

The paper trail starts now.

A FEMA Public Assistance Pocket Guide for Oregon Cities

Before
Blue sky day

During
Grey sky day

After
Recovery

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How to use this pocket guide

This is a working tool: checklists to score yourself against, logs to fill in, and references to reach for when it counts. Use it to prepare, to guide your team through an event, and to close the loop after.

Before · Blue Sky Day — p. 3

Pull this out once a year, ideally at budget season, and work through the readiness check.

During · Grey Sky Day — p. 8

Keep it where you can grab it fast: your emergency binder, a shared drive, the glovebox.

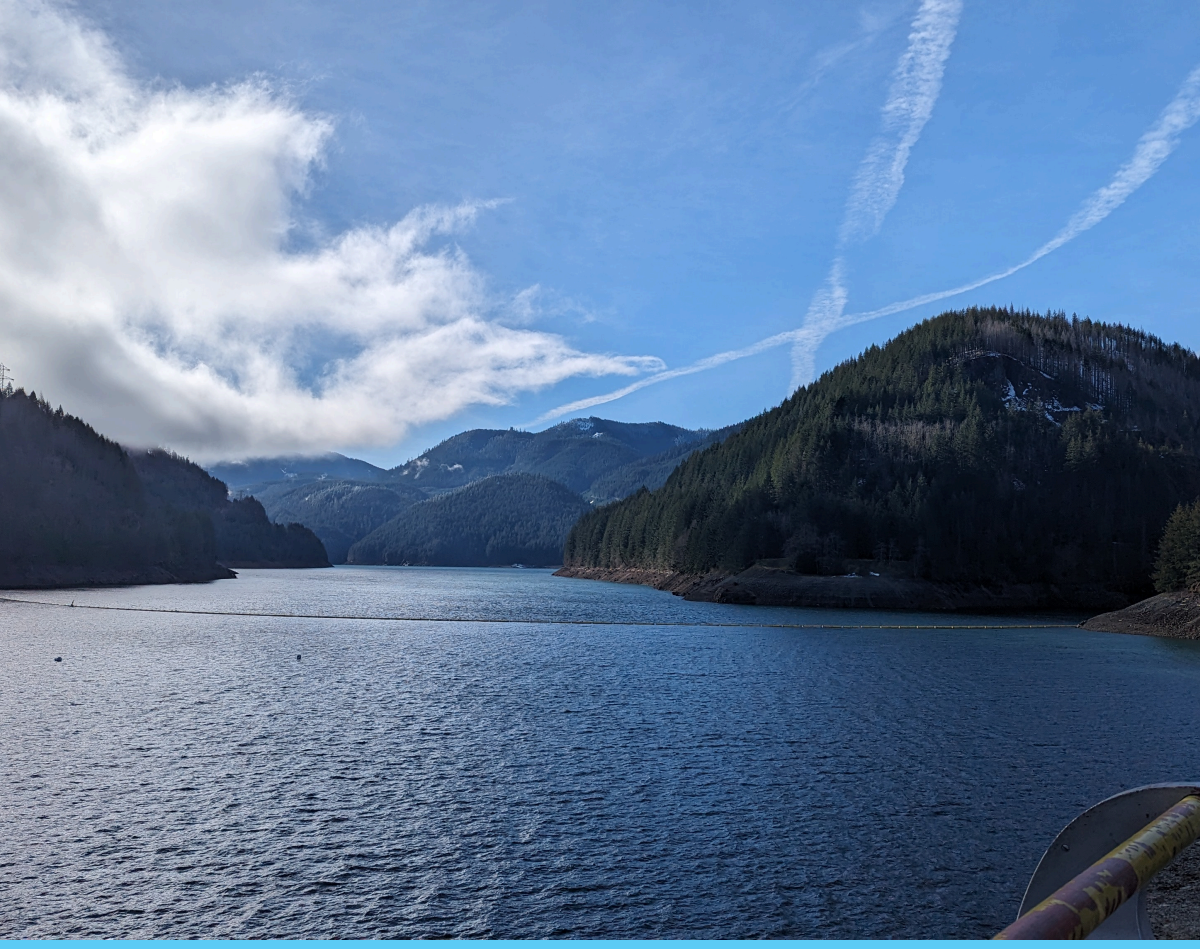
After · Closing the loop — p. 14

The timeline, the money mechanics, and how to appeal if you disagree with a decision.

Quick Reference · Any day — p. 23

A plain-language glossary, who to call, and a Categories of Work cheat sheet.

Who it's for: elected officials, city managers, and anyone who handles disaster costs, including finance, public works, and clerks. No FEMA experience needed.



Part One · Before

Blue sky day readiness.

This work is best done when there's no emergency. Review this section once a year, ideally during budget season, with finance, public works, and your clerk's office.

- The five-area annual check
- Documentation baseline
- Policy checklist
- Relationships to build now

The five-area annual check

Review these five areas every year and score your city honestly.

	Yes	Not sure	No
01 Applicant experience			
Is your Public Assistance (PA) contact, and their backup, in FEMA's Grants Portal?	☐	☐	☐
Has anyone on staff attended a PA Applicant Briefing or Oregon Department of Emergency Management (OEM) training in the past year?	☐	☐	☐
Do new finance and public works hires get an orientation to what PA is?	☐	☐	☐
Does your city manager or council know PA exists before a disaster?	☐	☐	☐
02 Policy and procedure			
Is your emergency procurement policy current, and does it cite the right Oregon Administrative Rule (OAR)?	☐	☐	☐
Is there a written disaster timekeeping policy that covers force account labor?	☐	☐	☐
Does your records retention policy name the 3-year post-closeout window?	☐	☐	☐
Is there a continuity plan naming who steps in if your PA contact is out?	☐	☐	☐
Do you track obtain and maintain on past PA-funded facilities?	☐	☐	☐
Do you follow a documented maintenance and inspection plan for city facilities?	☐	☐	☐

	Yes	Not sure	No
03 Procurement			
Do contracts include the 2 CFR 200 Appendix II federal clauses? Where rules differ, follow the strictest.	☐	☐	☐
Do you have prequalified vendors for debris removal, tree work, generator rental, and emergency repairs?	☐	☐	☐
Have your standard contracts been checked for cost plus a percentage of cost language?	☐	☐	☐
Do you know which regional or statewide cooperative purchasing agreements you could use?	☐	☐	☐
04 Contract administration			
Do you check contractors against SAM.gov exclusions before signing?	☐	☐	☐
Is there a standard contract file checklist, so every file has the same documentation?	☐	☐	☐
Is someone assigned to monitor contractor invoices and performance during an event?	☐	☐	☐
05 Financial management			
Can your disaster fund and cost codes be activated in a day, not a week?	☐	☐	☐
Has anyone reviewed your internal controls against 2 CFR 200 in the past year?	☐	☐	☐
Do you know your audit history with PA funding, and whether findings got fixed?	☐	☐	☐

A gap here doesn't cost you anything today.
It costs you weeks during closeout.

Policy checklist

- [ ] Written emergency procurement policy on file, citing OAR 137-049-0150
- [ ] Standard disaster time codes built into payroll and finance, ready to activate on day one
- [ ] Insurance reviewed against FEMA's "obtain and maintain" requirement on facilities that previously received PA funding (see p. 18)
- [ ] Records retention covers at least 3 years past closeout, not 3 years past the event
- [ ] Applicant eligibility confirmed: local government, special district under ORS 198, school district, or qualifying private nonprofit

Documentation Baseline

- **Photograph and inventory** public facilities and major equipment now, dated. This is your "before" picture. Without it, FEMA can't tell disaster damage from deferred wear.
- **Keep maintenance records current.** Deferred maintenance is one of the fastest ways to lose an otherwise eligible project.
- **Know the eligibility cascade.** Applicant, facility, and work each have to be independently eligible. A project can fail on any one of the three.

Relationships to build now

- **Designate a PA point of contact and a trained backup.** Disasters don't wait for vacations to end.
- **Know your people by name** before an IDA. Oregon has seven OEM regions covering all 36 counties.
- **Join or help build a COAD or Long Term Recovery Group** before your area needs one.
- **Talk to neighbors now** about regional procurement and mutual aid. A shared debris contractor is easier to agree on before a disaster.

Fill in: your people

PA point of contact	
Backup	
County emergency manager	
OEM regional coordinator	
OEM PA contact	

> **Every year: contact confirmed, policies reviewed, contracts current, accounts ready, photos updated. Sixty minutes a year against months of cleanup later.**



Part Two · During

Grey sky day response.

The clock on Public Assistance starts now, not when the declaration comes through. Everything you document from this point forward is either money you'll get back or money you won't.

- The first 72 hours
- Photo and damage log
- Daily documentation logs
- Emergency procurement

72 The first hours

- [ ] **Life safety first,** always
- [ ] **Declare a local emergency** if your situation calls for it. It can strengthen your county's request upstream.
- [ ] **Start a daily disaster journal:** date, time, decision, who made it
- [ ] **Contact your county emergency manager** to begin Initial Damage Assessment coordination
- [ ] **Photograph damage before cleanup,** date-stamped, with something for scale. Once debris is cleared, the evidence is gone.
- [ ] **Assign one documentation lead per department.**
- [ ] **Open a dedicated disaster cost code** on day one, not after the declaration

> **Write it down now. FEMA reimburses what's documented, not what's remembered.**

Daily documentation logs

Track these every day the response is active. Each log needs these fields:

Force account labor

Name | Date | Straight time | Overtime | Rate of pay | Project or site | Task description | Supervisor sign-off

Track straight time and overtime separately, for every employee on disaster work.

Equipment

Equipment ID and type | Date | Hours used | Operator | Project or site

Use FEMA's equipment rate schedule, not an internal estimate. FEMA rates can be lower than your state DOT or RS Means rates; ask OEM which applies. For leased equipment, use the invoice plus actual fuel costs.

Materials and supplies

Item | Quantity | Unit cost | Vendor | Invoice or PO | Project or site

Materials from your own stock count too. They're valued at today's cost to replace them, not what you originally paid.

Donated resources and volunteers

Name or organization | Date | Hours | Task performed

Documented volunteer labor and donated equipment can offset your local cost share on emergency work (Categories A and B). The PAPPG v5 draft also allows it on the specific permanent work project it supported (Categories C–G). Without records, it can't be counted. For spontaneous volunteers, Oregon Volunteers in Disaster (ORVID), run through OregonServes, is the state's system for registering them.

Contracted work

Contract or PO | Scope | Cost | Procurement method

If it was a noncompetitive emergency procurement, write down the justification at the time, not when someone asks later.

Sample daily labor log

Name	Date	ST	OT	Site · task	Sup.

Photo and damage log

For every site, capture:

- Site name and location
- Date and time
- Description of damage
- GPS coordinates
- Before and after pairs
- Something for scale

Leave damage undisturbed until it's photographed whenever practical. Use OEM's own damage assessment forms (p. 26) rather than a homemade log, if possible. Your county will expect the state's format.

5 – 7 days later: re-inspect every site

Water intrusion, mold, and structural shifts often show up days later, and damage found after sign-off is much harder to add. Treat the re-inspection as required, and photograph it the same way you did the first pass.

Emergency procurement, done right

- Use the written policy you already have on file. **OAR 137-049-0150** covers Oregon's emergency exemption.
- Get multiple quotes whenever time allows, even in an emergency.
- **Never agree to cost plus a percentage of cost.** FEMA won't reimburse it.
- Document the emergency justification when you buy, not weeks later.

FEMA procurement guidance, templates, and job aids: fema.gov/grants/procurement

Three Rules for Cross-Department Documentation

1. **Documentation follows the work, not the site.** If three departments touch the same tree in the same park, each one's hours are logged under that job.
2. **One work order number travels with the job,** from first response through closeout.
3. **One person reconciles it all.** Pick that person before the event, not during it.



Part Three · After

Closing the loop.

Once FEMA is involved, the work shifts to timelines, money, and follow-through. Know the clock, know the mechanics, and capture what you learned so next year's Before section is stronger.

- Timeline reference card
- Obtain and maintain
- Mitigation funding
- The money mechanics
- Appeals and closeout
- After action cycle

The PA Process, Step by Step

Pre **Pre-award**
Preliminary Damage Assessment › Declaration request › Declaration evaluation › Presidential Approval

1 **Operational planning and applicant coordination**
Set-up and coordination › Applicant Briefing › Request for Public Assistance (30 days)

2 **Impacts and eligibility**
Applicant eligibility › Impact survey and scoping call › Impact and damage identification › Initial eligibility

3 **Scoping and costing**
Site inspections › Damage documentation and dimensions › Scope of work › Cost development › Compliance reviews

4 **Final reviews**
Final project reviews › Applicant signature

5 **Obligation and recovery transition**
Funds obligated to the recipient (OEM) › Recovery transition meetings

6 **Post-award monitoring and amendments**
Quarterly progress reports ›
Scope changes, time extensions, appeals, audits

7 **Final reconciliation and closeout**
Project completion certification › Close projects › Close applicant › Close PA award

Source: FEMA Public Assistance National Workflow, fema.gov/assistance/public

The Money Mechanics

Federal 75%	Local 25%

- **Cost share.** Standard federal share is 75%. Up to 100% is possible for the most catastrophic declarations, but don't plan around it.
- **Management costs.** Your city is eligible for up to 5% of its total project costs, 100% federally funded, to manage and administer the grant. That can include hiring outside grant management or disaster recovery support if your staff is stretched. Plan for it early- procure before needed.
- **Insurance settles first.** FEMA won't pay for what insurance covers or should have covered (44 CFR 206.191). Pursue your claim in parallel with PA.
- **Immediate Needs Funding.** In some disasters, FEMA can advance part of the anticipated funding. Ask your PAC; it's case by case.

Reimbursement is not immediate. Plan for the gap now, not when it opens.

Build Your Financial Bridge

30 days · Floor

Operating cash most cities can reach from current fund balance practice.

60 days · Target

Backed by a council-adopted reserve policy and a named bridge mechanism.

90+ days · Aspirational

Usually needs an intergovernmental agreement, a line of credit, or a state pool arrangement.

Know your liquidity sources

- General fund reserve
- Line of credit with your bank
- Oregon LGIP (State Treasury)
- Tax anticipation note

Each has a different approval pathway and time to cash. Write the plan down and get it adopted before the year you need it.

This one catches cities off guard

The "Obtain and Maintain" Insurance Requirement

If your city receives PA funding for permanent work (Categories C–G) on a building, its contents, equipment, or vehicles, FEMA requires you to:

1. **Secure insurance** equal to the PA funding you received for that facility
2. **Maintain it** for as long as the facility is in use
3. **Show proof** of that coverage at closeout

Doesn't apply to

Debris removal or road and bridge repairs.

If you don't comply

FEMA can deny assistance for the same hazard at the same facility in a future disaster, and can potentially claw back funds already paid.

Build this into your Blue Sky Day insurance review (p. 6). A coverage gap is much cheaper to fix before the next event.

Know the Appeals Process

You won't agree with every determination. Here's the actual clock:

First appeal · 60 days

From FEMA's electronic transmittal of its determination. In writing, with justification, the dollar amount in dispute, and the regulation or policy you believe was misapplied.

State review

Oregon OEM reviews and forwards it with a recommendation.

FEMA response · 90 days

FEMA requests more information, sends it for technical review, or decides. In practice, it often takes much longer.

Second appeal · 60 days

From the first appeal decision. Miss it, and the first decision is final.

Arbitration

If a first appeal is unresolved after 180 days, or you disagree with the first appeal decision, you can request arbitration instead of a second appeal.

Get verbal guidance in writing, every time. After a conversation with your PAC, send a follow-up email confirming what was said.

Closeout Checklist

- [ ] Final Project Worksheet costs reconciled against actual documented costs
- [ ] Insurance “obtain and maintain” compliance documented and on file
- [ ] Project closeout and disaster closeout are different. Each project closes when its work is complete and reconciled. Keep records at least 3 years from when the recipient closes the whole disaster award, not your last project
- [ ] Procurement files complete and audit-ready under 2 CFR 200
- [ ] Lessons captured

What would you tell next year’s version of yourself?

Recover Stronger: Section 406 Mitigation

Section 406 lets you build the damaged part back **stronger** , not just the way it was, as part of the same PA permanent work project (Categories C–G) and at the same cost share.

It's cost-effective if it meets any one test

15%	100%	BCA
or less of the eligible repair cost	or less, if the measure is on FEMA's Appendix J list	a benefit-cost analysis shows it pays off

The rules

- **Damaged elements only.** Mitigate the manholes that flooded, not the undamaged ones down the line. HMGP (404) covers undamaged parts.
- **Above code.** Required code upgrades are part of the repair. 406 is what goes beyond them.
- **Before construction.** Raise it at site inspection and get it in the scope before the work starts.

Appendix J examples

Larger culverts and drainage structures · Submersible pumps at water and wastewater plants · Equipment elevated above flood level Anchored storage tanks

406 does not need a Hazard Mitigation Plan. **HMGP** does.

Keep a short list of what you'd fix at each facility. When your PDMG asks about mitigation, you'll have the answer.

Learn and Improve: Your After Action Cycle

Every event should produce the same four things, on the same schedule:

Step 1
72 hrs

Hot wash

Informal debrief notes from everyone who worked the event

Step 2
45 days

After Action Report

What happened, what worked, what didn't

Step 3
60 days

Improvement Plan

Specific fixes, each with an owner and due date

Step 4
90 days

Plan updates

Procurement policy, contacts, and this guide, revised

An improvement item only counts if it changes something concrete: a policy, a contract, a contact list, a training. Keep a running list, even one spreadsheet, so it survives staff turnover and carries into next year's Before section.

Glossary

Common Public Assistance terms in plain language.

Arbitration
An alternative to a stalled first appeal, once it's been pending more than 180 days.

Categories of Work
FEMA's A–G classification of eligible work (p. 27).

Cost share
The split between federal and local funding, standard 75/25.

Declaration
The President's formal approval making an area eligible for federal assistance.

De-obligation
FEMA reversing a funding commitment, often after an audit finds a documentation gap.

Direct administrative vs. management costs
Direct costs bill to a specific project; management costs (up to 5%) cover administering the grant.

Duplication of benefits
FEMA won't pay costs that insurance covered, or should have.

EHP review
Environmental and Historic Preservation review, alongside PW development. Flag sensitive sites early.

Force account
Work done by your own employees and equipment, not a contractor.

IDA
Initial Damage Assessment: the county's first look at damage.

Immediate Needs Funding
An early, partial advance in some disasters, before final costs are set.

Obligated
FEMA has committed funding. It doesn't mean the check is in the mail.

PAC
Public Assistance Coordinator: your primary FEMA contact, assigned at kickoff.

PDA
Preliminary Damage Assessment: a joint walkthrough with state and FEMA.

PW
Project Worksheet: scopes and costs each project. Due 30 days after kickoff.

Recipient
The state (Oregon OEM), which receives the grant and passes funds through.

RPA
Request for Public Assistance, due 30 days after your county is designated.

Subrecipient
Your city or district, funded through the recipient.

2 CFR 200
Uniform Guidance: the federal procurement and financial standards.

44 CFR 206
The federal regulations governing Public Assistance.

Contacts and Resources

Oregon Department of Emergency Management (OEM) · Public Assistance

Phone 503-378-2911
Fax 503-373-7833
Email oem.pa-recovery@oem.oregon.gov
Address 3930 Fairview Industrial Drive SE, Salem, OR 97302

Two portals. Don't mix them up.

grantee.fema.gov
FEMA Grants Portal: application and eligibility

oemgrants.oregon.gov
After obligation: reimbursements, reporting, OEM

OEM Regional Coordinators

Seven regions cover all 36 counties. Your coordinator works with you in every phase, not just after a disaster. Find yours on OEM's Regional Coordinators Program page.

Your County's Emergency Manager

OEM's Local and Tribal Emergency Managers directory covers every county. Confirm yours before an IDA.

Forms You'll Actually Use

OEM's Damage Assessment Forms, Templates and Resources page has what your county expects:

- [ ] IDA Checklist for Criteria
- [ ] IDA Data Collection for Public Infrastructure (Excel)
- [ ] Public Infrastructure Guidelines and Categories
- [ ] IDA County Summary Form (Excel)
- [ ] IDA and PDA Instruction Manual
- [ ] PDA Checklist and PDA Summary Form
- [ ] Reasonable Cost Evaluation Job Aid

Key Links

PAPPG v5.0 (Amended) and PA library
fema.gov/assistance/public/library

FEMA Public Assistance
fema.gov/assistance/public

OEM Public Assistance
oregon.gov/oem › Disaster Assistance › Public Assistance

2 CFR 200 (Uniform Guidance)
ecfr.gov/current/title-2/part-200

44 CFR 206 (PA regulations)
ecfr.gov/current/title-44/part-206

SAM.gov exclusions check
sam.gov

Categories of Work

Emergency work — 6 months

A **Debris Removal**
Clearing and disposing of debris in the public interest: vegetation, vehicles, construction materials

B **Emergency Protective Measures**
Actions to eliminate or reduce an immediate threat to life, public health, or safety

Permanent work — 18 months

C **Roads and Bridges**
Paved, gravel, and unpaved roads; bridges

D **Water Control Facilities**
Dams, reservoirs, levees, floodwalls, aqueducts

E **Buildings and Equipment**
Structures, systems, contents, and vehicles

F **Utilities**
Water, power, sewer, and communications

G **Parks, Recreational, and Other**
Mass transit, beaches, docks, and facilities not listed elsewhere



Ready before it happens.

A practical guide for Oregon elected officials, city managers, and staff who touch disaster costs. Checklists, sample logs, and references you can act on, before, during, and after the next disaster.

- **Before:** work the five-area check once a year.
- **During:** document from the first hour.
- **After:** know the clock, the money, and the appeals.

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