

Lessons Learned from Water/Wastewater Utilities that Participated in FEMA's Public Assistance Grant Program

Many drinking water and wastewater utilities have received funding for repair and replacement work through the Federal Emergency Management Agency (FEMA) Public Assistance (PA) Grant Program. The PA Program provides grants to eligible applicants after Presidentially-declared disasters. In this brochure, water and wastewater utilities provide lessons learned from working with FEMA and participating in the PA Program.

For more detailed information about the FEMA PA program, see <http://www.fema.gov/public-assistance-local-state-tribal-and-non-profit> and the EPA publication: *Public Assistance for Water and Wastewater Utilities in Emergencies and Disasters* – available at <http://water.epa.gov/infrastructure/watersecurity/emergency/upload/Public-Assistance-for-Water-and-Wastewater-Utilities-in-Emergencies-and-Disasters.pdf>.

DISCLAIMER: *These lessons learned are provided to help water and wastewater utilities better understand use of the FEMA PA Program, but do not assure or guarantee any funding from FEMA.*

Learn about the PA Program prior to a disaster so the process goes more smoothly

– To help maximize your potential for reimbursement, learn about the PA process and key deadlines for applying for funds and reach out to state officials who administer the grant program with FEMA and to other utilities that could be mentors.

You may be eligible for reimbursement under Categories A, B, D and F

– Take advantage of several possible categories where water and wastewater facilities may be eligible. The PA Program includes Category A (Debris Removal), Category B (Emergency Protective Measures) which cover emergency work and Category D (Water Control Facilities), and Category F (Utilities) which covers permanent repair of water treatment and delivery systems and sewage collection and treatment facilities. See the FEMA Applicant Handbook for more information.

Take advantage of getting a monetary advance for your emergency work

– FEMA's PA Program generally reimburses applicants for eligible projects upon completion of eligible work. In some cases, Immediate Needs Funding (INF) may be available from FEMA to meet an Applicant's urgent needs in the initial aftermath of a disaster. Upon request by the State, FEMA can provide INF within the first 60 days after the disaster declaration for work that must be performed immediately. INF funding is available for emergency work only; it cannot be used to complete permanent repairs. Eligible activities typically



include debris removal, emergency protective measures, and removal of health and safety hazards. See pages 10 and 11 on FEMA 323 Applicant Handbook - March 2010 at http://www.fema.gov/pdf/government/grant/pa/fema323_app_handbk.pdf

Maximize your potential for reimbursement by maintaining thorough recordkeeping and accounting to track costs

– For projects to be eligible, you should maintain detailed documentation to ensure maximum reimbursement. Examples of recordkeeping include:

- Establish accounting code to track work related to the disaster
- Keep detailed documentation of damage assessments to your utility
- Follow accounting procedures to track invoices, receipts, and expenses
- Follow procedures to track work performed (including vendors' work); equipment usage; personnel time; and vehicle gas and mileage.

This information is necessary to show progress to State and FEMA officials (who may rotate out on a regular basis) over the duration of the project and to comply with PA requirements to maintain financial and program records.

The water and wastewater utility in the City of Keene, New Hampshire instituted a work management system following a flood disaster in 2005 that can now easily capture the level of detail required by the FEMA PA program.

Before the disaster, document the existing condition of your facility so you can demonstrate damage incurred and needed posts-disaster repair actions

Take photographs and keep work orders and maintenance records (e.g., GIS maps of pipeline inspections) to demonstrate the current state of your facility and distribution system. After the disaster (even before the Presidential declaration), collect similar documentation for a thorough damage assessment before you conduct any repair work.

For small systems, State Rural Water Associations' Circuit Riders can help utilities collect damage assessment information and share it with the local emergency operations center and the state PA representative. They can even attend PA meetings with a utility.

Incorporate the PA process as part of your emergency response, training, and exercise plans

– In emergency response plans, outline responsibilities to comply with the PA Program such as those of the finance department to establish project codes and keep certain records after a disaster. In terms of training, there is available PA Program awareness courses provided by FEMA (such as <http://training.fema.gov> IS-630-Introduction to Public Assistance Process), outreach from EPA, and other utility mentoring opportunities. Some utilities recommend conducting an exercise specifically for the PA Program that involves key players including the utility disaster response team and the finance, accounting, and legal departments.

Be able to easily transfer your records onto FEMA forms

– When implementing your recordkeeping and accounting procedures, make sure the data you collect is consistent with the requirements of the forms used for the PA Program. The level of detail that FEMA requires is cap-

East Valley Water District in California obtained over \$400,000 in response to the Old Fire in the San Bernardino National Forest. The Water District recognized that they could have completed the application process more efficiently if the output from their financial system was in a format similar to a FEMA form.

tured in specific forms (project worksheets that detail damages, costs, and work).

Be aware that the FEMA PA Program is a reimbursement program

– Utilities must pay for all repair costs upfront. The PA Program provides reimbursement funds for approved projects only after work is completed. It may take several months to years before PA Program funds are fully awarded. Thus, utilities should plan to finance projects before reimbursement is provided.

Explore Mitigation Funds as part of disaster funding

As part of the PA Program, FEMA may pay for particular cost effective mitigation actions to prevent the reoccurrence of the same damage. The following link provides potential mitigation measures that are pre-determined to be cost effective (see <http://www.fema.gov/public-assistance-local-state-tribal-and-non-profit/hazard-mitigation-funding-under-section-406-0>). For water and wastewater treatment plants, these measures include elevation of equipment and controls that can be elevated easily and flood-proofing of buildings. For raw water intakes, cost effective measures include buttressing to prevent damage from erosion, scour and flood debris.

Portland Water Bureau obtained a \$3 million mitigation grant from FEMA to make conduits more secure from landslides.

Strengthen the connection to State emergency management officials

– Identifying key players and coordinating with the State before, during, and after a disaster may help with the application process and ensure that funds are available sooner. The PA Program is processed through the State, as the Grantee, and the utility, as the sub-grantee. The State is responsible for certifying that approved projects are completed. Obligated FEMA PA funds are then transferred to the State, which transfers funds to applicants based on procedures established by each state. Grant recipients are subject to audits by the DHS Office of Inspector General and State auditors. The OMB requires grant recipients to maintain financial and program records for three years beyond the date of final project closeout.

Contact various organizations to get assistance

Other organizations that have experience with the PA Program may provide valuable assistance (e.g., in filling out FEMA forms). These organizations include State Rural Water Associations' Circuit Riders; Water/Wastewater Agency Response Networks programs; other utilities that serve as mentors; vendors; and consulting firms specializing in the FEMA PA Program.