

PUBLIC ASSISTANCE WORKBOOK

2019

REFERENCE GUIDE FOR CITY DEPARTMENTS



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The purpose of the Public Assistance Workbook is to guide City departments through the Federal Emergency Management Agency's (FEMA) Public Assistance (PA) program. This workbook contains recommendations for action, checklists, eligibility requirements, and procedures related to the program's administration.

In anticipation of—or immediately following—a disaster, the Office of Emergency Management (OEM) is responsible for activating the City's Public Assistance Plan and supporting Public Assistance Workbooks. OEM's primary role is to coordinate the City's PA application, and to liaise between City departments and PEMA/FEMA specialists. OEM acts on behalf of the City as an advocate and is available to support City departments throughout the PA process.

This workbook is geared towards City departments, specifically. If requested by OEM to participate in the PA program, departmental representatives should review this workbook for critical information, next steps, and required documentation.

This document is based on FEMA's 2018 Public Assistance Program and Policy Guide (PAPPG).
Click the link below for additional information:

<https://www.fema.gov/media-library/assets/documents/111781>.

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PUBLIC ASSISTANCE PROCESS

The Public Assistance (PA) program provides funding to state and local governments—as well as eligible private nonprofits (PNP)—to support post-disaster recovery operations. The PA program unlocks federal disaster assistance for costs linked to debris removal operations, emergency protective measures, and the repair, replacement, or restoration of disaster-damaged property. The grant is a cost-share program split between the federal, state, and/or local government. While the federal reimbursement is no less than 75 percent, the state may opt to contribute up to the remaining 25 percent. If the state does not split the funds, the residual 25 percent becomes the responsibility of the local government or PNP.

To activate the PA program, a Presidential Disaster Declaration is required. A Presidential Disaster Declaration is issued once a county and state prove disaster-related costs exceed the PA program’s per capita threshold. To qualify for PA, Pennsylvania and Philadelphia County—combined with local PNPs—must both demonstrate that incident-related expenses exceed the thresholds¹ outlined in the table below.

Type of Assistance	Threshold ²	Time to Request
Public Assistance	State: \$19,053,569 (FFY19)³	Within 30 days of event
	Philadelphia: \$5,768,302.68 (FFY19)⁴	

Once the PA program is activated, City departments work to identify eligible costs for the City’s Project Worksheet(s) (PW). The PW itemizes eligible expenses incurred during disaster preparations, responses, and recovery. Once the PW and supporting documentation is reviewed and approved by PEMA and FEMA, the federal cost-share is calculated from the PW’s total, and the reimbursement is transferred electronically to the City’s General Fund.

The image on the following page (Figure 1.0) outlines FEMA’s Public Assistance process. For the purposes of the figure, PEMA is the “Recipient” and all City departments are combined under the label of “Applicant/Subrecipient.” Each phase of the PA program implementation process is outlined in further detail throughout this document.

¹ For snow events, counties must meet or exceed record or near-record snowfall totals to be eligible. Counties who do not meet or exceed records can submit letters of appeal through the Governor’s Office. Counties may also qualify for PA as “contiguous” if snow totals exceed the record—or near record—snowfall of a bordering county.

² The per capita impact indicator is based on the Consumer Price Index published by the US Department of Labor, and census population data. The per capita impact indicators are published annually by FEMA in the Federal Registrar.

³ The statewide threshold is the state per capita impact indicator of \$1.50 multiplied by the state population of 12,702,379. The 2019 federal fiscal year (FFY2019) extends from Oct. 1, 2018 through Sept. 30, 2019.

⁴ The threshold for Philadelphia is the federally mandated county per capita impact indicator of \$3.78 multiplied by the county population of 1,526,006. The 2019 federal fiscal year (FFY2019) extends from Oct. 1, 2018 through Sept. 30, 2019.

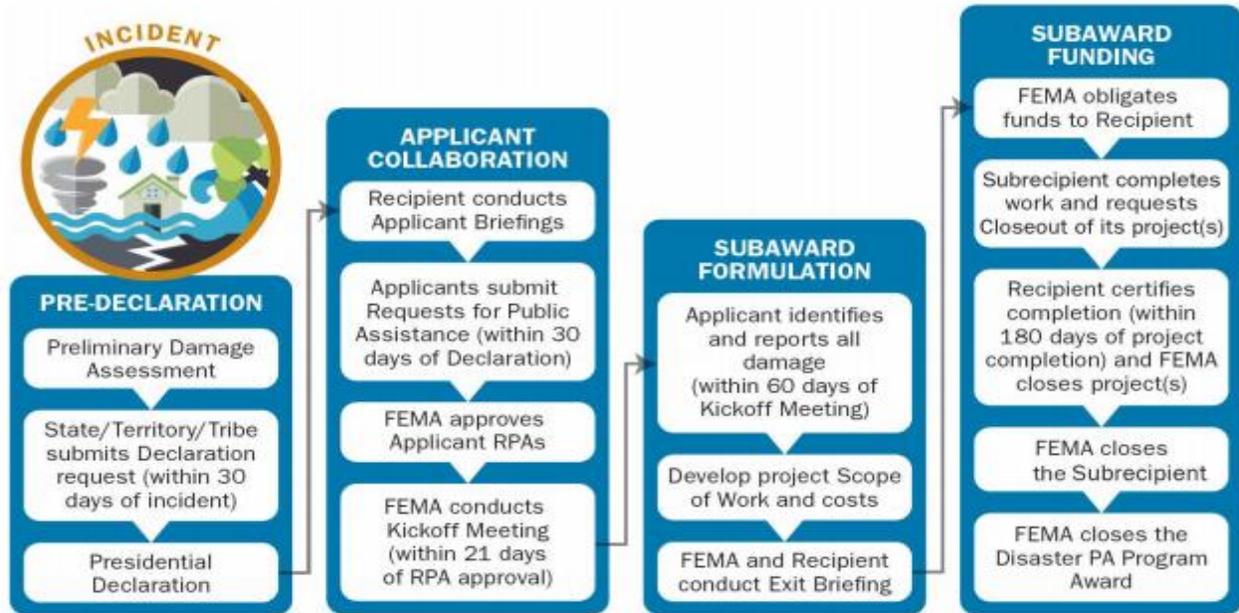


FIGURE 1.0: PA PROGRAM IMPLEMENTATION PROCESS (PAPPG, 2018).

The table below lists the events for which Philadelphia qualified for Public Assistance since 1955.

Philadelphia Public Assistance Declaration History ⁵ (Current – 1955)	
Disaster	Incident Date
Severe Winter Storm Jonas	January 2016
Hurricane Sandy	October 2012
Hurricane Irene	August 2011
Severe Winter Storms	February 2010
Flooding	June 2006
Hurricane Katrina	September 2005
Tropical Depression Ivan	September 2004
Multiple Storms	August 2004
Hurricane Floyd	September 1999
Severe Winter Storms	January 1996
Flooding	January 1996
Severe Winter Storms	January 1994
Hurricane Agnes	June 1972
Flooding	September 1971
Drought	August 1965

⁵ <https://www.fema.gov/disasters>

ELIGIBILITY

To qualify for PA reimbursements, the *applicant*, *facility*, *work*, and *cost* must meet FEMA's eligibility standards.

ELIGIBLE APPLICANTS. Eligible *applicants* include public entities—City departments—and private nonprofit (PNP) organizations with a granted tax exemption status, or an approved state certificate⁶. Eligible PNPs must provide critical programs or other essential government services, as outlined in the table below.⁷

Critical Services	Other Essential Governmental Services ⁸
Power / Water / Gas	Museums
Communications	Performing Arts Facilities
Education	Community Arts Center
Communications	Zoos
Emergency Medical Care	Libraries
Fire Protection/Emergency Services	Homeless Shelters

ELIGIBLE FACILITIES. *Facilities* must be the property of an eligible applicant. Damage must be directly tied to the declared disaster, and cannot receive duplicative reimbursement through external credits such as insurance proceeds.

ELIGIBLE WORK. Eligible categories of *work* include emergency protective measures and/or permanent work to repair or replace disaster-damaged facilities. The type of work—often referred to by category—reimbursable through the program is dependent on the type of disaster declaration. All work must be the direct result of the declared disaster, located within the designated disaster area, be the legal responsibility of the applicant, and cannot be the result of negligence on the part of the owner. The following table outlines the seven types of work, by category, eligible for reimbursement.

⁶ Eligible PNPs have granted tax exemptions from the US Internal Revenue Service under section 501 (c), (d), or (e) of the Internal Revenue Code. Eligible PNPs also include those with state approved certificates stating that the organization is a non-revenue producing nonprofit entity conducting business under State Law.

⁷ PNP damages and costs are used towards reaching the City threshold. PNPs that perform “other essential governmental services” must first apply for disaster assistance through the Small Business Administration (SBA) before seeking assistance under the Public Assistance program.

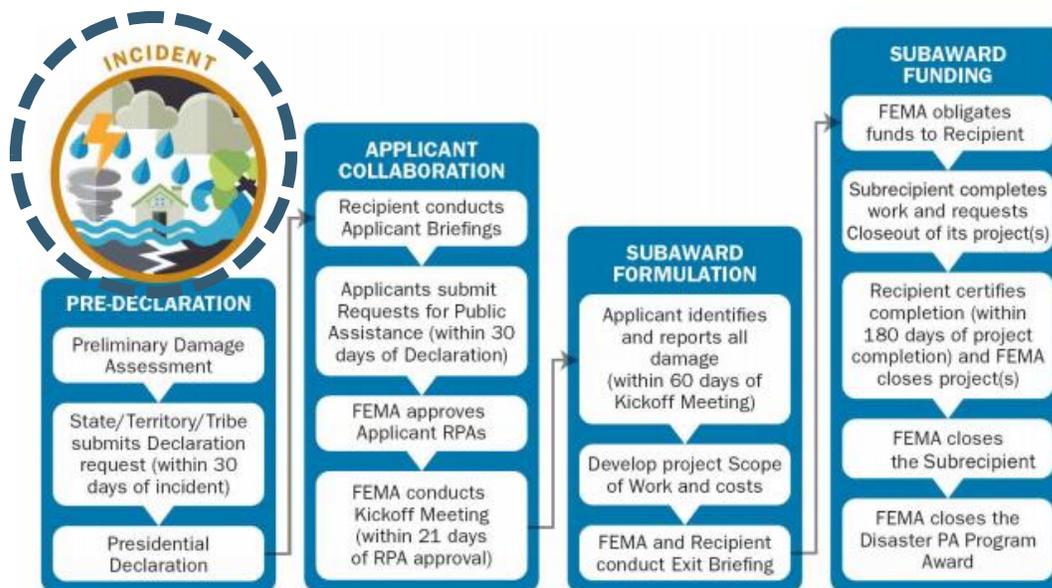
⁸ For a complete list of “other essential governmental services” refer to FEMA Disaster Assistance Policy Private Nonprofit (PNP) Facility Eligibility <https://www.fema.gov/private-nonprofit-facility-eligibility-0>.

Category	Description
Emergency Work	
A	Debris Removal – The clearance, removal, and/or disposal of items such as trees, sand, gravel, building materials, wreckage, vehicles, and personal property.
B	Emergency Protective Measures – Necessary activities taken by a community before, during, and after a disaster to eliminate or reduce an immediate threat to life, public health and safety, or improved property.
Permanent Work	
C	Roads and Bridges – Repair of roads, bridges, and associated features such as surfaces, bases, shoulders, ditches, culverts, guardrail, lighting, etc.
D	Water Control Facilities – Repair of facilities built for channel alignment, recreation, navigation, land reclamation, fish and wildlife habitats, interior drainage, irrigation, erosion prevention, and flood control.
E	Buildings and Equipment – Repair or replacement of buildings, including their contents and systems, heavy equipment, and vehicles.
F	Utilities – Repair of water treatment and delivery systems, power generation facilities/distribution lines, and sewage collection/treatment facilities.
G	Parks, Recreational Facilities, and Other Items – Repair and restoration of parks, playgrounds, pools, cemeteries, and beaches.

ELIGIBLE COSTS. Reimbursable costs include expenses for force account labor, materials, equipment, and contracts used to prepare for, respond to, and recovery from the declared disaster. Costs must fall within the declaration’s incident period, be reasonable and necessary to accomplish the work; in compliance with Federal, State, and local requirements for competitive procurement; and not duplicated by any applicable credits such as insurance proceeds. If unsure of eligibility, entities are encouraged to contact OEM to discuss the concern.⁹

⁹ For example, while standby labor is considered an ineligible cost, exceptions have been made to include activities performed to address a threat, or potential threat, to public life and safety.

COST TRACKING ACTIVITIES



It is important for all departments to track and record the critical information—who, what, where, when, why, and cost—related to pre-event preparations, incident response, and disaster recovery operations. To support a Presidential Disaster Declaration, and to activate the Public Assistance program, Philadelphia and the State must demonstrate disaster-related costs exceed FEMA’s per capita thresholds¹⁰. As lead coordinator for the City’s PA application, the Office of Emergency Management (OEM) is responsible for implementing the strategies outlined in the Public Assistance Plan and supporting workbooks. In this role, OEM advocates on behalf of the City and manages the City’s PA portfolio. If it appears as though the City and State thresholds may be exceeded, OEM initiates the application process and begins outreach to relevant departments.

If disaster-related costs are expected to exceed the disaster threshold, OEM notifies City departments to submit costs and damages incurred. To expedite the Public Assistance process, the Pennsylvania Emergency Management Agency (PEMA) and FEMA may require initial cost estimates within the first 72 hours following the cessation of disaster conditions. To support this expedited timeline, departments should actively track, record costs, and estimate disaster-related expenses through the preparation, response, and recovery phases. Specifically, departments should track and record costs related to labor, contracts, equipment, materials, and property damage. For more information on cost tracking, see below.

¹⁰ Philadelphia’s and Pennsylvania’s FFY19 per capita thresholds are \$5,768,302.68 and \$19,053.569, respectively. The 2019 federal fiscal year extends from Oct. 1, 2018 through Sept. 30, 2019.

Labor. Estimate labor totals using base salary, overtime, and fringe costs. For questions related to fringe rates, contact OEM's Recovery Planning Coordinator. Specifically, departments should collect the following information:

- ❖ Overtime hours worked and dates for permanent, temporary, reassigned, essential employees called back from administrative leave, and grant-funded personnel;
- ❖ Work location; and,
- ❖ Type of work performed.

Contracts. Estimate contract totals using invoices and purchase orders. Any work contracted beyond 70 hours of the event must be competitively bid in accordance with local, state, and federal laws as well as FEMA regulations. Specifically, departments should collect the following information:

- ❖ Copy of contract, scope of work, vendor purchase orders, invoices, payments; and,
- ❖ Explanation detailing the execution of the contract and procurement methodology.

Equipment. Estimate equipment costs using FEMA's Schedule of Equipment Rates (<https://www.fema.gov/schedule-equipment-rates>). Multiply the time spent using the equipment by the rate assigned by FEMA. If the equipment is not listed, use a comparable rate to estimate the total cost. Specifically, departments should collect the following information:

- ❖ Equipment operator (equipment must be tied to persons, dates, and times listed under labor);
- ❖ Date and hours of operation;
- ❖ Location and type of work;
- ❖ Damaged and destroyed equipment; and,
- ❖ Leased equipment.

Materials. Estimate costs of expendable materials and supplies using invoices and purchase orders. Eligible materials include items purchased for the event or taken from an existing stockpile. Specifically, departments should collect the following information:

- ❖ Date of purchase;
- ❖ Unit price;
- ❖ Number of units purchased; and,
- ❖ Function.

Physical Damage and Repairs. Estimate the cost of damages and necessary repairs. Damage must exceed FEMA's small project minimum to qualify¹¹. Specifically, departments should collect the following information:

- ❖ Detailed description of damage, location, and required restoration;
- ❖ Estimated repair cost;
- ❖ Photographs of the damage; and,
- ❖ Hazard mitigation opportunities.

RECORD KEEPING. Departments are encouraged to use in-house record-keeping systems capable of tracking critical costs—labor, equipment, material, contracts, etc.—directly tied to the disaster event.

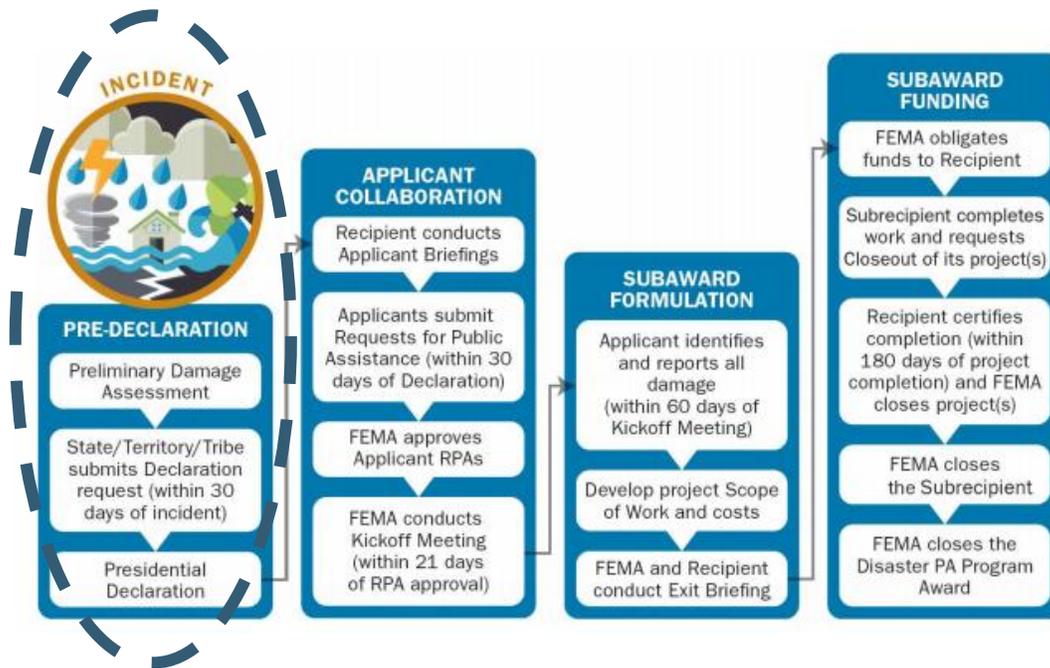
PRE-DISASTER PROPERTY SURVEY. FEMA only reimburses for damages directly tied to the disaster. Departments are encouraged to survey and document the pre-disaster condition of facilities, infrastructure, and equipment in order to substantiate claims that damaged properties were in good repair prior to the disaster. Examples of pre-disaster documentation include annual bridge reports, photographs, and annual inspections.

CHECKLIST:

- Document all costs associated with disaster preparations, response, and recovery.
 - Track and record labor costs.
 - Track and record disaster-related contracts and invoices.
 - Track and record deployed equipment and disaster-related function.
 - Track and record materials used, disaster-related function, and invoices.
- Conduct pre-disaster surveys to support post-disaster property damage claims.

¹¹ Submissions must exceed the small project minimum of \$3,200 (FFY19) to qualify: <https://www.fema.gov/public-assistance-indicator-and-project-thresholds>. The 2019 federal fiscal year extends from Oct. 1, 2018 through Sept. 30, 2019.

PRELIMINARY DAMAGE ASSESSMENTS (PDA)



The Preliminary Damage Assessment (PDA) is a survey used to assess the scope of damages, estimate costs incurred, and identify unmet needs. The results of the PDA are used to prove that expenses exceed the PA threshold, and to support the request for federal assistance. The actions below outline the steps required to complete a PDA.

COMPLETE THE OEM PDA SPREADSHEET. If Philadelphia experiences a significant event, OEM requests disaster-related cost estimates from City departments and local PNPS. To submit these cost estimates, City departments complete an OEM Preliminary Damage Assessment (PDA) Spreadsheet. This fillable OEM PDA Spreadsheet is distributed by OEM’s Recovery Planning Coordinator to capture costs incurred for disaster-related work.

DESIGNATE A REPRESENTATIVE. Each City department must designate at least one representative to complete the OEM PDA Spreadsheet. The representative(s) must be familiar with departmental policies, grant administration, and fiscal management. If a Presidential Declaration is issued and the PA program is activated, the representative(s) will be the primary individual(s) responsible for coordinating all PA activities on behalf of the department.

SUBMIT AN IMPACT STATEMENT. OEM may ask City departments to submit—in addition to the OEM PDA Spreadsheet—an impact statement. The statement from each City department is combined into a citywide narrative outlining the effects of the disaster on local operations, in order to support a Presidential Disaster Declaration¹².

¹² See Annex P: Sample Impact Statement for more information.

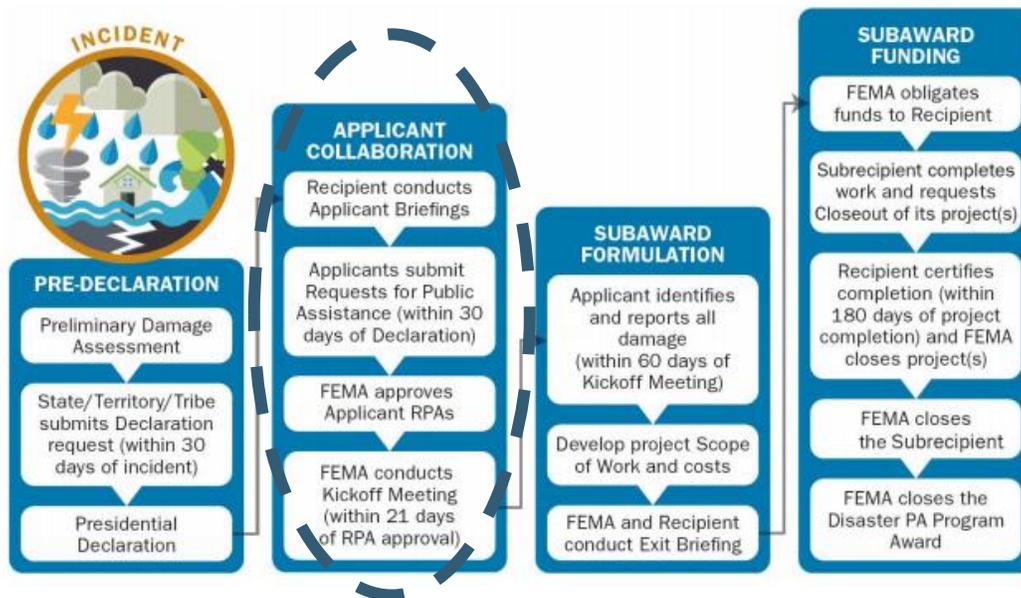
SCHEDULE A SITE VISIT. OEM may contact your department to schedule a site visit with PEMA and FEMA to assess disaster-damaged properties. Department representatives knowledgeable about the costs of repair and extent of damages must meet OEM, PEMA, and FEMA personnel onsite, as requested.

REQUEST FOR DISASTER DECLARATION. Once the OEM PDA spreadsheets are submitted, OEM forwards the cost estimates to PEMA for review. PEMA, once reviewed, combines the City's estimates with other counties across the state. If the City and the State *both* exceed the FEMA thresholds, the Request for Disaster Declaration process proceeds through the Governor. If the President approves the request, a declaration is issued. Once declared, FEMA's Public Assistance program is activated.

CHECKLIST:

- Submit disaster-related costs to OEM using the OEM PDA Spreadsheet.
- Designate a department liaison to coordinate the PA process.
- Submit an impact statement to OEM, if requested.
- Coordinate with OEM to schedule site visits, if requested.

APPLICANTS' BRIEFING



Once a Presidential Disaster Declaration is issued, FEMA activates the PA program. In coordination with PEMA and FEMA, OEM then schedules a mandatory Applicants' Briefing. All participating agencies are required to attend the briefing and sign the required PEMA and FEMA forms¹³. City department representatives must include the designee(s) assigned during the PDA process. At the conclusion of the Applicants' Briefing, City departments sign-up for a one-on-one Kickoff Meeting with PEMA and FEMA.

The Applicants' Briefing—conducted by PEMA and/or FEMA—addresses eligibility criteria, administrative procedures, the disaster's incident period, and Project Worksheet (PW) development. The briefing provides an opportunity for City agencies to ask PEMA and FEMA specialists questions about the program and process.

IDENTIFY INCIDENT PERIOD. The incident period, as determined by FEMA, is the strict timeframe to which all disaster costs must be tied. While the incident period may span a series of days or weeks, the City—as a single applicant—may be instructed to identify a smaller window of time within FEMA's incident period. For example, the City may be asked to select a 48-hour window within a five-day incident period. In that case, all costs must be directly linked to the 48-hour window. OEM is responsible for selecting the City's timeframe, if required by PEMA and FEMA. The timeframe is identified using the costliest window of time for the City as a whole, recognizing

¹³ Mandatory forms include the DAP-1 (Annex A), DAP-2 (Annex B), and Request for Public Assistance (Annex C). OEM completes the mandatory forms on behalf of all City departments as a single Applicant.

that the dates/hours may not reflect each individual department’s most expensive operational period.

ELIGIBLE WORK CATEGORIES. Depending on the type and magnitude of the disaster, FEMA may only activate parts of the Public Assistance program. Types of eligible work fall under two categories: emergency work and/or permanent work. Both categories are broken down into a series of sub-categories, which may be activated independently of one another. PEMA and FEMA representatives disclose the activated categories of work during the Applicants’ Briefing. Refer to the following table for more information on the categories—and sub-categories—of work.

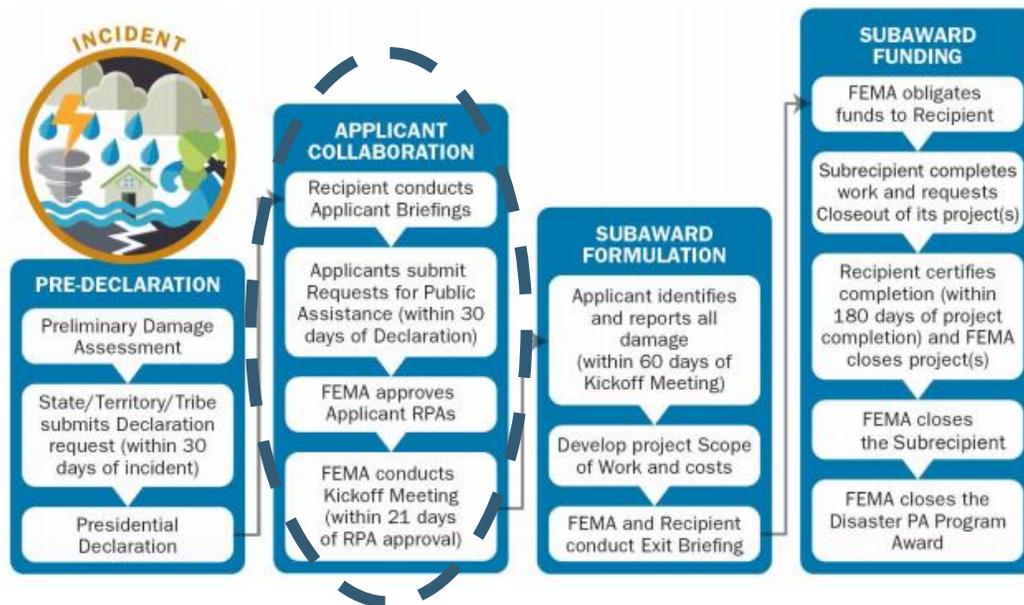
Category	Description
Emergency Work (complete within six months of the disaster declaration)	
A	Debris Removal – The clearance, removal, and/or disposal of items such as trees, sand, gravel, building materials, wreckage, vehicles, and personal property.
B	Emergency Protective Measures – Necessary activities taken by a community before, during, and after a disaster to eliminate or reduce an immediate threat to life, public health and safety, or improved property.
Permanent Work (complete within 18 months of the disaster declaration)	
C	Roads and Bridges – Repair of roads, bridges, and associated features such as surfaces, bases, shoulders, ditches, culverts, guardrail, lighting, etc.
D	Water Control Facilities – Repair of facilities built for channel alignment, recreation, navigation, land reclamation, fish and wildlife habitats, interior drainage, irrigation, erosion prevention, and flood control.
E	Buildings and Equipment – Repair or replacement of buildings, including their contents and systems, heavy equipment, and vehicles.
F	Utilities – Repair of water treatment and delivery systems, power generation facilities/distribution lines, and sewage collection/treatment facilities.
G	Parks, Recreational Facilities, and Other Items – Repair and restoration of parks, playgrounds, pools, cemeteries, and beaches.

CHECKLIST:

- RSVP to OEM to confirm attendance.
- Send at least one representative, including the departmental designee established during the PDA process, to the Applicants’ Briefing.
- Record the incident period and, if applicable, the City-specific window.
- Adjust documentation and costs to reflect the incident period/City-specific window, if applicable, to ensure all costs are linked to the eligible dates/hours.

- Record the eligible categories of work.
- Adjust documentation and estimates to reflect activities that fall within the activated categories of work.
- Schedule a Kickoff Meeting with PEMA and FEMA at the conclusion of the briefing.

KICKOFF MEETING



Kickoff Meetings for each City department are scheduled at the conclusion of the Applicants' Briefing. To confirm meeting dates/times, OEM sends an email to all department designees outlining the meeting details. During the Kickoff, departments review costs, damages, and required documentation with PEMA and FEMA specialists. The goal of the meeting is to initiate the development of each department's Project Worksheet(s) (PW).

The Kickoff Meeting is a one-on-one discussion between department designees and PEMA/FEMA representatives. The meeting is designed to provide a detailed review of the PA Program, and to address each department's specific needs.

KICKOFF MEETING PREPARATION. Department representatives should come to the scheduled Kickoff Meeting ready to discuss costs, damages, and questions. To properly prepare for the Kickoff Meeting, departments should:

- ❖ Review OEM's sample Kickoff Meeting Agenda, for reference¹⁴.
- ❖ Compile a list departmental costs and damages within the designated incident period, and provide supporting documentation (i.e. purchase orders, contracts, invoices, etc.).
- ❖ Identify circumstances that may require special review, including environmental and historic preservation issues.
- ❖ Prepare questions and concerns to discuss with OEM, PEMA, and FEMA.

¹⁴ See Annex D for a sample Kickoff Agenda.

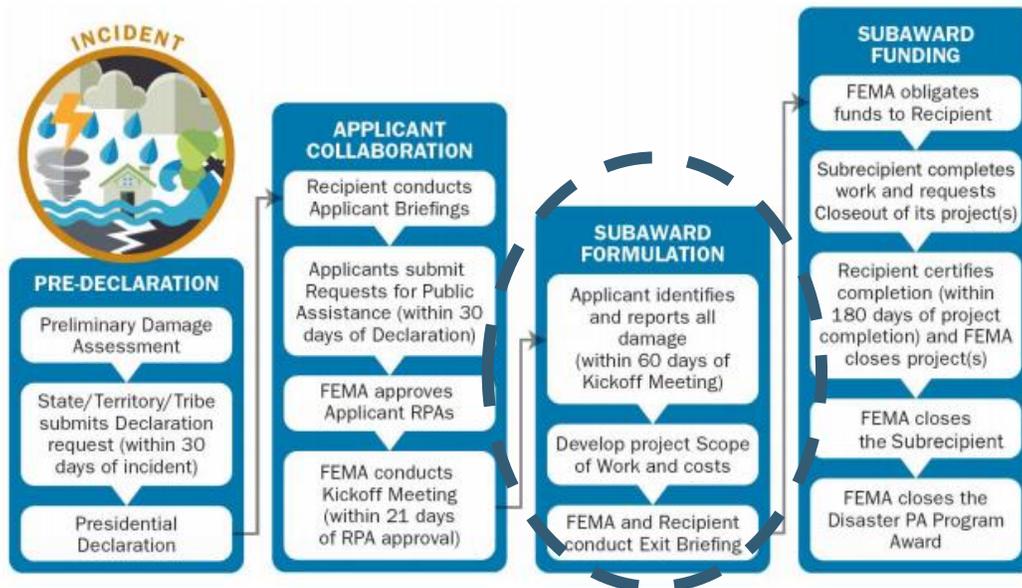
RECEIVE AND COMPLETE FORMS. At the Kickoff Meeting, OEM provides an excel spreadsheet for each department to complete. OEM's PW Workbook contains forms and information required by PEMA and FEMA (DAP-5, DAP-6, DAP-8, etc.)¹⁵ in an electronic format. For questions related to the PW development process, contact OEM's Recovery Planning Coordinator.

CHECKLIST:

- Schedule and confirm a Kickoff Meeting with OEM, PEMA, and FEMA.
- Bring a list of departmental costs and damages with supporting documentation.
- Receive OEM's PW Workbook to support worksheet.
- Compile a list of questions and concerns to discuss directly with PEMA and FEMA Specialists.

¹⁵ See Annex E for required PEMA/FEMA forms. City departments should use OEM's electronic PW Workbook in place of the PDF forms.

PROJECT WORKSHEET DEVELOPMENT



Following the Kickoff Meeting, City departments begin Project Worksheet (PW) development activities. The PW outlines the essential information—who, what, when, where, why, and cost—for each item of disaster recovery work. Depending on the disaster, the City may have a single PW or a series of PWs. Each agency’s designee is responsible for compiling and submitting costs, damages, and supporting documentation to OEM’s Recovery Planning Coordinator by the established deadline. **All costs must fall within the incident period’s date(s) and hours, as well as the categories of work activated by FEMA.** PW support is available to City departments from OEM and/or PEMA and FEMA.

A Project Worksheet (PW) documents the scope of work and itemizes the costs of each recovery project. The approved PW is the basis for federal funding.

PROJECT TYPES. To facilitate reimbursement, FEMA divides projects into four types. The procedures for processing PWs, funding, and deadlines vary according to project type. For more information, refer to the table below.

PROJECT	DESCRIPTION
Small Projects	Projects with repair or replacement costs ranging from \$3,200 to \$128,900 (FFY19) ¹⁶ . The federal share for small projects is paid upon PW approval.
Large Projects	Projects with repair or replacement costs in excess of \$128,900 (FFY19) ¹⁷ . The federal cost share is paid on a progress basis, as the work is complete. Final payments are based on actual costs.
Improved Projects ¹⁸	With prior FEMA and PEMA approval, departments may restore a facility back to the pre-disaster function with improvements, for which the department is financially responsible. Funding is limited to the federal share of the project’s estimated cost. Additional hazard mitigation funds may be available through the Hazard Mitigation Grant Program (HMGP).
Alternate Project ¹⁹	With FEMA and PEMA approval, departments may alter a damaged facility from the pre-disaster condition if the public welfare would not be best served by the repair, restoration, or reconstruction of the damaged area. Changes to the site may require an Environmental Assessment. Alternate projects are subject to reduced FEMA funding from the original project estimate.

PROJECT WORKSHEET DEVELOPMENT. Department designees should compile and record eligible costs in the electronic OEM PW Workbook. Depending on the scale and magnitude of the City’s projects, a FEMA specialist may schedule a PW Development Meeting to discuss grant management efforts in-person. If a department has a large number of complex projects, FEMA may choose to assign a staff member to the agency for a sustained length of time. Departments may be responsible for developing PWs independently, especially for small projects. To develop a PW, departments should track and record costs tied to the activated categories of work. See below for more information on eligible costs.

ELIGIBLE COSTS	
EMERGENCY WORK (Categories A-B)	PERMANENT WORK (Categories C-G)
Force account labor (overtime hours including benefits for full time and/or reassigned employees).	Force account labor (regular and overtime hours, including benefits).
Force account labor (regular and overtime hours for temporary employees).	All working hours for force account equipment.
All working hours for force account equipment.	Materials.
Materials.	Reasonable contract costs.
Reasonable contract costs.	Rental equipment costs.
Rental equipment costs.	Repair costs.

¹⁶ The threshold is updated annually: <https://www.fema.gov/public-assistance-indicator-and-project-thresholds>. The federal fiscal year 2019 rates are effective October 1, 2018 – September 30, 2019.

¹⁷ Ibid.

¹⁸ See Annex F: Request for Improved Project (DAP-14)

¹⁹ See Annex G: Request for Alternate Project

Documented donated resources.	Effective hazard mitigation measures.
Direct administrative costs (DAC).	Direct administrative costs (DAC)

Force Account Labor

- ❖ Employees (full time, part time, volunteers): Name, job title, date(s) worked, hours worked per day (regular and overtime), hourly wages, and total cost incurred.

Labor rates include actual wages paid *plus* fringe benefits paid or credited. Contact OEM's Recovery Planning Coordinator for updated fringe rates. **Supporting documentation includes copies of employees' timesheets and departmental overtime policies.**

Force Account Equipment

- ❖ Equipment details: Year, Make, Model, HP, and capacity.
- ❖ Equipment deployment: Date(s) used, operators name(s), hours used per day, FEMA equipment rate, and total cost incurred.

Refer to the FEMA Equipment Rate tab in the OEM PW Workbook or FEMA's website (<https://www.fema.gov/schedule-equipment-rates>) for updated pricing information. Equipment standby and idle time are ineligible and should be excluded from the OEM PW Workbook.

Supporting documentation includes equipment logs and timesheets for personnel assigned to the piece of equipment.

Force Account Materials

- ❖ Description of materials, unit price, quantity used, and total cost incurred.

Eligible materials may be taken from existing stockpiles or purchased specifically for the disaster. Department's must provide copies of invoices to support pricing. If invoices are unavailable, departments must contact area vendors to identify a price point. Proof of payment, once complete, must be provided for reimbursement. **Supporting documentation includes invoices and/or purchase orders.**

Rental Equipment

- ❖ Description of equipment rented, quantity, and total cost incurred.

Supply a copy of the rental agreement to support the equipment claim. Proof of payment, once complete, must be provided for reimbursement. **Supporting documentation includes copies of rental and/or lease agreements.**

Contracts

- ❖ Description of service and total cost incurred.

Contracts must be of reasonable cost, selected through a competitive bid process, and comply with local, state, and federal procurement standards. Proof of payment, once complete, must

be provided for reimbursement. **Supporting documentation** includes copies of signed contract documents including bid documentation and/or mutual aid agreements.

Damage Information

- ❖ Facility: Basic function, location, and pre-disaster condition.
- ❖ Description: Cause and the dimensions or components damaged.
- ❖ Scope of work: Describe the eligible work necessary to repair the damage as an action with quantifiable (i.e. length, width, depth, capacity, etc.) and descriptive (i.e. brick, wood, asphalt, timber deck bridge, etc.) terms.
- ❖ Cost to perform approved repairs.

Departments should also include any information pertinent to the scope of work including references to the Hazard Mitigation Proposal, if applicable. Supporting documentation should include photographs of damage, pre-disaster inspections, and relevant codes and standards required if repairs exceed the pre-disaster design. **Supporting documentation** includes photographs, pre- and post-disaster inspections, maps, and floorplans.

Change in Pre-Disaster Condition

- ❖ Note whether changes from the damaged site or facility pre-disaster condition will be made. Coordinate with OEM and/or the FEMA specialist to seek approval for an Improved Project or Hazard Mitigation funding.

Approval is required to change a site or facility including an increase or decrease in size, change in function, or modifications to building components and materials. If the pre-disaster conditions can be changed to prevent or reduce future disaster-related damage, discuss Hazard Mitigation opportunities with OEM and/or FEMA.

Special Considerations

- ❖ Endangered Species: Departments must take precaution and be aware of any endangered species near a project site.
- ❖ Historic Preservation: Properties eligible for the National Register of Historic Places—usually any facility over 50 years—requires special consideration under the National Historic Preservation Act.
- ❖ Environmental Requirements: Ensure all practical means are used to protect, restore, and enhance the environment. If the project alters the “footprint” of a facility, or if it is located in a wetland, affects air/water quality, endangered species, flora, or fauna, the department must adhere to all applicable rules and regulations.
- ❖ Floodplain Management: Any project within or affecting the floodplain must be reviewed to ensure that it meets the requirements of the Executive Order on Floodplain Management and the Protection of Wetlands.
- ❖ Insurance: Actual or anticipated insurance proceeds will be deducted from the eligible project costs for insured facilities.

To avoid a delay in funding, ensure PWs disclose all special considerations associated with repair, reconstruction, and restoration efforts.

Direct Administrative Costs (DAC)

- ❖ Employee name (regular time and overtime), date of work, hours of work, description of work (i.e. compiling staff rosters, coordinating with vendors, printing PW materials, etc.), and total costs incurred.

Department designees are encouraged to submit costs associated with PA administrative duties. Designees should record hours, dates, and work conducted to include in the project's PW. Any activities performed following the Kickoff Meeting are eligible for DAC.

SUPPORTING DOCUMENTATION. Departments must provide supporting documentation to substantiate submitted expenses. Accurate documentation expedites project approval, funding, and recovery.

ORGANIZING PROJECT WORKSHEETS. Depending on the number and complexity of projects, each department may develop a series of PWs. The table below outlines the potential methods of organization for a PW. Each department may choose the structure that works best for the individual projects. A FEMA representative, in coordination with OEM, works with each department to ensure PWs are logical and consistent with the criteria outlined below.

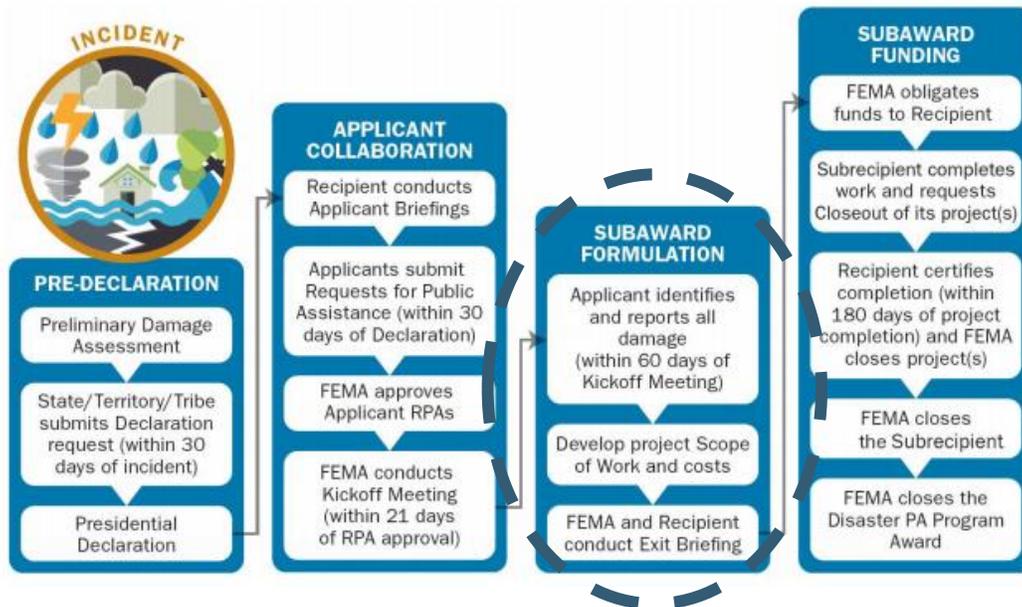
Method	Explanation
Specific Site	All work conducted at single site (i.e. Kelly Drive).
Specific Facility	All work conducted on a single facility (i.e. Falls Bridge).
Damage Type	All work conducted under a single Category A-G (i.e. debris removal).
System	All work conducted on a single system (i.e. water distribution).
Boundaries / Agency	All work conducted within a specific area (i.e. Fairmount Park), or within a single department (i.e. Philadelphia Fire Department).
Method of Work	All work conducted using the same method (i.e. contractors, force account labor, etc.).
Complex	Work conducted at several facilities at a single complex (i.e. High School).
Special Considerations	Work conducted on facilities with unique concerns (i.e. environmental resource, historic building, etc.).

SITE VISITS. To validate damage claims, FEMA and PEMA may require an in-person assessment. The inspection is scheduled through OEM with departmental liaisons. To guide the visit, departments must provide a representative—knowledgeable about the facility, function, and needed repairs—to support the PEMA and FEMA specialists' assessment.

CHECKLIST:

- Compile all cost and damage documentation in one location.
- Contact OEM to discuss scheduling a PW Development Meeting with FEMA.
- Prepare PW(s). Remember to:
 - Organize PWs by category and project.
 - Capture all eligible costs associated with each PW.
 - Provide supporting documentation.
 - Provide a detailed damage description and scope of work for repair, restoration, and/or reconstruction needs.
 - Provide cost estimates and explanations for incomplete work.
 - Calculate direct administrative costs.
 - Double check work to ensure costs are accurate in order to expedite approval and support future federal/state audits and financial reviews.
- Discuss options and procedures for improved projects, alternate projects, and hazard mitigation opportunities with OEM and FEMA.
- Submit PW(s) to OEM's Recovery Planning Coordinator for an internal review.

INTERNAL REVIEW PROCESS



Once the PWs are developed, departments submit all documents to OEM to forward to PEMA. PEMA reviews the documentation and pass the information up to FEMA. If there are any outstanding issues or questions, FEMA provides a list of requests to each department. Once FEMA is satisfied with the information provided, a draft PW is sent to OEM for review.

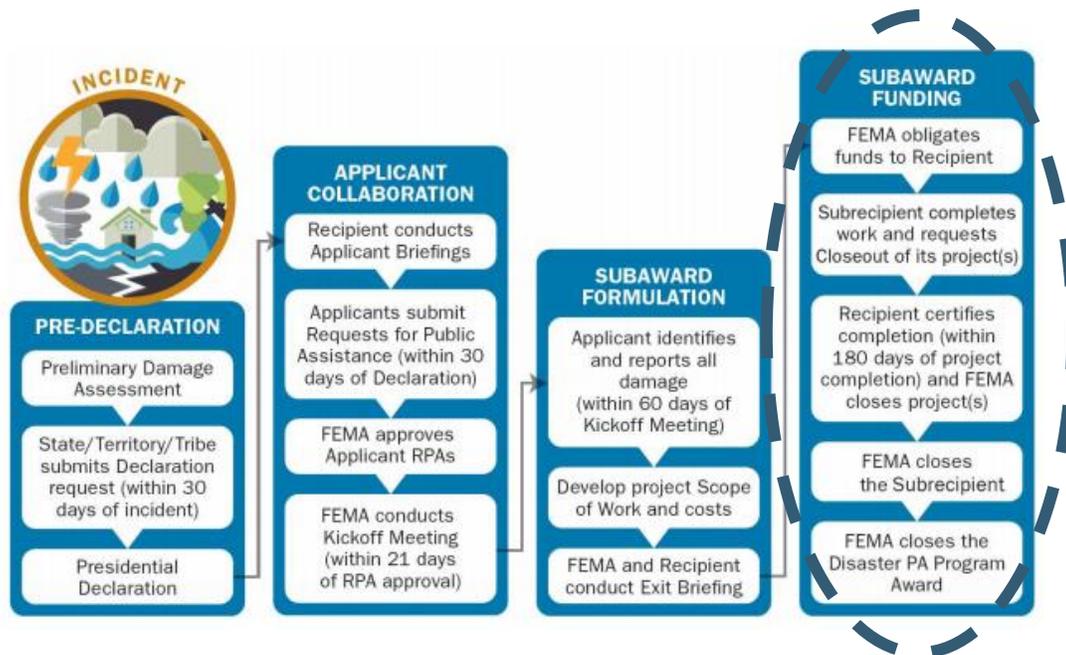
The internal review ensures all costs are accurately reflected and substantiated with supporting documentation.

INTERNAL REVIEW. To ensure all eligible costs are accurate and properly substantiated with supporting documentation, the City—lead by OEM—conducts an internal PW review. Depending on the number and scale of each department’s PW, the Director of Emergency Management (DEM) or the City’s Managing Director (MD) conducts the internal review. Once approved, the DEM or MD signs the PWs on behalf of the departments and return the final drafts to PEMA and FEMA.

CHECKLIST:

- Submit PWs and supporting documentation to OEM.
- Respond to any inquiries from FEMA or OEM regarding outstanding documentation.

SMALL PROJECT VALIDATION, OBLIGATION, AND CLOSEOUT



SMALL PROJECT VALIDATION. FEMA initiates the small project validation process once all small projects are submitted, or following a large number of submissions. FEMA reviews a 20 percent sample of the City’s small projects. If the sample meets FEMA’s criteria, the full package of small projects is approved. However, if the assessment finds significant discrepancies, a second sample is reviewed.

The small project validation process confirms the PW is complete, scope of work is accurate, work is eligible, and costs are reasonable.

Since all City departments apply for PA as a single applicant, the validation sample is taken across a pool of every department’s projects. If necessary, FEMA may schedule a validation meeting in coordination with OEM. Only departments with projects selected for the sample must attend the meeting. If selected, FEMA reviews the PW including cost records, estimates, measurements, pictures, and any supporting documentation related to the project. All departments are responsible for substantiating claimed costs; any failure to provide project support may result in the disqualification of the entire sample. If your department is requested to participate in the small project validation meeting, please review the FEMA’s Validation Worksheet²⁰ to prepare.

City departments are encouraged to submit small project PWs as early as possible. OEM’s Recovery Planning Coordinator and/or FEMA and PEMA specialists provide guidance pertaining to

²⁰ See Annex H: Validation Worksheet

deadlines. Any small projects submitted 60 days after the Kickoff Meeting are validated and obligated on an individual basis.

SMALL PROJECT OBLIGATION. Once FEMA validates the City's small projects, the approved funds are obligated. Payments for small projects are made at the time of approval on the basis of the amount listed on the PW, whether estimated or actual. Once approved, FEMA obligates the federal share²¹ to PEMA. Once received, PEMA notifies OEM's Recovery Planning Coordinator that the funding is available and coordinates the electronic transfer into the City's General Fund. Depending on a number of circumstances, the Managing Director's Office may elect to return reimbursements back to each department. This decision is generally made by the city's executive leadership team, and will vary by event.

SMALL PROJECT CLOSEOUT. Once all small projects are complete²², departments submit a Small Project Closeout Form²³ to OEM. A completed project means that all work described in the PW's Scope of Work has been performed and paid. To close out the grant, departments must provide proof of payment for contractor invoices and purchase orders. The Small Project Closeout Form should be submitted no later than one month following the completion deadline.

Projects are considered closed out once FEMA determines both PEMA and the City have completed all required grant work, and that internal FEMA specialists have completed all necessary administrative actions.

If a department does not complete the scope of work as outlined in the PW within the established timeframe, FEMA de-obligates the project. If de-obligated, the City must return the project's funds to FEMA.

Once all departments have completed all small projects and submitted the Small Project Closeout Form, OEM submits a DAP-12²⁴ to PEMA. The form certifies that all small projects—citywide—are complete and funds are expended.

SMALL PROJECT COST ADJUSTMENTS. If a project's actual cost is less than the amount listed on the PW, the City is not required to return the surplus. However, if the cost to complete all small projects is significantly greater than the total amount approved, departments may ask OEM to appeal to FEMA for additional funding. For more information, refer to the Appeals section.

²¹ The federal share of eligible costs is no less than 75 percent, and up to 100 percent. The state may opt to cover the remaining costs but are not required to contribute.

²² To be complete, all activities outlined in the scope of work must be finished and paid out. For more information on deadlines, refer to the Time Limits and Extensions section.

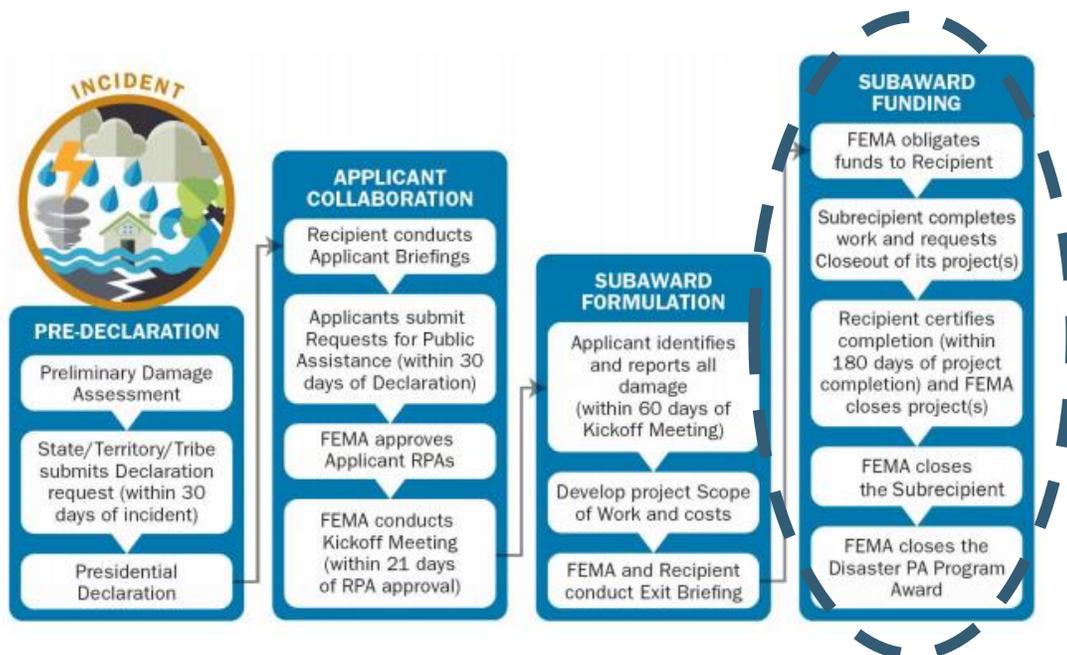
²³ See Annex I: Small Project Closeout Form.

²⁴ See Annex J: DAP-12 Completed Project Listing and Claim for Reimbursement.

CHECKLIST:

- Participate in the small project validation process, if requested.
- Review the Validation Worksheet and collect the necessary documentation, if selected for the small project validation.
- Complete the activities outlined in the scope of work for all small projects.
- Payout all invoices and purchase orders associated with each small project.
- Submit a Small Project Closeout Form to OEM with proof of payment and other supporting documentation, as requested.

LARGE PROJECT VALIDATION AND CLOSEOUT



LARGE PROJECT VALIDATION. Large projects are typically developed directly with FEMA. Therefore, unlike small projects, large projects do not require a sample validation.

LARGE PROJECT OBLIGATION. Because large projects are reimbursed based on actual costs and not estimates, project funding is processed on a progress payment basis. To request a payment for a large project, the department must prove that the work being reimbursed is complete and paid off. Departments are required to submit regular status updates (DAP-11²⁵) outlining project progress and current expenditures. Any invoices or requests for funds (DAP-9²⁶) must be submitted with the progress report. The maximum amount departments may request over the course of the project may not exceed 75% of the approved PW amount. Once the DAP-11 and DAP-9 forms are submitted, OEM compiles and send the documentation to PEMA. As the work is completed and paid, FEMA transfers the reimbursement electronically to the city through PEMA. The obligation procedures continues until the project is complete, and FEMA has paid out of the full 75% cost-share. As with small projects, FEMA funds are transferred electronically to the City's General Fund. Depending on a number of circumstances, the Managing Director's Office may elect to return reimbursements back to each department. This decision is generally made by the city's executive leadership team, and will vary by event.

LARGE PROJECT CLOSEOUT. Unlike small projects—which are closed when *all* projects are complete—large projects are closed out on an individual basis. Once a large project is complete,

²⁵ See Annex K: DAP-11 Form (Large Project Status Report)

²⁶ See Annex L: DAP-9 Form (Request for Large Project Reimbursement)

departments notify OEM and submit a DAP-12²⁷ with documentation validating the actual cost of work. The DAP-12 serves as the final request for payment for large projects, and is signed by the City's Applicants' Agent.

LARGE PROJECT COST ADJUSTMENTS. Unlike small projects, the reimbursements for large projects are adjusted to reflect the actual cost of work. Once a large project is complete, PEMA compares the final costs against the amount paid by FEMA. The results of the review are forwarded to FEMA for any necessary funding adjustments.

CHECKLIST:

- Submit Large Project Status Reports (DAP-11) to OEM for each large project in accordance with the established deadline.
- Submit a Reimbursement Request (DAP-9) to OEM once a portion of a large project is complete (at least \$10,000 worth of work).
- Complete the scope of work for every approved large project.
- Pay all invoices and submit proof of payment to OEM along with the required DAP forms.
- Submit a Project Closeout Form (DAP-12) to OEM once a large project is complete.
- Ensure all projects are closed out by the established deadline.

²⁷ See Annex J: DAP-12 Form (Complete Project Listing and Claim for Reimbursement)

TIME LIMITS AND EXTENSIONS

Depending on the category of work, projects must be completed within a set time from the date of the disaster declaration. All emergency work—categories A-B—must be complete within six months, and permanent work—categories C-G—must be complete within 18 months. OEM may request extensions from PEMA based on extenuating circumstances or unusual project requirements beyond the City’s control. As outlined below, PEMA may extend emergency work an additional six months, and permanent work may be extended an additional 30 months.

Category	Regulatory Deadline	PEMA Time Extension Authority	Total Time Allowed
Emergency Work Categories A - B	6 Months	6 Months	12 Months
Permanent Work Categories C - G	18 Months	30 Months	48 Months

REQUEST AN EXTENSION. To request a project extension, departments must submit a Request for Time Extension form (DAP-15)²⁸ to OEM prior to the designated deadline. OEM forwards the request to PEMA. PEMA may grant a pre-approved extension if there are no changes to the cost or scope of work. If departments require extensions beyond PEMA’s pre-approved extensions—six and 30 months—PEMA may forward the request to FEMA to assess and determine whether to grant an extension and, if approved, provide the revised time limits.

CHECKLIST:

- Complete all emergency work—categories A and B—within six months.
- Complete all permanent work—categories C-G—within 18 months.
Submit a Request for Time Extension form (DAP-15) to OEM, if necessary.

²⁸ See Annex M: DAP-15 Request for Time Extension

CHANGE OF SCOPE

While completing an approved project, a department may discover hidden damages, the need for additional work, or an increase in expenses beyond the estimate listed on the PW. As soon as potential changes to the scope of work or cost are identified, departments must notify OEM. All changes to an approved scope of work, or PW estimate, must be reviewed and granted by FEMA. The approval process for altering work varies according to project type.

CHANGING LARGE PROJECTS. If a project's work or cost differs from the approved PW, departments must submit a Change of Scope Form²⁹ to OEM. In addition to the form, departments must provide supporting documentation to justify the eligibility of the work and/or costs. Once received, OEM forwards the request to PEMA and FEMA for consideration. If necessary, PEMA and FEMA may require a site visit to issue a determination. Once a decision is made, FEMA provides PEMA and OEM with an amended PW or a written denial.

CHANGING SMALL PROJECTS. Small projects do not generally require a request for change unless the total cost for all small projects citywide significantly exceeds the approved expenses. However, if there is a gross error or omission in a small project's scope of work, departments should submit a Change of Scope Form³⁰ to OEM. FEMA does not typically conduct cost adjustments for small projects as costs underruns are usually offset by project overruns. Therefore, departments may only submit an appeal for additional funding if the City as a whole has significantly underestimated all small project expenses. If appropriate, OEM submits a request to PEMA within 60 days of the final small project's completion.

CHECKLIST:

- Submit a Change of Scope Form to OEM for large projects requiring a change to approved work or costs.
- Provide supporting documentation to justify the change in scope for a large project.
- Submit a Change of Scope Form to OEM for small projects with gross errors or omissions in the approved PW.

²⁹ See Annex N: Change of Scope Form

³⁰ See Annex N: Change of Scope Form

APPEALS

If a department wishes to contest a FEMA ruling, the City can submit an appeal. Appeals may address a variety of decisions including facility eligibility, costs, time extensions, scopes of work, and/or significant project overruns. Departments interested in appealing a decision should contact OEM to discuss next steps.

REQUEST AN APPEAL. If the decision to appeal is made, departments must submit an Appeal Request Form³¹ to OEM no later than 50 days from the receipt of FEMA's decision. The form must also accompany a written narrative explaining the reason for the contestation, and the adjustment being requested. Any documentation including photographs, correspondence, contracts, insurance policies, etc. supporting the appeal must also be included. The FEMA Regional Administrator reviews the request and render a decision within 90 days of receipt. Should FEMA request additional information to support the ruling, departments will have 60 days to provide the necessary documentation.

GRANTED APPEALS. If approved, FEMA adjusts projects, obligates additional funding, or sends a Project Specialist to meet with relevant department(s) to discuss future actions.

DENIED APPEALS. If an appeal is denied, departments may submit a second appeal in accordance with the procedures outlined above. Second appeals are forwarded—with a recommendation for action—from the FEMA Regional Administrator to FEMA Headquarters. FEMA HQ reviews the appeal and renders a decision within 90 days of receipt.

SMALL PROJECT APPEALS. The City may submit an appeal for additional funding if the total cost for small projects *citywide* significantly exceeds the amount approved. If applicable, departments must check the appropriate box on the Small Project Closeout Form.³² If the City as a whole incurred significant net overruns, OEM submits an appeal to FEMA within 60 days of the last small project's completion.

CHECKLIST:

- Contact OEM with questions or concerns regarding a decision made by FEMA.
- Submit an Appeal Request Form, and supporting documentation, no later than 50 days from the receipt of FEMA's decision.
- Provide OEM with a written narrative outlining the reasons for the appeal and the adjustment(s) requested.

³¹ See Annex O: Appeal Request Form

³² See Annex I: Small Project Closeout Form

PUBLIC ASSISTANCE WORKBOOK

REFERENCE GUIDE FOR CITY DEPARTMENTS

Please contact OEM's Recovery Planning Coordinator with any questions related to Public Assistance. OEM is available to provide PA support and policy guidance before, during, and after a disaster.

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ANNEX A: DAP-1 DESIGNATION OF AGENT RESOLUTION

PEMA’s DAP-1 form designates the City’s Applicant’s Agent. All City departments apply for Public Assistance as a single Applicant, under the authority of a single Agent. The Applicant’s Agent is the Director of Emergency Management, Managing Director, or designee. The Office of Emergency Management completes the DAP-1 Form on behalf of all City departments.

Fillable PDF:

<http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-01%20Form%20Designation%20of%20Applicants%20Agent.pdf>.

PEMA-DAP -2	DESIGNATION OF AGENT RESOLUTION	
FOR: _____ <small>(Enter Name of Disaster or Number)</small>		
BE IT RESOLVED BY _____ OF _____ <small>(Governing Body) (Public Entity)</small>		
THAT _____, <small>(Name of Applicant Agent) (Title)</small>		
IS HEREBY AUTHORIZED TO EXECUTE FOR AND IN BEHALF OF _____, _____ County, <small>(Public Entity) (County)</small>		
a public entity established under the laws of the Commonwealth of Pennsylvania, all required forms and documents for the purpose of obtaining financial assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288 as amended by Public Law 100-707).		
Passed and approved this _____ day of _____, 20____.		
_____ <small>(Name)</small>	_____ <small>(Title)</small>	_____ <small>(Signature)</small>

CERTIFICATION		
I, _____, duly appointed and _____ <small>(Name) (Title)</small>		
of _____, do hereby certify that the above is a true and correct copy of <small>(Public Entity)</small>		
a resolution passed and approved by the _____ <small>(Governing Body)</small>		
of _____ on the _____ day of _____, 20____. <small>(Public Entity)</small>		
_____ <small>(Signature)</small>	_____ <small>(Official Position)</small>	_____ <small>(Date)</small>

ANNEX B: DAP-2 PUBLIC DISASTER ASSISTANCE APPLICATION

PEMA’s DAP-2 form constitutes the PA Disaster Assistance Agreement between the State and City. The Office of Emergency Management completes the DAP-2 form on behalf of all City departments.

Fillable PDF:

<http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-02%20Form%20Public%20Assistance%20Application%20and%20Agreement%20for%20Financial%20Assistance.pdf>

PEMA-DAP-1
Rev. Feb 2016

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY**

PUBLIC DISASTER ASSISTANCE APPLICATION
and
AGREEMENT FOR FINANCIAL ASSISTANCE

NAME OF APPLICANT: _____

COMPLETE MAILING ADDRESS: _____

 _____, Pennsylvania, _____

COUNTY: _____ TELEPHONE No: (____) - ____ - _____ FEDERAL EIN: ____ - _____

APPLICANT'S AGENT NAME: _____ EMAIL: _____

PROJECT APPLICATION NUMBER: FEMA - - DR - PA - - -
(ASSIGNED BY PEMA)

This document shall constitute the Public Disaster Assistance Agreement between the Commonwealth of Pennsylvania and the above-named Applicant. This document, and all of the terms and conditions contained herein, shall apply to the grant of all disaster assistance funds provided by, or through, the Commonwealth of Pennsylvania, to the Applicant.

The Applicant certifies that:

1. The Applicant's Agent has the legal authority to apply for public disaster assistance on behalf of the Applicant and is authorized to execute all required forms on behalf of the Applicant.
2. The Applicant's elected officials and governing body have been informed of the terms and conditions of this Agreement, which apply to the receipt of federal and state financial assistance.
3. The Applicant agrees to establish and maintain a proper accounting system in accordance with generally accepted accounting standards to record disaster related expenditures.
4. The Applicant agrees to use the disaster assistance funds solely for the purposes for which the funds are approved and provided by the federal government and the Commonwealth.
5. The Applicant agrees to complete all approved work items within the time limits that are established by the Governor's Authorized Representative or the federal government. Time limits for project completion begin with the date of the disaster declaration, unless appropriate time extensions are requested and granted by the Pennsylvania Emergency Management Agency (PEMA) and the Federal Emergency Management Agency (FEMA). Debris Clearance (Category A) and Emergency Protective Measures (Category B) must be completed within six months; Permanent Work (Categories C through G) are to be completed within 18 months.

1

ANNEX C: REQUEST FOR PUBLIC ASSISTANCE FORM

FEMA’s Request for Public Assistance (RPA) form initiates the applicant’s entrance into the Public Assistance program. The Office of Emergency Management completes the RPA form on behalf of all City departments.

Fillable PDF:

https://www.fema.gov/media-library-data/1505397829631-758807d2f22ea320a71a74ade429675d/FEMA_Form_009-0-49_RPA_508_FINAL.pdf

DEPARTMENT OF HOMELAND SECURITY Federal Emergency Management Agency		OMB Control Number 1660-0017 Expires December 31, 2019	
REQUEST FOR PUBLIC ASSISTANCE			
Paperwork Burden Disclosure Notice			
Public reporting burden for this data collection is estimated to average 15 minutes per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting this form. This collection of information is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed in the upper right corner of this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW., Washington, DC 20472. Paperwork Reduction Project (1660-0017) NOTE: Do not send your completed form to this address.			
Privacy Act Statement			
Authority: FEMA is authorized to collect the information requested pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, §§ 402-403, 406-407, 417, 423, and 427, 42 U.S.C. 5170a-b, 5172-73, 5184, 5189a, 5189e; The American Recovery and Reinvestment Act of 2009, Public Law No. 111-5, § 601; and "Public Assistance Project Administration," 44 C.F.R. §§ 206.202, and 206.209.			
APPLICANT (Political subdivision or eligible applicant)		DATE SUBMITTED	
COUNTY (Location of Damages. If located in multiple counties, please indicate)			
APPLICANT PHYSICAL LOCATION			
STREET ADDRESS			
CITY	COUNTY	STATE	ZIP CODE
MAILING ADDRESS (if different from Physical Location)			
STREET ADDRESS			
POST OFFICE BOX	CITY	STATE	ZIP CODE
Primary Contact/Applicant's Authorized Agent		Alternate Contact	
NAME		NAME	
TITLE		TITLE	
BUSINESS PHONE		BUSINESS PHONE	
FAX NUMBER		FAX NUMBER	
HOME PHONE (Optional)		HOME PHONE (Optional)	
CELL PHONE		CELL PHONE	
E-MAIL ADDRESS		E-MAIL ADDRESS	
PAGER & PIN NUMBER		PAGER & PIN NUMBER	
Did you participate in the Federal/State Preliminary Damage Assessment (PDA)? <input type="checkbox"/> YES <input type="checkbox"/> NO			
Private Non-Profit Organization? <input type="checkbox"/> YES <input type="checkbox"/> NO			
If yes, which of the facilities identified below best describe your organization?			
Title 44 CFR, part 206.221(e) defines an eligible private non-profit facility as: "... any private non-profit educational, utility, emergency, medical or custodial care facility, including a facility for the aged or disabled, and other facility providing essential governmental type services to the general public, and such facilities on Indian reservations." "Other essential governmental service facility means museums, zoos, community centers, libraries, homeless shelters, senior citizen centers, rehabilitation facilities, shelter workshops and facilities which provide health and safety services of a governmental nature. All such facilities must be open to the general public."			
Private Non-Profit Organizations must attach copies of their Tax Exemption Certificate and Organization Charter or By-Laws. If your organization is a school or educational facility, please attach information on accreditation or certification.			
OFFICIAL USE ONLY: FEMA - _____ -DR- _____ - _____ FIPS# _____ DATE RECEIVED _____			

ANNEX D: SAMPLE KICKOFF MEETING AGENDA

The Kickoff Meeting is a one-on-one discussion between department designees and PEMA/FEMA representatives. The meeting is designed to provide a detailed review of the PA program, and to address each department’s specific needs. To prepare for the Kickoff, departments should review the agenda below.

Public Assistance Kickoff Meeting	
Meeting Agenda	
Agenda Item	Note/Actions
1. Introductions	<input type="checkbox"/> Department Representative, OEM, Finance, PEMA, FEMA
2. Overview	<input type="checkbox"/> Incident Dates <input type="checkbox"/> Eligibility <input type="checkbox"/> Documentation
3. Labor Costs <ul style="list-style-type: none"> • Permanent Employees- Overtime • Temporary Employees • Fringe Benefits 	<input type="checkbox"/> Provide FEMA with payroll records, overtime policy, and a sampling of employee timesheets. <input type="checkbox"/> Capture the total eligible labor costs that your organization incurred (including Fringe). <input type="checkbox"/> Straight time costs not eligible for permanent employees.
4. Equipment <ul style="list-style-type: none"> • FEMA Equipment Schedule 	<input type="checkbox"/> FEMA rates are inclusive of fuel, usage, insurance, etc. <input type="checkbox"/> Equipment needs to be tied to an operator
5. Materials <ul style="list-style-type: none"> • Used Inventory • Food, Vouchers 	<input type="checkbox"/> Provide FEMA with receipts or invoices for materials used during the incident period.
6. Contracts	<input type="checkbox"/> Demonstrate that correct contract bidding procedures were followed <input type="checkbox"/> Provide FEMA with a copy of contracts
7. Administration	<input type="checkbox"/> Administrative time for work on Public Assistance application may be eligible.
8. Permanent Work	<input type="checkbox"/> Identify projects for permanent work. <input type="checkbox"/> Review cost estimating and documentation procedures for large projects. <input type="checkbox"/> Review special considerations.
9. Hazard Mitigation	<input type="checkbox"/> Identify potential measures to eliminate future damages.
10. Identify Action Items and Next Steps	<input type="checkbox"/> Contact FEMA to set up Project Worksheet development meeting. Also notify OEM. <input type="checkbox"/> Review Internal Review Process
Additional Notes	
<hr/>	
<hr/>	

PEMA-DAP-5

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY**

**FORCE ACCOUNT ACTIVITY WORKSHEET
LABOR, EQUIPMENT, AND MATERIALS**

.PW NO:	APPLICANT
CATEGORY:	WORK LOCATION AND DESCRIPTION

MATERIALS

DESCRIPTION	QUANTITY	UNIT OF MEASURE	UNIT PRICE \$	COST \$	CHECK #

MATERIALS TOTAL \$ _____

LABOR TOTAL \$ _____
 EQUIPMENT TOTAL \$ _____
 MATERIALS TOTAL \$ _____
 GRAND TOTAL \$ _____

LABOR COST CALCULATION OF TOTAL LABOR COST [g] =

* for PERMANENT employees performing EMERGENCY WORK: $[c] \times [d] + [c] \times [d] \times [f] = [g]$
overtime plus overtime fringe benefit cost = TOTAL LABOR COST [g]

* for PERMANENT employees performing PERMANENT WORK, and
 * for TEMPORARY employees performing EMERGENCY and/or PERMANENT WORK

$[a] \times [b] + [a] \times [b] \times [e], + [c] \times [d] + [c] \times [d] \times [f] = [g]$
Regular time plus regular time fringe benefit cost plus, overtime plus overtime fringe benefit cost
 equals TOTAL LABOR COST

EMERGENCY WORK is Debris Removal (Category A) and Emergency Protective Measures (Category B)

PERMANENT WORK is the remaining categories (C thru F) for permanent repair / restoration / relocation

ANNEX F: DAP-14 REQUEST FOR IMPROVED PROJECT

With prior approval, departments may restore a facility back to pre-disaster function with improvements for which the department is financially responsible. Funding is limited to the federal share of the project’s estimated cost. Complete the form below to request an Improved Project.

Fillable PDF:

<http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-14%20Form%20Request%20for%20Improved%20Project.pdf>

<div style="border: 1px solid black; padding: 2px;"> PEMA-DAP-14 Rev. Jun 1999 </div>	COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY	
REQUEST FOR IMPROVED PROJECT (PREPARE A SEPARATE REQUEST FOR EACH IMPROVED PROJECT)		
APPLICANT:	DISASTER No.:	
CATEGORY OF DAMAGE	PROJECT WORKSHEET NO.:	FEMA I. D. No.:
1. DESCRIPTION OF THE HIGHER GRADE FACILITY TO BE CONSTRUCTED OR ADDITIONAL PERMANENT REPAIRS TO BE ACCOMPLISHED. INCLUDE DIMENSIONS, TYPE OF MATERIALS, AND ANY OTHER DETAILS THAT PROVIDE A COMPLETE DESCRIPTION OF PROJECT.		
2. ESTIMATED COST OF THE ABOVE FACILITY \$		
3. SOURCE OF FUNDING OVER PUBLIC ASSISTANCE GRANT		
4. WORK TO BE PERFORMED BY: (Check only one) <input type="checkbox"/> a. CONTRACT <input type="checkbox"/> b. OWN EMPLOYEES AND EQUIPMENT <input type="checkbox"/> c. COMBINATION OF a. & b.		
5. ESTIMATED DATE THE ABOVE PERMANENT WORK WILL BE COMPLETED		
6. ESTIMATE OF THE COST OF REPAIR/REPLACEMENT AS SHOWN IN THE PROJECT W.S.		
7. AMOUNT REQUESTED FOR IMPROVED PROJECT \$ _____		
SIGNATURE OF APPLICANT’S AGENT	DATE OF REQUEST	
APPROVAL OF THIS REQUEST IS BASED ON THE ABOVE INFORMATION. ANY CHANGED CONDITIONS MUST BE IMMEDIATELY REPORTED TO THE GOVERNOR’S AUTHORIZED REPRESENTATIVE.		
AMOUNT APPROVED AS AN IMPROVED PROJECT \$		
GOVERNOR’S AUTHORIZED REPRESENTATIVE	DATE OF APPROVAL	

ANNEX G: REQUEST FOR ALTERNATE PROJECT

To request an Alternate Project, complete and submit the following form to OEM's Recovery Planning Coordinator within 11 months of the initial Kickoff Meeting. PEMA and FEMA must grant approval prior to construction.

Request for Alternate Project	
Department:	
PW Number:	
Category of Work: <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G	
Description of proposed alternate project:	
Proposed plan for original damaged facility:	
Estimated cost of the proposed alternate project:	
Estimated cost of the repair/replacement as shown in the PW:	
Source of funding above Public Assistance Grant:	
Work to be performed by: (check one) <input type="checkbox"/> Contract <input type="checkbox"/> Own Employees and Equipment <input type="checkbox"/> Both	
Estimated date that the above project will be completed:	
Signature of Department Representative:	Date of Request

ANNEX H: VALIDATION WORKSHEET

To validate small project costs, FEMA assesses a 20 percent sample of small projects citywide. The following form outlines FEMA’s small project validation process.

Fillable PDF:

https://www.fema.gov/media-library-data/20130726-1608-20490-1108/90_118.pdf

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

ANNEX K: DAP-11 LARGE PROJECT STATUS REPORT

Large projects are funded according to the actual cost. As such, the obligation of funds is made on a progress payment basis. Departments are required to submit regular status updates—monthly or quarterly, as requested—outlining project progress and current expenditures to OEM.

Fillable PDF:

<http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-11%20Form%20Quarterly%20Large%20Project%20Status%20Report.pdf>

PEMA-DAP-11 COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY

QUARTERLY LARGE PROJECT STATUS REPORT

(Due at PEMA on or before Jan. 10th; Apr. 10th; Jul. 10th & Oct 10th until project completion)

DATE: _____

TO: Pennsylvania Emergency Management Agency
Bureau of Recovery and Mitigation
ATTN: Public Assistance Officer
1310 Elmerton Avenue
Harrisburg, Pennsylvania 17110-2150

FROM: _____
Applicant Name – Government or Private Nonprofit FEMA Applicant I. D. Number

Mail Address Disaster Number

City, State, ZIP County

This is the current status of Project Worksheet # _____ as of ____/____/____.

Project Name _____

The FEMA approved amount of this Project Worksheet is \$ _____

*The current estimate of the cost to perform the Approved Scope of Work is \$ _____
(A comment is mandatory if the current estimate is greater than 10% of the FEMA estimated/approved project amount). **Any change in the Scope of Work must have written approval by FEMA.**

Stage / Phase	Date
Engineering / Design	*
DEP permit applied for	*
DEP permit approved	*
Advertised for bids	
Bids received	
Contractor selected	

Stage /Phase	Date
Work starts / started on	*
Work* % complete a/o	*
Expected Completion Date	*
Work Completed	

* = MANDATORY ENTRY - either data or N/A. Remarks / Problems encountered or expected:
(Continue on reverse side if needed)

Applicant Agent Signature

ANNEX L: DAP-9 REQUEST FOR REIMBURSEMENT

The minimum amount a department can request for large project reimbursement at one time is \$10,000. The maximum amount departments may request over the course of the project may not exceed 75% of the approved PW amount.

Fillable PDF:

[http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-09%20Form%20Request%20for%20Reimbursement%20\(Large%20Project\).pdf](http://www.pema.pa.gov/about/publicinformation/Documents/Other%20Public%20Assistance%20Forms/DAP-09%20Form%20Request%20for%20Reimbursement%20(Large%20Project).pdf)

PEMA-DAP-9	COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
REQUEST FOR REIMBURSEMENT (LARGE PROJECTS ONLY)	
APPLICANT:	FEMA I. D. No.:
PROJECT WORKSHEET No.:	FEMA DISASTER No.:
<i>COSTS INCURRED TO DATE</i>	
LABOR	\$
EQUIPMENT	\$
MATERIAL	\$
CONTRACTOR VENDOR OTHER	\$
TOTAL COSTS INCURRED	\$ 0.00
Report costs by Project Worksheet - Attach Invoices - Minimum \$10,000.00	
<i>FOR PEMA USE ONLY</i>	
APPROVED AMOUNT OF PROJECT	\$
75% OF PROJECT APPROVED AMOUNT	\$
PREVIOUS REIMBURSEMENT	\$
AUTHORIZED REIMBURSEMENT	\$
CERTIFICATION BY SUBGRANTEE (APPLICANT AGENT):	
I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF THE INFORMATION ABOVE IS CORRECT AND ALL REPORTED COSTS WERE INCURRED IN ACCORDANCE WITH APPROVED PROJECT WORKSHEET AND OTHER GRANT CONDITIONS. I FURTHER CERTIFY THAT ALL REPORTED EXPENDITURES ARE SUPPORTED BY INVOICES (PAID OR IN HAND AND DUE), CANCELLED CHECKS, PAYROLLS, TIME RECORDS, CONTRACTS, ETC., IN ACCORDANCE WITH GENERALLY ACCEPTED ACCOUNTING PROCEDURES, AND ARE BEING MAINTAINED FOR REVIEW BY APPROPRIATE FEDERAL/STATE OFFICIALS.	
SIGNATURE OF AGENT _____	DATE _____
RETURN FORM AND INVOICES TO: PEMA Attn: BORM - Public Assistance 1310 Elmerton Avenue Harrisburg, PA. 17110	

ANNEX N: CHANGE OF SCOPE FORM

To request a change of scope for an approved PW, complete and submit the following form to OEM's Recovery Planning Coordinator.

Request for Change of Scope	
Department:	
PW Number:	
Type of Work: <input type="checkbox"/> Emergency <input type="checkbox"/> Permanent	
Category of Work: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G	
Original PW Amount:	New PW Amount:
Reason(s) for Change of Scope:	
Is the additional work or cost related to the disaster? If so, how?	
Supporting documents (justifying additional work and/or costs) are attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Signature of Department Representative:	Date of Request:

ANNEX O: APPEAL REQUEST FORM

To request an appeal from FEMA, complete submit the following form to OEM’s Recovery Planning Coordinator within 50 days of receipt of the original decision.

Appeal Request	
Department:	
Decision to be Appealed:	
Date of Original Decision:	
Provide a narrative below that addresses why your department is contesting the decision:	
Amount of adjustment requested (if applicable):	
Supporting documentation (photos, plans, correspondence, contracts, insurance policies, etc., as needed to justify request for appeal) is attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Signature of Department Representative:	Date of Request:

ANNEX P: SAMPLE IMPACT STATEMENT

To support a Presidential Disaster Declaration, the City may submit an impact statement in addition to cost estimates. The narrative outlines the disaster’s impact to the City’s operations, which may otherwise not be reflected in the quantitate submission. A sample impact statement submitted by the City following Hurricane Sandy is copied below.

COMPREHENSIVE ASSESSMENT OF IMPACT FROM HURRICANE SANDY

County Name:	Philadelphia
<p><i>The Community impact statement should not dwell on financial losses only, but the hardships and challenges encountered by power losses, nursing homes, hospitals, emergency responders, schools, prisons, and other community institutions, or any other clear and compelling justification for federal assistance to help in recovering from the effects of Hurricane Sandy.</i></p>	
<p>When completed this form should be sent to the State Emergency Operation Center, Infrastructure Branch. Email to: binfrastru@pa.gov</p>	
<p>It is imperative that we receive this form no later than 4:00 PM, Thursday, November 1.</p>	
<p>Describe the overall impact Sandy has had on your County: <i>Example: (Fallen trees have impacted the emergency response of utility crews, fire apparatus, police response. Impact of prolonged power/water outages etc...)</i></p>	
<p>Hurricane Sandy knocked down nearly 500 trees, caused power outages for nearly 65,000 residents, and resulted in coastal flooding along the Delaware River. Over 60 buildings reported damages from the storm. Downed trees closed nearly 80 roads. Police, fire, EMS, and public works agencies received record levels of emergency calls during the event. Philadelphia’s 311 call center received nearly 11,500 calls at the peak of the storm. Due to high prolonged winds, the Commonwealth closed all interstates in the immediate area as of 7pm on Sunday, October 28th including I-95 in Pennsylvania, I-676, non-toll portion of I-476, I-76 from PA Turnpike to NJ line, and US Route 1 to Philadelphia. During the storm, City government, schools, and public transit were closed for two days. All flights from Philadelphia Airport were canceled on Monday, October 29th. Fortunately, the flooding on fresh water creeks, streams, and rivers was limited, but Philadelphia had record-breaking flooding along the Delaware River which led to the closing of Delaware Avenue, a major arterial street in the city.</p> <p>The City’s Office of Emergency Management coordinated operations from the Emergency Operations Center beginning at 4:00PM on Sunday, October 28th. EOC operations ceased on Wednesday, October 31 at 6:00PM, but on-going work is needed to deal with hundreds of downed trees, repairing a total of 73 traffic signals that were knocked out, and restoring power to thousands of residents and businesses.</p> <p>President Obama signed an Emergency Declaration for Pennsylvania, giving FEMA authorization to identify, mobilize, and provide at its discretion, equipment and resources necessary to alleviate the impacts of the emergency.</p>	
<p>Describe the Housing/Sheltering issues caused by Sandy. <i>Example: Number of houses damaged and without power. Number of resident requiring shelter.</i></p>	
<p>Philadelphia opened three emergency shelters in preparation for Hurricane Sandy. Preparation was made in coordination with the American Red Cross and (INSERT ANIMAL RESPONSE ORGS) to open all shelters at 4PM on Sunday. Two were closed on Tuesday, October 30th at 8:00PM and the third shelter was closed on Wednesday, October 31st at 4:00PM. At the height of operations, nearly 400 people were sheltered in all three facilities along with approximately 30 companion animals (pets). Many residents arrived at the shelter pre-disaster so shelter operations lasted for over 72 hours.</p> <p>The emergency shelters faced a challenge of accommodating dozens of homeless individuals who were evicted by local city homeless shelters in advance of the storm. The City coordinated closely with the Office of Supportive Housing to facilitate the relocation of these individuals and to assist other shelter residents with special needs.</p>	

COMPREHENSIVE ASSESSMENT OF IMPACT FROM HURRICANE SANDY

<p>Describe Impact Sandy has had on Schools, Hospitals and other Critical Facilities in your County.</p> <p><i>Example: (Describe impact if these facilities don't return to normal operating condition soon....etc...)</i></p> <p>Public, charters, Archdiocesan and several local colleges and universities were closed both on Monday, October 29 and Tuesday, October 30. The majority of schools re-opened on Wednesday, October 31. There are five public schools that continue to not have power and could not open for classes.</p> <p>The use of 3 City schools as emergency shelters also challenged school resources. School Police officers were used as security for shelter operations and engineering/janitorial staff were both available for the duration of the event to address building needs at the shelter. The West Philadelphia emergency shelter remained open during school operations on Wednesday, October 31st which required close coordination with the School District.</p>
<p>Description of Roads and Bridges impacted within your area.</p> <p><i>Example: (Impact on the County's ability to function.)</i></p> <p>Numerous city streets and major arterials experienced road blocks due to downed trees and wires. Most major arterials were cleared by Thursday morning, however over 80 road closures and 32 traffic signal outages currently remain as Thursday, November 1st.</p> <p>Philadelphia citizens are highly dependent on mass transit, and SEPTA pro actively shut down a 12:00AM Monday, October 29th and began to resume only a select number of bus routes Tuesday at 12:00PM. Numerous other bus routes closed due to downed trees and wires.</p> <p>Regional rail lines remained closed until Tuesday morning but continue to experience residual delays. AMTRAK suspended operations Sunday, resuming partial operations between Philadelphia and Washington Wednesday morning. NJ Transit suspended operations Sunday, reopening Thursday morning.</p>
<p>Describe the actions the County took to protect Life and Property</p> <p><i>Example: When did preparations begin, what was done, EOC operations and mission. What operations are continuing</i></p> <p>Preparations for this storm began on Thursday, October 25. The City's Office of Emergency Management (OEM) coordinated closely with the Mayor as well as state and city leadership to prepare for Sandy. OEM convened 3 emergency conference calls with (INSERT NUMBER) of city agencies and non-profit partners. Public information messaging was coordinated at all levels of government to ensure public readiness. OEM assisted other agencies in pre-positioning resources and staff in advance of the storm including police, fire, EMS, and other key City partners. In addition, OEM recommended that agencies prepare emergency staffing plans, check facilities for vulnerabilities, test generators, vehicles, and other key equipment. In coordination with the Mayor, the City was proactive in advising the evacuation of flood prone neighborhoods at 2:00PM on Sunday, October 28th.</p> <p>The EOC was first activated on Sunday, October 28 for a limited activation and was activated fully on Monday, October 29 at 6:00AM with over 20 agencies represented. The EOC activation was reduced to a limited level again on Tuesday, October 30 at 8:00PM. The EOC ceased operations on Wednesday, October 31 at 6:00PM. In all, the activation lasted 74 hours. The EOC focused on shelter operations, response, power outages, structural damage, and downed trees. On Monday night during the height of the storm, the EOC was also coordinating with the Fire Communications Center for response to a multi-dwelling 2-alarm structural fire.</p>
<p>Describe impact on other Facilities in your County.</p> <p><i>Example: Supply and treatment plants out of operation, any businesses impacted, impact on employment, wellness issues, etc..</i></p> <p>Many businesses in Philadelphia were also closed or staffed with limited personnel on Monday, October 29 and Tuesday, October 30. This was due to local businesses following the lead of City government and school closing, but also compounded by the closure of public transportation.</p> <p>During the storm, a water treatment plant within the city lost power and had to shut down. Operations were able to be diverted to other water treatment plants throughout the city. Additionally, the refinery in South Philadelphia managed by Philadelphia Energy Solutions removed hydrofluoric acid from the plant and powered down operations to stabilize them for the storm.</p>
<p>Authorized Individual: Samantha Phillips, Dep. Managing Director for EM</p>