

BAKER DONELSON

FEMA PUBLIC ASSISTANCE: DOCUMENTATION REQUIRED TO SUPPORT ELIGIBLE COSTS

State, local, tribal and territorial (SLTT) government entities and certain private non-profit (PNP) entities are eligible to apply for FEMA Public Assistance to reimburse eligible costs incurred as a result of federally declared disasters. Part of what makes a cost “eligible” is that it is substantiated with good documentation. This information sheet provides a quick reference for the kind of documentation FEMA requires for various categories of costs.

ELIGIBLE COSTS ARE:

- Directly tied to the performance of eligible work;
- Adequately documented (as explained in more detail below);
- Reduced by all applicable credits, such as insurance proceeds and salvage values;
- Authorized and not prohibited under federal, state, territorial, tribal, or local government laws or regulations;
- Consistent with the Applicant’s internal policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the Applicant; and
- Necessary and reasonable to accomplish the work properly and efficiently.

FOR MORE INFORMATION, PLEASE CONTACT A MEMBER OF OUR DISASTER RECOVERY AND GOVERNMENT SERVICES GROUP:



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GENERAL FEMA DOCUMENTATION REQUIREMENTS

Contract Costs (applies to all costs that are incurred under contract or purchase order)	<ul style="list-style-type: none"> • Contracts including required federal terms and conditions and any applicable change orders • Analysis demonstrating cost/price reasonableness • Procurement policy • Procurement documents (e.g., RFP or ITB, selection process, evaluation, or justification for noncompetitive procurement) • Evidence of contractor oversight (e.g., daily or weekly logs, records of performance meetings (required for time and materials contracts)) • Invoices
Labor Costs (employees, contracted or temporary labor, mutual aid, prison labor)	<p>For each individual:</p> <ul style="list-style-type: none"> • Name • Job title and function • Job classification (e.g., full-time exempt, full-time non-exempt, part-time, temporary) • Days and hours worked • Pay rate(s) and fringe benefit rate(s) • Description of work performed • Timesheets, daily logs, activity reports (summary list of all timesheets or representative sample with description of sampling methodology) • Fringe benefit calculations <p>Additionally:</p> <ul style="list-style-type: none"> • Justification for any standby time claimed • Labor pay policy for each type of worker (e.g., part-time, full-time, temporary, contract) • Mutual aid agreement, as applicable
Equipment	<p>For each piece of applicant-owned (force account) equipment:</p> <ul style="list-style-type: none"> • Type of equipment and attachments used, including year/make/model • Size/capacity (e.g., horsepower, wattage) • Locations and days and hours used with usage logs • Operator name • Schedule of rates, including rate components <p>Additionally:</p> <ul style="list-style-type: none"> • Description of acquisition of equipment (e.g., previously owned, purchased, rented) • If purchased or rented, rental vs. purchase cost comparison • If purchased, invoices and receipts • If rented, rental agreement, invoices and receipts • Basis for rates used (e.g., FEMA Equipment Rates or applicant's Equipment Rates) • Disposition information (e.g., salvage value, documentation of disposition proceeds)
Materials and Supplies	<p>For supplies from stock:</p> <ul style="list-style-type: none"> • Historical cost records (e.g., original invoices) • Inventory records • Type and quantities used, with support documentation (e.g., daily logs) <p>For purchased supplies:</p> <ul style="list-style-type: none"> • Receipts or invoices demonstrating purchase or stock replenishment cost • Justification if purchased materials or supplies were not used
Travel Costs	<ul style="list-style-type: none"> • Proof of purchase (e.g., invoices, receipts), including names of individuals to which they relate so they can be compared to work activity • Labor policies or contracts demonstrating travel costs are the legal responsibility of the applicant • Description of traveler's role demonstrating his or her participation in the eligible work is necessary

GENERAL FEMA DOCUMENTATION REQUIREMENTS, *CONTINUED*

Utility Costs	<ul style="list-style-type: none">Records indicating pre-disaster use vs. disaster-related use
Meals	<p>As applicable:</p> <ul style="list-style-type: none">Labor policy or written agreement requiring provision of mealsDescription of conditions so severe as to require employees to work abnormal, extended work hours without a reasonable amount of time to provide for their own mealsEvidence that food or water was or is not available for employees to purchaseCertification that no meals were provided to individuals receiving a per diem, at a restaurant or individually (bulk meals only) <p>Additionally:</p> <ul style="list-style-type: none">Catering contract or purchase order (Note: FEMA only reimburses the cost of meals brought to the work location, such as bulk meals, and does not reimburse group outings or individual meals)Names of individuals consuming the meals (will be cross-referenced with daily work logs for verification)Description of efforts to ensure meals were provided only to applicant personnel, volunteers or contractors performing disaster-related work (e.g., sign-in sheets, ID verification)Description of work performed by individuals receiving meals
Insurance	<ul style="list-style-type: none">Policies, declarations and endorsementsClaim informationCoverage decisionsSettlement informationEvidence of applicant's reasonable efforts to pursue insurance proceeds
Donations and Volunteer Hours	<ul style="list-style-type: none">Detailed logs of all volunteer hours and donationsDocumentation that shows the donated resource is from a third partyDescription of how the donated resource is necessary and reasonable to accomplish the projectDocumentation that shows the usage of the donated resource in the performance of eligible work and within the project's period of performance
Legal Responsibility	<p>As applicable:</p> <ul style="list-style-type: none">Law delegating jurisdictional powers to applicantStatute, order, contract, articles of incorporation, charter or other legal document making applicant legally responsible to conduct activities for general publicRight-of-Entry to perform work on private property, including agreements to indemnify and hold harmless the federal government
For Electric Utilities: Conductor Replacement	<ul style="list-style-type: none">Visual evidence of disaster-related broken strands, splices, or sleevesVisual evidence of spans stretched beyond clearance requirementsDocumentation of leaning poles (e.g., photographs)Documentation of broken cross-arms, braces, ties, insulators, guys, pulled anchors, bent pinsEvidence from a licensed Professional Engineer that conduct is damaged beyond repairEvidence of pre-disaster condition (e.g., inspection, maintenance records)

All costs must be necessary, reasonable and a direct result of the disaster.

Documentation should support these requirements including a Cost or Price Analysis, when applicable.

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