




FEMA

March 28, 2022

MEMORANDUM FOR: FEMA Regional Administrators  
Regions I - X

ATTENTION: Federal Coordinating Officers  
Regional Recovery Division Directors  
Consolidated Resource Center Directors

FROM: Melissa K. Forbes   
Assistant Administrator  
Recovery Directorate

SUBJECT: Simplifying the Public Assistance Program

Thank you for your continued commitment to helping communities before, during, and after disasters. As the Administrator noted with the release of the *2022-2026 FEMA Strategic Plan* (Strategic Plan), we are seeing tremendous change in the emergency management risk landscape and expectations regarding FEMA's role. Nowhere is that more apparent than within the Public Assistance (PA) program. Since the start of Fiscal Year (FY) 2020, our teams have obligated over \$75.7 billion to help communities recover from both COVID-19 and other disasters. That is more than the total program obligations from 2003-2017—a period that included historic hurricanes Charley, Gustav, Ike, Irene, Katrina, Matthew, Rita, Sandy, and Wilma. It is even more inspiring that our PA teams—and the partners we work with—have done this when they themselves have been survivors of the largest disaster in FEMA's history, the COVID-19 pandemic.

The Strategic Plan challenges us to adapt to our changing landscape. Specifically, the Administrator has asked all of us to streamline coordination and delivery of federal assistance and find ways for communities to navigate the PA program more easily. To meet that challenge, I am pleased to provide an update on near-term actions we are taking to simplify the PA program.

### **Listening to Communities and Assessing Performance**

Implementing goals as bold and ambitious as those laid out in the Strategic Plan require us to talk to the communities we serve to gain a better understanding of how PA can best serve them. To that end, I am excited to announce that FEMA is re-establishing the Public Assistance Steering Committee. The committee will be comprised of leaders from FEMA, states, tribal nations, territories, and local governments, and is charged with providing feedback and direction on operational issues and strategic initiatives within the Program. The committee's first meeting will be held in the next 45 days, and we

are actively working with your Recovery teams on membership. This effort is also responsive to the National Advisory Council's (NAC) 2021 Report recommendations.

### **Simplifying Processes**

We are also looking to streamline PA processes ahead of hurricane season. The changes below are intended to simplify documentation requirements, provide better service to our applicants by offering opportunities to directly engage with Consolidated Resource Center (CRC) staff, and improve coordination between the field and CRC staff. These measures aim to reduce the number of Requests for Information (RFI) required to efficiently process PA funding and decrease the documentation burden on the communities we serve. We are also identifying additional business process changes to reduce RFIs through the broader PA Assessment.

### ***Sampling to Minimize Burden***

In its 2021 Report to the FEMA Administrator, the NAC identified an opportunity to adopt the Government Accountability Office (GAO) approach to sampling and thereby decrease the documentation burden FEMA places on communities when they request Public Assistance. Therefore, we are releasing the attached *Public Assistance Sampling Procedure*. The procedure utilizes an attribute-based sampling approach, following the GAO Financial Audit Manual, for verifying supporting documentation for PA projects. This will reduce the level of documentation that FEMA requires applicants to submit with projects to validate PA claims. The next version of FEMA's Public Assistance Program and Policy Guide (PAPPG) will formally adopt this procedure. In the interim, FEMA staff should use it to develop all large projects.

### ***Determination Reviews and Communications***

Maximizing the availability of federal assistance requires eligibility determinations be made by those with the best understanding of the challenges facing communities during their recoveries. Going forward, all determination memos during field operations must be reviewed by the Federal Coordinating Officer (FCO). It is vital that FEMA's most knowledgeable and seasoned field and regional staff are engaged in these reviews and are knowledgeable about when Public Assistance is and is not able to meet a community's intended outcomes.

It is also vital that FEMA provide clear, prompt answers to keep long-term recovery moving. Currently, there are over 1,500 determination memos (DMs) that have been under development for more than 45 days. While the CRCs do not make eligibility decisions, early coordination between the field and CRCs can help identify potential eligibility issues and help resolve them in a timely manner.

### ***Deploying CRC Staff for Complex Projects***

The CRCs provide technical expertise to help FEMA develop or validate project scopes of work and cost estimates. While it is most efficient for FEMA to share this expertise across disasters, it is critical that individuals developing projects understand the unique circumstances facing communities as they recover, especially for complex recoveries.

To that end, I have directed the PA Division to coordinate with FCOs to deploy CRC staff to field offices so they can participate with field staff in applicant coordination meetings, site inspections, and

other critical milestones for complex projects. Through our broader PA assessment, we are also determining what a CRC Liaison to field operations will look like as a standard practice.

### **Simplifying Policy**

The policy changes and clarifications below are also intended to reduce burdensome requirements for applicants and ensure consistency on authorities for certain time extensions.

#### ***Deadline to Support and Estimate Completed Projects***

As a result of the deadline not having the intended outcome of helping recovery progress in a timely manner, I am removing the requirement in the PAPPG v4 that for all projects completed prior to obligation, applicants, “*must submit documentation for the project within 90 days of the Recovery Scoping Meeting or within 90 days of the work completion date, whichever is later.*” This change applies to all unobligated projects. Program Delivery Managers (PDMGs) should continue to work with applicants to obtain documentation necessary in a timely manner for project development. After a time determined appropriate by the RA or FCO, a determination memo should be issued if documentation is not provided.

Additionally, I am waiving the requirement under PAPPG v3.1 that completed small projects must be prepared based on actual costs. This waiver is in place for all unobligated small projects on any open incident. For completed large projects, there will be no change at this time; however, documentation requirements for completed large projects will remain a focus of the broader PA Assessment, specifically to continue to simplify these requirements and reduce the applicant’s burden.

The waivers discussed above do not apply to an applicant’s 90-day post-obligation deadlines described in Chapter 12 of the PAPPG v4 (Financial Reconciliation and Closeout). However, as there is no longer a requirement to submit all supporting documentation prior to obligation, I am adjusting the 90-day post obligation deadline for projects with work completed prior to obligation to begin on the date of obligation.<sup>1</sup>

The PA Division will host four webinars in April to discuss project development implications related to the removal of the requirements described above. The target audience for these webinars will be Infrastructure Branch Directors (IBDs), Public Assistance Group Supervisors (PAGS), and CRC staff. The changes described above will be reflected in the PAPPG v5.

#### ***Time Extensions for Closeout Deadlines***

The PA Division has received questions from Regions about the RA’s authority to approve time extensions to deadlines for submitting projects for closeout. RAs have the authority to grant time extensions to closeout deadlines.

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<sup>1</sup> Regarding small projects, per PAPPG v4, the post-obligation deadline begins on the work completion date for an applicant’s last small project. Consistent with this waiver, if work on the last small project was completed prior to obligation, it begins on the date of obligation.

Examples of circumstances that may justify a time extension include:

- Projects with open and active correspondence pending that is related to the scope or cost of the project;
- When the respective Subrecipient or Recipient has insufficient personnel available to process project closeout and documentation reviews due to active incident response activities; or
- When the respective Subrecipient or Recipient have a significant amount of project closeouts due simultaneously.

## **Training**

As you know, the PA Incident Management Cadre has expanded exponentially over the past five years to meet growing mission needs. Regions are also building staff capacity to handle their growing routine disaster-year workload. With so many new PA employees, we recognize the need to continually train new employees, provide ongoing training to existing employees, and cross-train to build our bench strength.

As part of the PA Sprint, the PA Division is delivering refresher training for Task Force Leaders (TFLs) and PDMGs during a PA Stand Down in June to provide enhanced training on customer experience, using the Request for Information Job Aid, and ensuring consistent documentation requirements. The PA Division is also launching an inaugural PA Leadership Academy for IBDs, PAGs, and TFLs in July that will include training on policy and consistent application of programmatic guidance, leadership education, and customer service best practices. The Academy will conclude with a 3-day simulated Joint Field Office capstone exercise.

The changes described above are intended to simplify and streamline PA program delivery. As the broader PA Assessment moves forward and we re-establish the PA Steering Committee, we will look for further opportunities to quickly implement changes to simplify the program. In addition to the items above, we will be working to simplify our approach to management costs, force account, RFIs, and mutual aid documentation.

The Recovery mission is truly an enterprise endeavor, and we greatly appreciate your ongoing partnership to ensure that PA meets its key goals and objectives of ensuring simplicity, accuracy, efficiency, accessibility, and timeliness with a focus on customer experience as we support impacted communities in their recovery efforts.

cc: Anne Bink, Associate Administrator, Office of Response and Recovery  
David Bibo, Deputy Associate Administrator, Office of Response and Recovery  
Tom McCool, Acting Assistant Administrator, Field Leadership Directorate  
Regional Recovery Division Directors I-X  
Regional Public Assistance Branch Chiefs I-X

Attachments:

Public Assistance Steering Committee Overview  
Public Assistance Assessment Charter  
Public Assistance Sampling Procedure