



Florida Recovery Obligation Calculation

Disaster Readiness Assessment Best Practices

How to Maximize your 2025 DRA





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This Best Practices document has been developed for Applicants to serve as a reference tool in maximizing their Disaster Readiness Score for the 2025 hurricane season.

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.

Required Documentation:

Notice of Federal Funding Award

- To receive full points for this question, the Applicant must provide a Notice of Federal Funding Award document.
- "Federal funding Award" can include any type of Federal grant in which the Applicant is required to follow the Code of Federal Regulation (CFR), which could include the American Rescue Plan Act (ARPA), Coronavirus Aid, Relief, and Economic Security Act (CARES ACT), and Community Development Block Grant (CDBG). The Federal grant does not have to be specific to Public Assistance, as there could be potential first-time Applicants.
- If the Applicant has previously been awarded Public Assistance (PA) funds, the entity may upload a copy of their most recent funding agreement with the Florida Division of Emergency Management (FDEM).

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.
- To receive full points for this question, the Applicant must have been awarded PA funding within the last 5 years for two or more disasters. The State will utilize Florida PA to verify which disasters the Applicant has received PA funding for.

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)
- The Applicant should select the category in which the funding was reimbursed. The State will utilize Florida PA to verify if the federal funding was reimbursed for CAT A and/or CAT B eligible 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
- The Applicant should select the applicable disaster(s) in which they received FEMA PA funding for Category A (Debris Removal) and/or Category B (Emergency Protective Measures). The State will utilize Florida PA to verify the disaster(s) in which the Applicant received FEMA PA funding for CAT A and/or CAT B.





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.
- The Applicant should select the project size experience that is applicable to them. The State will utilize Florida PA to verify if the Applicant has experience with the selected project size(s) in the Public Assistance Program within the last 5 years.

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.
- The Applicant must select the number of staff members who will be responsible for administering the Applicant's FEMA PA grants in the event of a declared disaster. Your selection must support your response in question 2a. If you select two or more dedicated staff members, you must provide the requested information for at least two staff members in question 2a.

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

- Applicant will need to provide the name, department, job title, and years of experience of the staff member(s) who will be responsible for administering their FEMA PA Grant(s).





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/Certificates
Resume

- To receive full points for this question, the Applicant must upload a memo or resume detailing the staff member(s) experience and the role they served in administering FEMA PA grants. The memo or resume must detail the disaster names and the PA tasks completed by the staff member. The staff member(s) listed in question 2a. must be the staff member(s) listed in the memo or resume documentation.
- If the Applicant does not have previous experience administering FEMA PA Grants but has taken the list of trainings below, the Applicant can select option B. In this case, the Applicant must upload all applicable training certificates. Please note that only the FEMA approved training certificates listed below will be supported for this question. To receive points, the Applicant must upload **ALL** the FEMA-approved training certificates mentioned below. The staff member(s) listed in question 2a. must be the staff member(s) listed in the training certificates documentation. If the Applicant selects two or more dedicated staff members in Q2, the two staff members listed in 2a can combine their FEMA training certificates.
- FEMA approved training courses and certificates
 - IS-1000 - Public Assistance Program and Eligibility
 - IS-1006 - Documenting Disaster Damage and Developing Project Files
 - IS-1007 - Detailed Damage Description and Dimensions
 - IS-1008 - Scope of Work Development (Scoping and Cost)
 - IS-1015 - Insurance Considerations, Compliance, and Requirements
 - IS-1016 - Environmental and Historic Preservation (EHP) Considerations/Compliance for Public Assistance Grants
 - IS-1017 - Scope Change Requests, Time Extensions, Improved/Alternate Project Requests





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

Required Documentation:
Advertisement
Request for Proposal
Proposal
Scoring Tabulation
Notice of Award
Grant Administration Contract
Amendment/Contract Renewal- Active until November 2025

- To receive full points for this question the Applicant must provide a full procurement package with a responsible vendor or have experienced staff administering their FEMA PA grants.
- If you select option A, the Applicant must upload a grant administration executed contract that extends until November 2025, or includes a renewal option that extends until June 2026. Additionally, the following documents should be included: solicitation/advertisement, request for proposal, vendor's proposal, scoring/bid tabulation, and notice of award.
- The grant administration contract should include all applicable contract provisions:
 - For all contracts, confirmation that the contract addresses debarment and suspension.
 - For construction contracts of any amount, confirmation that the contract references equal employment opportunities.
 - For contracts above \$10,000, confirmation the contract addresses termination for cause and for convenience.
 - For all contracts above \$100,000, confirmation the contract includes reference to the Byrd Anti-Lobbying Amendment.



- For contracts above \$100,000 that involve employment of mechanics or laborers, confirmation the contract includes reference to the Contract Work Hours and Safety Standards Act.
 - For all contracts above \$150,000, confirmation the contract references the compliance with the Clean Air Act and Federal Water Pollution Control Act.
 - For contracts above the simplified acquisition threshold (refer to the project validation guide for the applicable simplified acquisition threshold), confirmation the contract references the following provisions:
 - administrative, contractual, or legal remedies for contract violations, and
 - inclusion of Federal bonding requirements
 - For all contracts where a contractor's IT systems are used to input, store, process, output, and/or transmit sensitive (Applicant) information, or a contractor will have access to sensitive (Applicant) information, confirmation the contract references the following provisions:
 - Safeguarding of Sensitive Information, and
 - Information Technology Security and Privacy Training
- If you select Option B, you would have selected Option A in Q2b. The provided documentation in Q2b. must be supported.

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.

Required Documentation:

Labor Policy

- To receive points for this question, the Applicant must upload a general labor policy or employee manual. This document should outline how employees are paid on a daily basis (not just during an emergency), detailing the differences between straight time and overtime eligibility for employees. Additionally, the policy must be:
 - Applied uniformly, regardless of a Presidential declaration.
 - Non-discretionary when the Applicant activates various pay types. (Compensation should be based on uniform standards defined in the pay policy and not a certain personnel's decision. For example, language such as "the Manager may, in his or her discretion, award overtime compensation" would not be permissible because this makes the award of overtime compensation discretionary.
 - Not contingent upon Federal funding.

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.

Required Documentation:

Emergency Pay Policy

- To receive full points for this question, the Applicant must upload a policy outlining how employees will be paid during an emergency. The policy must detail emergency pay rates vs regular pay rates. For example, some Applicants may give double pay or compensatory time for hours worked during the emergency period. These additional compensations still need to be reasonable. As stated in Q4, the policy should not be subject to Federal funding, should be applied uniformly regardless of a presidential declaration, and should not include discretionary criteria.

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.

- It is recommended that the Applicant's policy should include verbiage stating 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 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.
- If applicable, it is recommended that the Applicant's policy should include verbiage stating 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. FEMA also provides PA funding for straight time if the backfill employee is a:
 - Contracted or temporary employee, or
 - Permanent employee called in on a normally scheduled day off (weekend other day off).
 - If the backfill employee is called in from scheduled leave, only over-time is eligible.
- **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.
 - If applicable, it is recommended that the Applicant's policy should state that prisoners should be paid at the rate that the Applicant normally pays prisoners.
 - **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.
 - If applicable, it is recommended that the Applicant's policy include language that clearly outlines and defines the terms of standby use and compensation.
 - **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)

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.

Required Documentation:

Labor Policy, Written Agreement

- To receive full points for this question, the Applicant must upload a policy or standard procedure that covers meals for employees and volunteers engaged in eligible Emergency Work.
- **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)

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.

Required Documentation:

Emergency Financial Plan

- To receive full points for this question, the Applicant must upload an emergency financial plan that includes language identifying strategies to bridge 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)
- The emergency financial plan should not simply summarize and state that the Applicant will use rainy day funds, reprioritize the annual budget, or rely on borrowing. Rather, the Applicant should include examples in the emergency financial plan, ensuring that it is more detailed and tailored to their specific circumstances.

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.
- To receive points for this question, the Applicant's documentation must state that the plan is reviewed annually, or it must include the date it was last reviewed or revised within the past year.

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.

Required Documentation:

Maintenance Procedures

- To receive full points for this question, Applicants must upload written policies or procedures that detail routine maintenance schedules. These should include:
 - Documentation requirements (to include retention schedule) for facilities within their jurisdiction.
 - Process outlining roles and responsibility of who, how, and when staff are required to conduct routine maintenance on the facilities.

- **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)

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

- The Applicant should provide the job title of the staff member responsible for internally approving the maintenance policies and procedures.

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

- A. ☐ Once a year
- B. ☐ Every 1-3 years
- C. ☐ 3 + years
- To receive full points for this question, the Applicant's documentation must state that the documentation is reviewed annually, or the documentation must include the date of the most recent review conducted within the past year.

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

- A. ☐ Once a year
- B. ☐ Every 1-3 years
- C. ☐ 3 + years
- The Applicant should select the option based on how often applicable employees are responsible for reviewing and acknowledging their maintenance procedures.

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.

Required Documentation:

Equipment Inventory Procedures

- To receive full points for this question, the Applicant must upload equipment inventory procedures. The equipment inventory procedures should include the following:
 - Who (position) will complete the inventory?
 - How often the inventory will be reviewed and the documentation that will be utilized to report the inventory.
 - Include the type of equipment and attachments used (including year, make, and model, and Size/capacity).
- **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)

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.

Required Documentation:

Leasing vs. Purchasing Procedures

- To receive full points for this question, the Applicant must upload documentation of written leasing versus purchasing procedures for equipment costs. This procedure should include the steps the Applicant takes to determine the most economical approach for leasing or purchasing equipment.
- **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))

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.

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

- To receive full points for this question, the Applicant must upload an Office of Inspector General (OIG) document, procurement policy, code of conduct, or employee handbook that outlines written procedures or internal controls addressing instances of fraud, waste, and abuse.
- **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)

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

- The Applicant should provide the job title of the staff member responsible for updating and monitoring the internal controls.



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.

Department Name

Audit Report

- To receive full points for this question, the Applicant must upload an audit report of the agency/division/office that was conducted externally within the last 3 years.
- The Annual Comprehensive Financial Report (ACFR) can be submitted for this question.
- **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)

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).

Required Documentation

Corrective Action Plan

- If the Applicant's audit report resulted in findings, the Applicant should upload a corrective action plan addressing those findings. If the corrective action plan was included in the audit report, upload the audit report.





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.

Requirement Documentation

Single Audit Report

- To receive full points for this question, the Applicant must either upload a single audit report from their most recent fiscal year or select the option indicating that they have been audited by an independent auditor annually for the last 3 years. If you select option B, the State will verify your answer and documentation in Q12.
- Applicants that receive money from the federal government (grants, cooperative agreements, etc.) and expend more than \$750,000 of federal dollars in a single fiscal year are required to have Single Audits. The Single Audit must be performed by an independent auditor. A Single Audit includes an audit of both your organization's financial statements and compliance with Federal award requirements for those programs identified as "major programs" (based on application of the risk-based approach and criteria outlined in 2 CFR § 200.518 and .519) for the audit.

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.

Required Document

Internal Controls/Procedures

- To receive full points for this question, the Applicant must upload a policy that details internal controls and procedures in place for duplication of benefits. This document must confirm how the Applicant defines the application of funds and verify how the Applicant prioritizes the claims in relation to other grants.





- **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)

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.

Required Document

Internal Controls/Procedures

- To receive full points for this question, the Applicant must upload a policy or written procedures that detail how administrative costs are tracked. Recipients and Subrecipients must provide documentation to substantiate costs claimed for eligible management activities. Additionally, costs claimed must be reasonable. Acceptable documentation can include:
 - An explanation of work performed with a representative sample of daily logs/activity reports. The activity must be related to eligible projects.
 - Documentation to substantiate the necessity of any claimed office supplies, equipment, or space.
 - For meetings or site inspections, the activity description needs to include the number and purpose of the meetings or site inspections.
 - Travel costs need to include the purpose of travel and a copy of the travel policy.
 - 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.
 - 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)



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.

Required Documentation:
Labor Timesheets
Equipment Log
Internal Controls/procedures

- To receive full points for the question, the Applicant must upload written procedures of their process for documenting donated resources. Example equipment logs or labor timesheets must be uploaded along with the written procedure.
- Procedures should state which forms will be used, who will oversee and coordinate the forms daily, and specify the deadline for collecting the forms at the end of the designated time period.
- **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)



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.

Required Documentation:

Debris Management Plan

FDEM Review Email

- To receive full points for this question, the Applicant must upload a debris management plan (DMP) that has been reviewed by FDEM, along with the FDEM approval email.
- If the Applicant's debris management plan has not yet been reviewed by FDEM, the Applicant will need to email their DMP to F-ROCDocs@em.myflorida.com. Once the Division reviews the plan, the Applicant will receive an email confirmation. After receiving the email confirmation, the Applicant can answer "yes" and upload both the DMP and the confirmation email. Please note that if the Applicant is unable to have their DMP reviewed by FDEM by the DRA submission deadline, the Applicant will have an opportunity to update their selection during the Abatement period.

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

- The Applicant should provide the job title of the staff member responsible for internally approving the DMP.

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

- A. ☐ Once a year
- B. ☐ 1-3 years
- C. ☐ 3+ years
- To receive full points for this question, the Applicant's documentation must state that the documentation is reviewed annually, or it must include the date of the most recent review conducted within the past year.



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

- A. ☐ Once a year
- B. ☐ 1-3 years
- C. ☐ 3+ years
- The Applicant should select the option based on how often applicable employees are responsible for reviewing and acknowledging the DMP.

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.

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

- To receive full points for this question, the Applicant must upload a screenshot or documentation of their time tracking system. The documentation should detail pay codes specifying straight time, overtime, and whether work is regular work or emergency work. Alternatively, the Applicant could provide a payroll screenshot that includes pay codes and a listing of system codes.
- Ideally, Applicants will use special pay codes for hours related to the emergency work and these hours will tie to the claimed work hours. Some Applicants may only use notes or comments to mark emergency work hours and do not distinguish between regular hours and emergency hours; such a system will likely be considered inefficient.
- **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)



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.

Required Documentation:

Screenshot of System

Journal Entries of System

- To receive full points for this question, the Applicant must upload a screenshot of a formal system, journal entries, an expense report, or financial statements to demonstrate how FEMA funds are being tracked. The documentation must clearly display the allocation of funds to a project and provide a record of the funds being disbursed.
- **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.)

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.

Required Documentation

Map or listing of jurisdiction

Entity's Codes

Lease Agreement

Ordinances/Charter

Formal guidance documenting the need to review/update legal jurisdiction



- To receive full points for this question, the Applicant must upload one of the following documents. Applicants can upload multiple documents if applicable.
 - Map or listing of jurisdiction
 - Entity's codes
 - Ordinances/Charter
 - Formal guidance documenting the need to review/update legal jurisdiction
- The documentation should clearly define the Applicant's legal authority to conduct debris removal and emergency protective measures work. It should identify the Applicant's jurisdiction and include policies and procedures that outline allowable activities to protect life and safety. The documentation should also cover responsibilities and the scope of jurisdiction. If a facility is owned and maintained by a Federal agency, it is important to review any agreements between Federal agencies and the Applicant, as well as deeds associated with the facilities, construction documents, title documents, and local government tax records. This is necessary to confirm that the Applicant is legally responsible for the operation, maintenance, and repairs associated with the facility.
- **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)

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

- A. ☐ Once a year
 - B. ☐ 1-3 years
 - C. ☐ 3+ years
- To receive full points for this question, the Applicant's documentation must state that the documentation is reviewed annually, or it must include the date of the most recent review conducted within the past year.

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.

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

- To receive full points for this question, the Applicant must upload a document that details the organization's temporary reduction sites and permanent disposal sites. These sites must have been authorized by the Florida Department of Environmental Protection. Additionally, you must upload the approval from the Florida Department of Environmental Protection for the temporary reduction sites and permanent disposal sites.
- **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).

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

- A. ☐ Once a year
- B. ☐ 1-3 years
- C. ☐ 3+ years
- To receive full points for this question, the Applicant's documentation must state that the documentation is reviewed annually, or it must include the date of the most recent review conducted within the past year.

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.

Required Documentation:

Procurement Policy

- To receive full points for this question, the Applicant must upload a 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))

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.
- To receive full points for this question, the Applicant's procurement policy must clearly define and include procurement threshold amounts within the document.

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

- It is recommended and considered best practice for the Applicant's procurement thresholds to be stricter than or equal to the federal thresholds noted in 2 C.F.R. § 200.320. Please refer to the chart above for federal thresholds.





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.

Required Documentation:

Procurement Policy

- To receive full points for this question, the Applicant's policy must outline the procurement process for goods and services, including procedures that require a scope of work in the solicitation. The scope of work should clearly state the description of the work being performed.
- **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)

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.

- The Applicant should provide the job title of the staff member 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).

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.

Required Documentation:

Procurement Policy





- To receive full points for this question, the Applicant's policy must include written, documented 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.
- **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)).

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

- The Applicant should provide the job title of the staff member responsible for updating and monitoring the standards of conduct.

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
- To receive full points for this question, the Applicant's documentation must state that these standards of conduct are reviewed and/or updated annually. Alternatively, it must include the date of the most recent review conducted within the past year.

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 basis 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 basis for such determination.

Required Documentation:

Procurement Policy

Bid Evaluation



- To receive full points for this question, the Applicant must upload a written process detailing how they determine whether a prospective contractor qualifies as responsible, including the basis for such determination. Additionally, the Applicant can upload a bid evaluation scorecard, score sheet, or any other evaluation documents to demonstrate that they have verified the vendor's qualifications or conducted due diligence.
- In an invitation to bid process, the County may consider the following factors in addition to price when determining whether a vendor is responsible, and a bid is responsive:
 - Ability, capacity and skill of the vendor to perform the contract.
 - Whether the vendor can perform the contract within the time specified, without delay, interference, or conflict with current workload.
 - Character, integrity, reputation, judgment, experience and efficiency of the Vendor.
 - Quality of performance of previous engagements.
 - Previous and existing compliance by the vendor with laws and regulations relating to the contract.
 - Sufficiency of the financial resources and ability of the Vendor to perform the contract or provide the commodity, service or construction.
 - Quality, availability and adaptability of the commodities, services or construction to the particular use required.
 - Ability of the vendor to provide further maintenance and service for the use of the subject of the contract.
 - Number and scope of conditions attached to the Bid.
 - Qualifications of vendor, licensing and corporate qualifications.
 - Evidence of negative litigation history.
 - Use of one or more subcontractors with a record of poor performance.”
- It is recommended that this documented process should include:
 - An analysis of the Contractor's Integrity
 - An analysis of the Contractor's past and current compliance with public policies such as Equal Opportunity and non-discrimination laws; and Applicable prevailing wage laws.
 - A review of System of Award Management (SAM.gov) to ensure the contractor is not debarred or suspended.
- **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)

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

- The Applicant should provide the job title of the staff member responsible for the oversight of the determination process.

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.

Required Documentation:

Internal Controls/Procedures

- To receive full points for this question, the Applicant must upload internal controls or written procedures detailing their process for maintaining records to document the history of procurement, including, but not limited to:
 - Making the solicitation/advertisement public.
 - Developing notice of award documentation.
 - For sealed bid proposals, ensuring the vendor awarded the fixed fee contract was the lowest, most responsive, and qualified bidder, or creating a cost analysis.
 - Providing explanations if the selected vendor is not the lowest, most responsive, or qualified bidder.
 - Confirming all required documentation was provided by responding vendors and used in the evaluation of proposals.
 - Addressing cost-specific information in the proposal or contract.
 - Ensuring responses to the request by vendors are appropriate.



- **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))

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

- The Applicant should provide the job title of the staff member responsible for maintaining these records.

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.

Required Documentation:

Bid Tabulation Criteria

- To receive full points for this question, the Applicant must upload a bid tabulation document that includes the criteria outlined in their procurement policy. This document should detail the criteria used when conducting technical evaluations of proposals received and for selecting offerors.
- Technical criteria will vary among Applicants and should be outlined in the Applicant's procurement policy. Criteria could consist of the following.
 - Vendor's compliance with the request for proposal
 - Vendor's experience, qualifications, existing contracts, and references
 - Vendor's Methodology, technical plan, and approach
 - Vendor's cost proposal
- **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))





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

- The Applicant should provide the job title of the staff member responsible for overseeing the technical evaluations of the Emergency Management proposals.

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.

Required Documentation:

Bid Evaluation Criteria

Procurement Policy

- To receive full points for this questions, the Applicant's procurement policy must state, "Local Preference will not be used in the evaluation of bids or proposals relating to procurements deriving from Federal grant funding."
- **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)).



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.

Required Documentation:

Procurement Policy

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

- To receive full points for this question, the Applicant's procurement policy or other documentation must include written procedures to promote the engagement and contracting of minority firms, small businesses, women's business enterprises, and Labor Surplus Area (LSA) firms.
- Formal procedures should include the following: The Applicant must, at a minimum, take the following six affirmative steps:
 - Place qualified small and minority businesses and women's business enterprises on solicitation lists.
 - Assure that small and minority businesses and women's business enterprises are solicited whenever they are potential sources.
 - Divide total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises.
 - Establish delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women's business enterprises.
 - Use the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
 - Require the prime contractor, if subcontracts are to be let, to take the five previous affirmative steps.
- **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)

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.

Required Documentation:

Internal Controls

Cost or Price Analysis Procedures

- To receive full points for this question, the Applicant must upload a document that includes written procedures or internal controls for developing independent estimates 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).
- Verbiaget could state, "For every procurement in excess of the Simplified Acquisition Threshold, including contract modifications, and subject to Federal procurement guidelines, the County shall perform a cost or price analysis, which shall include an independent estimate of cost prior to issuing bids or proposals. For proposals where price is not considered in the award, profit shall be negotiated as a separate element of the price. In determining whether profit is fair and reasonable, the County shall consider the complexity of work, the risk to be borne by the CONSULTANT/CONTRACTOR/VENDOR, the CONSULTANTS/CONTRACTORS/VENDORS investment, the amount of subcontracting necessary, the quality of the CONSULTANTS/CONTRACTORS/VENDORS record and past performance, and industry profit rates for the surrounding geographical area. "Cost Plus Percentage" methods for determining profit may not be used."
- **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))

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.

Required Documentation:

Procurement package for a vendor engaged under emergency/noncompetitive procurement

Documentation of exigent circumstances should be available.

Emergency procurement Memorandums

Procurement Policy

- To receive full points for this question, the Applicant must upload documentation that includes written procedures addressing emergency/exigent (non-competitive) procurement in compliance with 2 C.F.R. 200.320.
- **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])

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?

- 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.

- To receive full points for this question, the Applicant must upload written procedures as to why contracts were not competitively bid.. The written procedure or policy should include the following elements for any procurement related to a disaster or emergency: a brief description of the service being procured, a period of time when noncompetitive procurement was used, steps taken to determine that full-and-open competition could not be used, and any known conflicts of interest, etc.

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.
- To receive full points for this question, the Applicant's written procedures should include language stating that the Applicant will identify a transition point to start procuring a competitively bid contract as soon as the exigent or emergency ceased to exist.
 - Verbiage could state, "The use of the Emergency exception is only permissible during the actual emergency circumstances. Emergency circumstances will vary for each incident, making it difficult to determine in advance or assign a particular time frame when noncompetitive procurements may be warranted. Emergency circumstances may exist for days, weeks, months, or longer in some cases. The City must ensure that work performed under the noncompetitively procured contracts is specifically related to the emergency circumstance in effect at the time of procurement. The City shall upon awarding a noncompetitive contract, immediately begin the process of competitively procuring similar goods and services to transition to competitively procured contracts as soon as the emergency ceases 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

Required Documentation:

Procurement Policy

- To receive full points for this question, the Applicant must upload a procurement policy that includes ALL applicable provisions described in 2 C.F.R. Part 200, Appendix II for federal awards. These provisions are listed below in Q32a. If the provisions are not listed out in the policy, there must be language stating that the applicant will comply with all the applicable provisions described in 2 C.F.R. Part 200, Appendix II for federal awards.



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

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

- A. Contract Remedies ☐ Yes ☐ No
- B. Termination for Cause and Convenience ☐ Yes ☐ No
- C. Equal Employment Opportunity ☐ Yes ☐ No
- D. Contract Work Hours and Safety Standards Act ☐ Yes ☐ No
- E. Clean Air Act and the Federal Water Pollution Control Act ☐ Yes ☐ No
- F. Debarment and Suspension ☐ Yes ☐ No
- G. Byrd Anti-Lobbying Amendment ☐ Yes ☐ No
- H. Procurement of Recovered Materials ☐ Yes ☐ No
- I. Prohibition on Contracting Telecommunications Equipment or Services ☐ Yes ☐ No
- J. Domestic Preferences for Procurements ☐ Yes ☐ No
- The Applicant must select which contract provisions are included their policy.

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.

Required Documentation:

Procurement Policy

Policy outlining adherence/procedures for Piggybacking

- To receive full points for this question, the Applicant must select option B.
- If the Applicant selects option A and intends to use a cooperative or joint-purchasing (piggy-back) contract, their procurement policy or documentation must include written procedures for the procurement and usage of 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?

- 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.
- To receive full points for this question, the Applicant's uploaded policy must include piggy-back procedures and include the following:
 - The original contract was procured in compliance with the federal procurement under grant rules that would apply to the entity seeking reimbursement.
 - The original contract contains appropriate assignability provisions that allow the assignment of all or a portion of the specified deliverables under the terms originally advertised, competed, evaluated, and awarded, or contains other appropriate assignment provisions.
 - The scope of work to be performed falls within the scope of work under the original contract, and there are no cardinal changes to the contract; and
 - The contract price is fair and reasonable.

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.

Required Documentation:

Mutual Aid Agreement

- To receive full points for this question, the Applicant must upload an executed Mutual Aid Agreement(s) in place outside of the Statewide Mutual Aid Agreement (SMAA). If the Applicant does not utilize mutual aid, select option C.
- Please note, some entities have a Mutual Aid Agreement with the State of Florida. We are asking if your entity has a Mutual Aid Agreement with any other entities not through the State agreement. For example, an Electric Co-op, a different state, an interlocal agreement, etc.



- **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)

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).
- To receive full points for this question, the Applicant must upload written procedures that include a description of the services requested and received, along with documentation of associated costs (e.g., labor, equipment, supplies, or materials) These procedures should specify how and when documentation will be requested.



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.

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

- To receive full points for this question, the Applicant must provide a pre-positioned contract (standby contract) for debris removal activities procured in compliance with 2 CFR 200, as well as the full procurement package.
- If you select option A, the Applicant must upload an executed debris removal contract that extends until November 2025, or includes a renewal option that extends until June 2026. Additionally, the following documents should be included: solicitation/advertisement, request for proposal, vendor's proposal, scoring/bid tabulation, and notice of award.
- The debris removal contract should include all applicable contract provisions:
 - For all contracts, confirmed the contract addresses debarment and suspension.
 - For construction contracts of any amount, confirmed that the contract references equal employment opportunities.
 - For contracts above \$10,000, confirmed the contract addresses termination for cause and for convenience.
 - For all contracts above \$100,000, confirmed the contract includes reference to the Byrd Anti-Lobbying Amendment.
 - For contracts above \$100,000 that involve employment of mechanics or laborers, confirmed the contract includes reference to the Contract Work Hours and Safety Standards Act.
 - For all contracts above \$150,000, confirmed the contract references the compliance with the Clean Air Act and Federal Water Pollution Control Act.

- For contracts above the simplified acquisition threshold (refer to the project validation guide for the applicable simplified acquisition threshold), confirmed the contract references the following provisions:
 - administrative, contractual, or legal remedies for contract violations, and
 - inclusion of Federal bonding requirements
- For all contracts where a contractor's IT systems are used to input, store, process, output, and/or transmit sensitive (Applicant) information, or a contractor will have access to sensitive (Applicant) information, confirmed the contract references the follow provisions:
 - Safeguarding of Sensitive Information, and
 - Information Technology Security and Privacy Training

35a. The Applicant must list the contractor for the pre-positioned contract in question number 35 in the textbox.

- The Applicant will need to provide the name of the vendor(s) listed in the contract(s) documentation in Q35.

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.

Required Documentation:

Pre-qualified Vendor List

- To receive full points for this question, the Applicant must provide a list of two or more pre-qualified vendors for debris removal activities.
- Generally, Applicants go through a RFQ process to create a pre-selected vendor list. Once an emergency hits, contracts can be put in place with the vendors on this list. Since the vendors have already undergone a selection process, there is no need to go through the bidding process again during emergencies.
- **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)

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.

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

- To receive full points for this question, the Applicant must provide a contract with a debris monitoring vendor procured in compliance with 2 CFR 200, as well as the full procurement package.
- If you select option A, the Applicant must upload an executed debris monitoring contract that extends until November 2025, or includes a renewal option that extends until June 2026. Additionally, the following documents should be included: solicitation/advertisement, request for proposal, vendor's proposal, scoring/bid tabulation, and notice of award.
- The debris monitoring contract should include all applicable contract provisions:
 - For all contracts, confirmed the contract addresses debarment and suspension.
 - For construction contracts of any amount, confirmed that the contract references equal employment opportunities.
 - For contracts above \$10,000, confirmed the contract addresses termination for cause and for convenience.
 - For all contracts above \$100,000, confirmed the contract includes reference to the Byrd Anti-Lobbying Amendment.

- For contracts above \$100,000 that involve employment of mechanics or laborers, confirmed the contract includes reference to the Contract Work Hours and Safety Standards Act.
- For all contracts above \$150,000, confirmed the contract references the compliance with the Clean Air Act and Federal Water Pollution Control Act.
- For contracts above the simplified acquisition threshold (refer to the project validation guide for the applicable simplified acquisition threshold), confirmed the contract references the following provisions:
 - administrative, contractual, or legal remedies for contract violations, and
 - inclusion of Federal bonding requirements
- For all contracts where a contractor's IT systems are used to input, store, process, output, and/or transmit sensitive (Applicant) information, or a contractor will have access to sensitive (Applicant) information, confirmed the contract references the follow provisions:
 - Safeguarding of Sensitive Information, and
 - Information Technology Security and Privacy Training

37a. If the Applicant plans to claim Debris Removal (CAT A) costs, please provide the vendor name in the text box provided.

- The Applicant will need to provide the name of the vendor(s) listed in the contract(s) documentation in Q37.

37b. If the Applicant plans to claim Debris Removal (CAT A) costs, the Applicant must specify if the debris monitoring vendor utilizes automated load tickets, hand-written tickets or both.

- A. ☐ Automated only
- B. ☐ Both Automated and Hand-written
- C. ☐ Hand-written only
- D. ☐ Load tickets unavailable

Required Documentation:

Load Ticket

- To receive full points for this question, the Applicant must select either option A or B and upload an example load ticket template.
- The load ticket template should include all necessary elements. Click on the link to reference the necessary elements: [FEMA Debris Monitoring Guide SOP](#).

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.

Required Documentation:
Written Procedures
Pre-Positioned Contract

- To receive full points for this question, the Applicant must upload a document that includes 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.
- Procedures could involve overseeing the contractor by reviewing progress reports, conducting inspections, ensuring compliance with contractual requirements, performing performance evaluations, maintaining records, coordinating meetings with the contractor, and monitoring invoices and change 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))