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Comment Submitted by AZ DEMA-EM

Posted by the **Federal Emergency Management Agency** on Feb 14, 2023

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Re:
Force Account Labor Summary - FEMA Form FF-104-FY-21-137
This is an entirely useless form that makes filling out and compiling the data almost impossible or so work intensive that it is counter-productive. The State has adopted a much improved form that has been successfully been used for 10+ years and has reduced time spent by 70+%.

Applicant's Benefits Calculation Worksheet - FEMA Form FF-104-FY-21-135
Also useless. This only provides averages, and does so incorrectly. For example, Health is typically not a percentage but a dollar amount, depending on the employees specific plan.

Materials Summary Record - FEMA Form FF-104-FY-21-138
Does not track enough info to be of use. Additionally, it tracks info of NO use. Again, the State has developed a system that is more user friendly and reduces work to both the Applicant as well as the Project Specialist/Federal Reviewer.

Rented Equipment Summary Record - FEMA Form FF-104-FY-21-139
I just cant say this enough.....this is terrible! This increases the level of work required to document it and makes it extra difficult. It isn't that complicated, yet the forms make it so.

Force Account Equipment Summary Record - FEMA Form FF-104-FY-21-141
I could just say ditto, but seriously. These forms are utter garbage, this being the worst of the lot. It doesn't tie in to Labor, there's not enough room to fill out the (actually) unnecessary sections, and isn't long enough to do even the most simple repair. These forms are an exercise in how to increase work without increasing any effectiveness.

DRAFT: FEMA Form FF-104-FY-22-245 Damage Information
So.....in essence, this is a 20+ page form that does not capture enough information to adequately describe a damaged facility, which replaces the much shorter version that only required that the person filling it out to actually know what they were doing. Can't describe my frustration enough with where this is going.

DRAFT: FEMA Form FF-104-FY-22-242 Project Application for Infrastructure Restoration
Stop! Just, stop! While in the past PA was complicated. this is taking it all to a new level of complicated, with an end result of massive delays and lost opportunities for reimbursement due to the levels of complexity and difficulties involved. Additionally, the "certifications" make no legal or procedural sense. If the objective is to make it so bad that everyone stops applying, then you are succeeding. If the process is to make improvements, you are working in the wrong direction!!!

DRAFT: FEMA Form FF-104-FY-22-241 Project Application for COVID-19
So....you created a 36 page document to essentially track limited Cat B activities. And it will come out, 3 years after the event and likely never see use as the event is closing here in May. Again, stop trying to make the simple more complicated. Forms can't solve problems, they only create more.

All the rest.....
Okay. We give up. To summarize, you've taken, essentially, a simple Excel spreadsheet with about a dozen tabs, and a few other forms (60 Day List, RPAs, etc) and created 28 forms here (not including other required ones not seen here) made up of so many pages, it is literally not worth my time to open each one/count the number of pages/add them together, but easily in the 100-200+ page range, make it so complicated that reimbursement opportunities will be lost due to: filling out the wrong box, making it so complicated that Applicants withdraw, and creating an environment which transfers risk to the States, while making the opportunity for fraud or error increase exponentially due to the complexity, especially since NONE of the forms tie together to track anything and instead must be hand compared and tracked in a different system to even get a dollar total, much less enable the ability to locate the fraud/mistakes by those attempting to do their due diligence and be responsible stewards.

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