



Florida Recovery Obligation Calculation (F-ROC)

2025 Disaster Readiness Assessment



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Applicant Experience

1. Has this Applicant previously been awarded Federal funding?

- a. ☐ Yes, the Applicant has received Federal funding.
- b. ☐ No, the Applicant has not previously received Federal funding.

1a. If yes, has the Applicant been awarded Public Assistance (PA) funding within the last 5 years?

- a. ☐ Yes, this Applicant has been awarded Public Assistance funding for 2 or more disasters.
- b. ☐ Yes, this Applicant has been awarded Public Assistance funding for 1 disaster.
- c. ☐ No, this Applicant has not been awarded Public Assistance funding in the last 5 years.

1b. If yes, was any of the funding to reimburse eligible work under Category A (Debris Removal) or Category B (Emergency Protective Measures)?

- a. ☐ Category A and Category B
- b. ☐ Category A only
- c. ☐ Category B only
- d. ☐ Category B only, the Applicant does not claim Category A work
- e. ☐ No Emergency work, only Category C-G (Permanent Work)

1c. If yes, please select the disaster(s) in which you received FEMA PA funding for Category A (Debris Removal) and/or Category B (Emergency Protective Measures)?

- a. ☐ DR4337 Hurricane Irma
- b. ☐ DR4399 Hurricane Michael
- c. ☐ DR4468 Hurricane Dorian
- d. ☐ DR4486 Florida Covid-19 Pandemic
- e. ☐ EM3533 Hurricane Isaias
- f. ☐ DR4564 Hurricane Sally
- g. ☐ EM3551 Hurricane Eta
- h. ☐ EM3560 Surfside Building Collapse
- i. ☐ EM3561 Tropical Storm Elsa
- j. ☐ EM3562 Tropical Storm Fred
- k. ☐ DR4673 Hurricane Ian
- l. ☐ DR4680 Hurricane Nicole





- m. ☐ DR4709 Florida Severe Storms, Tornadoes, and Flooding
- n. ☐ DR4734 Idalia

1d. If yes, does the Applicant have experience with projects in the Public Assistance Program within the last 5 years? (Choose all that apply)

- a. ☐ Yes, obligated large projects.
- b. ☐ Yes, obligated small projects.
- c. ☐ Yes, both small and large obligated projects.

**If yes, please upload the following documents:*

Required Documentation:

Notice of Federal Funding Award

2. Does the Applicant have staff member(s) who will be dedicated to and responsible for administering their FEMA PA grants in the event of a declared disaster?

- a. ☐ Yes, in the event of a disaster the Applicant has 2 or more dedicated staff members.
- b. ☐ Yes, in the event of a disaster the Applicant has at least 1 dedicated staff member.
- c. ☐ No, the Applicant will not have any dedicated staff members.

2a. If yes, please list the staff member(s) who will be responsible for administering the FEMA Public Assistance Grant. (Please include Name, Department, Title, and years of experience. Ex: John Doe, Finance, Director, 4 years)

Employee Name	Department	Position Title	Years of Experience

**Click to add another staff member*





2b. If yes, do these staff member(s) have previous experience or training related to administering FEMA PA Grants?

- a. ☐ Yes, the staff member(s) have previous FEMA PA experience administering FEMA PA Grant(s)
- b. ☐ Yes, the staff member(s) have FEMA PA training but do not have previous experience administering FEMA PA Grant(s)
- c. ☐ No, the staff member(s) do not have previous FEMA PA experience or training.

Required Documentation:
Experience Memo
Training Transcript
Resume

3. Does the Applicant have an executed Agreement with a responsible vendor to assist in administering their FEMA PA grant(s) that was procured in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has an executed Agreement with a responsible vendor to assist in administering their FEMA PA grant(s) that was procured in compliance with 2 CFR 200.
- b. ☐ No, the Applicant currently does not have an executed Agreement with a responsible vendor but **has** experienced staff administering their FEMA PA grants.
- c. ☐ No, the Applicant currently does not have an executed Agreement with a responsible vendor and **does not** have experienced staff administering their FEMA PA grants.

**If yes, please upload the following documents:*

Required Documentation:
Advertisement
Request for Proposal
Proposal
Scoring Tabulation
Notice of Award
Grant Administration Contract
Amendment



Policy/Procedure

4. Does the Applicant (and all core departments) have an established labor policy that is in compliance with FEMA PA grant funding requirements, is applied uniformly regardless of a Presidential declaration, is non-discretionary when the Applicant activates various pay types, and is not contingent upon Federal funding?

- a. ☐ Yes, the Applicant and all core departments that provide personnel during a disaster have an established labor policy that is in compliance with FEMA PA grant funding requirements.
- b. ☐ No, the Applicant and all core departments that provide personnel during a disaster do not have an established labor policy that is in compliance with FEMA PA grant funding requirements.

Reference: FEMA determines the eligibility of overtime, premium pay, and compensatory time costs based on the Applicant's pre-disaster written labor policy, provided the policy: does not include a contingency clause that payment is subject to Federal funding; is applied uniformly regardless of a Presidential declaration; and has set non-discretionary criteria for when the Applicant activates various pay types. (PAPPG pg. 69)

**If yes, please upload the following documents:*

Required Documentation:
Labor Policy

**If more than one policy, please click to upload an additional policy and the name of the department*

5. Does the Applicant have an approved labor policy or relevant employee agreement(s) that outlines how employees will be paid during an emergency?

- a. ☐ Yes, the Applicant's approved labor policy (or similar documentation) outlines how employees will be paid during an emergency.
- b. ☐ No, the Applicant's approved labor policy (or similar documentation) does not outline how employees will be paid during an emergency.

Reference: FEMA's criteria for reimbursing straight-time labor costs differ depending on the type of employee and whether that employee is performing Emergency Work or Permanent Work. (PAPPG pg. 69)

5a. Does the Applicant's labor policy note that reassigned employees (employees not performing their normal day-to-day duties) should be paid at their normal pay rate and not the pay rate of the services that they performed?

- a. ☐ Yes, the Applicant's labor policy notes that reassigned employees should be paid at their normal pay rate and not the pay rate of the services that they performed.
- b. ☐ No, the Applicant's labor policy does not note that reassigned employees should be paid at their normal pay rate and not the pay rate of the services that they performed.

Reference: The Applicant may assign an employee to perform work that is not part of the employee's normal job. For example, a police officer may clear debris. FEMA provides PA funding based on the reassigned employee's normal pay rate, not the pay level appropriate to the work, because the Applicant's incurred cost is the employee's normal pay rate. (PAPPG pg. 70)

5b. Does the Applicant's labor policy note that a backfill employee (an employee that is temporarily replacing another employee who is responding to the incident – work performed does not need to be eligible work) should be paid at their normal pay rate?

- a. ☐ Yes, the Applicant's labor policy notes that a backfill employee should be paid at their normal pay rate.
- b. ☐ No, the Applicant's labor policy does not note that a backfill employee should be paid at their normal pay rate.
- c. ☐ N/A, the Applicant does not utilize backfill employees.

Reference: The Applicant may need to temporarily replace an employee who is responding to the incident. Overtime costs for the backfill employee are eligible even if the backfill employee is not performing eligible work as long as the employee that he/she is replacing is performing eligible Emergency Work. (PAPPG pg. 70)

5c. Does the Applicant's labor policy note that prisoners should be paid at the rate that the Applicant normally pays prisoners?

- a. ☐ Yes, the Applicant's labor policy notes that prisoners should be paid at the rate that the Applicant normally pays prisoners.
- b. ☐ No, the Applicant's labor policy does not note that prisoners should be paid at the rate that the Applicant normally pays prisoners.
- c. ☐ N/A, the Applicant does not utilize prisoners for labor.

Reference: FEMA provides PA funding for prisoner labor costs based on the rate that the Applicant normally pays prisoners. (PAPPG pg.87)

5d. Does the Applicant's labor policy define Standby use and pay?

- a. ☐ Yes, the Applicant's labor policy defines Standby use and pay.
- b. ☐ No, the Applicant's labor policy does not define Standby use and pay.
- c. ☐ N/A, the Applicant does not utilize Standby time.

Reference: FEMA may provide PA funding for labor costs related to intermittent standby time for staff conducting eligible evacuation or sheltering, search and rescue, or emergency medical care. Standby use and pay are consistent with the Applicant's labor policy (or contractual obligation based on a labor agreement) and consistent with its practice in non-federally declared incidents; (PAPPG pg. 71)



**If yes, please upload the following documents:*

Required Documentation:

Labor Policy

**If more than one policy, please click to upload an additional policy and the name of the department*

6. Does the Applicant have a written agreement or labor policy that includes meals for employees and volunteers engaged in eligible Emergency Work, including those at Emergency Operation Centers, provided the individuals are not receiving per diem?

- a. ☐ Yes, the Applicant has a written agreement or labor policy that includes meals for employees and volunteers engaged in eligible Emergency Work, including those at Emergency Operation Centers, provided the individuals are not receiving per diem.
- b. ☐ No, the Applicant does not have a written agreement or labor policy that includes meals for employees and volunteers engaged in eligible Emergency Work, including those at Emergency Operation Centers, provided the individuals are not receiving per diem.

Reference: Applicants often provide meals for emergency workers. Provision of meals, including beverages and meal supplies, for employees and volunteers engaged in eligible Emergency Work, including those at EOCs, is eligible provided the individuals are not receiving per diem and one of the following circumstances apply:

- Meals are required based on a labor policy or written agreement that meets the requirements of Chapter 6. Cost Eligibility;
- Conditions constitute a level of severity that requires employees to work abnormal, extended work hours without a reasonable amount of time to provide for their own meals; or
- Food or water is not reasonably available for employees to purchase. FEMA only reimburses the cost of meals that are brought to the work location and purchased in a cost-effective and reasonable manner, such as bulk meals. FEMA does not reimburse costs related to group outings at restaurants or individual meals. (PAPPG pg. 117)

**If yes, please upload the following documents:*

Required Documentation:

Labor Policy, Written Agreement

7. Does the Applicant have an Emergency Financial Plan that identifies strategies to close the gap between the disaster event costs and the entity's financial capacity?

- a. ☐ Yes, the Applicant has an Emergency Financial Plan that identifies strategies to close the gap between the disaster event costs and the entity's financial capacity.
- b. ☐ No, the Applicant does not have an Emergency Financial Plan that identifies strategies to close the gap between the disaster event costs and the entity's financial capacity.





Reference: Each emergency financial plan should be based on the likely frequency of the disaster's occurrence. If insufficient funds are available to address the disaster event, the emergency financial plan should identify strategies to close the gap between the disaster event costs and the local governmental entity's financial capacity. Such strategies may include rainy day funds, reprioritizing its annual budget, and borrowing. (F.S. 252.391, pg. 8)

**If yes, please upload the following documents:*

Required Documentation:

Emergency Financial Plan

7a. Is the Applicant's Emergency Financial Plan reviewed annually?

- a. ☐ Yes, the Applicant's plan is reviewed annually.
- b. ☐ No, the Applicant's plan is not reviewed annually.

8. Does the Applicant have written policies and procedures that outline routine maintenance schedules to include documentation requirements for facilities within their jurisdiction (related to CAT B Mold Remediation)?

- a. ☐ Yes, the Applicant has written policies and procedures that outline routine maintenance schedules to include documentation requirements for all facilities within their jurisdiction.
- b. ☐ No, the Applicant does not have written policies and procedures that outline routine maintenance schedules to include documentation requirements for facilities within their jurisdiction.

Reference: The Applicant must demonstrate that damage was caused directly by the declared incident. FEMA does not provide PA funding for repair of damage caused by deferred maintenance. When necessary to validate damage, the Applicant may be required to provide documentation supporting pre-disaster condition of the facility (e.g., facility maintenance records, inspection/safety reports). (PAPPG pg. 52)

Reference: For mold remediation to be eligible, mold must not be a result of poor facility maintenance or failure to take protective measures to prevent the spread of mold in a reasonable time after the incident. (PAPPG pg. 137)

**If yes, please upload the following documents:*

Required Documentation:

Maintenance Procedures

**If more than one policy, please click to upload an additional policy and the name of the department*



**8a. If yes, who is responsible for internally approving the maintenance policies and procedures?
Please provide a title.**

a. _____

8b. How often are these policies and procedures evaluated and/or updated?

- a. ☐ Once a year
- b. ☐ Every 1-3 years
- c. ☐ 3 + years

8c. How often are applicable employees responsible for reviewing and acknowledging the policies and procedures?

- a. ☐ Once a year
- b. ☐ 1-3 years
- c. ☐ 3+ years

9. Does the Applicant have procedures to document inventory of their force account equipment, purchased equipment, and leased equipment?

- a. ☐ Yes, the Applicant has documented procedures for equipment inventory.
- b. ☐ No, the Applicant does not have procedures to document inventory of equipment.

References: FEMA provides PA funding for the use of Applicant-owned (force account) equipment, including permanently mounted generators, based on hourly rates. FEMA may provide PA funding based on mileage for vehicles, if the mileage is documented and is less costly than hourly rates. There are instances when the Applicant does not have sufficient equipment to effectively respond to an incident. If the Applicant purchases equipment that it justifiably needs to respond effectively to the incident, FEMA provides PA funding for both the purchase price and either:

- The use of the equipment based on equipment rates (without the ownership and depreciation components);
- or the actual fuel and maintenance costs. (PAPPG pg. 72)

**If yes, please upload the following documents:*

Required Documentation:

Equipment Inventory Procedures

10. Does the Applicant have written procedures that require a leasing versus purchasing analysis for equipment costs?

- a. ☐ Yes, the Applicant has procedures to perform a lease versus purchasing analysis.
- b. ☐ No, the Applicant does not have lease versus purchasing procedures.



References: The non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. (2 CFR § 200.318(d))

**If yes, please upload the following documents:*

Required Documentation:
Leasing vs. Purchasing Procedures

11. Does the Applicant have a documented process of internal controls that can address instances of fraud, waste, and abuse (FWA), such as conflicts of interest and gaps in required documentation?

- a. ☐ Yes, the Applicant has a process of internal controls to address FWA.
- b. ☐ No, the Applicant does not have a process of internal controls to address FWA.

Reference: Recipients must comply with the requirements of The False Claims Act (31 U.S.C. §§ 3729-3733) which prohibits the submission of false or fraudulent claims for payment to the federal government. (PAPPG pg. 259)

**If yes, please upload the following documents:*

Required Documentation
Office of Inspector General (OIG) document
Procurement Policy
Code of Conduct
Employee Handbook

11a. If yes, who is responsible for updating and monitoring the internal controls? Please provide a title.

a. _____

12. Was there an audit of the agency/division/office conducted within the last 3 years by an external/internal auditor or federal agency that covers policies and procedures, operations, or internal controls?

- a. ☐ Yes, there was an **external** audit of the agency/division/office.
- b. ☐ Yes, there was an **internal** audit of the agency/division/office.
- c. ☐ No, the Applicant has not had an internal or external audit in the last 3 years.





Reference: Recipients must comply with the requirements of The False Claims Act (31 U.S.C. §§ 3729-3733) which prohibits the submission of false or fraudulent claims for payment to the federal government. (PAPPG pg. 259)

**If yes, please upload the following documents:*

Department Name

Audit Report

12a. If yes, did the audit result in a finding(s)?

- a. ☐ Yes, the audit resulted in a finding(s).
- b. ☐ No, the audit did not result in a finding(s).

**If yes, please upload the following documents:*

Required Documentation

Corrective Action Plan

13. Was a Federal Single Audit required and performed for the Applicant's most recent fiscal year?

- a. ☐ Yes, a Federal Single Audit was required and performed for the Applicant's most recent fiscal year.
- b. ☐ No, but the Applicant has been audited by an independent auditor yearly for the last 3 years.
- c. ☐ No, the Applicant has not been audited yearly for the last 3 years.

Reference: Recipients must comply with the requirements of The False Claims Act (31 U.S.C. §§ 3729-3733) which prohibits the submission of false or fraudulent claims for payment to the federal government. (PAPPG pg. 259)

**If yes, please upload the following documents:*

Requirement Documentation

Single Audit Report

14. Does the Applicant have specific internal controls and procedures in place for duplication of benefits?

***FEMA expects themselves to be the last resort for the Applicant. If the Applicant receives insurance proceeds or funds from other grants, they should be used to offset the FEMA claims.**

- a. ☐ Yes, the Applicant has specific internal controls and procedures for duplication of benefits.
- b. ☐ No, the Applicant does not have specific internal controls and procedures for duplication of benefits.





Reference: FEMA is legally prohibited from duplicating benefits from other sources. If the Applicant receives funding from another source for the same work that FEMA funded, FEMA reduces the eligible cost or de-obligates funding to prevent a duplication of benefits (PAPPG pg. 93. Stafford Act § 312, 42 U.S.C. § 5155, and 2 C.F.R. § 200.406)

**If yes, please upload the following documents:*

Required Document

Internal Controls/Procedures

**If more than one policy, please click to upload an additional policy and the name of the department*

15. Does the Applicant have written policies and procedures on how they will document their administrative costs?

- a. ☐ Yes, the Applicant has written policies and procedures on how they will document their administrative costs.
- b. ☐ No, the Applicant does not have written policies and procedures on how they will document their administrative costs.

Reference: Recipients and Subrecipients must provide documentation to substantiate costs claimed for eligible management activities. Additionally, costs claimed must be reasonable. Documentation includes:

1. An explanation of work performed with a representative sample of daily logs/activity reports. The activity must be related to eligible projects.
2. Documentation to substantiate the necessity of any claimed office supplies, equipment, or space.
3. For meetings or site inspections, the activity description needs to include the number and purpose of the meetings or site inspections.
4. Travel costs need to include the purpose of travel and a copy of the travel policy.
5. Training needs to include the location, date(s), and title of the course. The training must be related to PA and occur within the period of performance of the Category Z PW.
6. Recipients and Subrecipients need to certify that the management activities and associated costs claimed are eligible, consistent with the Interim Policy, and not related to ineligible projects. See Appendix D for a Certification of Management Cost Eligibility document. (Public Assistance Management Costs Standard Operating Procedures, pgs. 6-7)

**If yes, please upload the following documents:*

Required Document

Internal Controls/Procedures





16. Does the Applicant have a process and procedure in place to accurately document donated resources (labor, equipment, materials)? *Please refer to the 'I' icon for detailed requirements.

- a. ☐ Yes, the Applicant has a process and procedure in place to accurately document donated resources' labor, equipment, and materials.
- b. ☐ No, the Applicant does not have a process and procedure in place to accurately document donated resources' labor, equipment, and materials.
- c. ☐ N/A, the Applicant does not claim donated resources costs.

Reference: The Applicant needs to submit the following to support donated resources (not an all-inclusive list): For each individual: Sign-in sheet (required), Name (required), Title and function (required for professional services), Days and hours worked (required), and Location of work and work performed (required). Equipment: Same information listed under Chapter 6:III. Applicant-Owned Equipment and Purchased Equipment (required) and Who donated each piece of equipment (required). Supplies or materials: Quantity used (required), Who donated (required), Location(s) used (required), and Invoices or other documentation to validate claimed value (required). (PAPPG pgs. 91-92)

**If yes, please upload the following documents:*

Required Documentation:
Labor Timesheets
Equipment Log
Internal Controls/procedures

Documentation

17. Does the Applicant have a Debris Management Plan that has been reviewed by the Florida Division of Emergency Management?

- a. ☐ Yes, the Applicant has a FDEM reviewed Debris Management Plan.
- b. ☐ No, the Applicant does not have a FDEM reviewed Debris Management Plan.
- c. ☐ N/A - The Applicant does not plan to claim Debris Removal (CAT A) costs.

**If yes, please upload the following documents:*

Required Documentation:
Debris Management Plan
FDEM Review Email





17a. If yes, who is responsible for internally approving the Debris Management Plan? Please provide a title.

a. _____

17b. How often is the Debris Management Plan internally evaluated and/or updated?

a. ☐ Once a year

b. ☐ 1-3 years

c. ☐ 3+ years

17c. How often are applicable employees responsible for reviewing and acknowledging the plan?

a. ☐ Once a year

b. ☐ 1-3 years

c. ☐ 3+ years

Information: Applicable employees refer to the personnel who will reference the debris management plan in the event of a disaster.

18. Does the Applicant utilize a centralized system with coding that records employee type (budgeted or unbudgeted) and accounts for hours worked (straight time or overtime) as it relates to Emergency Work?

a. ☐ Yes, the Applicant utilizes a centralized system to account for budgeted and unbudgeted time for hours worked.

b. ☐ No, the Applicant does not utilize a centralized system to account for budgeted and unbudgeted time for hours worked.

Reference: For Emergency Work, only overtime labor is eligible for budgeted employee hours. For unbudgeted employees performing Emergency Work, both straight-time and overtime labor are eligible. Emergency Work Labor Eligibility indicates different types of budgeted and unbudgeted employees. (PAPPG pg. 69-70)

**If yes, please upload the following documents:*

Required Documentation
Screenshot of System
Time Tracking System
Payroll
System Codes Listing

**If all departments utilize the same system, only upload one copy. If different, please upload all systems.*





19. Does the Applicant have a system in place to account for FEMA funds on a project-by-project basis?

- a. ☐ Yes, the Applicant's accounting system does account for FEMA funds on a project-by-project basis.
- b. ☐ No, the Applicant's accounting system does not account for FEMA funds on a project-by-project basis.

References: Federal regulations (2 CFR 200.302 and 44 CFR 206.205) require recipients and subrecipients to maintain a system that accounts for FEMA funds on a project-by-project basis. The system must disclose the financial results for all FEMA-funded activities accurately, currently, and completely. It must identify funds received and disbursed and reference source documentation (i.e., canceled checks, invoices, payroll, time and attendance records, contracts, etc.)

**If yes, please upload the following documents:*

Required Documentation:
Screenshot of System
Journal Entries of System

20. Does the Applicant have documentation stating their legal jurisdiction to conduct debris removal and emergency protective measures work within the area in which eligible work is being claimed?

- a. ☐ Yes, the Applicant has documentation stating their legal jurisdiction.
- b. ☐ No, the Applicant does not have documentation stating their legal jurisdiction.
- c. ☐ N/A, the Applicant is a State Agency (as categorized in Florida PA) with applicable statewide jurisdiction under Florida statute.

Reference: In general, the Applicant only has legal responsibility to conduct Emergency Work activities within its jurisdiction. If the Applicant conducts Emergency Work activities outside its jurisdiction, it must demonstrate its legal basis and responsibility to conduct those activities. (PAPPG pg. 54)

**If yes, please upload the following documents:*

Required Documentation
Map or listing of jurisdiction
Entity's Codes
Lease Agreement
Ordinances/Charter
Formal guidance documenting the need to review/update legal jurisdiction





20a. If yes, how often is the documentation evaluated and/or updated?

- a. ☐ Once a year
- b. ☐ 1-3 years
- c. ☐ 3+ years

21. Does the Applicant have a pre-determined list of all the locations of the Applicant's temporary reduction sites and permanent disposal sites that has been authorized by the Florida Department of Environmental Protection (FDEP)?

- a. ☐ Yes, the Applicant's pre-determined list has been approved by the Florida Department of Environmental Protection.
- b. ☐ No, the Applicant does not have pre-determined list approved by the Florida Department of Environmental Protection.
- c. ☐ N/A, the Applicant does not claim Debris Removal (CAT A) costs.

Reference: The Applicant should contact applicable Federal, State, Territorial, and Tribal regulatory agencies to ensure compliance with requirements and permits for debris-related operations. Upon completion of debris removal and disposal, site remediation may be necessary at staging sites and other impacted areas. (PAPPG pg. 101)

**If yes, please upload the following documents:*

Required Documentation
Map or document showing location of temporary reduction sites and permanent disposal sites
Permits for reduction and disposal sites
Approval from the Florida Department of Environmental Protection for their temporary reduction sites and permanent disposal sites
Debris Management Plan

21a. If yes, how often is the documentation evaluated and/or updated?

- a. ☐ Once a year
- b. ☐ 1-3 years
- c. ☐ 3+ years





Procurement

22. Does the Applicant have a written procurement policy in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has a written procurement policy in compliance with 2 CFR 200.
- b. ☐ No, the Applicant does not have a written procurement policy in compliance with 2 CFR 200.

References: The non-Federal entity must have and use documented procurement procedures, consistent with the standards of this section and [§§ 200.317, 200.318, and 200.319](#) for any of the following methods of procurement used for the acquisition of property or services required under a Federal award or sub-award. (2 C.F.R. § 200.320 & 2 C.F.R. § 200.318 (a))

**If yes, please upload the following documents:*

Required Documentation:

Procurement Policy

22a. If yes, does the Applicant's procurement policy have procurement thresholds?

- a. ☐ Yes, the Applicant's procurement policy has procurement thresholds.
- b. ☐ No, the Applicant's procurement policy does not have procurement thresholds.

22b. If yes, are the Applicant's purchasing thresholds stricter than or equal to the federal thresholds noted in 2 C.F.R. § 200.320?

- a. ☐ Yes, the Applicant's purchasing thresholds are stricter than or equal to the federal thresholds.
- b. ☐ No, the Applicant's purchasing thresholds are not stricter than or equal to the federal thresholds.

Procurement Method 2 CFR §200.320	Threshold
Micro-purchase	Up to \$50,000
Small Purchase	Up to \$250,000
Sealed Bids	N/A
Competitive Proposals	\$250,000 or more
Non-competitive Proposals	Appropriate only when these circumstances apply: <ul style="list-style-type: none">• Available only from a single source (sole source)• Public emergency• Expressly authorized by awarding or pass-through agency in response to written request from district• After soliciting a number of sources, competition is deemed inadequate





23. Does the Applicant have written procurement procedures that ensure all solicitation documents include a clear description of the need for the goods or services being procured (scope of work)?

- a. ☐ Yes, the Applicant's written procurement policy includes a clear description of the need for the goods or services being procured.
- b. ☐ No, the Applicant's written procurement policy does not include a clear description of the need for the goods or services being procured.

Reference: Solicitations must incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. These descriptions enable potential contractors to understand the requirements and prepare sound proposals to satisfy those requirements (PDAT pg 40)

**If yes, please upload the following documents:*

Required Documentation:

Procurement Policy

23a. If yes, who is responsible for implementing and monitoring solicitation documents to ensure that there is a clear description of the need for the goods or services being procured (scope of work)? Please provide a title.

a. _____

24. Does the Applicant maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant does maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in contract selection and administration.
- b. ☐ No, the Applicant does not maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in contract selection and administration.

Reference: The regulations require non-state entities to have written standards of conduct covering conflicts of interests and governing the actions of employees engaged in the selection, award, and administration of contracts. These standards must include disciplinary actions in the event of violations of the standards of conduct. (PDAT pg. 16, 2 C.F.R 200.318 (c) (1))

**If yes, please upload the following documents:*

Required Documentation:

Procurement Policy





24a. If yes, who is responsible for updating and monitoring the standards of conduct? Please provide a title.

a. _____

24b. If yes, how often does the Applicant evaluate and/or update these standards of conduct?

- a. ☐ Once a year
- b. ☐ 1-3 years
- c. ☐ 3+ years

25. Does the Applicant have a written process in place to document its determination that a prospective contractor qualifies as responsible, as well as its basis for such determination in compliance with 2 CFR 200? (Responsible vendor is defined as such with contract integrity, compliance with public policy, record of past performance and financial and technical resources.)

- a. ☐ Yes, the Applicant does have a written process in place to document its determination that a prospective contractor qualifies as responsible and the bases for such determination.
- b. ☐ No, the Applicant does not have a written process in place to document its determination that a prospective contractor qualifies as responsible and the bases for such determination.

References: *The Non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. (2 C.F.R. § 200.318(h))*

FEMA requires the non-state entity to document its determination that a prospective contractor qualifies as responsible, as well as its basis for such determination. In making a contractor responsibility determination, the non-state entity must consider such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. (PDAT pg. 22)

**If yes, please upload the following documents:*

Required Documentation:
Procurement Policy
Bid Evaluation

25a. If yes, who is responsible for the oversight of the determination process? Please provide a title.

a. _____





26. Does the Applicant have a written process of maintaining records sufficient to detail the history of a procurement in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has a written process of maintaining records sufficient to detail the history of a procurement.
- b. ☐ No, the Applicant does not have a written process of maintaining records sufficient to detail the history of a procurement.

References: A non-state entity is required to maintain records sufficient to detail the history of procurement. These records include, but are not limited to, the rationale for method of procurement, the selection of the contract type, the contractor selection or rejection, and the basis for the contract price. Additionally, the non-state entity's records must also include the contract document and any contract modifications with the signatures of all parties. (2 C.F.R. § 200.318(i))

**If yes, please upload the following documents:*

Required Documentation:

Internal Controls/Procedures

26a. If yes, who is responsible for maintaining these records? Please provide a title.

a. _____

27. Does the Applicant have a written method for conducting their technical evaluations of proposals received and for selecting offerors in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has a written method for conducting their technical evaluations of the proposals received and for selecting offerors.
- b. ☐ No, the Applicant does not have a written method for conducting their technical evaluations of the proposals received and for selecting offerors.

References: The non-state entity must have a written method for conducting their technical evaluations of the proposals received and for selecting offerors. When evaluating proposals, FEMA expects the non-state entity to consider all evaluation factors. (PDAT pg. 49, 2 C.F.R. 200.320(b)(2)(ii))

**If yes, please upload the following documents:*

Required Documentation:

Bid Tabulation Criteria





27a. If yes, who is responsible for overseeing the technical evaluations of Emergency Management proposals? Please provide a title.

a. _____

28. Does the Applicant utilize geographic preference in the evaluation of bids/proposals for federally funded contracts?

- a. ☐ Yes, the Applicant utilizes geographic preference in the evaluation of bids/proposals for federally funded contracts.
- b. ☐ No, the Applicant does not utilize geographic preference in the evaluation of bids/proposals for federally funded contracts.
- c. ☐ N/A, the Applicant is a State Agency and follows the same policies and procedures it uses for procurements from its non-federal funds when it procures property and services under a FEMA award.

References: *The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract. (2 C.F.R. 200.319(c))*

**If yes, please upload the following documents:*

Required Documentation:
Bid Evaluation Criteria
Procurement Policy

29. Does the Applicant have written procedures in place to promote the engagement and contracting of minority firms, small businesses, women's business enterprises, and Labor Surplus Area (LSA) firms in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has written procedures in place to promote the engagement and contracting of minority firms, small businesses, women's business enterprises, and LSA firms.
- b. ☐ No, the Applicant does not have written procedures in place to promote the engagement and contracting of minority firms, small businesses, women's business enterprises, and LSA firms.

References: *The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. (2 C.F.R. § 200.321)*





**If yes, please upload the following documents:*

Required Documentation:

Procurement Policy

Example operating procedure evidencing steps taken such as existing procurement policies, selection memos, RFQs.

30. Does the Applicant have written internal controls in place to perform a cost or price analysis before executing work or leveraging procured contracts that are of a dollar value greater than the Simplified Acquisition Threshold (SAT) (currently defined at \$250,000) in compliance with 2 CFR 200?

****Exceeding the SAT can occur as a result of a proposed contract modification or increases in the contract amount.***

- a. ☐ Yes, the Applicant has written internal controls in place to perform a cost or price analysis before executing work or leveraging procured contracts that are of a dollar value greater than the Simplified Acquisition Threshold (SAT).
- b. ☐ No, the Applicant does not have written internal controls in place to perform a cost or price analysis before executing work or leveraging procured contracts that are of a dollar value greater than the Simplified Acquisition Threshold (SAT).
- c. ☐ N/A, the Applicant is a State Agency.

References: *The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. (2 C.F.R. § 200.324 (a))*

**If yes, please upload the following documents:*

Required Documentation:

Internal Controls

Cost or Price Analysis Procedures

31. Does the Applicant have written procedures addressing emergency/exigent (non-competitive) procurement in compliance with 2 C.F.R. 200.320?

- a. ☐ Yes, Applicant has written procedures addressing emergency/exigent (non-competitive) procurement.
- b. ☐ No, the Applicant does not have written procedures addressing emergency/exigent (non-competitive) procurement.





References: Non-state entities must follow the procurement requirements found at 2 C.F.R. §§ 200.317 – 200.326. However, Federal regulations allow for noncompetitive procurements under certain circumstances, including when a non-state entity determines that immediate actions required to address the public exigency or emergency cannot be delayed by a competitive solicitation. This represents an exception to requirements for full and open competition. FEMA approval is not required for use of noncompetitive procurements under the emergency or exigency exception; however, the non-state entity must document its justification for using noncompetitive procurements and must still comply with other procurement requirements and ensure that costs are reasonable. (2 C.F.R. § 200.320 [c])

**If yes, please upload the following documents:*

Required Documentation:
Procurement package for a vendor engaged under emergency/noncompetitive procurement
Documentation of exigent circumstances should be available.
Emergency procurement Memorandums
Procurement Policy

31a. If yes, do these procedures include providing a narrative as to why contracts were not competitively bid, or a memo with this type of information?

****Please note the narrative/memo should include a brief description of the service being procured, period of time noncompetitive procurement was used, steps taken to determine full-and-open competition could not be used, any known conflicts of interest, etc.***

- a. ☐ Yes, these procedures include providing a narrative as to why contracts were not competitively bid, or a memo with this type of information.
- b. ☐ No, these procedures do not include providing a narrative as to why contracts were not competitively bid, or a memo with this type of information.

31b. Does the Applicant have written procedures to identify a transition point to a competitively bid contract as soon as the exigent or emergency ceased to exist?

- a. ☐ Yes, the Applicant has written procedures to identify a transition point to a competitively bid contract as soon as the exigent or emergency ceased to exist.
- b. ☐ No, the Applicant does not have written procedures to identify a transition point to a competitively bid contract as soon as the exigent or emergency ceased to exist.

32. Does the Applicant's procurement policy include the applicable provisions described in 2 C.F.R. Part 200, Appendix II for federal awards?

- a. ☐ Yes
- b. ☐ No





References: 2 C.F.R. § 200, Appendix II

**If yes, please upload the following documents:*

Required Documentation:

Procurement Policy

32a. Please select all provisions included in your Procurement Policy.

- | | |
|--|--|
| a. Contract Remedies | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Termination for Cause and Convenience | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Equal Employment Opportunity | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Contract Work Hours and Safety Standards Act | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| e. Clean Air Act and the Federal Water Pollution Control Act | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| f. Debarment and Suspension | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| g. Byrd Anti-Lobbying Amendment | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| h. Procurement of Recovered Materials | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| i. Prohibition on Contracting Telecommunications Equipment or Services | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| j. Domestic Preferences for Procurements | <input type="checkbox"/> Yes <input type="checkbox"/> No |

33. Does the Applicant intend to use cooperative or joint-purchasing (piggy-back) contracts?

- a. ☐ Yes, the Applicant intends to use piggy-back contracts.
- b. ☐ No, the Applicant does not intend to use piggy-back contracts.

References: Piggyback contracting is a type of cooperative purchasing and occurs when one entity assigns the contractual rights it has in a contract to another entity. FEMA advises against the use of piggyback contracts. Piggyback contracts are usually not compliant with Federal requirements as the scope of work pertains to the needs of a different entity. (VIII. Procurement and Contracting Requirements; (b) Cooperative Purchasing; PAPPG pg. 84)





33a. If yes, does the Applicant have written procedures for procurement and usage of piggy-back contracts to include the below language to be compliant with federal regulations?

1. The original procurement complies with federal regulations.
2. The scope of work does not exceed what was contemplated by the original contract.
3. The original contract contains an assignability clause.
4. The cost is reasonable.

- a. ☐ Yes, the Applicant has written procedures for procuring and utilizing piggy-back contracts.
- b. ☐ No, the Applicant does not have written procedures for procuring and utilizing piggy-back contracts.

**If yes, please upload the following documents:*

Required Documentation:
Procurement Policy
Policy outlining adherence/procedures for Piggybacking

Contract Administration

34. Does the Applicant have a written Mutual Aid Agreement(s) in place outside of the Statewide Mutual Aid Agreement (SMAA)?

- a. ☐ Yes, the Applicant has an agreement(s) with an Entity other than the State of Florida (SMAA).
- b. ☐ No, the Applicant does not have mutual aid agreement(s) with an Entity other than the State of Florida (SMAA).
- c. ☐ N/A, the applicant does not utilize mutual aid.

References: FEMA provides PA funding to the Requesting Entity as it is legally responsible for the work. FEMA does not provide PA funding directly to the Providing Entity. For the work to be eligible, the Requesting Entity must have requested the resources provided. The Requesting Entity or State, if applicable, must provide a description of the services requested and received, along with documentation of associated costs (e.g., labor, equipment, supplies, or materials) to FEMA in support of a request for PA funding. (IX. Mutual Aid, PAPPG pg. 85)

**If yes, please upload the following documents:*

Required Documentation:
Mutual Aid Agreement





34a. If yes, does the Applicant have a process in place to ensure they are requesting and obtaining the necessary documentation of associated costs from the providing Entity? (e.g., labor, equipment, supplies, and/or materials)?

- a. ☐ Yes, the Applicant does have a process in place to ensure they are requesting and obtaining the necessary documentation of associated costs from the providing Applicant (e.g., labor, equipment, supplies, and/or materials).
- b. ☐ No, the Applicant does not have a process in place to ensure they are requesting and obtaining the necessary documentation of associated costs from the providing Applicant (e.g., labor, equipment, supplies, and/or materials).

35. Does the Applicant have a pre-positioned contract (standby contract) for debris removal activities procured in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has a pre-positioned contract for debris removal activities in compliance with 2 CFR 200.
- b. ☐ No, the Applicant does not have a pre-positioned contract for debris removal activities.
- c. ☐ N/A, the Applicant does not plan to claim Debris Removal (CAT A) costs.

**If yes, please upload the following documents:*

Required Documentation:
Advertisement
Request for Proposal
Proposal
Scoring Tabulation
Notice of Award
Contract
Amendment

35a. If yes, please list the contractor. (Please list the contractor in textbox)

a. _____

36. Does the Applicant have a list of 2 or more pre-qualified vendors for debris removal activities?

- a. ☐ Yes, the Applicant has a pre-qualified vendor list for debris removal activities.
- b. ☐ No, the Applicant does not have a pre-qualified vendor list for debris removal activities.
- c. ☐ N/A, the Applicant does not plan to claim Debris Removal (CAT A) costs.





Reference: Non-state entities may use prequalified lists of persons, firms, and products when purchasing under a FEMA award. These prequalified lists, however, are not contracts. They are tools to aid in the procurement of future requirements by allowing non-state entities to review the qualifications of prospective contractors prior to a contract award. The federal rules set forth two requirements that non-state entities must meet when using such a list.

- First, they must ensure that all prequalified lists are current and include enough qualified sources to ensure maximum full and open competition.
- Second, they must not exclude potential bidders or offerors from qualifying during the solicitation period. (PDAT pg. 41)

Required Documentation:
Pre-qualified Vendor List

37. Does the Applicant have a contract with a debris monitoring vendor procured in compliance with 2 CFR 200?

- a. ☐ Yes, the Applicant has a contract with a debris monitoring vendor in compliance with 2 CFR 200.
- b. ☐ No, the Applicant does not have a contract with a debris monitoring vendor.
- c. ☐ N/A, the Applicant does not plan to claim Debris Removal (CAT A) costs.

**If yes, please upload the following documents:*

Required Documentation:
Advertisement
Request for Proposal
Proposal
Scoring Tabulation
Notice of Award
Contract
Amendment

37a. If yes, please list the contractor. (Please list the contractor in textbox)

a. _____





37b. If yes, does the Applicant's debris monitoring vendor utilize automated load tickets or hand-written tickets?

- a. ☐ Automated only
- b. ☐ Both Automated and Hand-written
- c. ☐ Hand-written only
- d. ☐ Load tickets unavailable

**If yes, please upload the following documents:*

Required Documentation:
Load Ticket

38. Does the Applicant have written procedures on how they will maintain contractor oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders?

- a. ☐ Yes, the Applicant has written procedures detailing how they will maintain contractor oversight to ensure work is performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
- b. ☐ No, the Applicant does not have written procedures detailing how they will maintain contractor oversight to ensure work is performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Reference: A non-state entity must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. (PDAT pg. 16, 2 C.F.R. 200.318(b))

**If yes, please upload the following documents:*

Required Documentation:
Written Procedures
Pre-Positioned Contract

