BACKGROUND

Section 422 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121 et seq (Stafford Act) authorizes the Federal Emergency Management Agency (FEMA) to provide funding on the basis of the federal estimate for projects with an estimated cost below a specified and established dollar threshold and implement simplified procedures for projects below such threshold. In August 2022, FEMA published a final rule to increase the established threshold for Small Project maximum for the agency’s Public Assistance (PA) program to $1 million (Small Project). The increased threshold reduces the administrative burden on state, local, tribal, or territorial (SLTT) governments and private non-profit (PNP) organizations receiving FEMA financial grants following a disaster. A Small Project has costs below the threshold, while a Large Project has costs equal to or above the $1 million threshold (Large Project).¹ This policy supersedes guidance pertaining to Small Projects in the Public Assistance Program and Policy Guide (PAPPG) and establishes additional requirements related to Small Projects. All other requirements in the PAPPG apply.

PURPOSE

This policy streamlines application procedure for Small Project funding under the PA program to simplify implementation of the PA program and support rapid recovery for Applicants. The use of simplified procedures, such as submitting self-certified estimates and summary reports, may allow applicants to receive funding early and promotes rapid recovery of the affected community. This policy defines FEMA’s simplified procedures and requirements for Small Projects funded under the PA program.

PRINCIPLES

A. Apply simplified procedures in an appropriate and consistent manner.

B. Reduce the administrative burden for Small Projects.

¹ Small Projects are those that have a total eligible project cost (federal and non-federal cost share) less than the threshold after mitigation is added and all applicable reductions are taken, such as insurance proceeds. FEMA also establishes a minimum threshold for which projects must meet or exceed to be considered for Public Assistance (PA) funding. FEMA adjusts these thresholds annually based on the consumer price index. See Per Capita Impact Indicator and Project Thresholds | FEMA.gov.
C. Support equitable delivery of assistance to underserved communities.
D. Enable communities to recover more quickly after all Presidential emergency and major disaster declarations.

**REQUIREMENTS**

**A. APPLICABILITY**

This policy applies to all PA Small Projects funded under major disasters and emergencies declared on or after the date of issuance. It applies to Stafford Act Sections 403, 406, 407, and 502. It does not apply to Management Costs funded under Stafford Act Section 324 or Donated Resources.

**B. DOCUMENTATION REQUIREMENTS**

FEMA is streamlining documentation requirements for Small Projects to include acceptance of Applicants’ self-certified estimates and summary information for eligible facility, work and cost as outlined in Section C and in accordance with all laws, regulations, Executive Orders, and policies in lieu of providing more detailed documentation. Additional certification requirements are listed below in Section H.

FEMA specifies the information and documentation that Applicants are required to submit in Appendix A: Minimum Small Project Information Requirements. Additionally, information for detailed documentation requirements is further defined in the PAPPG V.4

FEMA will accept eligible Applicants submitting summary documentation and less information for Small Projects. Applicants must continue to retain all source documentation, including project eligibility records and financial records, for 3 years after the date the Recipient submits to FEMA certification of completion of the last Small Project. The Recipient must keep all financial and program documentation for 3 years after the date it submits the final SF-425 in accordance with 2 C.F.R. § 200.334 and access to records will be provided upon request in accordance with 2 C.F.R. § 200.337. SLTT government laws may require longer retention periods. Real property and equipment disposition, audits, and litigation may also require longer retention periods.\(^2\) If requested, Applicants must provide documentation to FEMA. Recipients may require documentation not otherwise required by FEMA (such as actual cost documentation for Small Projects). In such cases, the Applicant must provide the documentation to the Recipient.

**C. COST ESTIMATES**

To streamline the application process for Small Projects, FEMA does not adjust estimated costs to the actual incurred amount. Once the estimated amount is obligated, FEMA considers it reasonable and eligible and does not re-evaluate the cost if there is no evidence of fraud, waste or abuse, and the Applicant complies with federal grant conditions.

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\(^2\) 2 C.F.R. § 200.334.
1. **Completed work**: FEMA may accept certified cost estimates for projects that have all work complete in cases where Applicants are unable to compile actual costs within a reasonable timeframe, or when Applicants have not yet received final invoices. FEMA does not develop estimates for completed work.

2. **Applicant-provided estimates**: To streamline the process for Small Projects, FEMA will accept the Applicants providing certified cost estimates as outlined in Section B above. The Applicant’s itemized cost estimate must include information to support the estimate and certify that the costs claimed directly correlate to work required to address major disaster and emergency related impacts in the Project Application. FEMA may use the Cost Estimating Format (CEF)\(^3\) on Small Projects as necessary due to project complexities.

   a. **Completed or partially completed work** may be estimated based on an extrapolation of known actual costs.

   b. **Employee labor costs** for Applicants’ Force Account Labor estimates may be accepted based on summary information instead of providing detailed documentation (e.g., time sheets, labor rates) as outlined in the PAPPG V.4 Chapter 9, Scope of work and Cost Development. Estimates may be calculated based on actual or estimated total number of staff and total hours with average pay rates. Average rates may only be used for employees at similar pay grades and same category of employee (i.e., permanent full-time vs. part-time vs. temporary hire). Applicants should include fringe benefits as part of the labor estimate. Fringe benefits may be calculated based on a percentage of the hourly pay rate.

   c. **Equipment and supplies** cost estimates for purchased equipment or supplies may be accepted based on purchase orders, rental agreements, or the lowest of three quotes. Items that meet the PAPPG definition of equipment must include a reduction for depreciation or fair market value (estimated or actual) at the time the equipment is no longer needed. For Small Projects, fair market value and the associated reduction are addressed during project formulation. To calculate depreciation or fair market value, the date used to determine when equipment is no longer needed is based on the work completion deadline. For Force Account Equipment the estimate should be based on usage hours and applicable equipment rate. No reduction is taken for supplies for Small Projects during project formulation because the quantity of supplies for which funding is eligible is an amount that is necessary and reasonable, and the estimate is based on the aggregate unused supplies not exceeding $5,000.\(^4\)

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\(^3\) CEF for large Projects has been designed to provide more uniformity in estimating costs for large projects, and to make it user friendly and flexible enough to respond to individual project conditions for all types of permanent restorative work. For more complex Small Projects, CEF may be applicable due to the threshold increase to under $1 million.

d. **Contract costs** are typically calculated based on a bid or contract amount obtained from a competitive procurement process. If a request for proposals has not yet been issued, contract work may be estimated based on historical costs or another Applicant’s costs for projects that are similar in size and scope of work (e.g., similar quantities and types of debris, materials costs, and other factors).

All Small Projects must comply with procurement and contracting laws and regulations. In instances where Applicants submit cost claims based on non-competitive bids or contracts, time and materials contracts, or cost-plus-percentage-of-cost or percentage-of-construction contracts, FEMA will review the project for reasonable cost and procurement and contracting compliance.

e. **Construction** estimates and summaries are permitted based on the below criteria. FEMA does not conduct additional cost validation or reasonable cost analysis unless there are Scope of Work (SOW) concerns or evidence of inaccurate information. When Applicants provide estimates for construction work in accordance with the following criteria, the construction estimate must be:

   i. Prepared by a licensed professional engineer or other estimating professional, such as a licensed architect or certified professional cost estimator who certifies the estimate was prepared in accordance with industry standards;

   ii. Based on a component-level scope of work that is clearly attributable to the disaster-related damage with a level of detail sufficient to validate that cost elements are neither omitted nor duplicated;

   iii. Accompanied by certification that the estimated cost directly corresponds to the repair of damage caused directly by the declared major disaster or emergency; and

   iv. Based on unit costs for each component of the SOW and not a lump sum amount; or a bid or contract amount obtained from a competitive procurement process (if bid/contracting process has occurred).

If Applicant plans to conduct any work with employee labor, the estimate must be developed based on the language in Sections C.2 (b) and (c), not (d) or (e) above. For additional information on Applicant estimates see PAPPG V.4 Chapter 9.II.2

f. **Hazard Mitigation** is encouraged in order to provide protection from future incidents. FEMA has the authority to provide PA funding for cost-effective hazard mitigation measures that will reduce the potential for damage to a facility from a disaster event.\(^5\) PA Mitigation is in addition to any code and standard upgrade requirements and must reduce potential future damage to the damaged portion(s) of the facility, meet cost-effectiveness criteria, and comply with other Federal, State, tribal, territorial, or local legal requirements.\(^6\) PA considers a mitigation

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\(^5\) *Stafford Act § 406(e), 42 U.S.C. § 5172; 44 C.F.R. § 206.226(e).*

\(^6\) *44 C.F.R. § 206.226(e).*
measure cost-effective if it does not exceed 15 percent of the total eligible repair
cost of the facility (prior to insurance reductions), was pre-determined to be cost-
effective up to 100 percent of eligible repair cost (prior to insurance reductions) or is demonstrated to be cost-effective through an acceptable benefit cost analysis methodology.

g. **Soft Costs** are costs necessary to complete the project such as costs for permits, studies, designs, surveys, or project management and may be included in the Applicant provided summary based on quotes or historical costs. If FEMA approves a project that only includes funding for Architectural and Engineering design, the project size classification will be amended once the scope of work and associated costs has been included.

3. **FEMA Estimates:** For work that has not been completed, where applicable or relevant, FEMA may use the CEF to ensure that the estimate includes all costs to complete the approved SOW. FEMA offers assistance to the Applicant to develop its SOW or cost estimate based on provided information (e.g., soft costs, damage, loss, and addition information to build estimate). FEMA may request this additional information when needed to prepare the estimate.

4. **Duplication of Benefits:** If the Applicant receives funding from another source for any work or costs in the project application, it will notify FEMA, and funding will be reconciled to eliminate duplication as required by Stafford Act § 312. Prior to obligation, FEMA reduces the project amount to account for:

   i. Actual insurance proceeds, if known; or anticipated insurance proceeds based on the applicable insurance policy if the amount of actual proceeds is unknown.; and
   
   ii. Funding from any other sources for the same work that FEMA funded such as non-federal grants, third party liability, and other federal awards.

D. **REQUESTS FOR ADDITIONAL INFORMATION**

In general, FEMA limits its requests for additional information to scenarios where Recipients or Subrecipients:

   1. Do not provide all information and documentation required by this policy; or
   
   2. Provide unclear or inaccurate information or documentation.

E. **NON-DISCRIMINATION [AND EQUITY] IN FEDERALLY ASSISTED PROGRAMS**

As a condition of receiving PA funding, Recipients and Subrecipients must comply with all federal civil rights laws and authorities prohibiting discrimination, including but not limited to, Section 308 of the Stafford Act, 42 U.S.C. § 5151, which requires the impartial and

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7 see Appendix J of the PAPPG for a full list of hazard mitigation measures pre-determined to be cost-effective up to 100 percent of eligible repair costs.
8 44 C.F.R. §§ 206.252(c) and 253(a).
equitable delivery of disaster services and activities without discrimination.

F. ENVIRONMENTAL AND HISTORIC PRESERVATION COMPLIANCE REQUIREMENTS

Applicants must comply with EHP laws, regulations, and Executive Orders (EO), including but not limited to, the Endangered Species Act (ESA), National Environmental Policy Act (NEPA), and the National Historic Preservation Act (NHPA). Applicants must afford FEMA the opportunity to perform EHP reviews prior to starting any work that has potential to impact the environment or historic properties, including archaeological resources. FEMA reviews each Small Project to ensure that the project complies with appropriate EHP laws, regulations, and EOs. If an Applicant starts work prior to FEMA’s completion of the EHP review, it jeopardizes PA funding for the entire project. Such situations may compel FEMA to revoke federal funding for those portions of the project that fail to meet the EHP compliance requirements. FEMA will conduct a review of all projects to ensure compliance with EHP requirements. FEMA may require additional SOW clarification to determine compliance with other requirements such as those needed by regulatory agencies for consultation.

G. INSURANCE COMPLIANCE REQUIREMENTS

When FEMA provides assistance for permanent work to repair or restore a facility, Stafford Act § 311 requires the applicant to insure the facility and contents with the types and extent of insurance that is reasonably available, adequate, and necessary to protect the facility against future loss. FEMA refers to this as the requirement to “obtain and maintain” insurance requirement. If the Applicant does not comply with this insurance requirement, FEMA will deny or deobligate PA funding for that facility and the facility is ineligible for PA funding in any subsequent disaster. Applicants may comply with the insurance requirement for both flood and non-flood hazards using commercial property insurance or, with FEMA’s approval, a self-insurance plan. FEMA Insurance Specialists will conduct an insurance review for all projects for compliance with the obtain and maintain insurance requirement and a duplication of benefits review.

H. DAMAGE, WORK, AND COST CERTIFICATIONS

To streamline the process, FEMA will accept the Applicant’s provided certification for damage and work, in lieu of providing comprehensive source documentation. The Applicant must certify that damage was caused directly by the declared incident. FEMA does not provide PA funding for repair of damage caused by deterioration, deferred maintenance, failure to take measures to protect a facility from further damage, or negligence. With exception of the information and documentation listed in Appendix A, and in lieu of

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9 See the Environmental and Historic Preservation Considerations sections of the PAPPG for additional information.  
11 Stafford Act 311 (c): 44 CFR Part 75; and FP 206-086-1, VII, Part 1. C.  
12 PAPPG Chapter 4, I.B.1
providing comprehensive source documentation to FEMA, Applicants must certify\(^\text{13}\) that:

1. **Damage**: All damage claimed was a direct result of the Presidential emergency and major disaster declaration. The damage did not result from a lack of maintenance.

2. **Work Claimed**: All work claimed to restore the facility back to its pre-disaster design function and capacity was required as a direct result of the Presidential emergency and major disaster declarations, is located within the designated area, and is the applicant’s legal responsibility.

3. **Impartial and Equitable Delivery of Public Assistance**: All work claimed was delivered in an impartial and equitable manner as required by Title VI of the Civil Rights Act, Section 308 of the Stafford Act, 42 U.S.C. § 5151, and applicable provisions of laws and authorities prohibiting discrimination.

4. **Code and Standard Compliance**: All facilities are being restored in accordance with all federal and SLTT code and standard requirements.

5. **Procurement and Contracting**: The Applicant is using the most restrictive of either its own documented policies and procedures for procurement or federal procurement and contracting laws in accordance with 2 C.F.R. Part 200. The Applicant is following Environmental Protection Agency guidelines for procurement of recovered materials; and including all applicable required contract provisions.

6. **Cost Reasonableness**: All costs claimed are reasonable and of a type generally recognized as ordinary and necessary for the type of facility and work as required by 44 C.F.R. § 206.228 and 2 C.F.R. § 200.404.

7. **Duplication of Benefits**: No work or costs are being claimed that are covered by another funding source.

8. **Documentation Retention**: All documentation is being retained in accordance with 2 C.F.R. §§ 200.334 and 200.337 and will be provided upon request.

9. **True and Correct Statements**: All information provided is true and correct. Upon submittal, the certified Project Application becomes a legal document. It is a violation of federal law to intentionally make false statements or hide information when applying for Public Assistance.

I. **POST AWARD MONITORING**

1. **Quarterly Progress Reports**: FEMA does not require Recipients or Subrecipients to submit Quarterly Progress Reports for Small Projects.

\(^{13}\) Final responsibility for ensuring compliance with EHP laws, regulations, and executive orders remains with FEMA. Failure to obtain and provide all requested documentation jeopardizes funding.
2. **Audits:** FEMA may adjust funding on Small Projects due to audit findings. Recipients and Subrecipients are subject to federal and non-federal audits. A Recipient or Subrecipient that expends $750,000 or more in federal awards during its fiscal year must have a single or program-specific audit conducted for that year in accordance with 2 C.F.R. § 200.501. Additionally, Recipients and Subrecipients must have records available for review by SLTT auditors, FEMA, the U.S. Department of Homeland Security’s Office of Inspector General, or the U.S. Government Accountability Office. Monitoring and oversight requirements in connection with recipient compliance with federal civil rights laws are also authorized pursuant to 44 C.F.R Part 7.

3. **Payment Validation:** FEMA may request documentation to validate Recipient payment to the Subrecipient on individual Small Projects under the Payment Integrity Information Act of 2019. The SLTT will follow its applicable laws and regulations for payment processing.

4. **Sampling:** FEMA may implement sampling procedures in order to evaluate the accuracy of estimates for Small Projects. Such reviews will not change the amount of funding awarded for individual projects but will be utilized to assess cost estimating processes under simplified procedures. FEMA reserves the right to conduct further review should there be audit findings as a result of the sampling procedures.

**J. POST AWARD CHANGE(S) IN SCOPE OR COSTS**

Once FEMA awards a Small Project, FEMA does not adjust the estimated cost or approved amount of an individual Small Project unless it is for one of the reasons listed below. This applies even when FEMA obligates the Project based on an estimate and the actual project costs for completing the eligible scope of work differ from the estimated amount.

FEMA only adjusts the approved amount on individual Small Projects for the following reasons:

1. The Subrecipient did not complete the approved scope of work;
2. FEMA approves a change in scope of work, including any additional hazard mitigation;
3. The Subrecipient received funding not previously deducted to prevent a duplication of benefits (e.g., when actual insurance proceeds exceed the estimated amount deducted);
4. When actual insurance proceeds are less than the estimated amount deducted;
5. Errors or omissions;
6. Hidden damage;
7. Non-compliance with applicable laws, regulations, and Executive Orders; or
8. Fraud, waste, or abuse.

In these cases, FEMA only adjusts the cost for the specific item(s) adjusted.

FEMA will adjust the project size classification based on adjusted cost estimates for the project. FEMA must provide the required congressional notification under section 507 of the
DHS Appropriations Act for any projects that equals to or exceeds $1 million.

FEMA encourages Applicants to use excess funds on activities that reduce future risk or improve future disaster operations.

K. NET SMALL PROJECT OVERRUN

The Subrecipient may request additional funding if its combined actual cost of all its Small Projects significantly exceeds the total amount obligated for all its Small Projects. FEMA refers to this as a Net Small Project Overrun (NSPO) appeal. The Subrecipient must submit request in the form of an appeal within 60 days of the latest work completion date of all its Small Projects. If all of the Subrecipient’s Small Projects have not been obligated at that time, then the Subrecipient has 60 days from the date FEMA obligated its last Small Project to submit an appeal. The appeal must include actual cost documentation for all Small Projects that FEMA funded.

The work completion date is the date the Subrecipient completes all work associated with the approved scope of work, including meeting all compliance requirements. It does not include administrative actions after the actual project scope of work has been completed such as paying invoices, reconciling insurance, warranty periods, compiling and submitting documentation, or other grant management activities.

L. SIMPLIFIED CLOSEOUT

FEMA reconciles all Small Projects based on accepted certified summaries provided by Recipients. To close Small Projects, the Recipient must submit a Small Project Completion Certification and certify that:

- The Subrecipient completed the approved SOWs for all of its Small Projects in accordance with the FEMA-State/Territory/Tribe Agreement; and
- It made all payments in accordance with the FEMA-State/Territory/Tribal agreement (44 C.F.R. § 206.205(a)).

The Applicant must provide documentation to substantiate final actual insurance proceeds and any other sources of funding that may duplicate FEMA PA funding. Applicant must provide documentation to show that they have obtained insurance and complied with all EHP conditions. Non-compliance with any applicable federal and SLTT laws, regulations, and EOs may result in adjustment, denial or deobligation of funding.

M. TIMELINES AND EXTENSIONS

1. **Subrecipient Completion Certification:** If the Subrecipient is not requesting an NSPO, it must certify completion of all its Small Projects to the Recipient no later than 90 days from its latest Small Project work completion date, or the latest approved completion deadline for all of its Small Projects, whichever is sooner. If work on the latest Small Project was completed prior to obligation, the 90-day deadline begins on the date of obligation. If a NSPO is requested, then the process in Section J applies.
2. **Recipient Completion Certification:** The Recipient must certify that the Subrecipient completed the approved scopes of work for all its Small Projects in accordance with the FEMA-State/Tribe/Territory Agreement; and that the Recipient made all payments in accordance with the FEMA-State/Tribe/Territory agreement.

The Recipient must submit the certification to FEMA within 180 days from the latest Small Project work completion date, or the latest approved deadline of the Subrecipient’s Small Projects, whichever is sooner. If work on the latest Small Project was completed prior to obligation, the 180-day deadlines begin on the date of obligation. The Recipient must submit certification of completion of its own Small Projects within 90 days of the latest Small Project work completion date, or the approved deadline of its last Small Project, whichever is sooner. If work on the latest Small Project was completed prior to obligation, the 90-day deadlines begin on the date of obligation. Once FEMA receives the Recipient’s completion certification and completes the necessary review, FEMA closes the respective Small Projects and notifies the Recipient electronically.

3. **Completion Certification Time Extensions:** Recipients and Subrecipients that are unable to meet these deadlines may request a time extension from the FEMA Regional Administrator. Examples of extenuating circumstances that may justify a time extension include.

   i. Projects with open and active correspondence pending that is related to the scope or cost of the project;

   ii. When the respective Recipient or Subrecipient has insufficient personnel available to process project closeout and documentation reviews due to active major disaster or emergency response activities; or

   iii. When the respective Recipient or Subrecipient have a significant amount of project closeouts due simultaneously.

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Melissa K. Forbes  
Assistant Administrator  
Recovery Directorate

January 6, 2023

______________________________
Date
ADDITIONAL INFORMATION

REVIEW CYCLE
This policy will be evaluated and incorporated into version 5 of the PAPPG.

AUTHORITIES
• Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121 and 5207, as amended
• Title 44 of the Code of Federal Regulations, Part 206, Subpart G and H
• Title 2 of the Code of Federal Regulations, Part 200

MONITORING AND EVALUATION
FEMA will closely monitor the implementation of this policy through coordination with regional and field staff, as appropriate, as well as interagency partners and SLTT stakeholders.

QUESTIONS
Direct questions to fema-recovery-pa-executive-office@fema.dhs.gov.
# Appendix A: Minimum Small Project Information Requirements

Note: Applicants must continue to retain all source documentation

<table>
<thead>
<tr>
<th><strong>Applicant Information</strong></th>
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<tbody>
<tr>
<td><strong>Applicant Eligibility</strong></td>
<td>• All information required in the PAPPG to substantiate applicant eligibility.</td>
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<tr>
<th><strong>Facility Information</strong></th>
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<tr>
<td><strong>Facility Eligibility</strong></td>
<td>• Facility Location (address or GPS);</td>
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<td>• Facility type;</td>
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<td>• Original date of facility construction;</td>
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<td>• For a natural feature: documentation to substantiate that it is improved and maintained.</td>
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<td>• Information in the PAPPG for services provided in facilities that are owned or operated by private non-profit applicants (Chapter 4, Section II.B).</td>
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<td>• Information in the PAPPG for facilities that are:</td>
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<td>▪ Leased (Chapter 4, Section I.3.d);</td>
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<td>▪ Inactive or partially inactive (Chapter 4, Section II.C);</td>
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<td>▪ Scheduled for repair or replacement (Chapter 4, Section II.D);</td>
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<td>▪ Privately owned or operated (Chapter 4, Section II); or</td>
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<td>▪ Beaches (Chapter 8, Section IX.E.1).</td>
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<td>• Mixed use facilities (Chapter 4, Section II.B.1)</td>
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<td>• Information for submerged roads (PA Guidance on Inundated and Submerged Roads FEMA Policy FP 104-009-13)</td>
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<tr>
<th><strong>Work Information</strong></th>
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<tr>
<td><strong>Work on a Facility or Equipment</strong></td>
<td>• Type and quantity of equipment, material, and supplies purchased or used;</td>
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<td>• Work location(s);</td>
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<td>• Description of the work required to restore the facility, including dimensions and quantities by material type (with photos and sketches if available);</td>
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<td>• Applicable permits and authorizations;</td>
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<td>• If applicable, documentation substantiating coordination with regulatory agencies; and</td>
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<td>• Information and documentation required by the PAPPG for:</td>
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<td>▪ Pre-disaster capacity of channels, basins, and reservoirs (Chapter 8, Section IX.B);</td>
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<td>▪ Replacement or relocation of a facility (Chapter 8, Section IV.A);</td>
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<td>▪ Improved or Alternate Projects (Chapter 8, Section VIII).</td>
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<tr>
<th><strong>Damage Information</strong></th>
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<td>• Location (address or GPS)</td>
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<td>• A detailed, component-level damage description with dimensions and material types (with photos and sketches if available);</td>
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<td>• Description of the cause of damage; and</td>
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<td>• For insurable equipment, serial or vehicle identification number (VIN).</td>
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Debris Removal
(Category A)

- Detailed description of work activities;
- Type and quantity of labor resources;
- Type and quantity of purchased or used equipment, material, and supplies;
- Quantity of each type of debris and method of removal;
- Work locations with physical address or GPS coordinate and;
- Timeframe of work performed;
- Applicable permits and authorizations;
- If applicable, documentation substantiating coordination with regulatory agencies;
- Information required by the PAPPG and the Simplified PA Program Part 2 Memo dated September 6, 2022, updated for:
  - Removal of hazardous limbs, trees, or stumps if contracted at a per price item (Chapter 7, Section 1.B);
  - Waterway debris removal (Chapter 7, Section C);
  - Removal of privately owned vehicles or vessels (Chapter 7, Section I.D);
  - Private residential or commercial property debris removal (Chapter 7, Section I.G.3 and 4); and
  - Debris removal from private roads (Chapter 7 Section I.G.2).
- Debris disposal
  - Temporary and final disposal site locations;
  - Applicable permits and authorizations;
  - Any documentation substantiating coordination with regulatory agencies;
  - If contracted, name of hauler to the final disposal location;
  - Type of disposal site (e.g., municipal, private, commercial); and
  - For commercial disposal sites: vendor names.
- Removal of vegetative debris in an invasive species quarantine area:
  - Name of the quarantine area;
  - Method of disposal; and
- Whether the debris was disposed of according to quarantine requirements.
- Monitoring

Emergency Protective Measures
Category B)

- Detailed description of work activities;
- Type and quantity of labor resources;
- Type and quantity of purchased or used equipment, material, and supplies;
- Work locations with physical address or GPS coordinate;
- Timeframe of work performed; and
- Information, summary and documentation required by the PAPPG for:
  - Any work on private property and work that requires FEMA approval including non-congregate sheltering (Chapter 7, Section II.O.2);
  - Residential electrical meter repair (Chapter 7, Section II.R);
  - Demolition of residential or commercial property (Chapter 7, Section II.R).
II.U); safe rooms for temporary schools (Chapter 8, Section II.V.5); and host-state/tribe/territory evacuation or sheltering (Chapter 7, Section II.O.4).

- Emergency Access (Chapter 7, Section II.J)
- Mosquito abatement (Chapter 7, Section II.Q and Appendix G);
- Expenses related to operating a facility or providing a service (Chapter 7, Section II.D);
- Purchase or construction of a temporary facility (Chapter 7, Section II.V);
- Mold remediation (Chapter 7, Section II.X.3);
- Emergency berms or dunes on beaches (Chapter 7, Section II.X.4); or
- Repair of damage caused during the performance of eligible emergency protective measures or debris removal operations (Chapter 7, Section III).

### Hazardous materials
- Types of hazardous materials;
- If not disposed, reason for not disposing and what was done, if anything, at the location of the materials; or
- If disposed:
  - Location of disposal sites;
  - Vendor or organization that transported the material;
  - Waste manifests;
  - Notification of proper storage;
  - Any required facility-specific Emergency Response Plans for spills, safety, and proper handling; and
  - Whether any oil or hazardous spills occurred and if so, whether it was reported to state environmental agencies; if so, the case or site number.

### Hazard mitigation
- Detailed description of the work, including dimensions and quantities by material type

### Use of fill or borrow material
- Type and quantity of fill;
- Source and location of the fill and borrow; and
- Whether the source location is commercial (if so, vendor(s) name), municipal, private, or other.

### Ground disturbance
- Location and dimensions of ground disturbance;
- Whether the site was previously undisturbed or outside of an existing footprint or right-of-way; and
- Whether it involves removal of any trees, root-balls, stumps, or other vegetation and if so, method of removal.

### Work in or adjacent to a cemetery
- Cemetery name and age.

### Work in or within 200 feet of a waterway, body of water, floodway, or wetland
- Whether any equipment is being placed in water or wetlands. If yes, location and area dimensions (length, width, and depth).
- Whether discharge or fill materials occurred. If so, type of material.
- If dredging: method, dimensions, and boundaries.

### Work on or adjacent to a facility
- Whether there were any previous extensive renovations to the exterior or interior of the facility. If so, dates of renovations; and
| **constructed 45 or more years ago; listed on a national register; or that is a locally registered landmark or in a historic district** | • Detailed descriptions of mold remediation activities including chemical cleansers or pounds per square inch for power washing. |
| **Temporary access road or temporary staging of equipment or materials** | • Whether it is in an existing right-of-way; and • Type of surface. |

| **Cost Information** |
| **Hazard mitigation** | • If applicable, a benefit-cost analysis or information for FEMA to conduct a benefit cost analysis. |
| **Costs for completed work** | • Certified cost estimates may be used in cases where Applicants are not able to compile actual costs within a reasonable timeframe, or when Applicants have not yet received final invoices. • Estimates may be calculated based on actual or estimated total number of staff and total hours with average pay rates, including fringe benefits. Average rates may only be used for employees at similar pay grades and same category of employee (i.e., permanent full-time vs. part-time vs. temporary hire). • Summary of the total hours and cost must include each of the following separately listed, if applicable:  ▪ Total number of employee straight-time hours and cost;  ▪ Total number of employee overtime hours and cost;  ▪ List of purchased materials, supplies, and equipment broken out by type with total cost for each;  ▪ Rented equipment cost with total number of days and/or hours used;  ▪ Total number of applicant-owned equipment usage hours and cost broken out by equipment type; and • Total cost for each contractor. |
| **Costs for uncompleted work** | • Itemized cost estimate; or • Information for FEMA to prepare a cost estimate, which may be estimated based on an extrapolation of known actual costs. |
| **Contracts** | • Type of contract; and • Information and documentation required in PAPPG Chapter 6, Section VIII for contracts that are:  ▪ Non-competitively bid;  ▪ Time and materials;  ▪ Cost-plus-percentage-of-cost; or  ▪ Cost-plus-percentage-of-construction. |
| **Insurance** | • Policies as applicable and settlement documents; and • Documentation to support compliance with Obtain and Maintain insurance requirements, if applicable. |

| **Environmental or Historic Preservation Information** |
| Environmental or Historic Preservation Information | • Applicable permits and authorizations;  
• Applicable documentation substantiating coordination with regulatory agencies; Whether work is near threatened or endangered species or designated critical habitat; and  
• Documentation for FEMA to confirm compliance with EHP laws, executive orders, and regulations. |