Debris removal is usually the most expensive activity that takes place after an event.

Today we’re going to talk about how to get + keep eligible debris reimbursements.
• Remember 3 things to help maximize your reimbursements and minimize your risk . . .

1. Debris Plan.
2. Ownership of the entire process.
3. Know the rules!
   – Required permits.
   – Procure properly.
   – Prove up quantities.
   – Prove up eligibility of work.

1. Debris plan

Develop a Debris Management Plan NOW . . .

and use it!
1. Debris plan (Continued …)

  - Contracting:
    - Prequalified contractor.
    - Properly procured pre-event contract.
  - Priorities (critical facilities, routes, etc.).

1. Debris plan (Continued …)

- Debris contractors + subcontractors are required under Louisiana law to be licensed with the State Licensing Board for Contractors.

SOURCE: LSA R.S. 37:2150-2192

- Debris monitors are not required to be licensed.

Identification of Debris Removal Contractors- Does the jurisdiction identify at least one or more debris contractors that it has prequalified?
Part II – Debris Management Planning Concepts

1. Debris plan (Continued . . .)

Push + shove  Debris removal

• Debris management sites (DMS) . . .
  – Louisiana Department of Environmental Quality (LDEQ) permitted . . .
• Force account labor (FAL) + equipment vs. contract.
1. Debris plan (Continued …)

- Do not use a boiler-plate plan.
- Develop a plan that fits **YOUR needs**.
  - Address **every** possibility …
    - E.g. Oil refinery, pogy boats, meat processing facilities, etc.

2. Ownership of the process

Who is ultimately responsible?

- **Applicant** is ultimately responsible.
2. Ownership of the process

Assign someone from your staff as YOUR Debris Manager.
• Manage the monitor(s).
  – In-house and/or contract.

2. Ownership of the process (Continued …)

• Maintain independent relationship between monitor(s) and the debris contractor.

2. Ownership of the process (Continued …)

• Emphasize: Failure to know what’s going on puts you at risk.
Who can help?

- **FEMA** and **GOHSEP** can provide technical assistance, when requested (pre- and post-disaster).

3. Know the rules!

- Follow the GOHSEP Debris Guide.

**NOTE:** Only FEMA-eligible and reasonable debris costs will be reimbursed. ONLY FEMA DECIDES WHAT IS ELIGIBLE and REASONABLE.
3. Know the rules! (Continued …)

• LDEQ:
  – Debris management site (DMS) permit.
  – Disposal of storm-generated vegetative debris.
  – R.S. 30:2413.1

Critical documentation

CITY OF LOAD TICKET
3. Know the rules! (Continued …)

- **Leaners** (trees that lean) + **hangers** (broken limbs) + **stumps**:
  - FEMA Debris Management Guide 325.
  - October 1999 – July 2007
  - FEMA 9500 series: Specific documentation requirements beyond haul tickets.

- **Each type** of debris requires a **specific type** of documentation.
- Know what you **need to provide** to FEMA/GOHSEP.

WHO + WHAT + WHERE + WHEN + HOW MUCH!
Quantification: Reduces YOUR risk!

Best Practice/Best Protection:

How much of what did you remove?

• Some type of measurement:
  – Cubic yards
  – Tons
  – Each
  – Etc.

Check FEMA 325 Debris Management Guide for details.
3. Know the rules!

Procurement

- Procurement 44 CFR Part 13.36 or 2 CFR 215:
  - Competitive.
  - Cost reasonable or unreasonable?

Procurement (Continued …)

- Develop your own scope of work/pay items.

Procurement (Continued …)

- FEMA Fact Sheet Recovery Policy (RP)
  9580.201: Debris Contracting Guidance:
  - Applicant’s Contracting Checklist.
  - Debris Removal Contract Cost Analysis.
  - Debris Operations Contract Bid Sheet.
Debris Contracting Guidance

Overview

Unless exempted and contracting entities must use funds for debris removal, as provided in 44 CFR 206.11 or Public Assistance (PA) Grant (RP 580.04). Permission to enter the buildings for debris removal must be obtained in writing from building owners. Non-profit Public Assistance grant recipients conducting operations related to debris removal may enter non-profit contracted buildings. Non-profit contractors are required to submit claims with a notice of intent to file as provided in 44 CFR Part 136 or other Public Assistance regulation. In addition, non-profit contractors must comply with any other public assistance regulations. Public Assistance recipients should ensure that debris removal contractors comply with all applicable Federal laws and regulations.

Cost Analysis

Pursuant to 44 CFR 42.53, Public Assistance applicants must complete a cost analysis for any contract or contract modification where prior competition is lacking. Failure to complete a cost analysis may jeopardize FEMA Public Assistance grant funding. Applicants are encouraged to complete a cost analysis using the attached Debris Removal Contract Cost Analysis. Applicants are also encouraged to file documentation supporting the cost analysis with all associated contract documents.

Upon request, FEMA will provide guidance as necessary in the cost analysis process. Such a review does not constitute approval or disapproval. Deciding the eligibility of costs for reimbursement under FEMA’s Public Assistance Program.

Debris Operations Bid Sheet

The debris operations bid sheet is presented on the next three pages. The remainder of this section is intentionally left blank.
3 things to remember . . .

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3. Know the rules!
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   - Procure properly.
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   - Prove up eligibility of work.

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For more information + to download materials from today’s seminar:

gohsep.la.gov/outreach.aspx