample and will not be validated separately.
 - At the same time these projects are being validated, the PAC will refer the projects to the appropriate Special Considerations Specialist for resolution.
 - This permits both validation and Special Considerations review to proceed concurrently.
- The applicant may request that all emergency work small projects be validated separately to expedite funding. Normally, however, the validation sample may include both emergency work and permanent work projects.

Getting started

- The PAC will obtain, through the Resource Coordinator, a Specialist from the Resource Pool to conduct small project validation.
- Validation consists of three parts:
 - A general administrative review, including a site visit, when required;
 - A Special Considerations review to identify any projects having Special Considerations requirements that may have been overlooked; and
 - The project validation.
- The validation will ensure that:
 - The scope of work is accurate and complete.
 - The proposed work is eligible.
 - The cost estimate accurately reflects the scope of work and is reasonable.
 - Special Considerations have been properly identified.

Validation

- During the validation process the Specialist will:
 - Visit the sites to confirm all aspects of the project description are accurate, complete, and that all Special Considerations have been identified.
 - Confirm the damage description is complete, accurate and eligible.
 - Confirm the scope of work is complete, accurate and eligible.
 - Review all actual costs records to ensure completeness, accuracy and eligibility.
 - Review the cost estimate to ensure it is complete, reasonable and eligible.
- These tasks will require the Specialist to review the project file including all cost records, computations, measurements, notes, pictures, blueprints, plans, and any other documentation related to the project.
- The Specialist will use a *Validation Worksheet* and a *Project Validation Form* to record variances on eligibility and cost estimates.
 - A variance is the difference between the information the applicant has included in the project and the information that the validating Specialist determines to be eligible and reasonable.
- Variances are recorded as the difference in dollar cost assigned to the item in question by the applicant and the dollar cost determined by the Specialist.
- Eligibility differences will occur when the applicant includes ineligible work in the scope of work or ineligible items in the components of a project.

- FEMA is required by law to pay only for costs incurred to repair eligible damages.
- Cost estimate variances will occur when the applicant has made an error in estimating a project cost.

Analyzing the results

- The validation results will be evaluated to determine if the applicant's small projects are satisfactory and acceptable.
- There will be one of two possible results of the validation: the sample will be either satisfactory or unsatisfactory.
 - A satisfactory validation is one in which the dollar value of the variances does not exceed 20 percent of the total dollar value of the projects being validated.
 - An unsatisfactory validation is one in which the dollar value of the variances exceeds 20% of the total dollar value of the projects being validated.
- The Specialist will complete the first validation sample within 15 calendar days after receiving the assignment. If the first validation sample fails, the Specialist will continue the validation process with the second sample. The Specialist will have an additional 15 days to complete the second sample, if needed.
- If the second validation sample passes, then the validation process is complete and once any corrections have been made, all small projects without Special Considerations will be obligated at the same time.
- If the second sample fails, the PAC will assign a Specialist to work directly with the applicant to rework or reformulate all projects that were not included in the two samples. The time frame for reformulation will vary depending on the size and complexity of the projects for a particular applicant, but should occur as soon as possible.

Funding

- Funding for all small projects without Special Considerations, that have been validated and have had corrections made, will be obligated at one time.
- Projects being reformulated will be obligated as each *PW* is completed and reviewed by the PAC.
- Small projects with Special Considerations will be obligated as each one completes the necessary Special Considerations reviews.
- Small projects submitted after 30 days from the Kickoff Meeting may be validated on an individual basis and will be obligated as each validation is completed.

THE APPLICANT'S ROLE and RESPONSIBILITIES

Validation confirms that small projects completed by the applicant are in compliance with all laws, regulations, and agency policy. This validation process applies to all small projects, including emergency work, permanent work and small projects with Special Considerations.

Your records are the basis for validation, which will be limited to the minimum amount of review needed to ensure statutory and regulatory compliance.

- This will normally be 20% of all your small projects, barring significant discrepancies.
- Validation will be scheduled by your Public Assistance Coordinator (PAC) at a time convenient for you, and you will be notified in advance which projects have been selected. This will allow you to have the appropriate records ready for review.
- Validation can normally be completed within 15 days of submission of your *Project Worksheets (PWs)* to the PAC, and your request to initiate project validation.

How does it work?

- The validation process begins when your *PWs* are submitted to the PAC.
- The PAC will review each worksheet to ensure the scope of work is complete and to start the review process where Special Considerations issues have been identified.
- Once you have determined that all, or a large batch of small projects has been submitted, you should request the PAC to proceed with validation.
- The PAC will request a Specialist from the FEMA / State resource pool to conduct the validation.
- Together, the Applicant Liaison (Liaison) and the PAC will select two samples from all the small projects you have submitted. Each sample is made up of 20% of the total small projects.

What will the validation Specialist be looking for?

During the validation process the Specialist will:

- Visit the sites to confirm all aspects of the project description are accurate, complete and that all Special Considerations have been identified.
- Confirm the damage description is complete, accurate and eligible.
- Confirm the scope of work is complete, accurate and eligible.
- Review all actual costs records to ensure completeness, accuracy and eligibility.

- Review the cost estimate to ensure it is complete, reasonable and eligible.

These tasks will require the Specialist to review the project file including all cost records, computations, measurements, notes, pictures, blueprints, plans, and any other documentation related to the project. **You are responsible for documenting all claimed costs**; failure to provide documentation may result in the costs being considered a variance.

What happens during validation?

- The Specialist will note and correct all eligibility and cost variances, and these changes will be made on the *PWs*. If the total variances on the sample projects do not exceed 20% of the cost of the sample projects, the results of validation are satisfactory.
- If the results of validation are unsatisfactory, the Specialist will validate the second sample using the same process. If the total eligibility and cost variance on all projects does not exceed 20% of the total cost for all projects in both samples the validation results are satisfactory.
- If, however, the second sample results are also unsatisfactory, the PAC will assign a Specialist to assist you in reformulating and resubmitting all projects that were not included in the two samples.
- If the results are satisfactory and there is a noted minor pattern of error, you will be encouraged to review all other projects for similar problems. After any of these corrections have been made, all small projects without Special Considerations will be approved and funded by the PAC. Those small projects with Special Considerations will be individually funded as the Special Considerations issues are resolved.

Will more than the two samples ever be validated?

Yes. All projects submitted later than 30 days from the Kickoff Meeting may be validated and all variances will be corrected.

What do I need to know?

- Emergency work can be handled separately for the purposes of validation if there is a need for expedited money prior to completing all small projects.
- If you submit all small projects at one time, they will be validated as a group; if you submit small projects at more than one time, each group may be validated individually. The choice is yours, based on your funding or other needs.
- You are responsible for maintaining all documentation needed to support the project listed on the *PWs*.

- You are not required to submit supporting documentation to FEMA, but you should retain it for three (3) years from the date the State closes your grant.
- Validation of your small projects will be scheduled so you will know in advance when and which projects will be validated. This will give you the opportunity to have all pertinent records ready for review and expedite the process.
- There may be instances when you have submitted cost estimates on a project, but have actual project costs when the validation is conducted. When actual costs are available at the time of validation, the Specialist will adjust the *PW* to show the new costs. This project will be validated as any other project, using the new costs. No cost variance will show because of the change to actual costs, but any discrepancies in scope of work eligibility or eligible quantities found during validation using these costs will be subject to normal validation rules.
- Review the *Validation Worksheet* to become familiar with what the validation Specialist will be looking for.
- Your PAC can answer any specific questions you may have concerning validation.

THE STATE'S ROLE and RESPONSIBILITIES

Under the Public Assistance Program, applicants may develop their own small projects. The State is responsible for ensuring that the applicant is aware of validation procedures and documentation requirements. The State is also responsible for helping to select the sampling of projects for validation.

The positions that State personnel may be manning during validation are: applicant (subgrantee), Applicant Liaison (Liaison), Specialist or Grantee. This SOP will discuss the State's role as Applicant Liaison.

What happens prior to validation?

- At the Applicants' Briefing, the State presents the procedures and forms applicants will need to apply for public assistance.
- As the Liaison, you will help the Public Assistance Coordinator (PAC) explain project development and project documentation requirements to the applicant at the Kickoff Meeting.
- The applicant will submit projects to the PAC using *Project Worksheets (PWs)*.
- The PAC will review all small projects to ensure the scope of work is complete and that all Special Considerations have been identified.
 - Any obvious errors or omissions will be discussed with the applicant and be corrected.
- The applicant will notify the PAC when all small projects, or a batch of small projects, have been submitted and are ready for validation.
- The PAC will request a Specialist to conduct the validation.

How is the validation sample selected?

- The PAC will notify you that the applicant is ready for validation.
- You will meet with the PAC and select two 20 % samples from the list of all small projects submitted by the applicant.
 - Select a random sample that includes a cross-section of categories.
 - Select two separate samples so that the Specialist conducting the validation will have a second sample to validate if the first sample does not pass.
 - Small projects with Special Considerations will be included in the sample and will not be validated separately.

- The applicant may request that all emergency work small projects be validated separately to expedite funding. This is acceptable, however, normally emergency work *PWs* may be combined with permanent work *PWs* to draw the sample.

How are validation results reviewed?

- The PAC will contact you when the validation is complete.
- Review with the PAC and Specialist all *Validation Worksheets* and the *Project Validation Form*.
- Ask the Specialist to describe any conversations or questions that may have been brought up by the applicant.
- If the applicant did not pass validation, discuss any follow-up help that the applicant may need to reformulate the remaining small projects.

What happens when validation is complete?

- Contact the applicant to see if there are any issues or concerns regarding validation that they would like to discuss.
- If the applicant passed validation, all small projects without Special Considerations will be obligated as a group.
- Small projects with Special Considerations issues will be funded individually as each review is complete.
- If the applicant did not pass the second validation, the PAC will assign a Specialist to work with the applicant to reformulate all projects that were not included in the two samples. These projects will be obligated as they are completed.
- Explain to the applicant how the State will disburse small project funds once FEMA has obligated the money.

THE PAC'S ROLE and RESPONSIBILITIES

Under the Public Assistance Program, applicants may develop their own small projects. The PAC is responsible for ensuring that at least 20% of all applicant submitted *Project Worksheets (PWs)* are validated for eligibility and reasonableness of cost. This validation of the applicant's small projects confirms that projects are in compliance with all laws, regulations, and agency policy. The 20% sampling applies to all small projects, including emergency work, permanent work and small projects with Special Considerations.

What do I need to do prior to validation?

- As the Public Assistance Coordinator (PAC), you will discuss project development (formulation) with the applicant at the Kickoff Meeting.
- The applicant will submit projects to you using *PWs*.
- Review *PWs* to ensure complete scopes of work.
- Discuss with the applicant that the validation will occur when they request it, but that if they have not requested validation within 30 days of the Kickoff Meeting, that you will go ahead and initiate the validation process. All projects submitted after 30 days of the Kickoff Meeting may be validated on an individual basis.
- Explain to the applicant that validation can occur after all or most of the projects have been submitted, or can be done in batches if that would better suit the applicant's needs.
- Once the applicant indicates to you that their small projects have been submitted and they are ready, initiate the validation process.

How do I initiate validation?

- Contact the Applicant Liaison and select two 20 % samples from the list of all small projects submitted by the applicant.
 - The State will help with the sample selection, but you are responsible for ensuring that a cross-section of categories is included in the sample.
 - Two separate samples are selected so that the Specialist conducting the validation will have a second sample to validate if the first sample does not pass.
- Small projects with Special Considerations will be included in the sample and will not be validated separately.
 - At the same time these projects are being validated, refer the projects to the appropriate Special Considerations Specialist for resolution.

- This permits both validation and Special Considerations review to proceed concurrently.
- The applicant may request that all emergency work small projects be validated separately to expedite funding. This is acceptable, however, normally emergency work *PWs* may be combined with permanent work *PWs* to draw the sample.
- Update Case Management File to show which projects have been selected for validation.

How do I assign a Specialist to conduct the validation?

- Request a Specialist to perform validation from the Resource Coordinator (RC).
 - The RC will select the Specialist from the resource pool of FEMA, State, or contract personnel, and assign that person to you to handle whatever validation needs are necessary at that time.
 - Upon completion of the assigned validation, and any follow-up applicant work that might be necessary, release the Specialist back to the RC and the Resource Pool.
- Make a copy of all *PWs* that will be validated for each sample.
- Give the Specialist the selected *PWs* for sample 1 and sample 2, and review any special issues or concerns that you may want the Specialist to consider during validation.
- Give the Specialist the name of the applicant and all necessary contact numbers.
- Explain to the Specialist that you would like to be contacted immediately if any major or unusual issues are found.
- Ensure that the Specialist knows how to conduct a validation.
 - Specialist must conduct validation within 15 days of receiving assignment.
 - If the first validation sample fails, the Specialist will continue the validation process with the second sample. The Specialist will have an additional 15 days to complete the second sample, if needed.
 - A *Validation Worksheet* and a *Project Validation Form* must be used to record variances relating to eligibility and cost estimates.

What happens when the Specialist completes the validation?

- Review all *Validation Worksheets* and the *Project Validation Form* with the Specialist.
- Ask the Specialist to describe any conversations or questions that may have been brought up by the applicant.

- Discuss any concerns or issues that might have become apparent to the Specialist during the validation process.
- If the applicant did not pass the second validation, discuss any follow-up help that the Specialist needs to provide the applicant in reformulating the remaining small projects,
- If the applicant passed validation, and you have no further need of the Specialist's services, release the Specialist back to the Resource Pool.
- Contact the RC to make the Specialist's availability known.

Validation results are in, what happens now?

Upon receipt of the *Validation Worksheets* and *Project Validation Form*, take the following actions:

Satisfactory Results – Specialist Recommends Funding

1. Review the *Project Validation Form* and attached *Validation Worksheets* for accuracy.
2. Send any projects with Special Considerations identified as a result of validation to the appropriate Specialists for review and resolution.
3. Make adjustments to *PWs* as necessary.
4. Discuss adjustments with applicant.
5. Process the projects without Special Considerations for funding according to funding procedures.
6. Update the Case Management File.
7. Ensure that the *Project Validation Form* and any attachments are scanned into the Case Management File.

Unsatisfactory Results – Specialist Does Not Recommend Funding

1. Review the *Project Validation Form* and attached checklists.
2. Determine if the applicant is having a problem with a particular aspect of project development, e.g., cost estimating, or if the problems are general in nature.
3. Discuss with the applicant the validation results and explain that a Specialist will be assigned to review, and reformulate if necessary, all remaining projects.
4. Request the RC assign you a Specialist from the Resource Pool to assist the applicant in developing acceptable projects.
5. Discuss the applicant's requirements with the assigned Specialist.

6. Make arrangements with the applicant for the Specialist to provide technical assistance to the applicant.
7. Coordinate these actions with the Applicant Liaison.
8. Review the remaining *PWs* that have been prepared with the help of the Project Officer. These *PWs* should be acceptable and will not require further validation.
9. Process the corrected *PWs* without Special Considerations for funding.
10. Send any *PWs* with Special Considerations to the appropriate Specialists for review and resolution.
11. Update the Case Management File.
12. Scan any new documents into the Case Management File.

THE SPECIALIST'S ROLE and RESPONSIBILITIES

Validation Specialists are program and technical experts capable of verifying an applicant's work for eligibility and reasonableness of cost.

How is a validation Specialist chosen?

- The Public Assistance Coordinator (PAC) will request a Specialist to perform validation from the Resource Coordinator (RC).
- The RC will select the Specialist from the resource pool of FEMA, State, and contract personnel, and assign that person to the PAC to handle whatever validation needs are necessary at that time.
- Upon completion of the assigned validation, and any follow-up applicant work that might be necessary, the PAC will release the Specialist back to the RC and the Resource Pool.

Why is validation conducted?

Project validation is conducted to ensure that:

- The scope of work reflects disaster-related damage.
- The work and costs being proposed are eligible for Federal assistance.
- The cost estimates are reasonable.
- Special Considerations have been identified.

When is validation conducted?

- The Applicant Liaison (Liaison) and the PAC will select two 20% samples from the list of all small projects submitted by the applicant. Two separate samples are selected so that you will have a second sample to validate if the first sample does not pass validation.
- The PAC will initiate the validation process at the applicant's request, once the applicant indicates to the PAC that all or most of the projects have been submitted. Validation can also occur as the applicant submits groups of small projects.
- All projects submitted after 30 days of the Kickoff Meeting are subject to validation.
- The applicant may request that all emergency work projects be validated separately to expedite funding. Normally, however, emergency work projects may be combined with permanent work projects to draw the sample.

- FEMA is required to complete the first validation sample within 15 calendar days after receiving the assignment.
 - If the first validation sample fails, continue the validation process with the second sample. You will have an additional 15 days to complete the second sample, if needed.
 - If the second validation sample passes, then the validation process is complete.
 - If the second sample fails, the PAC will assign you or another Specialist to work directly with the applicant to rework or reformulate all projects that were not included in the two samples.
- The time frame for reformulation will vary depending on the size and complexity of the projects for a particular applicant, but should occur as soon as possible.

Are small projects with Special Considerations included in validation?

- Small projects with Special Considerations will be included in the sample and will not be validated separately.
- The PAC will make a copy of any Special Considerations projects for validation and refer the projects to the appropriate Special Considerations Specialist for resolution. This permits both validation and Special Considerations review to proceed concurrently.

I've received my assignment what do I do first?

- Once you have received your assignment from the RC, report to the PAC to pick up copies of the *Project Worksheets (PWs)* you will be validating.
- The PAC will go over each *PW* with you and explain anything special that may need to be looked at.
- Once you have received the *PWs*, contact the applicant to setup an appointment to go over the applicant's files. The validation will take place at the applicant's place of business.
- Notify the Applicant Liaison where and when the validation will take place.
 - Each state will handle their reviews differently pursuant to their state laws and procedures.
 - Although some state laws may require that the State review 100% of all projects, FEMA will only participate in a sampling of small projects for validation as discussed in this document.

- If a *PW* contains any identified Special Considerations issues, contact the Special Considerations Specialist to see if there is anything specific that should be checked.
- Also, notify the Special Considerations Specialist of the site visit date and encourage a joint site inspection whenever possible.
 - Your technical expertise is often valuable to the Special Considerations Specialist and vice versa.
 - This coordination will expedite the Special Considerations review and save the applicant time and effort by conducting only one site visit.

How do I conduct the validation?

- Validation consists of three parts:
 1. A general administrative review, including a site visit, when required.
 2. A review to identify any projects having Special Considerations requirements that may have been overlooked.
 3. The project validation.
- Use the *Project Validation Job Aid for Specialists* to conduct the validation.
- Use the *Validation Worksheet and Instructions* for each project being validated.
- Record the validation results on the *Project Validation Form*.
 - Complete the heading of the *Project Validation Form*, which is self-explanatory.
 - Check the appropriate block to indicate if this form applies to Sample 1 or Samples 1 and 2.
 - This form has two columns to record variances: eligibility and cost estimate.
 - A variance is the difference between the information the applicant has included in the project and the information that you have determined to be correct.
 - Variances are recorded as the difference in dollar cost assigned to the item in question by the applicant and the dollar cost determined by the Specialist.

How do I handle an eligibility difference?

Eligibility differences will occur when the applicant includes ineligible work in the scope of work or ineligible items in the components of a project. FEMA is required by law to pay only for costs incurred to repair eligible damages.

Do the following when you discover an eligibility error either as a line item or in the scope of work in a project you are validating.

1. Record the dollar value of the error in Column C, (Eligibility Variance), of the *Project Validation Form*.
2. Explain the error in Column E, (Comments), of the *Project Validation Form*.
3. Discuss the error with the applicant to ensure that they understand why the cost is not eligible. Tell the applicant to change the *Project Worksheet (PW)* to correct the item in question.
4. Make a line item adjustment to your copy of the *PW* that reflects the amount of the eligibility variance.
5. **Do not review other similar projects** not in the sample pool for validation to see if the applicant has made the same mistake. The validation process is confined to the selected sample. However, encourage the applicant to review other projects for similar errors and submit any corrections to those *PWs* to the PAC.

Example of “An Ineligible Line Item in the Cost Estimate.”

The applicant's project scope of work is “Repair 200 feet of gravel road.” The applicant's estimated cost is \$7,450. You discover that the applicant's estimate includes 200 feet of guardrail at \$26 a linear foot. You determine that the guardrail is not eligible, as it did not exist before the disaster. Enter \$2,246 (200 x \$26), the ineligible cost for the guardrail, in Column C, (Eligibility Variance), and an explanation in Column E, (Comments).

Example of “An Inaccurate Scope of Work.”

The applicant's project scope of work is “Repave 200 feet of road.” The applicant's cost estimate is \$3,300. You determine that the road surface was gravel prior to the disaster and the paving is not eligible. You calculate the repair costs using gravel to be \$2,246. Enter \$1,054 (\$3,300-\$2,246), the difference between the applicant's estimate and your estimate, in Column C, (Eligibility Variance), and an explanation in Column E, (Comments).

How do I handle cost estimate variances?

Cost estimate variances will occur when the applicant has made an error in estimating a project cost.

- Use the same method to develop the validation cost estimate that the applicant used. If the applicant used *Means*, for example, use *Means* to validate the estimate. Do not compare a Means estimate with a FEMA cost code estimate.
- There may be instances when the applicant submitted a *PW* based on estimated cost but has actual project costs when the validation is conducted. When actual costs are available at the time of validation, the Specialist should adjust the *PW* to show the new costs. This project should be validated as any other project, using the new costs. No cost variance will show because of the change to actual costs, but any discrepancies in scope of work eligibility or eligible quantities found during validation using these costs will be subject to normal validation rules.
- Record the dollar value of the differences in Column D, (Cost Estimate Variance), of the *Project Validation Form*.
- If the applicant has submitted a project cost estimate and has previous experience and records to support the estimate, review the previous work records and validate against the previous experience. Past experience should give you a reliable source of anticipated costs.
- There may be instances where the applicant has submitted a project cost estimate and has not used an estimating tool, such as Means, and has no previous experience with this type of damage repair. In this case, develop a project cost estimate using the FEMA cost codes to validate the project cost estimate. Explain the difference in Column E, (Comments), on the *Project Validation Form*.
- Explain cost estimate errors to the applicant. Make adjustments on the *PWs*, just as done with eligibility variances.

How do I correct math errors?

Record math errors when validating cost estimates.

- Record the findings of math errors or Special Considerations omissions on the *Validation Worksheet*, *Project Validation Form*, and *PW*.
- Math errors are corrected but are not considered a variance on the *Project Validation Form*.

- Math errors include, but are not limited to:
 - Calculation errors in addition, subtraction, multiplication, and division.
 - Extension errors, e.g., multiplying total labor hours by the incorrect hourly rate.
 - Using an incorrect quantity measurement, e.g., cubic yards instead of square yards.

How do I analyze the validation results?

- The sample validation results will be evaluated to determine if the applicant's small projects are satisfactory and acceptable. Use the *Project Validation Form*.
- Complete the *Project Validation Form* as follows:

Validation Section

- a. Enter the project numbers in Column A, (Project), in the validation section.
- b. Enter the applicant estimate for each project in Column B, (Applicant Estimate).
- c. Enter eligibility variances, if any, for each project being validated in Column C, (Eligibility Variance).
- d. Enter cost estimate variances, if any, for each project being validated in Column D, (Cost Estimate Variance).
- e. Enter appropriate comments for each project being validated in Column E, (Comments).
- f. Total Columns B, C, and D, and enter the results in the appropriate **Subtotal** block.
- g. Add the subtotals in Columns C and D, and enter the results in the appropriate **Total Variance** block. (Note: all variances are considered positive.)
- h. Divide the figure in the **Total Variance** block by the figure in the **Subtotal** block, Column B. Round the result to the nearest whole number. This is the percentage of variance. Enter this figure in the **Percent of Variance** block.

Validation Results Section

Check the appropriate block to indicate the validation results.

Recommendation Section

Check the appropriate block to indicate the Specialist's recommendations to the PAC.

What do I do with the results?

There will be one of two possible results of the validation: the sample will be either satisfactory or unsatisfactory. A satisfactory validation is one in which the dollar value of the variances does not exceed 20 percent of the total dollar value of the projects being validated.

Satisfactory Results

1. Advise the applicant that the results of the validation are satisfactory and that the PAC will be advised so that all small projects without Special Considerations can be approved and funded.
2. Forward the *Project Validation Form* and the validation checklists to the PAC.
3. Give a copy of the form and checklists to the applicant for their records.
4. The PAC will make any eligibility adjustments to the *PW*.

Unsatisfactory Results

1. Advise the applicant and the PAC that the results of the validation are unsatisfactory and explain the reasons why.
2. Validate the second 20 percent sample using the procedures in Paragraph IV, above.
3. Combine the results of the first and second samples. This will improve the overall accuracy of the validation, as the sample size is now 40 percent.
4. If the results of the combined samples are satisfactory, proceed as described in Paragraph A, above.
5. If the validation results of the combined samples are unsatisfactory:
 - a. Advise the applicant that the results of the validation are unsatisfactory and explain the reasons why.
 - b. The conclusion at this point is that the applicant needs technical assistance in project development, as 40 percent of the applicant's projects are not acceptable.
 - c. Forward the *Project Validation Form* and the validation checklists to the PAC for review and necessary action.
 - d. Give a copy of the analyses and checklists to the applicant for their records.
 - e. Inform the applicant that the PAC will advise them as to what actions will be taken concerning their small projects.

What happens when the validation is complete?

- Review all *Validation Worksheets* and the *Project Validation Form* with the PAC.
- Describe any conversations or questions that may have been brought up by the applicant.
- Discuss with the PAC any concerns or issues that might have become apparent during the validation process.
- Discuss any follow-up help that might be necessary if the applicant did not pass the second sample.
- If the applicant passed validation, and the PAC has no further need of your services, the PAC will release you back to the Resource Pool.
- Contact the RC and make your availability known so you may be reassigned to another project or PAC.

Appendix A

Project Validation Job Aid for the Specialist

Instructions: This document is designed to assist the validation Specialist in conducting successful project validations. This document will guide you in what to review, how to record variances, and make recommendations to the Public Assistance Coordinator (PAC).

✓	Action	Steps	Details
<input type="checkbox"/>	Assignment	<ul style="list-style-type: none"> <input type="checkbox"/> Receive <i>Project Worksheets</i> from PAC. <input type="checkbox"/> Review projects selected for validation. <input type="checkbox"/> Coordinate with other Specialists for Special Considerations, as appropriate. 	
<input type="checkbox"/>	Contact Applicant	<ul style="list-style-type: none"> <input type="checkbox"/> Contact applicant and identify yourself and your objective. <input type="checkbox"/> Set up a meeting to conduct the validation. The applicant will have requested validation and will be awaiting your call. <input type="checkbox"/> Inform the applicant of the exact projects that you will validate so records will be ready for your review. 	<ul style="list-style-type: none"> <input type="checkbox"/> Meeting issues: <ul style="list-style-type: none"> <input type="checkbox"/> The applicant will participate in all phases of the validation. <input type="checkbox"/> Access to selected project files is necessary. <input type="checkbox"/> Ask the applicant to identify contacts for each project. <input type="checkbox"/> The validation process will begin when the applicant indicates that they desire validation to begin. The validation process can be done as groups of projects are submitted; however, 100 percent of small projects submitted after 30 days of Kickoff Meeting may be validated.

Appendix A

Project Validation Job Aid for the Specialist (continued)

✓	Action	Steps	Details
<input type="checkbox"/>	Special Considerations	<ul style="list-style-type: none"> <input type="checkbox"/> Note unidentified Special Considerations (considerations that surface as a result of review). <input type="checkbox"/> Record results. <input type="checkbox"/> For identified Special Considerations, coordinate with the Special Considerations Specialist to ensure all requirements are met. 	<ul style="list-style-type: none"> <input type="checkbox"/> Unidentified: <ul style="list-style-type: none"> <input type="checkbox"/> Review project scope of work and pictures. Also, make a site visit, if appropriate. <input type="checkbox"/> Discuss findings with applicant. <input type="checkbox"/> Results: <ul style="list-style-type: none"> <input type="checkbox"/> Note type of Special Considerations on <i>Project Validation Form (PVF)</i>. <input type="checkbox"/> Record any additional information the applicant can provide in the comment section of the PVF.

Appendix A

Project Validation Job Aid for the Specialist (continued)

✓	Action	Steps	Details
<input type="checkbox"/>	Validate Eligibility	<ul style="list-style-type: none"> <input type="checkbox"/> Review scope of work. <input type="checkbox"/> Review work activities for work completed. <input type="checkbox"/> Review work to be completed. <input type="checkbox"/> Record results and make recommendation (refer to <i>Small Project Validation Guidelines</i>). <input type="checkbox"/> Discuss results with applicant. 	<ul style="list-style-type: none"> <input type="checkbox"/> Scope of work <ul style="list-style-type: none"> <input type="checkbox"/> Site visits/pictures <input type="checkbox"/> Sketches/drawings <input type="checkbox"/> Dimensions <input type="checkbox"/> Work Activities (work completed) <ul style="list-style-type: none"> <input type="checkbox"/> Eligible Facility <input type="checkbox"/> Eligible Damage <input type="checkbox"/> Eligible Repair <input type="checkbox"/> Work Activities (work to be completed) <ul style="list-style-type: none"> <input type="checkbox"/> Eligible Facility <input type="checkbox"/> Eligible Damage <input type="checkbox"/> Eligible Repair <input type="checkbox"/> Results/recommendations <ul style="list-style-type: none"> <input type="checkbox"/> Note total cost variance for each project based on eligibility issues on the <i>PVF</i>. <input type="checkbox"/> Make any appropriate comments. <input type="checkbox"/> Show proposed changes on copy of <i>PW</i>. <input type="checkbox"/> Make any appropriate recommendations.

Appendix A

Project Validation Job Aid for the Specialist (continued)

✓	Action	Steps	Details
<input type="checkbox"/>	Validate Cost Estimate	<ul style="list-style-type: none"> <input type="checkbox"/> Review completed work. <input type="checkbox"/> Review work to be completed. <input type="checkbox"/> Record results and make recommendations (refer to <i>Small Project Validation Guidelines</i>). <input type="checkbox"/> Discuss results with applicant. 	<ul style="list-style-type: none"> <input type="checkbox"/> Work completed <ul style="list-style-type: none"> <input type="checkbox"/> Force account labor <input type="checkbox"/> Force account equipment <input type="checkbox"/> Materials <input type="checkbox"/> Leased/rented equipment <input type="checkbox"/> Contracts <input type="checkbox"/> Work to be completed <ul style="list-style-type: none"> <input type="checkbox"/> FEMA cost codes <input type="checkbox"/> Local unit costs <input type="checkbox"/> Bids submitted by contractors or estimates for lease rental costs <input type="checkbox"/> Results/recommendations <ul style="list-style-type: none"> <input type="checkbox"/> Note total cost variance for each project based on estimating issues on the <i>PVF</i>. <input type="checkbox"/> Make any appropriate comments on the <i>PVF</i>. <input type="checkbox"/> Show proposed changes on copy of <i>PW</i>.

Appendix A Project Validation Job Aid for the Specialist (continued)

✓	Action	Steps	Details
<input type="checkbox"/>	Calculate Variance	<input type="checkbox"/> Calculate variance using <i>Project Validation Form</i> . <input type="checkbox"/> Discuss results with applicant.	<input type="checkbox"/> Add Column B on <i>PVF</i> . <input type="checkbox"/> Add Column C on <i>PVF</i> . <input type="checkbox"/> Add Column D on <i>PVF</i> . <input type="checkbox"/> Add Columns C and D subtotals and enter in Total Variance block. <input type="checkbox"/> Divide total variance by subtotal in Column B. <input type="checkbox"/> Enter result in Percent of Variance block. Round to nearest whole number. <input type="checkbox"/> Advise applicant and give copies of documents.
<input type="checkbox"/>	First validation is less than 20% —Make recommendation	<input type="checkbox"/> Meet with PAC.	<input type="checkbox"/> Submit documents and recommendations. <input type="checkbox"/> Discuss concerns with PAC.
<input type="checkbox"/>	First validation is 20% or greater — Call Public Assistance Coordinator	<input type="checkbox"/> Discuss with PAC. <input type="checkbox"/> Validate second 20 percent sample following above procedures.	<input type="checkbox"/> Validate second 20 percent sample as advised by PAC. <input type="checkbox"/> Validate second sample as above. <input type="checkbox"/> Add results of second sample to those of first sample. <input type="checkbox"/> Calculate percent variance of combined first and second samples. <input type="checkbox"/> Advise applicant and give copies of documents.
<input type="checkbox"/>	Make recommendation on second evaluation	<input type="checkbox"/> Meet with PAC.	<input type="checkbox"/> Submit documents and recommendations. <input type="checkbox"/> Discuss concerns with PAC.

Appendix B

Instructions for Validation Worksheet

I. GENERAL REVIEW

All projects will get a general review. Each item on the checklist should be looked at. This portion of the review will not be considered in the evaluation of projects.

- A. **Review Project**—Make a general review of the file to familiarize yourself with the project. Make sure that it is well organized and identified. Suggest that a separate file be set up for each project if the applicant doesn't have one already.
- B. **Site Visit**—Visit the project site and make a visual inspection if necessary. Look at the items described in the scope of work, making sure that the items can be identified during the visual inspection.
- C. **Scope of Work**—Ensure that the scope of work is accurate, complete, and is eligible.
- D. **Pictures**—Suggest applicant keep pictures of the damage for documenting the scope of the project.
- E. **Sketches/Drawings**—Clear and concise sketches/drawings of the work should be kept by the applicant.
- F. Review each project to make certain that all Special Considerations issues have been identified. It may be that an applicant did not realize that a project involved Special Considerations and did not call it to the PAC's attention. Use the *Special Considerations Questions Job Aid* (Appendix D).
- G. Note any projects with Special Considerations in the Remarks column of the *Project Validation Worksheet*.
- H. Validate the project using established validation procedures.

II. COMPLETED WORK

Review the completed work to ensure that items being claimed are eligible and that costs are eligible and accurate.

III. FORCE ACCOUNT LABOR

Refer to the *Force Account Labor Worksheet* (FEMA Form 90-123) and review the force account labor to ensure that:

- A. Records are well organized and identified by date, position, location, and labor performed to support the *Project Worksheet*.
- B. Employee hours being claimed are eligible according to the guidelines.
- C. Hours worked are separated into regular and overtime hours.
- D. Fringe benefits are identified for regular and overtime. The applicant may use a blended rate or a separate rate for each worker's category.
- E. Calculations are clear, complete, and accurate.

IV. FORCE ACCOUNT EQUIPMENT

Refer to the *Force Account Equipment Worksheet* (FEMA Form 90-127) and review the force account equipment to ensure that:

- A. The number of labor hours for equipment operators match or exceed the equipment hours.
- B. Volunteer and prison labor hours for equipment operation are identified, if applicable.
- C. The applicant is using FEMA equipment rates or other approved rates.
- D. Mileage, not hours, is used for automobiles, buses, pickups, and ambulances.
- E. Calculations are clear, complete, and accurate.

V. MATERIALS

Refer to the *Materials Summary Record* (FEMA Form 90-124) and review the materials records to ensure that:

- A. Purchase orders/invoices dates and quantities match material records.
- B. Inventory records/stock tickets match material records.
- C. Calculations are clear, complete, and accurate.

VI. LEASED/RENTAL EQUIPMENT

Review leased/rental equipment records to ensure that:

- A. Lease/rental agreement dates fall within the disaster period.
- B. Invoice date and amount are correct.
- C. Gasoline, oil, and lubricants are claimed only when not covered in lease/rental agreements.
- D. Repairs and parts are claimed only when the applicant is liable for these costs as stipulated in the lease/rental agreement.
- E. Calculations are clear, complete, and accurate.

VII. CONTRACT

Review contracted work to ensure that:

- A. A copy of the contract is on file.
- B. Prescribed procurement procedures were followed.
- C. Competitive bidding was used or an exception was authorized.
- D. Calculations are clear, complete, and accurate.

VIII. WORK TO BE COMPLETED

Review work to be completed to ensure that:

- A. The cost estimating method used has been approved by the Public Assistance Coordinator.
- B. The cost estimate was accurately developed.
- C. Calculations are clear, complete, and accurate.

Appendix C Validation Worksheet

FEDERAL EMERGENCY MANAGEMENT AGENCY VALIDATION WORKSHEET		DISASTER: FEMA- _____ -DR- _____
APPLICANT	PA ID NO.	PROJECT WORKSHEET NO.
SPECIALIST	AGENCY	TELEPHONE NO.
I- GENERAL- ALL PROJECTS		
VALIDATION ITEM	REMARKS	
<input type="checkbox"/> Review projects <input type="checkbox"/> Visit site <input type="checkbox"/> Statement of work <ul style="list-style-type: none"> <input type="checkbox"/> Accurate <input type="checkbox"/> Complete <input type="checkbox"/> Eligible <input type="checkbox"/> Pictures <input type="checkbox"/> Sketches/drawings		
II- COMPLETED WORK		
<input type="checkbox"/> Forced Account Labor <ul style="list-style-type: none"> <input type="checkbox"/> Eligible employee <input type="checkbox"/> Hours <ul style="list-style-type: none"> <input type="checkbox"/> Regular <input type="checkbox"/> Overtime <input type="checkbox"/> Fringe benefits <ul style="list-style-type: none"> <input type="checkbox"/> Regular <input type="checkbox"/> Overtime <input type="checkbox"/> Calculations		
III- FORCE ACCOUNT EQUIPMENT		
<input type="checkbox"/> Labor hours exceeds or match Equipment hours <input type="checkbox"/> FEMA rates used <input type="checkbox"/> PAC approved rates used <input type="checkbox"/> Mileage used for automobiles, busses, pickups, and ambulances <input type="checkbox"/> Calculations		
IV- LEASED/RENTAL EQUIPMENT		
<input type="checkbox"/> Invoice <input type="checkbox"/> Price reasonable <input type="checkbox"/> Operation/labor cost <input type="checkbox"/> Gasoline/oil/lubricants <input type="checkbox"/> Eligible repairs/parts <input type="checkbox"/> Calculations		
V- MATERIALS		
<input type="checkbox"/> Purchase orders/invoices <input type="checkbox"/> Inventory records/stock tickets <input type="checkbox"/> Calculations		

Appendix D Project Validation Form

FEDERAL EMERGENCY MANAGEMENT AGENCY PROJECT VALIDATION FORM				DISASTER: FEMA- _____ -DR- _____	
APPLICANT		DATE	PA ID NO.		
SPECIALIST		AGENCY			
CONTACT PERSON		TELEPHONE NO.			
The projects listed below were validated from: <input type="checkbox"/> Sample 1 C.V. <input type="checkbox"/> Sample 1 and 2 C.V.					
VALIDATION					
A	B	C	D	E	
Project Worksheet No.	Applicant Estimate	Eligibility Variance	Cost Estimate Variance	Comments	
	\$	\$	\$		
SUBTOTAL	B \$	C \$	D \$	PERCENT OF VARIANCE % <i>(F divided by B)</i>	
TOTAL VARIANCE (COL. C + D) = F			F \$		
II-VALADIATION RESULTS					
<input type="checkbox"/> VARIANCE WITHIN 20% 1st VALIDATION <input type="checkbox"/> VARIANCE WITHIN 20% 2nd VALIDATION <input type="checkbox"/> VARIANCE WITHIN 20% 1st & 2nd VALIDATION					
III-RECOMMENDATION					
<input type="checkbox"/> APPROVE FUNDING, VARIANCE WITHIN 20% <input type="checkbox"/> PROVIDE TECHNICAL ASSISTANCE, VARIANCE EXCEEDS 20%					

Appendix E Special Considerations Questions

FEDERAL EMERGENCY MANAGEMENT AGENCY SPECIAL CONSIDERATIONS QUESTIONS		
APPLICANT	PA ID NO.	DATE
PROJECT NAME	PROJECT NO.	LOCATION
Form must be filled out - for each project.		
<p>1. Does the damaged facility or item of work have insurance and/or is it an insurable risk? <i>(e.g., buildings, equipment, vehicles, etc.)</i></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>2. Is the damaged facility located within a floodplain or coastal high hazard area/or does it have an impact on a floodplain or wetland?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>3. Is the damaged facility or item of work located within or adjacent to a Coastal Barrier Resource System Unit or an Otherwise Protected Area?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>4. Will the proposed facility repairs/reconstruction change the pre-disaster condition? <i>(e.g., footprint, material, location, capacity, use or function)</i></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>5. Does the applicant have a hazard mitigation proposal or would the applicant like technical assistance for a hazard mitigation proposal?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>6. Is the damaged facility on the National Register of Historic Places or the state historic listing? Is it older than 50 years? Are there other, similar buildings near the site?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>7. Are there any pristine or undisturbed areas on, or near, the project site? Are there large tracts of forestland?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>8. Are there any hazardous materials at or adjacent to the damaged facility and/or item of work?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		
<p>9. Are there any other environmental or controversial issues associated with the damaged facility and/or item of work?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure Comments _____</p>		

Appendix F

Project Validation Job Aid for the PAC

1. Review *PWs* to ensure that the applicant has written complete scopes of work.
 2. Review the *Special Considerations Questions* for each project.
 3. Document any changes or additions to the project information on the *PW* for each project.
 4. In coordination with the Liaison, select two 20% samples from all the small projects submitted by the applicant, for validation
 5. Send projects with Special Considerations to the appropriate queues for review. This can occur at the same time that validation is taking place. The PAC oversees the progress of Special Considerations reviews for small projects.
 6. Request a Specialist to conduct the validation from the Resource Coordinator (RC).
 7. Meet with the assigned Specialist, and go over the selected projects, noting any special issues you may want the Specialist to consider.
 8. Specialist meets with applicant and validates projects.
 9. Once validation is complete, review the *Validation Worksheets* and *Project Validation Form(s) (PVF)* with the Specialist. If the Specialist recommends funding, group projects into one of the following categories:
 - A. Small projects with no Special Considerations
 - B. Small projects with Special Considerations
- If not recommended for funding, request a Specialist from the RC to provide technical assistance to the applicant for reformulating all remaining projects.
10. Advise Applicant Liaison and applicant of the results of the review.
 11. Update the Case Management File with the results of the validation.
 12. Approve and forward through the system for funding, all small projects without Special Considerations that have been validated and have had corrections made.
 13. Once the Specialist has reformulated the remaining projects review these projects and update the Case Management File as necessary.
 14. Approve and forward projects through the system.
 15. As each small project that contains Special Considerations issues is resolved, update CMF as necessary, and approve and forward through the system for funding.