



KEY ELIGIBILITY CONSIDERATIONS

Cost Share

Costs claimed under Section 1206 are subject to Category G local cost share.

Timeline

Public Assistance (PA) can reimburse costs for eligible work done starting on the first day of the incident period and up to 180 days following the date PA permanent work is authorized if Preliminary Damage Assessments create a lag time.

Fees and Fines

The Federal Emergency Management Agency (FEMA) will reduce the costs incurred under 1206 by the dollar amount the jurisdiction collected in permitting revenue or should have collected per the jurisdiction's policy at the time of the disaster if the jurisdiction elects to waive fees or fines post-disaster.

Eligible Labor Limitations

Only overtime for budgeted employees (in accordance with the jurisdiction's pay policy at the time of the disaster) and both straight-time and overtime for temporary hires and contractor support are eligible.

The Disaster Recovery Reform Act (DRRA) Section 1206 policy authorizes FEMA PA under Federal Major Disaster Declarations (including Categories C-G) to reimburse costs within the first 180 days after the declaration to surge staff (i.e., overtime, temporary employees, and contractor support) to process permits and effectively administer and enforce building codes and floodplain management regulations (e.g., substantial damage assessments or determinations, public outreach and education, etc.) on all building types, including residential, public, and private buildings.

Recommended Minimum Steps to Maximize Funding

Assess Immediate Needs

- Designate a person and/or team responsible for implementing and managing 1206 efforts. The team can largely be contractor surge support if needed, but at least one person on the team should be a jurisdictional employee.
- Review building code, permitting, substantial damage/substantial improvement, and National Flood Insurance Program (NFIP) requirements. FEMA NFIP is expecting a proactive and multifaceted approach to code enforcement and substantial damage determinations.
- Roughly estimate the number of permits that will need to be processed, the number of substantial damage determinations, and what proactive code enforcement and outreach/education activities the jurisdiction will complete.
- Estimate total staffing needs to complete these tasks within 180 days after declaration.
- Identify staff gaps and identify solutions to fill gaps (e.g., contract support, temporary employees, overtime if permitted with the jurisdiction's pay policy at the time of the disaster).
 - If utilizing contractor support, ensure the vendor is aware of the documentation and details required within their invoices.

Document Activities and Isolate Costs

- Develop documentation and cost tracking process specifically for disaster-related activities that are separate from regular activities. FEMA will require documentation showing each penny spent was exclusively on damages related to the disaster.
- Train all staff on documentation processes and where to save or how to label disaster-specific activities.

Document Activities and Isolate Costs (Continued)

- Assign a Quality Assurance Reviewer to review documentation to ensure documentation procedures are adhered to. Provide ongoing feedback and training.
 - Ensure all costs incurred and permit revenue collected from disaster activities that will be claimed under 1206 are isolated.

Conduct Community Outreach and Internal Training

- Identify and deliver any internal training needs.
- Develop multifaceted (e.g., door-to-door outreach in high-impact areas, social media, traditional media, etc.) and multi-lingual community outreach plan informing the public of:
 - the permitting process;
 - how to proactively request substantial damage determinations;
 - code enforcement actions the jurisdiction will be taking;
 - how to avoid being taken advantage of by unscrupulous repair contractors; and
 - how to report any unscrupulous repair contractors.

Compile and Submit Expenses for FEMA Reimbursement

- After your FEMA PA Exploratory Phone Call, ensure a damaged inventory line item is added specifically for 1206 costs.
- Submit costs and backup documentation within the FEMA Grants Portal.

Examples of Backup Documentation

The examples below are not a fully inclusive list of all the documentation that FEMA requires.

- Timesheets with activity descriptions identifying work was related to disaster damages, location of work, and legally required under local, state, or federal ordinance or floodplain management requirements.
- Vendor invoices that include backup documentation identifying specifically which disaster-related activity was completed and the location of work.
- Jurisdiction's pay policy demonstrating overtime eligibility.
- Procurement backup documentation demonstrating compliance with the jurisdiction's procurement policy, the state's procurement regulations, and 2 CFR Part 200.
- Community's legally adopted building and floodplain ordinances.

ADDITIONAL RESOURCES

- [DRRA 1206 FEMA PA Policy](#)
- [DRRA 1206 FEMA Flyer](#)