

# FOREWORD

On behalf of the Federal Emergency Management Agency (FEMA), I am pleased to issue this Fourth Edition (Version 4) of the *Public Assistance Program and Policy Guide* (PAPPG). FEMA has archived previous editions at [www.fema.gov/media-library/assets/documents/111781](http://www.fema.gov/media-library/assets/documents/111781). FEMA applies this Version 4 to incidents declared on or after June 1, 2020. This version supersedes Version 3.1.

As part of this version of the PAPPG, FEMA has incorporated the *Public Assistance Alternative Procedures for Permanent Work Pilot Policy* (FP 104-009-7). This establishes Alternative Procedures as the first option considered for all large permanent work projects in order to ensure the ability of Applicants to drive their own recovery. It standardizes a single process for the development and consideration of fixed cost estimates for all permanent work projects. Applicants will be able to agree to a fixed cost estimate or choose to pursue funding under standard, actual cost procedures. This approach maximizes Applicant awareness of the opportunities and benefits provided by the Alternative Procedures, which include, but are not limited to:

- Flexibility in meeting post-disaster recovery needs, as opposed to being limited to rebuilding back to what existed prior to the disaster;
- Ability to share funds across all Alternative Procedures Permanent Work Projects;
- Ability to retain and use excess funds to reduce risk and improve future disaster operations (subject to timely closeout); and
- Eligibility for cost-effective hazard mitigation on replacement projects.

Appendix M: *Alternative Procedures for Permanent Work Pilot*, provides additional information along with a summary of benefits in comparison to the standard Public Assistance (PA) procedures.

Additionally, this PAPPG Version 4 incorporates the following:

## List of Changes and Clarifications Grouped by General Topic

Administrative
<b>Reorganized and simplified</b> language throughout the PAPPG
Incorporated the <b>Program Delivery Process</b> throughout the PAPPG
Updated <u>References and Resources</u> list
Updated <u>Appendix A: <i>Environmental and Historic Preservation Compliance</i></u>
Added language on <b>outcome-driven recovery</b> (Chapter 2. <i>Operational Coordination</i> )
Incorporated key <b>Grants Management</b> language and requirements such as <b>work completion definition</b> and deadline requirements throughout the PAPPG
Moved documentation checklists to relevant sections and <b>specified required documents</b> throughout the PAPPG
Defined <b>policy on logical grouping</b> of damage (Chapter 5:II. <i>Grouping Impacts into Projects</i> )
Incorporated <b>Documentation Retention Requirement</b> (Chapter 12:IV. <i>Documentation Retention Requirements</i> )
Incorporated <b>Appeal policy</b> (Chapter 3:V.C. <i>Appeal Rights and Requirements</i> )

## Administrative

Incorporated **Determination Memo and Administrative Record** guidance (Chapter 3:V.B. *Notification of Ineligibility Determination*)

Added **Closeout** policy and **documentation requirements** (Chapter 12. *Final Reconciliation and Closeout*)

Added standard **Request for Information** deadlines (Chapter 3:V. *Eligibility Determinations*)

Added definition for **site** (Chapter 5: *Damage and Impact Information*)

Added FEMA **validation of Applicant-submitted damage** information and documentation (Chapter 5:III.B. *Site Inspections*)

Added requirement for all **documentation** to be submitted **within 90 days** of work completion **regardless of obligation status** (Chapter 9:II.C. *Costs for Projects with All Work Completed*)

## Applicant Eligibility

Added **animal control services, center-based childcare, and food banks** to eligible private nonprofit (PNP) list (Chapter 3:VI.D.2. *Private Nonprofit Essential Social Services*)

Proration of emergency work on PNP **mixed-use facilities** (Chapter 4:II.B.1. *Mixed-Use Facility*)

Clarified that PNP facilities that provide **flood control** are **ineligible** (Chapter 3:VI.D.3. *Private Nonprofit Ineligible Services*)

Clarified requirements for PNPs **exempt from 501c** requirement (Chapter 3:VI.D. *Private Nonprofit Organizations*)

Clarified **Community Development District** requirement to **serve the public** (Chapter 3:VI.D. *Private Nonprofit Organizations*)

Moved **public broadcasting** to PNP **critical service** table based on Stafford Act (Chapter 3:VI.D.1. *Private Nonprofit Critical Services*)

## Emergency Work Eligibility

Clarified **demolition versus debris** (Chapter 7:I.G. *Debris Removal from Private Property*)

Added reference to **Operation Blue Roof** (Chapter 7:II.X.1. *Operation Blue Roof*)

Clarified that FEMA may provide exceptions to **demolish commercial structures** in limited, extraordinary circumstances (Chapter 7:II.U.2. *Commercially Owned Structures*)

Clarified and aligned **standby time** and **pre-positioning** of resources (Chapters 6:II.B.7. *Standby Time* and 7:II.E. *Pre-positioning Resources*)

Simplified the **opt-in** procedure for **debris removal Alternative Procedures** (Chapter 7:I.A. *Alternative Procedures for Debris Removal*)

**Removed “temporary”** from emergency repair language (Chapter 7:II.X. *Emergency Repair or Stabilization*)

Clarified **debris clearance vs. debris removal** (Chapter 7:II.J. *Emergency Access*)

Reduced list of **services eligible for temporary relocation** and added examples of eligible and ineligible support services (Chapter 7:II.V. *Temporary Relocation of Essential Services*)

Clarified that **Mosquito Abatement** may be eligible if any one of the bullet scenarios exists (Appendix G: *Mosquito Abatement*)

Eliminated requirement to make at least 10 percent of **sheltering capacity** available in Host-State sheltering (Chapter 7:II.O.4. *Host-State or Host-Tribe Evacuation and Sheltering*)

Refined **beach** eligibility language (Chapter 7:II.X.4. *Emergency Dunes or Berms on Beaches*)

Clarified language on **essential employees** being called-back from leave (Chapter 6:II.B.4. *Essential Employees Called Back from Furlough*)

## Emergency Work Eligibility

Clarified that the **return of evacuees** is eligible (Chapter 7:II.O.1. Evacuation)

Clarified language regarding **damage caused during Emergency Work** (Chapter 7:III. Damage Caused During Performance of Emergency Work)

## Permanent Work Eligibility

Eliminated **Alternate Project** reduction (Chapter 8:VIII.A. Capped Project Funding)

Clarified that replacement of **moldy** construction materials is only eligible as Permanent Work (Appendix I: Mold Remediation)

Clarified cost-effective **mitigation for low slope roofs** (Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures)

Refined **beach** eligibility language (Chapter 8:IX.E.1. Beaches)

Clarified eligibility of **Americans with Disability Act** requirements (Chapter 8:III.G. Accessibility for Individuals with Disabilities)

Refined hazard **mitigation policy** language (Chapter 8:IV.A. Public Assistance Hazard Mitigation)

Defined which **Flood Control Works** are under authority of the Natural Resources Conservation Service (Chapter 8:IX.B.2. Flood Control Works)

## Cost Eligibility

Added language on **cost share matching** with Other Federal Agency funds (Chapter 1:IV.E. Federal Cost Share)

Clarified PNP cost ineligibility when a **PNP declines or misses the deadline** to apply for a disaster loan from the Small Business Administration (Chapter 4:II.B.2. Small Business Administration Loan Requirement)

Clarified Small Business Administration loan requirement for PNP **mixed-use facilities** (Chapter 4:II.B.2. Small Business Administration Loan Requirement)

Incorporated additional language on **procurement and contracting** (Chapter 6:VIII. Procurement and Contracting Requirements)

Added language on what costs are covered by **increased cost shares** (Chapter 6:XIII. Increased Federal Cost Share for a Limited Timeframe)

Explained difference between **project management and grant management** costs (Chapter 6:XV. Project Management and Design Services and XVI. Grant Management and Administration)

Clarified eligibility of costs related to **pursuing insurance** proceeds (Chapter 6:XVIII.A. Insurance Proceeds)

Added language on eligibility of **interest on loans** (Chapter 6:XX. Interest on Loans)

Incorporated **increased operating cost clarifications**, including ineligibility of costs related to transportation of students to alternate schools or temporary facilities, staff being held-over to cover shifts, and new landfills (Chapter 7:II.F. Expenses Related to Operating a Facility or Providing a Service)

Clarified that the **minimum threshold** does not apply to Donated Resources or Management Costs (Chapter 9:II.A. Project Thresholds)

Allowing **Small Project completed work** to be **estimated and certified** (Chapter 9:II.C. Costs for Projects with All Work Completed)

### Cost Eligibility

Added language conveying that FEMA **does not re-evaluate reasonable costs on Alternative Procedure Permanent Work Pilot projects** (Chapter 9:II.E.6. *Fixed-Cost Offer for Alternative Procedures Projects*)

Eliminated allowance for **insurance adjustments on individual small projects** (Chapter 12:I.A. *Project Reconciliation and Closeout, Small Projects*)

### Policy and Guidance Documents Incorporated and Superseded

FEMA Recovery Policy, *Public Assistance Donated Resources*

FEMA Recovery Policy FP 104-09-12, *Public Assistance Alternative Procedures Pilot Program for Debris Removal*

FEMA Recovery Policy FP 104-009-7, *Public Assistance Alternative Procedures Pilot Program - Permanent Work Standard Operating Procedures*

*Public Assistance Alternative Procedures for Permanent Work Pilot (Version 4)*

FEMA Fact Sheet, *Public Assistance: Procurement Conducted Under Exigent or Emergency Circumstances*

FEMA Fact Sheet, *Public Assistance: Purchasing Goods or Services through Cooperative Purchasing Programs*

FEMA Fact Sheet, *Public Assistance: Private Property Debris Removal*

FEMA Fact Sheet, *Public Assistance: Contracting Requirements Checklist*

FEMA Job Aid, *Public Assistance: Reasonable Cost Evaluation*

FEMA's *Public Assistance Program Interim Guidance on 2 C.F.R. Part 200*

March 15, 2019, memo: *FEMA's Approved Cost Estimating Methodology*

July 9, 2018, memo: *Policy Clarification for Public Assistance Hydrologic and Hydraulic Study Requirements for Drainage Structures and Culverts*

March 15, 2019, memo: *FEMA Public Assistance Repair Versus Replacement Policy Clarification*

April 11, 2018, memo: *FEMA Public Assistance Eligibility of Private Nonprofit Elementary and Secondary Schools*

*Public Assistance Program Field Operations Pocket Guide*

*Public Assistance Program Management and Grant Closeout Standard Operating Procedure (SOP 9570.14), December 2013*

*FEMA Instructional Guidance, Public Assistance Expedited Projects*

### Guidance Documents Summarized and Referenced

FEMA Fact Sheet *Public Assistance Appeals and Arbitration Under the Disaster Recovery Reform Act*

## Guidance Documents Summarized and Referenced

*State Led Public Assistance Guide*

*Damage Assessment Operations Manual*

FEMA Recovery Policy FP 104-11-2, *Public Assistance Management Costs (Interim)*

FEMA Recovery Interim Policy FP 104-009-11, *Consensus-Based Codes, Specifications and Standards for Public Assistance* (Chapter 8:III.B, *FEMA Consensus-Based Codes, Specifications and Standards*)

FEMA makes updates to the PAPPG at [www.fema.gov/public-assistance-policy-and-guidance](http://www.fema.gov/public-assistance-policy-and-guidance) on an annual basis when necessary and conducts a comprehensive review no less than every three years. We look forward to your feedback to help inform the next version. FEMA staff may send policy recommendations through the PA Change Control Tool at [portalapps.fema.net/apps/ORR/NewPA/Pages/SubmitRequest-CCT-P3.aspx](http://portalapps.fema.net/apps/ORR/NewPA/Pages/SubmitRequest-CCT-P3.aspx). Recipients and Applicants may request changes via email at [FEMA-Recovery-PA-Grants-Mailbox@fema.dhs.gov](mailto:FEMA-Recovery-PA-Grants-Mailbox@fema.dhs.gov).



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