

Summary of Changes: Public Assistance Program and Policy Guide, Version 5

The Public Assistance (PA) Regulations & Policy Branch drafted Version 5 (V5) of the Public Assistance Program and Policy Guide (PAPPG) to be clearer, more equitable, more resilience-forward, and more supportive of readiness efforts. PA is excited to now present *PAPPG, V5* for Public Comment; along with this summary, which provides an overview of the proposed changes thus far to guide your review. From the entire PA program, *Thank you* for your review. Your feedback is critical in shaping and the PA program and improving FEMA's role in helping communities recover after disasters.

Overview

FEMA PA has now published *PAPPG, V5* for a 60-day Public Comment period – requesting all comments and feedback from Jun. 18 – Aug. 19, 2024. To guide Public Comment reviews, PA prepared this summary, including the following Compendium of Changes, to guide stakeholder reviews.

HIGHLIGHTED V5 IMPROVEMENTS

- ✓ **Equity Focus**
 - Drafted in plain language to increase accessibility and user-friendliness.
 - Emphasized compliance with the Civil Rights Act and applicable Executive Orders.
 - Incorporated considerations regarding how policy changes impact historically underserved communities.
- ✓ **Reorganization**
 - Clarified policy language and removed duplicative content.
 - Removed non-regulatory processes for inclusion in other PA guidance.
 - Restructured PNP content to increase user-friendliness.
- ✓ **Simplification**
 - Simplified language for a people first approach, in alignment with FEMA's Strategic Plan.
 - Where possible, removed “may” and “should,” and replaced with “must” to clarify requirements.
 - Reduced and refined list of acronyms by only including commonly known FEMA and industry acronyms.
 - Redefined acronyms at the beginning of each chapter in consideration of how the PAPPG is used in the field (i.e., the PAPPG is not read cover to cover but topic to topic).
- ✓ **Tribal Nations Emphasis**
 - Highlighted Tribal Nations-specific information.
 - Incorporated PA improvements from the [Recovery Program Enhancements to Support Tribal Nations memo](#).

- Included information provided for state & territory recipients to tribal recipients also.

Compendium of Changes

The following is organized by PAPPG, V5 chapter & section and only includes sections/subsections where updates have been made (this does not include all formatting changes or non-substantive updates).

INTRODUCTION

Authorities

- Updated to include V5-specific authorities and reorganized to remove duplicative references.

CHAPTER 1: DECLARATIONS AND PLANNING

Damage Assessments

- Added clarifying information regarding FEMA’s expectation that a state, tribal, or territorial (STT) government conduct an initial damage assessment prior to requesting a joint PDA, in order to validate the need for Federal assistance.
- Added terminology box titled “Recipients, Subrecipients, and Applicants” to distinguish between the PA-specific terms.

Declaration Request

- Added parenthetical following “immediate needs” to define term as indicating lifesaving or life-sustaining items.

Declaration Determinations

- Within subsection titled “Types of Assistance,” added language regarding the possible future impacts of climate change.

Declaration-Related Appeals

- Added guidance for appealing a declaration denial.

Recipient Administrative Requirements

- Added new subsection titled “Recipient-Led Public Assistance,” expanding on information only found within a callout box in *PAPPG, V4*.
- Referenced the State-led Guide and added language clarifying process as “Recipient-led”, to be more inclusive.

CHAPTER 2: COORDINATION AND APPEAL RIGHTS

PA Eligibility

- Relocated and reframed eligibility information from section titled “Eligibility Determinations” in *PAPPG, V4, Chapter 3: Applicant Coordination and Eligibility*, to new “PA Eligibility” section.
- Added language clarifying that non-compliance with PAPPG requirements jeopardizes PA funding.

Simplified Procedures

- Included a paragraph on FEMA’s Simplified Procedures policy. This paragraph introduces the policy, which is reflected throughout *PAPPG, V5*.

Sampling Procedures

- Added information about PA’s Sampling Procedures and provided link to guide.

Facilitated Discussions

- Added paragraph explaining that if an eligibility issue arises, FEMA’s Alternative Dispute Resolution (ADR) service can serve as a tool to help facilitate discussions.

Notification of an Ineligibility Determination

- Included language explaining that a Determination Memo (DM) could result from a Validate as You Go (VAYGo) audit finding.

Arbitration

- Added information regarding the Civilian Board of Contract Appeals (CBCA) and how it may be used to resolve contract disputes, including adding criteria for using the service.

CHAPTER 3: APPLYING FOR PUBLIC ASSISTANCE & APPLICANT ELIGIBILITY

Reformatted and reordered sections to present applicant eligibility information in a more linear, straightforward way; such that a new applicant may more quickly access key information.

Applicant Eligibility

- Included reference to distinct subsections created for SLTT eligibility (“Applicant Eligibility: State, Local, Tribal, and Territorial Government Entities”) and PNP eligibility (“Applicant Eligibility: Private Nonprofit Organizations”).

Request for Public Assistance

- Added bulleted list providing examples of “extenuating circumstances” for an applicant requesting an RPA time extension.

Applicant Eligibility: State, Local, Tribal and Territorial Government Entities

- Included link to Bureau of Indian Affairs (BIA) list of federally recognized tribal nations within “Tribal Governments” subsection.

Applicant Eligibility: Private Nonprofit Organizations

- Added new section for PNP eligibility. Content included in this new section was previously located within *PAPPG V4*, Chapters 3 and 4.

Organization Eligibility

- Added callout box highlighting for-profit entities’ general ineligibility and contracting exception for SLTTs.

Facility Eligibility

- Added terminology box clarifying and defining the PA-specific terms “rehabilitational facilities” and “rehabilitation facilities.”

Multiple Facilities

- Moved information regarding multiple facilities into new separate sub-header.

Leased Facilities

- Revised information about leased facilities to present information in plain language.

Small Business Administration Loan Requirement

- Added a table to convey important information about when an SBA loan would be required and for the category of work needed.
- Within “Small Business Loan Eligibility” subsection, removed limitation of “similar” disaster events for mitigation assistance to make improvements that help reduce the risk of future property damage.

Private Nonprofit Services

- Included documentation requirements that were previously only within the body of the document, including legal responsibility and services, within tables.
- Changed the requirement for educational PNPs to provide a “complete list of students and teachers” to the “number of students and faculty” to limit unnecessary PII collection.
- Removed the requirement for educational PNPs to provide “other records kept for students” to limit unnecessary PII collection.

CHAPTER 4: GENERAL FACILITY AND WORK ELIGIBILITY

Facility Eligibility

Public Facility

- Expanded bulleted list of eligible public facilities by including facilities listed in the Stafford Act and 44 CFR 206.201.
- Included eligibility language regarding green infrastructure and nature-based solutions.
- Removed duplicative *PAPPG, V4* language regarding ineligible facilities and reformatted into a bulleted list.

General Work Eligibility

- Added additional examples of impacts or damage not caused by the declared incident.
- Included language specifying that maintenance records are not required to substantiate damage in every situation. Three scenarios provided to support clarity.
- Included language specifying documentation and certification required to determine eligibility.

Legal Responsibility

- Included more options for documentation to support legal responsibility.

Equity Considerations

- Included language about equity considerations for disrupting the cycle of disproportionate effects of disaster consequences often facing underserved communities.

Climate Considerations

- Added section highlighting FEMA’s investment in building a more resilient nation.

CHAPTER 5: DAMAGE AND IMPACT INFORMATION

Impact List

- Moved deadline information into new subsection titled “Impact List Submission Deadline.”

Grouping Impacts into Projects

- Clarified that logical grouping should not be based on project size or grant administration considerations.
- Separated *PAPPG, V4* subsection titled “Initial Emergency Work Grouping” into two subsections titled “Initial Debris Removal Grouping (Category A)” and “Initial Emergency Protective Measures Grouping (Category B).”
- Added new subsection titled “Building Code and Floodplain Management Administration and Enforcement Activities Grouping (Category I).”
- Added new subsection titled “Grant Management Activities Grouping (Category Z).”

CHAPTER 6: COST ELIGIBILITY

Eligibility Requirements

- Moved eligibility requirements and figure titled “Cost Eligibility” from *PAPPG, V4* introductory paragraph into new separate section.

Reasonable Costs

- Within “Reasonable Cost Analysis” subsection, added “extraordinary labor costs” as an additional factor or extenuating circumstance existing and causing escalation in costs.

Reasonable Cost Analysis

- Clarified when we do and do not analyze costs for reasonableness.

Applicant (Force Account) Labor

- Added table to convey documentation and information requirements for small and large projects.
- Added clarification that costs associated with the salary and benefits of an employee on leave are not eligible.
- Clarified what constitutes overtime.
- Included language explaining that, for Category I, only overtime labor costs are eligible.
- For standby time, clarified that the applicant should provide “documentation to support the need for and provision of continuous support” rather than “data that led to its decisions and actions”.
- Added scenarios to provide clarity for backfill employee eligibility.

Applicant-Owned and Purchased Equipment

- Moved documentation list from in-text bulleted list into new table titled “Documentation Requirements for Applicant-Owned or Purchased Equipment Costs.”
- Provided clarification that because FEMA Rates include fuel costs, an applicant cannot include fuel costs in addition to FEMA equipment rates.
- Added new subsection titled “Telecommunications Equipment Purchase,” to clarify when applicants may not obligate or expend any FEMA awards, including any new, renewed, or extended purchase orders, contracts, subcontracts, or similar acquisitions on prohibited systems identified in the National Defense Authorization Act; pursuant to 2 C.F.R § 200.216.
- Added new terminology box defining “Covered Telecommunications Equipment.”

Rented or Leased Equipment

- Added language to clarify rental equipment as an option, in addition to leased equipment.
- Moved documentation list from in-text bulleted list into new table titled “Required Documentation for Rented or Leased Equipment Costs.”

Supplies

- Moved documentation list from in-text bulleted list into new table titled “Required Documentation for Materials and Supplies.”

Disposition for Small Projects

- Added new section explaining the disposition requirements for small projects.

Disposition of Real Property

- Reformatted *PAPPG, V4* language to clarify that recipients and applicants must obtain disposition instructions from FEMA.

Procurement and Contracting Requirements

- Within subsection titled “Procurement and Contracting Requirements for State and Territorial Government Entities,” combined *PAPPG, V4* terminology box titled “Procurement

Methods” and callout box titled “Procurement of Real Property” into single *PAPPG, V5* terminology box titled “Procurement Methods & Procurement of Real Property.”

- Within subsection titled “Procurement and Contracting Documentation Requirements,” moved documentation list from in-text bulleted list into new table titled “Required documentation for Contract Work Costs.”
- Removed “must” from the pre-procurement considerations because SLTTs do not have to pre-procure contracts.
- Added language clarifying that if the applicant does not adhere to competitive procurement requirements, FEMA will work with the recipient to identify remedies for non-compliance. However, if FEMA or the recipient determine that non-compliance cannot be remedied by imposing additional conditions, FEMA will disallow all or part of the associated costs. Previously, only provided that FEMA may disallow costs without considering remedies for non-compliance.

Mutual Aid

- Added new terminology box defining “Mutual Aid Agreement.”
- Created a sub-header for EMAC, which includes the documentation identified in the [Simplifying the Public Assistance Program Memo](#).
- Within subsection titled “Mutual Aid Documentation Requirements,” moved documentation list from in-text bulleted list into new tables titled “Documentation for EMAC Costs” and “Documentation for Mutual Aid Costs (non-EMAC).”

Prisoners

- Moved documentation list from in-text bulleted list into new table titled “Documentation for Prison Labor Costs.”

Grant Management and Administration

- Adjusted language to align with FEMA’s *Simplifying the Public Assistance Program Memo*.

Duplication of Benefits

- Within subsection titled “Insurance Proceeds,” moved documentation list from in-text bulleted list into new table titled “Insurable Facility Required Documentation for Insurance Proceeds.”
- Reordered “Duplication of Funding Between FEMA Programs” information from *PAPPG, V4* into a new subsection within the “Duplication of Benefits” section.

Increased Operating Costs

- Included language clarifying that this limited allowance is separate from and does not include loss of revenue.

CHAPTER 7: EMERGENCY WORK ELIGIBILITY

Debris Removal (Category A)

- Within bulleted list of necessary Category A work activities, relabeled “appurtenances” as “ancillary facilities.”
- Moved definition for “Federal-Aid Roads” from *PAPPG, V4* footnote into terminology box.

Hazardous Limbs, Trees, and Stumps

- Updated requirements to align with Stafford Act, Section 422, and FEMA’s *Simplifying the Public Assistance Program Memo* (i.e., added language indicating that FEMA encourages applicants work with qualified individuals to perform hazard tree assessments to determine those trees that can be saved by bracing.).
- Removed condition that bracing a tree is eligible “only when doing so is less costly than removal and disposal.”

Monitoring Contracted Debris Removal Operations

- Added terminology box defining “commercial and non-commercial property.”

Private Property Debris Removal (PPDR)

- Removed the requirement for pre-approval for PPDR.
- Added terminology box defining “orphan roads.”
- Added language clarifying FEMA’s authority to determine whether debris removal from restricted or private roads is in the public interest.

Emergency Protective Measures (Category B)

Saving Lives and Protecting Public Health and Safety

- Removed “Residential Electrical Meter Repair” from the list of eligible activities.
- Removed childcare services as a standalone EPM and is now only eligible when associated with emergency sheltering (both congregate and NCS).

Protecting Improved Property

- Added terminology box defining “improved property.”

Emergency Protective Measures on Private Property

- Expanded bulleted list of examples where emergency protective measures on private property may be eligible to include “animal carcass removal.”

Hazardous Materials

- Added terminology box defining “inland and coastal zones.”

Evacuation and Sheltering

- Within subsection titled “Sheltering,” expanded emergency sheltering eligibility to include survivors’ “household pets, service animals, assistance animals.”
- Removed requirement for pet owners to be sheltered for pet sheltering to be eligible.
- Removed pre-approval requirement for NCS activities in traditional settings (i.e., hotels/motels, dormitories, etc.).

Infectious Disease Incident

- Included clarifying language that FEMA will issue disaster-specific guidance in response to a specific infectious disease incident or pandemic.

Safety Inspections

- Removed *PAPPG, V4* inspection criteria and included in-text reference to Category I: Building Code and Floodplain Management Administration and Enforcement section.

Demolition of Private Structures

- Removed determining factor in demolition that, “If more than one wall of a structure is standing and not in immediate danger of collapsing, FEMA considers the removal of that structure to be demolition and not debris removal ...” which aligns the language to the [Wildfire Policy Guidance Memo](#).
- Added example box titled “Eligibility of Demolition Debris.”

Temporary Relocation of Essential Services

- Within subsection titled “Time Limitations”, reformatted *PAPPG, V4* subsections titled “Improved Project” and “Alternate Project” into bulleted list of “conditions when temporary facility funding is limited.”

Snow-Related Activities

- Clarified that FEMA does not authorize snow assistance for emergency declarations.

Emergency Repair or Stabilization

- Within subsection titled “Mold Remediation,” removed the “absence of rain gutters” as an example of evidence of pre-existing damage or deferred maintenance.

Damage Caused During Performance of Emergency Work

- Revised language to allow the replacement of damaged trees, shrubs, or other ground cover as eligible if the replacement is part of the repair work when damaged during eligible emergency work activities.
- Clarified that crops and agriculture are not eligible for replacement.

CHAPTER 8: PERMANENT WORK ELIGIBILITY (CATEGORIES C-G)

Added sub-headers to explain nuances about permanent work (e.g., good construction practices).

Codes and Standards

- Included additional information about Consensus-Based Codes, Specifications, and Standards (CBCSS) for improved awareness and understanding.
- Added the Building Science Resource Library as a resource to applicants seeking information on applicable building codes.
- Added a section related to local codes and standards and the criteria for eligibility.

Hazard Mitigation

- Reformatted and revised the previous “Public Assistance Hazard Mitigation” section to include separate subsections on the following topics:
 - Eligibility criteria for PA hazard mitigation that includes separate sections on future damage reduction, cost effectiveness, and compliance with legal requirements.
 - Proposing PA hazard mitigation.
 - Reducing adverse impacts.
 - Post-repair hazard mitigation
 - Completed hazard mitigation eligibility
 - Added a new subsection to address nature-based solutions.
- Clarified that PA mitigation measures can be implemented for all hazards, not just the hazard that caused the damage.
- Added information and reference to the Benefit Cost Analysis (BCA) Toolkit.

Flexible Restoration (Capped Projects)

- Moved language stating “FEMA does not incorporate funds from temporary facilities into fixed cost projects” from *PAPPG, V4, Chapter 7.V, Temporary Relocation of Essential Services* to this section.
- Clarified that, when the applicant chooses not to repair the original site (e.g., an Alternate Project), FEMA may require that the applicant coordinate with regulatory agencies to determine if the proposed work will adversely affect any historic properties and/or natural resources.

Eligibility Considerations by Facility

- Roads and Bridges (Category C):
 - Expanded the example list of drainage structures to include “vegetated swales” and “water bars.”
 - Incorporated the Inundated & Submerged Roads policy (DRRA 1228).
 - Included language clarifying road damage and submerged & inundated as distinct types of damage, to reduce confusion of applying the Inundated & Submerged Roads policy for all roads.
- Water Control Facilities (Category D):
 - Moved documentation for maintenance from *PAPPG, V4* footnote into the body text.

- Clarified documentation needed to demonstrate maintenance requirements for channels, basins, and reservoirs.
- Added “acequia” as a type of water control facility.
- Buildings and Equipment (Category E):
 - Buildings
 - Included information from *Appendix C: Welded Steel Moment Frame* in-text within this chapter (*Appendix C* was removed from the PAPPG).
 - Contents and Supplies
 - Provided a list of building contents and clarified that “contents” can also include equipment on the property rather than within the building.
- Utilities (Category F):
 - Added power storage facilities to the list of utilities.
 - Revised guidance on reconductoring by adding language stating that the use of advanced conductors or other technologies that improve the resilience of power generation, transmission, and distribution facilities may also be eligible for reconductoring. This also includes language stating that advanced conductors or other resilient technologies may be eligible as an upgrade through PA mitigation or through an Improved Project.
- Parks, Recreational, Other Facilities (Category G)
 - Removed “or to stabilize slopes, including dunes on eligible improved beaches” from the list of allowable purposes for eligible nature-based solutions.
 - Added “improve water quality and protect coastal property” to the list of allowable purposes for eligible nature-based solutions.
 - Revised to clarify that the replacement of trees, shrubs, and vegetation is eligible when included with site restoration.

Repair vs. Replacement

- Clearly states 50% Rule calculation may be re-run for an initial error by FEMA, but not for revised estimates.
- Removed “signs” from the list of example facilities for 50% Rule consideration.
- Removed roadway section as an example of a facility FEMA applies the 50% Rule calculation.

Relocation

- Simplified introductory language.
- Added subsections for “FEMA-Directed Relocation,” “Applicant-driven: Repair vs. Replacement,” and “Code-Driven: Part 9 & Other Code and Standard Relocations.”

Environmental and Historic Preservation Requirements

- Removed requirement that, for any structure built, replaced, or substantially improved in a Special Flood Hazard Area (SFHA), the applicant must, at a minimum, either elevate or floodproof the lowest floor (including the basement) to or above the 100-year base flood elevation (BFE).

Facility Located in or Impacting a Floodplain

- 8-Step Decision-making Process
 - Clarified eligibility to include examples of when FEMA may be unable to identify a practicable alternative to restoring the facility within the floodplain.
- Facility Located in a Special Flood Hazard Area
 - Revised introduction language to be clearer.

Requirement to Obtain and Maintain Insurance

- Clarified when FEMA may modify the insurance requirement, removed “An alternative to the insurance requirement provides adequate protection against future loss to the property” because there is no alternative. There are two conditions left when this may be applied.
- Revised the language explaining when the O&M requirement is not required.
- Added language to address situations when an applicant is not able to insure a facility before subsequent disaster.

Building Code & Floodplain Management Administration and Enforcement (Category I)

- Fully incorporated Building Code and Floodplain Management Administration and Enforcement (DRRA 1206).

CHAPTER 10: ENVIRONMENTAL AND HISTORIC PRESERVATION

- Created this chapter to inform applicants on the requirements and expectations of the environmental and historic preservation (EHP) compliance review process.

EHP Compliance

- Clarified information and documentation needed for projects that qualify for streamlined EHP review and projects requiring complex EHP review.
- Outlined the regulatory agencies that may need to be consulted or coordinated.
- Provided examples of project types that may have potential for impacts to natural and cultural resources.
- Provided guidance on navigating the EHP compliance review process.
- Explained the application of EHP laws and EOs, in addition to referencing the laws and EOs throughout.
- Discusses categorical exclusions (CATEX) and statutory exclusions (STATEX) in plain language.
- Provided EHP considerations by category of work.
- Explained and provided examples of projects that have potential to impact EHP resources.

CHAPTER 11: PROJECT MONITORING AND AMENDMENTS

Large Project Quarterly Progress Reports

- Aligned with PA’s information collection.

Audits

- Incorporated fraud language as required from the OIG audit.
- Provided compliance information relating to the Office of Equal Rights.
- Provided updated language on the Payment Integrity Information Act (PIIA), rather than the Improper Payments Elimination and Recovery Improvement Act (IPERIA).
- Provided guidance from the VAYGo SOP and provides a link to the *VAYGo PA Grants Guide*.

CHAPTER 12: FINAL RECONCILIATION AND CLOSEOUT

Project Reconciliation and Closeout

- Provided language from the 422 Policy relating to small project closeout procedures.
- Aligned the large project closeout documentation and information requirements to PA’s information collection.
- Incorporated the Closeout SOP language.

REFERENCES AND RESOURCES

- Removed reference to the *Validation of Small Projects (FEMA SOP 9570.6)*.

- Updated language to provide references to new SOPs, policies, and reference documents.

TERMS AND DEFINITIONS

- Added definitions for budgeted, unbudgeted, exempt, non-exempt, permanent, temporary, part-time, and overtime.
- Added definitions for alternate project, equity, hazardous tree, improved project, scope of work, underserved communities, and resilience. Also updated definition language for coastal zone.
- Added definition of pre-disaster.

Compendium of Changes: Appendices

Appendices require formatting, lettering, and review for consistency in organization.

APPENDIX A: ENVIRONMENTAL AND HISTORIC PRESERVATION COMPLIANCE

- Provided clarification for NEPA and NHPA.
- Included language for EO 12898, Environmental Justice.

APPENDIX C: MOSQUITO ABATEMENT

- Changed title of this appendix from “APPENDIX G: MOSQUITO ABATEMENT” to “APPENDIX C: MOSQUITO ABATEMENT,” due to the removal of previous appendices.

APPENDIX D: SNOW DECLARATIONS

- Changed title of this appendix to from “APPENDIX H: SNOW DECLARATIONS” to “APPENDIX D: SNOW DECLARATIONS,” due to the removal of previous appendices.
- Clarified the sources used to determine snow fall measurement.

APPENDIX E: MOLD REMEDIATION

- Changed title of this appendix from “APPENDIX I: MOLD REMEDIATION,” to “APPENDIX E: MOLD REMEDIATION,” due to the removal of previous appendices.

APPENDIX F: WORK ELIGIBILITY CONSIDERATIONS BY TYPE OF FACILITY

- Moved this appendix ahead of Appendix J.
- Changed title of this appendix from “APPENDIX N: WORK ELIGIBILITY CONSIDERATIONS BY TYPE OF FACILITY,” to “APPENDIX F: WORK ELIGIBILITY CONSIDERATIONS BY TYPE OF FACILITY,” due to the removal of previous appendices.
- Updated languages relating to PA hazard mitigation to increase clarity and readability.
- Added Building Code and Floodplain Management Administration & Enforcement (DRRA 1206).
- Added power storage facilities to the list of work eligibility considerations for utilities.

APPENDIX J: COST-EFFECTIVE PA HAZARD MITIGATION MEASURES

- Expanded Appendix J to increase PA Hazard Mitigation opportunities at 100% funding to include:
 - For buildings and structures outside of the wildland-urban interface (where FEMA building code policy already requires these mitigation measures), create defensible space around facilities or structures with wildfire risk by removing or reducing the volume of flammable vegetation. The volume of vegetation should be minimized (e.g.

hardscaping) by thinning or replacing flammable vegetation with less flammable, non-invasive species. Less flammable vegetation includes high-moisture plants, trees with low sap or resin content, plants with thick leaves, and drought tolerant vegetation. Native species are preferable as non-native options are less likely to withstand weather conditions, creating a fire risk.

- For buildings and structures outside of the wildland-urban interface (where FEMA building code policy already requires these mitigation measures), non-combustible construction materials: Replace and upgrade construction materials with non-combustible alternatives for facilities with wildfire risk.

PAPPG, V4 APPENDICES THAT WERE REMOVED DURING THE PAPPG, V5 REVISION:

- APPENDIX C: WELDED STEEL MOMENT FRAME
 - Removed this appendix. This information was incorporated into *Chapter 8: PERMANENT WORK ELIGIBILITY*.
- APPENDIX D: FREQUENT COMPLIANCE ISSUES WITH COOPERATIVE PURCHASING PROGRAMS
- APPENDIX E: STUMP CONVERSION TABLE
- APPENDIX F: HAZARDOUS STUMP WORKSHEET