

JUN 25 2014



FEMA

MEMORANDUM FOR: FEMA Regional Administrators
Regions I - X

ATTENTION: Recovery Division Directors

FROM: Brad J. Kieserman
Assistant Administrator
Recovery Directorate 

SUBJECT: Public Assistance Alternative Procedures Pilot Program for
Debris Removal

The purpose of this memorandum is to announce that FEMA is extending the performance period of the Public Assistance Alternative Procedures Pilot Program for Debris Removal, authorized by the Sandy Recovery Improvement Act of 2013 (P.L. 113-2), for one year to June 27, 2015. The extension will enable FEMA to collect additional data that will be used to evaluate the effectiveness of the alternative procedures and inform decisions as to which alternative procedures should be permanently incorporated into FEMA's Public Assistance Grant Program.

At the same time, FEMA will make two major changes to the implementation of the alternative procedures for declarations on or after June 28, 2014.

1. Each of the four implemented debris removal alternative procedures will be available for both large and small Category A – Debris Removal projects.
2. Subgrantees must notify FEMA of intent to participate in the alternative procedures before obligation of their first subgrant for debris removal or within 60 days of the subgrantee's Kickoff Meeting, whichever occurs earlier.

Details on these changes and general guidance for implementing the alternative procedures are contained in the attached, updated *PA Alternative Procedures Pilot Program Guide for Debris Removal* (Guide). The Guide also includes clarification that the augmented federal shares under Accelerated Debris Removal, apply to the performance of eligible debris removal work during the associated period, not just "completed" work or work that results in final disposal of debris.

If you have any questions about this guidance, please contact William Roche, Director of the Public Assistance Division, via email at William.Roche@fema.dhs.gov, or by phone at (202) 646-3834.

Attachment

**Public Assistance
Alternative Procedures
Pilot Program
Guide for Debris Removal (Version 2)**
June 27, 2014



FEMA

**Federal Emergency Management Agency
Department of Homeland Security
500 C Street, S.W.
Washington, DC 20472**

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PART I. OVERVIEW

On January 29, 2013, President Obama signed into law the Sandy Recovery Improvement Act of 2013 (P.L. 113-2). This law amends Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) (Stafford Act). Specifically, the law adds section 428, which authorizes alternative procedures for the Public Assistance Program under sections 403(a)(3)(A), 406, 407 and 502(a)(5) of the Stafford Act. It also authorizes the Federal Emergency Management Agency (FEMA) to implement the alternative procedures through a pilot program. The pilot program for the alternative procedures that pertain to debris removal is available through June 27, 2015. FEMA will analyze data documented throughout the pilot to assess the procedures' effectiveness at achieving the goals outlined in the Sandy Recovery Improvement Act. Based on the assessment, FEMA may elect to discontinue the program, extend the pilot for an additional performance period, or issue regulations that would institute the program changes authorized by the law.

The law identifies the following goals for these procedures:

- Reducing the costs to the Federal Government of providing Public Assistance.
- Increasing flexibility in the administration of such assistance.
- Expediting the provision of assistance to a state, tribal or local government, or nonprofit owner or operator of a private nonprofit facility.
- Providing financial incentives and disincentives for timely and cost-effective completion of projects with such assistance.

Public Assistance Program Features Included in the Alternative Procedures

The alternative procedures authorized under the law pertain to debris removal (emergency work) and repair, restoration, and replacement of disaster-damaged public and private nonprofit facilities (permanent work). This guide outlines the alternative procedures for debris removal only.

Alternative Procedures for Debris Removal

For debris removal, the law allows for, and FEMA is currently piloting:

- The use of a sliding scale for determining the federal share for removal of debris and wreckage based on the time it takes to complete debris and wreckage removal;
- The use of program income from recycled debris without offset to the grant amount;
- Reimbursing base and overtime wages for the employees of state, tribal or local governments, or owners or operators of private nonprofit facilities performing or administering debris and wreckage removal; and

-
- Providing incentives to a state or tribal or local government to have a debris management plan accepted¹ by the FEMA Administrator and have pre-qualified one or more debris and wreckage removal contractors before the start of the declaration's incident period.

The law also authorizes the FEMA to make grants for debris removal on the basis of fixed estimates, and to allow subgrantees to use excess funds from those grants for approved purposes. FEMA is not implementing these procedures as part of this pilot. FEMA continues to work to improve debris estimating methodologies and will consider implementing these procedures in the future.

A. Applicability

In accordance with the law, state, tribal, and local governments, and the owners and operators of certain private nonprofit facilities may participate in the alternative procedures during the pilot performance period.² Participation in the pilot program and use of the alternative procedures for debris removal is voluntary. If subgrantees use any of the alternative procedures, they will sign an acknowledgement regarding these procedures, which FEMA will attach to the Subgrant Application (Project Worksheet).

The alternative procedures for the debris removal pilot program is available to any applicant, upon request, for any major disaster or emergency declared on or after June 28, 2013, and until the end of the pilot program period. For incidents declared between June 28, 2013, and June 27, 2014, the alternative procedures contained in this document are for large projects only with the exception of reimbursement for straight time force account labor which can be applied to both small and large projects.³ (See **Debris Removal Straight Time Force Account Labor** section.) For disasters and emergencies declared on or after June 28, 2014, all of the debris removal alternative procedures can be applied to both small and large projects. Small projects, with the exception of those using the Accelerated Debris Removal--Increased Federal Cost Share (Sliding Scale) alternative procedure, are to be processed using the Simplified Procedures authorized by section 422 of the Stafford Act.

¹ FEMA will review debris management plans as described in the Debris Management Plan Job Aid.

² A grantee is defined as a state or tribal government that has chosen to serve as a grantee. A subgrantee is defined as a state agency, local government, Indian tribe, authorized tribal organization, Alaska Native village or organization, or certain Private Nonprofit organization that submits a request for disaster assistance under the Presidentially declared major disaster or emergency.

³ A large project is a project with a total estimated cost that exceeds the monetary threshold established in section 422 of the Stafford Act and 44 CFR §206.203(c). For major disasters and emergencies declared after February 26, 2014, the threshold is \$120,000. This threshold will be adjusted annually for inflation. A small project is any project below the large project threshold.

B. Compliance With Applicable Laws, Regulations, and Policies

The law authorizes FEMA to carry out the alternative procedures via this guidance as a pilot program. Accordingly, FEMA has developed this document to provide the framework for implementing the alternative procedures as a pilot program and to establish acceptable requirements for those elements of existing regulations that are excepted by the provisions of the law. This guidance document addresses exceptions to regulations in 44 CFR §206.203(c)(1), §206.204(e), §206.206, and §206.253(a).

Subgrantees participating in this pilot program must abide by the elements of this guidance document for applicable components of the Public Assistance Program; and FEMA will approve projects to which the alternative procedures apply in accordance with this document. However, all other statutory, regulatory and policy requirements of the Public Assistance Program apply and are not affected by the alternative procedures. The alternative procedures also do not affect requirements for compliance with other federal requirements, including environmental and historic preservation (EHP) laws, regulations, and executive orders.

C. Purpose of this Guidance Document

This document provides guidance to FEMA, grantees, and subgrantees for implementing the alternative procedures for the debris removal pilot program. This guidance document pertains only to procedures authorized under the law. FEMA, grantees, and subgrantees will implement all other aspects of the Public Assistance Program in accordance with standard procedures. It describes the scope and limitations of the alternative procedures; describes changes to the aspects of the Public Assistance Program to which these procedures apply; identifies responsibilities for certain activities; and identifies timelines for key actions and decisions.

As described above, FEMA is implementing the alternative procedures initially through a pilot program. The pilot will allow FEMA to gather meaningful information on the effectiveness of the alternative procedures, to establish controls for the proper use of federal funds, and to inform a potential future proposed rulemaking.

PART II. ALTERNATIVE PROCEDURES FOR DEBRIS REMOVAL

These procedures contain provisions intended to increase the effectiveness of debris removal operations and reduce federal administrative costs. Although some provisions are most effective when used together, such as employing a debris management plan in an accelerated debris removal operation, subgrantees may elect to use one or more of the procedures for their debris removal projects. Utilizing multiple debris removal alternative procedures is not required for any given debris removal project in order to receive the incentive for any of the other provisions. These alternative procedures are addressed in greater detail below.

A. Requesting Alternative Procedures for Debris Removal

Upon the declaration of a major disaster or emergency by the President authorizing FEMA to provide debris removal assistance, FEMA will provide eligible Public Assistance subgrantees the opportunity to participate in the alternative procedures for the debris removal pilot program. Subgrantees must notify FEMA of their intent to participate in the alternative procedures by signing and submitting the *Public Assistance Alternative Procedures Pilot Program for Debris Acknowledgement* (Appendix A) before obligation of their first subgrant for debris removal or within 60 days of the Kickoff Meeting, whichever occurs earlier.

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

The pilot program authorizes an increased federal cost share for the collection, hauling, processing, and disposal of debris when subgrantees perform removal operations within a specified time frame (Table 1). To participate in this procedure, debris removal projects must include all debris for which a subgrantee will be requesting FEMA assistance.

Table 1. Alternative Procedure Federal Cost Share

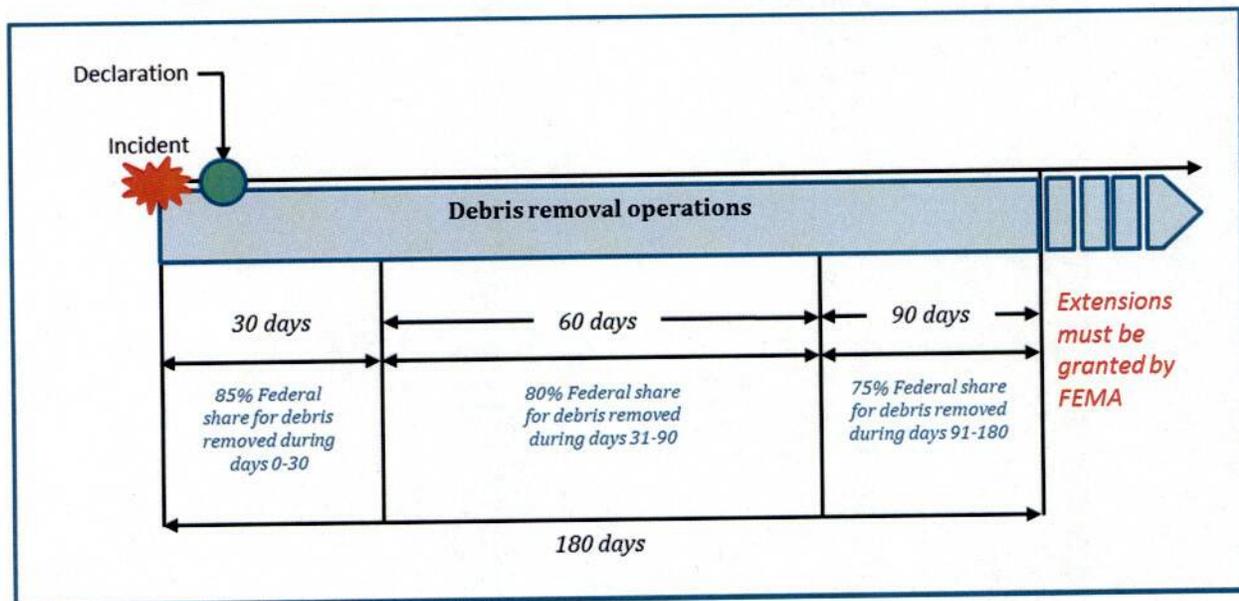
Debris Removal Work (Days from Start of Incident Period)	Federal Cost Share
0-30	85%
31-90	80%
91-180	75%
Federal dollars will NOT be provided for debris removal after 180 days (unless an extension is granted by FEMA)	

Reimbursement provided to subgrantees will be based on the federal cost share percentages shown in Table 1 for debris removal work performed within the specified time frames. The subgrant shall reflect actual costs for debris removal activities conducted from the incident's start date until the ending time frame specified in the table. The increased federal cost share for

accelerated debris removal is available only for grant assistance provided to a subgrantee for the debris removal it performs. It does not apply to debris removal conducted under Direct Federal Assistance (DFA).

A subgrant will be prepared at the appropriate cost share to reflect the amount of debris removal work completed during each operational time frame. If the subgrantee agrees to this alternative procedure, no costs associated with debris removal activities conducted after 180 days from the start of the incident period will be funded, unless FEMA grants an extension. The grantee must make any request for an extension of the 180-day timeframe and extensions may be granted only by FEMA. See 44 CFR 206.204(d) for further information on requesting extensions. Additional debris removal beyond the 180 days cannot be funded through DFA. After agreeing to this alternative procedure, and once the first subgrant is prepared and obligated at the increased federal share, the subgrantee cannot revert back to standard procedures for the remaining debris removal costs. Figure 1 describes the overall timeline for use of the sliding scale.

Figure 1. Timeline for use of the sliding scale for debris removal.



C. Recycling Revenues

Subgrantees may retain revenues received through recycling eligible disaster debris. The subgrantee shall provide the grantee written notification of the revenue received as part of its final accounting of actual costs. This should include the completion date of the debris removal operations, a brief description of the quantity and types of debris recycled, and the cost for processing debris for recycling. The grantee will forward this information to FEMA in the accounting of the final project costs. The cost of establishing and managing the recycling program or process and additional sorting and processing of the debris for recycling purposes

cannot be claimed as a direct project cost on the debris removal subgrant. This alternative procedure can be used in combination with any other alternative procedure or on its own.

Subgrantees can use revenues from debris recycling only for the following approved purposes: to meet the cost sharing requirements of Public Assistance grant funding for debris removal; to develop comprehensive disaster preparedness and assistance plans, programs, and capabilities; to conduct activities that reduce the risk of future damage, hardship or suffering from a major disaster; or to improve future debris removal operations or planning. Activities that improve future debris removal operations and planning may include:

- Developing disaster debris management plans
- Updating or revising existing plans
- Enhancing subgrantee landfill-management sites
- Installing mechanisms such as debris trash racks, K-Rail debris guards and silt fences to control the flow of disaster debris in future events
- Buying equipment such as street sweepers, shredders, backhoes, balers and sorting conveyors that would facilitate sorting, volume reduction, or removing disaster debris
- Purchasing debris recycling equipment
- Purchasing software and hardware products to facilitate quantifying disaster debris
- Buying onboard weight measurement systems for debris-collection trucks
- Purchasing software systems for debris load management to assist in tracking trucks, drivers and routes

If revenues are not used for an authorized purpose, grant funding will be reduced by the amount of that revenue as program income.

D. Straight Time Force Account Labor

When subgrantees use their own labor forces to perform all or part of debris removal operations, FEMA will reimburse, at the appropriate cost share level, the base and overtime wages for existing employees and hiring of additional staff. This alternative procedure can be used with any other alternative procedure or on its own.

E. Debris Management Plans

A subgrantee with a FEMA-accepted debris management plan at the time of an event can increase the effectiveness of its debris management operations. Specifically, a debris management plan should improve a subgrantee's ability to complete debris removal within the timelines associated with the sliding scale.

When the subgrantee has a FEMA-accepted debris management plan before the date of the declared incident period, FEMA will provide a one-time incentive of a 2 percent cost share adjustment applied to debris removal work completed within 90 days. This one-time incentive will not be available to the same subgrantee again during the course of the pilot. This procedure

can be used with any of the other pilot procedures or on its own. FEMA will review plans presented through the grantee. Plans should include all of the following elements:

- Debris management overview
- Events and assumptions
- Debris collection and removal plan
- Debris disposal locations and debris management sites
- Debris removal on private property
- Use and procurement of contracted services
- Use of force account labor
- Monitoring of debris operations
- Health and safety requirements
- Environmental considerations and other regulatory requirements
- Public information

The legislation also requires a subgrantee to have at least one or more pre-qualified contractors.⁴ Any debris contract award must comply with federal procurement requirements, as outlined in 44 CFR §13.36. Federal procurement compliance may have more stringent requirements than state or local requirements.

In addition, the content of the plans will vary and depend highly on state and local ordinances and zoning, as well as the location of critical infrastructure, emergency services, disposal locations, and other localized factors. FEMA will review the plans to ensure that subgrantees have considered the elements listed above. FEMA review of the plan does not mean it is approving any operational component of the plan and does not commit the Federal Government to funding any aspect of the plan.

⁴ A pre-qualified contractor is one that has been identified and evaluated by a local government and has been determined to be capable to perform debris removal work (e.g., capabilities, bonding, insurance, availability). Identification of these qualifications should be done in conjunction with the drafting of a debris management plan, which should include specific contract requirements and explain how contractor qualifications are established. A pre-qualified contractor does not constitute a “stand-by” contract.

PART III. GRANTS MANAGEMENT REQUIREMENTS

The process for monitoring and closing projects is streamlined under the alternative procedures. The grants management requirements are outlined in the sections that follow.

A. Grants Management Activities

For projects funded under the alternative procedures, major activities conducted during the Grants Management phase are as follows:

- The subgrantee must complete work within established regulatory time frames and request time extensions as appropriate, pursuant to 44 CFR §206.204(d) *Requests for time extensions*.
- The subgrantee must submit quarterly progress reports to the grantee for large projects in which the work is not completed and financially reconciled, pursuant to 44 CFR §206.204(f) *Progress reports*.
- The grantee will provide funds to the subgrantee in accordance with federal and state requirements.
- The grantee will ensure that subgrantees understand and adhere to federal procurement requirements as well as other requirements of 44 CFR Part 13, 2 CFR Part 215, and the appropriate Office of Management and Budget circulars.
- The grantee will ensure that subgrantees comply with EHP requirements, notify FEMA of any work that requires EHP compliance reviews, and provide necessary documentation to conduct EHP reviews.
- The subgrantee must not deposit grant funds in an interest-bearing account. If that occurs, the subgrantee must remit any interest earned to FEMA.
- The subgrantee will submit to the grantee a final report of project costs. This report will be used to track and monitor the success of the pilot (see Standard Operating Procedures 9570.14, *Program Management and Closeout* for information on closeout processes and requirements). The final report should include the following components as documented on the Project Worksheet (FEMA Form 90-91):
 - Total actual costs to complete the subgrant
 - Actual quantities of debris removed
 - Time frames for full removal of debris
 - Compliance with federal procurement requirements
 - Documentation of compliance with all subgrant conditions
 - Compliance with EHP conditions

B. Subgrant Closure

Alternative procedures subgrants are closed when the approved scope of work is completed, and the subgrantee provides the grantee an accounting of the subgrant in accordance with the above requirements. The grantee will provide the accounting of project costs to FEMA and will request the project be closed.

C. Appeals

For subgrants funded using the alternative procedures, the subgrantee can submit an appeal, in accordance with 44 CFR §206.206, only for the following:

- Subgrant approval and obligation
- Corrective actions resulting from compliance reviews such as an audit

D. Audits and Compliance Reviews

The Office of Inspector General may audit any subgrantee and/or subgrant. FEMA also can conduct compliance reviews of grants and subgrants. Any corrective actions the Agency takes as a result of these audits or compliance reviews may be appealed in accordance with 44 CFR §206.206. For alternative procedures subgrants, a compliance audit will review subgrants and costs to ensure that the subgrantee complied with the guidelines contained within this document and other applicable requirements.

PART IV. REPORTING AND PERFORMANCE MEASURES

FEMA will review and evaluate the alternative procedures pilot program to determine if the pilot met the objectives of the Sandy Recovery Improvement Act. FEMA will assess if the pilot achieved the objectives for the alternative procedures outlined in the law, namely:

- Reducing the costs to the Federal Government of providing Public Assistance.
- Increasing flexibility in the administration of such assistance.
- Expediting the provision of assistance to a state, tribal or local government, or nonprofit owner or operator of a private nonprofit facility.
- Providing financial incentives and disincentives for timely and cost-effective completion of projects with such assistance.

FEMA will implement a comprehensive assessment based on performance measures and metrics that are identified to measure the success of the pilot in meeting these objectives. If the pilot is determined to be effective, the data will be used to inform the development of future proposed rulemaking.

APPENDIX - A

Public Assistance Alternative Procedures Pilot Program for Debris Removal Acknowledgement

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

As a representative of the subgrantee, we elect to participate in the following:

- Accelerated Debris Removal - increased federal cost share (sliding scale)
 - Recycling Revenue (Subgrantee retention of income from debris recycling without a grant offset)
 - One-time incentive for a FEMA-accepted debris management plan and identification of at least one pre-qualified contractor
 - Reimbursement of straight time force account labor costs for debris removal
1. The pilot is voluntary and the subgrantee must apply the selected alternative procedures to all of its debris removal subgrants.
 2. For the sliding scale, the subgrantee accepts responsibility for any costs related to debris operations after six months from the date of the incident unless, based on extenuating circumstances, FEMA grants a time extension.
 3. The subgrantee acknowledges that FEMA may request joint quantity evaluations and details regarding subgrantee operations necessary to assess the pilot program procedures.
 4. All contracts must comply with local, state, and federal requirements for procurement, including provisions of 44 CFR Part 13.
 5. The subgrantee must comply with all federal, state and local environmental and historic preservation laws, regulations, and ordinances.
 6. The Office of Inspector General may audit any subgrantee and/or subgrant.

Signature of Subgrantee's Authorized Representative

Date

Printed Name and Title

Subgrantee Name

PA ID Number

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



**Public Assistance
Alternative Procedures
Pilot Program –
Debris Removal
Standard Operating Procedures**
June 27, 2014



FEMA

Federal Emergency Management Agency
Department of Homeland Security
500 C Street, S.W.
Washington, DC 20472

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**PUBLIC ASSISTANCE
ALTERNATIVE PROCEDURES
PILOT PROGRAM - DEBRIS REMOVAL**



FEMA

Standard Operating Procedures

A. Purpose and Applicability

This Public Assistance (PA) Alternative Procedures Pilot Program for Debris Removal (Debris Pilot) - Standard Operating Procedures (SOP) applies to debris removal subgrants in all major disasters and emergencies declared on or after June 28, 2013. The Debris Pilot will remain in place through June 27, 2015, at which point the Federal Emergency Management Agency (FEMA) will assess the pilot's effectiveness at achieving its goals.

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

B. Subgrantee Participation

The Public Assistance Crew Leader (PACL) will explain the Debris Pilot at the Kickoff Meeting in order to ensure a thorough discussion of the subgrantee's options. Subgrantees must notify FEMA of their intent to participate in the alternative procedures by signing and submitting the *Public Assistance Alternative Procedures Pilot Program for Debris Acknowledgement* (Appendix A) before obligation of their first subgrant for debris removal or within 60 days of the Kickoff Meeting, whichever occurs earlier. The PACL must attach the signed form to the first applicable Subgrant Application/Project Worksheet (subgrant) and the Case Management File (CMF). The PACL must note in the CMF that the subgrantee is "Participating in Alternative Procedures for Debris Removal" or "Not Participating in Alternative Procedures for Debris Removal". The subgrantee can reverse or modify its decision to participate prior to the 60 day deadline unless any of its subgrants for debris removal work are obligated. Once a subgrantee has debris subgrants that are obligated, it may not alter its decision regarding participation in the alternative procedures.

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C. Project Formulation

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

FEMA has established national standard project title numbers, cost codes and standard comments to capture and report data and **must** be used at all Joint Field Offices and Regional Offices. Project Title 120 Debris Alternative Procedures must be used for any subgrant that includes any of the alternative procedures for debris removal. It should not be used on any subgrant that does not include at least one (1) of the Debris Pilot procedures.

Title Number	Subgrant Title
120	Debris Alternative Procedures

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

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

Staff must use the following cost codes on all Category A subgrants that are not participating in the Debris Pilot:

Cost Code Number	Cost Code Description
9100	Force Account Overtime Debris Removal
9101	Force Account Overtime Debris Monitoring
9102	Contract Debris Removal
9103	Contract Debris Monitoring

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Staff must continue to use the standard cost codes that are in EMMIE (common cost codes are shown below). Staff must NOT use Cost Code 9999 for line items with costs as it will cause inaccurate data collections.

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

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

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

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

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

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

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

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
0000	Version 0	1	LS	N/A	N/A
9221	PAAP Accelerated Debris Removal 0-30 days - 85% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	\$actual costs	\$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
0000	Version 1	1	LS	N/A	N/A
9222	PAAP Accelerated Debris Removal 31-90 days - 80% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	\$actual costs	\$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
0000	Version 2	1	LS	N/A	N/A
9223	PAAP Accelerated Debris Removal 91-180 days - 75% Federal Share	1	LS	N/A	N/A
9231	Contract – Debris Removal	1	LS	\$actual costs	\$actual costs
9229	Force Account Labor (Straight-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
9230	Force Account Labor (Over-Time) – Debris Monitoring	1	LS	\$actual costs	\$actual costs
Total Cost:					\$

**PUBLIC ASSISTANCE
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3. Straight-Time Force Account Labor Procedure

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

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

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

4. Recycling Revenue Procedure

When a subgrantee elects to use the Recycling Revenue Procedure, it should provide documentation of any revenue received no later than 30 days after completion of the debris removal operation. In order to retain revenue received, the subgrantee must use the revenue prior to the period of performance deadline toward an approved purpose. Any use of revenue for expenditures such as equipment or training would not require additional EHP review; however, funds applied for a project that involves ground disturbing activities require EHP review prior to construction. Additionally, when applicable, subgrantee must provide documentation demonstrating compliance with the Resource Conservation and Recovery Act (RCRA). The subgrantee should provide an accounting of how the revenue was used no later than 90 days after the period of performance deadline.

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

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

5. Debris Management Plan Procedure

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

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

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

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

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6. Using Multiple Debris Removal Alternative Procedures

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

The following example shows three (3) procedures being used: Accelerated Debris Removal from Day 0-30; Debris Management Plan, and Straight-Time Force Account Labor:

Cost Code	Description	Unit of Quantity	Unit of Measure	Unit Price	Cost Estimate
0000	Version 0	1	LS	N/A	N/A
9009	Material	1	LS	\$actual costs	\$actual costs
9221	PAAP Accelerated Debris Removal Actual Costs Day 0-30	1	LS	N/A	N/A
9228	PAAP One Time 2% Incentive for Debris Management Plan	1	LS	N/A	N/A
9226	Force Account Labor (Straight-Time) – Debris Removal	1	LS	\$actual costs	\$actual costs
9227	Force Account Labor (Overtime) – Debris Removal	1	LS	\$actual costs	\$actual costs
Total Cost:					\$

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APPENDICES

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

Appendix B – Standard Comments for Debris Pilot

Appendix C – Example Subgrant with Combined Debris Removal Alternative Procedures

Appendix D – Debris Pilot Data Collection

APPENDIX - A

Public Assistance Alternative Procedures Pilot Program for Debris Removal Acknowledgement

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

As a representative of the subgrantee, we elect to participate in the following:

- Accelerated Debris Removal - increased federal cost share (sliding scale)
- Recycling Revenue (Subgrantee retention of income from debris recycling without a grant offset)
- One-time incentive for a FEMA-accepted debris management plan and identification of at least one pre-qualified contractor
- Reimbursement of straight time force account labor costs for debris removal

1. The pilot is voluntary and the subgrantee must apply the selected alternative procedures to all of its debris removal subgrants.
2. For the sliding scale, the subgrantee accepts responsibility for any costs related to debris operations after six months from the date of the incident unless, based on extenuating circumstances, FEMA grants a time extension.
3. The subgrantee acknowledges that FEMA may request joint quantity evaluations and details regarding subgrantee operations necessary to assess the pilot program procedures.
4. All contracts must comply with local, state, and federal requirements for procurement, including provisions of 44 CFR Part 13.
5. The subgrantee must comply with all federal, state and local environmental and historic preservation laws, regulations, and ordinances.
6. The Office of Inspector General may audit any subgrantee and/or subgrant.

Signature of Subgrantee's Authorized Representative

Date

Printed Name and Title

Subgrantee Name

PA ID Number

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

APPENDIX - B

Standard Comments for Debris Pilot

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

APPENDIX – C

Example Subgrant with Multiple Debris Removal Alternative Procedures

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

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

Example Damage Description and Dimensions – Multiple Alternative Procedures:

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

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

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

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

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

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

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

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

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

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

Insert Standard Comment Numbers 19, 22, and 24

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

APPENDIX – D

Debris Pilot Data Collection

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

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

Subgrantees should provide the following data, as applicable:

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

- Recycling facility
 - Location
 - Haul distance
 - Type(s) of debris recycled
 - Quantity of each type of debris

- Force account Labor/Equipment:
 - Timesheets
 - Employee logs to support the activities performed by each employee
 - Equipment logs
 - Overtime policy

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Frequently Asked Questions

On January 29, 2013, President Obama signed into law the Sandy Recovery Improvement Act of 2013 (P.L. 113-2). This law amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) to include Section 428, which authorized alternative procedures for the Public Assistance (PA) Program for debris removal. Section 428 authorizes the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) to implement the alternative procedures through a pilot program.

This document provides answers to frequently asked questions regarding the alternative procedures for debris removal. For additional information, refer to the *Public Assistance Alternative Procedures Pilot Program Guide for Debris Removal*.

General

1. What are the alternative procedures for debris removal?

Section 428 authorized the following alternative procedures for debris removal:

- Accelerated Debris Removal – Increased Federal Cost Share (Sliding Scale)
- Recycling Revenues
- Straight-Time Force Account Labor
- Debris Management Plan and one (1) or more Pre-Qualified Contractor(s)

FEMA is not currently implementing the alternative procedures for fixed estimate grants and use of excess funds for debris removal as part of this pilot program.

2. Is it optional for the subgrantee to participate in the alternative procedures for Debris Removal?

Yes. Participation in the alternative procedures is voluntary.

3. Can a subgrantee elect which alternative procedures it would use?

Subgrantees may elect to use one or more of the procedures for their debris removal projects. Utilizing multiple alternative procedures is allowed, but not required for any given debris removal project.

4. How long will the alternative procedures be available?

The program will remain in place through June 27, 2015, at which point FEMA will determine whether to extend it for an additional performance period.

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5. How can a subgrantee request participation in the alternative procedures?

The subgrantee must notify the grantee and FEMA of its intent to participate in the alternative procedures by signing and submitting the *Public Assistance Alternative Procedures Pilot Program for Debris Acknowledgement* before obligation of its first subgrant for debris removal or within 60 days of the Kickoff Meeting, whichever occurs earlier.

6. Can a subgrantee rescind its request to participate in the alternative procedures for debris removal?

Yes. If the subgrantee wishes to rescind its participation in one or more of the alternative procedures, and none of its subgrants for debris removal have been obligated, it must provide FEMA written notification within 60 days of the Kickoff Meeting. Once the subgrantee's first subgrant for debris is obligated or the 60 days after the Kickoff meeting have passed, the subgrantee may not alter its decision regarding participation in the alternative procedures.

7. Do the alternative procedures apply to both small and large projects?

For disasters declared between June 28, 2013, and June 27, 2014, the alternative procedures apply only to large projects with the exception of the Straight-Time Force Account Labor Procedure, which applies to both small and large projects. For disasters declared on or after June 28, 2014, all of the alternative procedures apply to both small and large projects.

8. How will FEMA obligate project costs with different federal cost share percentages?

FEMA will prepare versions to a project for each time period associated with a change to the federal cost share.

9. Is Direct Federal Assistance (DFA) for debris removal available to be used in conjunction with the alternative procedures?

DFA is not authorized in conjunction with the Accelerated Debris Removal Procedure. If DFA is authorized under the declaration, the grantee (on behalf of the subgrantee) may request DFA in conjunction with other alternative procedures.

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

10. What is the Accelerated Debris Removal Procedure?

The Accelerated Debris Removal Procedure is an increase in the federal cost share based on completion of debris removal work within the following timelines:

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

11. Under what circumstances will FEMA grant a time extension beyond 180 days?

FEMA grants time extensions based on extenuating circumstances or unusual project requirements that are beyond a subgrantee's control.

Recycling Revenues

12. Can the subgrantee retain revenues generated through recycling of eligible disaster-related debris?

Yes. The subgrantee may retain the revenue when used to:

- meet the non-federal cost sharing requirements of PA Program funding for debris removal;
- develop comprehensive disaster preparedness and assistance plans, programs, and capabilities;
- conduct activities that reduce the risk of future damage, hardship or suffering from a major disaster or emergency; or
- conduct activities to improve future debris removal operations or planning .

13. Is there a deadline to use the revenue?

Yes. Funds should be used prior to the period of performance deadline to complete the debris removal activities.

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14. What are the subgrantee's requirements for notifying the grantee regarding receipt and use of recycling revenue?

The subgrantee should provide documentation of any revenue received no later than 30 days after completion of the debris removal operation, to include the quantity and types of debris recycled. The subgrantee should provide a detailed accounting of how the funds were used no later than 90 days after the period of performance deadline.

15. Is the cost of establishing and managing a recycling program or process eligible for PA Program funding?

No. The cost of establishing and managing a recycling program or process cannot be claimed as a direct project cost on the debris removal subgrant.

16. Is the cost of collecting, sorting, processing and transporting disaster debris to a recycling facility eligible?

The costs for collecting, sorting, processing and transporting disaster debris, including recyclable materials, may be eligible. However, costs related to additional sorting, processing and transporting debris for the purpose of recycling is not eligible.

Straight-Time Force Account Labor

17. What types of personnel are eligible for straight-time force account labor?

Straight-time is eligible for the labor of budgeted employees and extra hires who are engaged in eligible debris removal operations. Straight-time eligibility can also apply to salaried and exempt employees. The salary must be comparable to labor rates for similar types of work.

18. Is straight-time force account labor eligible for other emergency work activities?

No. Straight-time force account labor is only eligible for debris removal under these alternative procedures.

19. Does reimbursement of straight-time force account labor include associated fringe benefits?

Yes. Straight-time fringe benefits are eligible for reimbursement.

20. What documentation does FEMA require for reimbursement of straight-time force account labor?

The subgrantee should document all costs related to the work performed, including, but not limited to, the specific activities performed by each employee, volume and type of debris removed, employee rates, and breakdown of fringe benefits. Documentation should differentiate overtime versus straight-time work and costs.

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Debris Management Plans

21. What are the requirements that a subgrantee must meet for the one-time two percent incentive?

The subgrantee must have a FEMA accepted Debris Management Plan and have identified one (1) or more pre-qualified debris removal contractor(s) before the date of the declaration's incident period. The adjustment is applied to debris removal work completed within 90 days from the first day of the incident period. Once a subgrantee utilizes this incentive, it is not available to the same subgrantee in a subsequent declaration during the course of the pilot program.

22. If FEMA reviewed a Debris Management Plan prior to the implementation of the Alternative Procedure Pilot Program for Debris Removal, must a jurisdiction re-submit its plan for review and acceptance to be eligible for the one-time two percent incentive?

Yes. The subgrantee should submit its plan to the grantee. The grantee will review and forward to FEMA for consideration. Prior to submission, the subgrantee should update its plan to incorporate any changes or additions.

23. What are the parameters of FEMA's review of a Debris Management Plan?

FEMA will ensure that the Debris Management Plan contains the basic components of a comprehensive plan that include at least the following planning elements:

- debris management overview
- events and assumptions
- debris collection and removal plan
- temporary debris management sites and disposal locations
- debris removal on private property
- use and procurement of contracted services
- use of force account labor
- monitoring of debris operations
- health and safety requirements
- environmental considerations and other regulatory requirements
- public information
- identify one (1) or more pre-qualified debris and wreckage removal contractors

Additional guidance is available in the Public Assistance Alternative Procedures - Debris Management Plan Review Job Aid.

24. By reviewing the Debris Management Plan, is FEMA committing to fund operations guided by the plan?

No. FEMA funding will be based on costs that are eligible under the PA Program.

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25. When a subgrantee has identified a pre-qualified contractor, does the applicant need to competitively bid a contract?

Yes, the subgrantee must still comply with 44 CFR Part 13. A pre-qualified contractor is not a contractor that has been awarded a contract. The importance of identifying pre-qualified contractors is to have qualified contractors that can readily bid on the debris removal project.

26. How can stand-by contracts with debris removal contractors meet the requirement of being “pre-qualified”?

The process to pre-qualify contractors requires that the subgrantee identify and evaluate contractors’ abilities to perform debris removal work (capabilities, bonding, insurance, availability, etc). If the subgrantee has signed a stand-by contract with debris removal contractors that meet the subgrantee’s qualification standards to perform debris removal work, FEMA would consider those contractors as pre-qualified. If the subgrantee utilizes the stand-by contract, federal reimbursement will be based on reasonable costs and compliance with the procurement requirements detailed in 44 CFR Part 13.

27. Can the one-time incentive of a two percent increased cost share adjustment be used in conjunction with the Accelerated Debris Removal – Increased Federal Cost Share (Sliding Scale) Procedure?

Yes. If the subgrantee has a Debris Management Plan that FEMA has accepted, has identified at least one (1) pre-qualified contractor and elects to utilize both procedures, FEMA will add an additional two percent to the incentive associated with the sliding scale for the first 90 days of debris removal operations.

Special Considerations

28. How will insurance proceeds be applied to subgrants processed using the alternative procedures?

Any insurance proceeds will be deducted from the subgrant, inclusive of any private property debris removal subgrants, in order to comply with Section 312 of the Stafford Act, which prohibits duplication of benefits.

29. Will FEMA review alternative procedures subgrants for compliance with environmental and historic preservation (EHP) laws, regulations, and executive orders?

Yes. FEMA must review alternative procedure subgrants for compliance with all applicable EHP requirements. This includes the use of revenues generated from recycling disaster-related debris. Any use of revenue for expenditures such as equipment or training would not require additional EHP review; however, should funds be applied for a project that involves ground disturbing activities would require EHP review prior to construction. Additionally, when applicable, subgrantee should provide documentation demonstrating compliance with the Resource Conservation and Recovery Act (RCRA).

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Grants Management, Closeout, and Appeals

30. When is a debris removal alternative procedures subgrant closed?

Debris removal alternative procedures subgrants are closed upon FEMA's receipt of a detailed accounting of the work performed and the grantee's certification that the subgrantee completed the approved scope of work.

31. Can a subgrantee submit an appeal for a debris removal alternative procedures subgrant?

Yes. A subgrantee may appeal any determination that FEMA makes during the subgrant approval and obligation process. A subgrantee may appeal changes that are made to an alternative procedures subgrant following an audit.