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# Introduction

City of Houston - Finance
*Disaster Recovery Team*

Presenters

- Fazal Syed, Senior Staff Analyst
- Meridith Sanders, Financial Analyst
- Azeezat Sulaimon, Financial Analyst
- Izine Harris, Financial Analyst

Management Team

- Arif Rasheed, Deputy Director
- Gloria Moreno, Assistant Director
- Bobby Qasim, Division Manager

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## Overview

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**Purpose**

# Purpose

- To provide recommendations and advice regarding some common aspects of disaster cost recovery under the FEMA Public Assistance (PA) program

- This presentation will not delve in to the PA process and all of its components

- Disclaimer: The opinions and statements in this presentation are those of the City of Houston, Finance Disaster Recovery Group and do not necessarily reflect State / FEMA positions. Please seek final guidance on PA matters from State and FEMA.

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# Training

**Issue:** How do I prepare for the upcoming disaster season?

What is a category of work?
What are procurement requirements?
What costs are eligible?
What documents are needed?
Which form do I use? How do I fill it out?

**Solution**

**Houston's Approach**

# Solutions

>Annual training on common disaster topics

>Department specific training

>Role/function specific training

>Policies, procedures, manuals

## Houston's Approach

>Citywide annual disaster training every summer

>Disaster Recovery Manual

>Participation in City/County/Statewide exercises

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# Pics and Video

**Issue:** Proving the extent and severity of damages following an event.

How do I prepare for the next disaster event?
How do I document damages?
How do we prove our claim?
How do we validate the condition prior to the event?

**Solution**

**Houston's Approach**

# Solution

Take pictures and video before and after a disaster

Pictures should be of all major assets and infrastructure before the disaster season

Clearly label pictures (Address, building, room, floor)

Drone fly-by video of roofs, buildings, and assets

Resources and tools to use include:

- Contractors and employees
- GPS enabled camera, drones, cellphones

# Houston's Approach

Example of a "hard lesson learned"

Certain departments contract for photography and drone services

Post disaster cell phone videos and pictures from employees and contractors in the field

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# Procurement

**Issue:** What can we do to lower our risk of ineligible procurement?

What requirements does 2 CFR 200 detail?

What should we consider when creating contracts for repairs?

Is a Cost or Price analysis necessary?

**Solution**

**Houston's Approach**

# Solutions

>Follow more stringent rules between local vs Federal guidelines
>Prepositioned contracts
>Cost / Price Analysis on contracts and amendments
>Be aware of contract amendments that may affect competition
>Federal Debarment check on ALL vendors (www.sam.gov)
>No cost plus % of cost contracts
>Time and Material contracts must have a price ceiling, be heavily monitored, and be for a short duration
>Lease / Rent amount should not exceed purchase cost
>No piggyback contracts

# Houston's Approach

>Pre-positioned contracts in place (PA, Debris)

> Proactive review of all procurements as part of the procurement process

> Involve legal department in early stages and in training

> Include Historically Underutilized Businesses in procurement process

> Follow current FEMA appeals and decisions to understand how to improve our processes

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# Force Account Costs

**Labor**: How do we track 15+ thousand timesheets? How do we create a consistent format? What labor time is eligible?

**Equipment:** How do we track equipment usage? What equipment time is eligible?

**Solutions**

**Houston's Approach**

# Solutions

*Labor*

- Disaster timesheet must note exact nature of work.
- "Disaster work" is not sufficient.
- Information on disasters timesheets must match with payroll records

*Equipment*

- Equipment operator must complete a disaster timesheet
- All equipment requires proof of ownership
- Vehicles tracked using hours should be in active use (Police cruiser with engine / lights running).

# Houston's Approach

> Created a standardized form for citywide use as a disaster timesheet
> Centralized team and repository - responsible for QAQC of every timesheet
> Provided forms and rate schedule to all employees prior to Harvey
> Leveraged leadership to ensure citywide adoption of forms

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# Site Inspections

**Issues:** Site inspections are not running smoothly.

There are communication and personality conflicts.

What is the site inspector's role in noting damages?

How do I avoid numerous Damage Under Review (DUR) requests following the inspection?

**Solutions**

**Houston's Approach**

# Solutions

>Hold a pre-inspection call with your employees and explain the Public Assistance program

>Define roles of all parties on the day of the site inspection

>Ensure that knowledgeable personell lead site inspections

# Houston's Approach

>Day of site inspection...

- Introduced everyone and clearly defined roles and responsilities of all attendees (Applicant, Recipient, FEMA, contractors)
- Designated a site inspection "Leader"
- Went over site map and drawings and planned exactly how the site inspection will be conducted

>Stayed flexible with time as many site inspections were longer than initally expected

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# Compliance Review

## Common Findings

>Repair costs are out of scope compared to SOW on project worksheet
>Lack of documentation to show competitive procurement
>No documented contract rate / price changes
>Historically Underutilized Businesses (HUB) not used
>Cost or Price analysis not documented
>Failure to follow your own procurement policy
>Force Account Equipment rates are other than FEMA published rates (no FEMA authorization)
>Timesheets not properly completed

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# Appeals

## Recommendations

>Clearly explain details of what, where, when, why, etc.

>Cite FEMA references (2 CFR 200, PAPPG, regulations)

>Include all documentation and support with first-level appeal Invoices and support, procurement documentation

>Before / After pictures of damages and repairs

>Letters or Certifications from authorities (Engineers, Architects, Fire Chief, etc.)

>Use publicly available information from newspaper articles, information from websites

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# Questions

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