

Revised Information Collection - Paperwork Reduction Act

FEMA Feedback Period

All Forms

- Having form options that allow a template upload (e.g., spreadsheet) to provide information for several locations, vs. manually populating multiple forms, is key to reducing burden.

Linking IRS and Sam.GOV

- The linking of IRS and Sam.Gov data to the system to help reduce risk of discrepancies or questions in the future is a great improvement.

Organization Information - Information Repository

- How is this information repository going to be populated? Is there a form that will upload (like the current damage inventory form)? Otherwise, for an entity that has thousands of employees, hundreds of equipment pieces, and/or hundreds of facilities, how is it practical to have to data enter each of these manually?
 - FEMA may want to consider whether or not an applicant wants to maintain a permanent record of their employees in the Grants Portal system at this level.
 - Maintaining an employee list from disaster to disaster could be burdensome (pay changes, fringe changes, title changes, etc.).
 - FEMA may want to consider whether or not an applicant wants to maintain a permanent record of their facilities in the Grants Portal system at this level.

Removing Barriers: "Reduce Process documentation requirements for claims less than \$1M".

- While FEMA's process for reducing the documentation requirement for less than \$1M is helpful in expediting projects through the system, however the inconsistent application of the spirit of this change on the Recipient side is the obstacle.
- The burden on the "FEMA side" is significantly reduced; however, if a Sub-Recipient is within a State that requires 100% of the backup, then how is this new process helpful in reducing the administrative burdens for Sub-Recipients and/or Recipients, for that matter?
- More often than not, small projects (under \$1M) often garner the same level of reviews, oversight, and scrutiny from a resource standpoint than large projects (over \$1M). This is true even though less documentation is required up front.

Expedited Projects

- What are the new expedited project documentation requirements?
- Revised sentence to selected expedited project is misleading and may likely result in more people selecting they need "Immediate attention or federal support. Should be better explained.

Hazard Mitigation Opportunities: "Prompt consideration of hazard mitigation on all permanent work projects, including offering simple mitigation measures.

- While FEMA offers the HMP options to Sub-Recipients, there is seldom guidance or ideas provided by FEMA. Not all Sub-Recipients are capable of developing mitigation options. With FEMA's broad experience with effective mitigation measures implemented across the country, there should be a more hands-on approach from FEMA specialists to help identify these mitigation options. Also, the timing of these discussions is also concern. FEMA front ends discussions with mitigation specialists who ask questioned prematurely before damage assessments are even completed. FEMA should

restructure this approach and timing to discuss with entities once they are ready to sit down and have productive discussions.

Pre-Approval Requests (As-Needed) Step in "Revised Information Collection Flow" Diagram.

- Having a pre-approval step prior to an impact list seems to be out of order. While there are some areas that require pre-approval during the emergency phase, it is often not known what the overall impact is at the early stages after a disaster. FEMA's timing of request for certain information is often a hindrance to the process. Could this step be implemented within each of the project types versus before the actual impact list is completed?

Impact List - General

- What is the timing of completing the impact list?
 - It is often not known what the "logical grouping" of projects are early in the process. Logical groupings typically consider category of damage, insurance, magnitude of damage, etc.
 - An automated system with "guardrails" to logically group projects is not practical given the factors that are taken into consideration by an applicant (per statement above).

Impact List - Infrastructure Damage Information

- The types of information requested on this form (i.e. maintenance records or other evidence of damage) may not be readily available at the time these forms are completed.
- Will this type of information be asked for during the project formulation phase if it can't be answered during the creation of the impact list?
- What if the values of the projects are unknown when the impact form is completed? This could impact the automated logical groupings, etc.

Damage Information - Component Damage Description and Dimensions

- This requires a heavy data entry exercise to enter every component that is damaged at a damaged facility (whether a large or small project).
- Does FEMA understand the burden this will place on an applicant when this type of information can be accomplished through other means (i.e., spreadsheets, RS Means, Xactimate)?
- Understanding that an applicant will now have the latitude to complete their own Site Inspection through the "damage information form." What if they are interested in expediting so they complete the Site Inspection, but actually lack the adequate technical expertise to complete the Site Inspection correctly? Doesn't this just lead to more rework if mistakes need to be addressed?
- Examples of increased burden hours and/or situations where the form may not be technically feasible for some applicants:
 - Non-quantifiable damaged components. Often complex mechanical or electrical systems will stop working after a storm. This will require a technician to arrive, assess the impact, and often reset the systems. For example, when a hospital loses power or faces water damage, the fire panels and elevators will need to be reset. These are "damaged" by the disaster, but there is no way to quantify the electrical failure of that system.
 - Large, multi-story, facilities that are impacted will have a higher burden to quantify. This Section appears to require the exact quantification of each room or impacted item within the room. This is going to be a major lift for the Applicant, which was historically held by FEMA site inspectors. I also fear that there is going to be too much diversity of facility components across all Applicants to be difficult to fit into standardized forms.
 - Applicants who have hundreds of impacted locations will spend more time data entering damaged components on FEMA's form versus spending the time to actually address their damages.

- Applicants with low administrative capacity, such as small towns or Houses of Worship, are going to be staffed by volunteers or personnel who hold multiple roles. There is going to be a difficult learning curve for these entities to fit within the standard forms, and to quantify properly, the damages.

Equity and Climate Change Resilience

- Equity and climate change resilience priorities are very important and should be considered in the recovery process. What does that actually look like during project development? What is the measurable outcome of this priority as it relates to funding received on any given PW?

Request for Information (RFIs)

- Somehow the repetitive RFIs need to be addressed. There should be a requirement that a single RFI be requested for a project (was once the process). A second RFI should be triggered ONLY if there is new information received from the first RFI response.
- RFIs should be streamlined so that they aren't coming from the State, the PDMG and the CRC, which often results in extraneous questions that were not needed to process the project. Reasonably, separate RFIs might come from insurance, HMP or EHP.
- RFI questions and responses need to be staged in a manner that all FEMA review groups may access relevant information without drilling down into several sub menus. Due to the complexity of piecing information together, the common outcome consists of redundant and additional RFIs, meetings, phone calls and/or emails.

Obligation and Post Obligation

- What is the new estimated timeline to obligation? (The approximate days from project submission to project obligation).
- Historically, post-obligation activities are completed in coordination with the Subrecipient and the State. Moving forward, are all these activities to be completed within Grants Portal, regardless of if the Recipient has a Grant Management System?
- Given each Recipient approaches these processes very differently, there is potential for duplicative efforts/tasks, depending on what State processes would be maintained with the addition of these processes within GP.