The Federal Emergency Management Agency (FEMA) and California Governor’s Office of Emergency Services (Cal OES) are accepting grant application submissions from the City and County of San Francisco (City), on a rolling basis, for costs eligible as COVID-19 Emergency Work, under FEMA and Cal OES Public Assistance programs. **For these cost recovery requests to be complete and successful, each department must prepare and submit personnel and non-personnel costs to the Controller’s Office Cost Recovery Branch (staffed by the CSA-Audits team).**[[1]](#footnote-2)

Each department can expect to receive a proportional share of its *FEMA*-*eligible costs*, based on an anticipated recovery rate of 93.75 percent[[2]](#footnote-3). Further potential recoveries will be based on eligible volunteer hours and donated materials creditable against the City’s 6.25 percent local cost share. To maximize the amounts recovered and minimize the risk of disallowance, your department must follow proper procurement rules and procedures and record all costs in PeopleSoft. You must retain summary and supporting cost documentation and provide it to the Controller’s Office Cost Recovery Branch, as specified in this document.

# **Document Purpose**

This document provides requirements and guidance for your department to submit non-personnel costs to the Controller’s Office Cost Recovery Branch. For each expense type below (as applicable to your department), please be prepared to provide summary costs and supporting detail for:

* Equipment Costs
	1. Use of City-owned equipment
	2. Rented equipment
	3. Equipment purchases (generally recoverable on a proportional basis of the life of the equipment)
* Materials Costs
	1. From your department’s stock
	2. Materials purchases (under term contracts, Prop. Q, or in accordance with Chapter 21 Emergency Purchasing provisions)
* Contracted Costs
	1. Commodities and General Services
	2. Professional Services
* Other Costs

# **Accounting for Non-Personnel Costs**

Your department must account for all non-personnel costs related to COVID-19 Emergency Work. Refer to this [memorandum](https://sfcontroller.org/sites/default/files/Documents/SFPreparedness/Memo%20-%20FY%202019-20%20-%20Local%20Emergencies%20-%20Accounting%20for%20Personnel%20%26%20Non-Personnel%20Costs%2020190917%20FINAL%20Signed.pdf) for general instructions.

FEMA allows the City to use new and existing noncompetitively procured contracts to protect public health and safety. Additional guidance, including procurement under exigent or emergency circumstances is provided [here](https://www.fema.gov/media-library-data/1584386517416-40bc24e5a2c4154c1ee44ed143e6491b/Procurement_During_EE_Circumstances_Fact_Sheet_508AB.pdf).

Please use the [Emergency Projects & Cost Recovery dashboard](https://epuobi-bifrost.sfgov.org/analytics/saw.dll?Dashboard) on SF Reports & Analytics to obtain summary reports on non-personnel costs for your department. You can submit these reports as summary documents for the COVID-19 costs your department has incurred.

# **Noncompetitive Procurement**

For the duration of the City’s Public Health Emergency, the use of new and existing noncompetitively procured contracts is allowable when an exigency or emergency exists, and competitive sourcing would preclude meeting the exigency or emergency. FEMA defines these terms as follows:

* ***Exigency*** – A situation in which there is a need to avoid, prevent, or alleviate serious harm or injury—financial or otherwise—to the City.
* ***Emergency*** – A situation in which there is a threat to life, public health or safety, or improved property requiring immediate action to alleviate the threat.

Emergency procurement must comply with the San Francisco Administrative Code, Section 21.15, and costs must be reasonable. For further information regarding procurements under Exigent or Emergency circumstances, refer to [FEMA rules and guidance](https://www.fema.gov/media-library-data/1584386517416-40bc24e5a2c4154c1ee44ed143e6491b/Procurement_During_EE_Circumstances_Fact_Sheet_508AB.pdf).

# **Cost Recovery Submittals, Non-Personnel Costs**

To facilitate biweekly submission of Public Assistance claims to FEMA and Cal OES, your department must provide non-personnel cost information to the Cost Recovery Branch following each pay period end, in conjunction with Personnel Costs. To do so, please:

* Upload, by the Friday after pay day, all new (not already submitted to the Cost Recovery Branch) summary costs and supporting documentation for each of the expense types below (applicable to your department) that your department classifies as COVID-19 Emergency Protective Measures costs (that is, Activity Code 0001) to the ShareFile folder created for your department. Please obtain the non-personnel costs report for your department from SF Reports & Analytics and upload this to the ShareFile folder.
* Ensure that you have the necessary supporting documentation for all non-personnel costs summarized in the report. (See the next section for supporting documentation requirements and guidance.) Upload this documentation to the respective ShareFile folder along with any other supporting documentation. Note the ShareFile folders for:
	+ *Equipment Costs*
	+ *Materials & Supplies Costs*
	+ *Contract Costs*
	+ *Other Costs (any non-personnel costs that do not fit in the above categories)*

# **Documentation Requirements**

Refer to the following checklists for required summary costs, supporting documentation, and detail. All costs must relate directly to COVID-19 response.

# **Equipment Costs**

1. Force Account (City-owned) Equipment

*Supporting Documentation*

* Local Subsystem-generated Reports, Logs, or Other Records

*Required Detail*

* Description of Work Performed for COVID-19 Emergency Response
* Equipment Type & Size
* Capacity
* Horsepower
* Make
* Model
* Equipment Number
* Operator Full Name
* Operator Dates Worked and Number of Hours Daily

Optionally, you may use FEMA Form 009-0-127 – Force Account Equipment Summary Record (in [PDF](https://www.fema.gov/media-library-data/1591810809664-9f07d59dcfe9e0dce65ac9d92aa6caa7/June9-FEMA_Form_009_0_127_FAE.pdf)) to report this information.

1. Rented Equipment

*Summary Costs*

* SF Procurement or Emergency Projects & Cost Recovery Dashboard

*Supporting Documentation*

* ICS 213 RR – Resource Request (if available)
* Supplier Invoice
* Proof of Payment (include P-Card statement if paid with a P-Card)
* Receipt

*Required Detail*

* Description of Work Performed for COVID-19 Emergency Response
* Equipment Type & Size
* Capacity
* Horsepower
* Make
* Model
* Dates and Hours Used
* Hourly Rate (specify whether with or without operator)

Optionally, you may use FEMA Form 009-0-125 – Rented Equipment Summary Record (in [PDF](https://www.fema.gov/media-library-data/1591810809493-9f07d59dcfe9e0dce65ac9d92aa6caa7/June7-FEMA_Form_009_0_125_Rented_Equipment.pdf)) to report this information.

1. Purchased Equipment

*Summary Costs*

* SF Procurement or Emergency Projects & Cost Recovery Dashboard

*Supporting Documentation*

* ICS 213 RR – Resource Request (if available)
* Justification for Purchase (see notes below) for COVID-19 Emergency Response
* Supplier Invoice
* Proof of Payment (include P-Card statement if paid with a P-Card)
* Receipt

*Required Detail*

* Description of Work Performed for COVID-19 Emergency Response
* Equipment Description

Note:

* + If the City has insufficient equipment to effectively respond to the incident, FEMA will pay for the purchase price of equipment.[[3]](#footnote-4)
	+ Justification must demonstrate why City had to buy equipment rather than use existing City-owned equipment or rent equipment (an e-mail with narrative is acceptable).

# **Materials & Supplies Costs**

1. From Existing Stock

*Summary Costs*

* SF Procurement or Emergency Projects & Cost Recovery Dashboard

*Supporting Documentation*

* ICS 213 RR – Resource Request (if available)
* Inventory Records (if available)
* Original Purchase Order(s), Supplier Invoice(s), Proof(s) of Payment, and Receipt(s) (if available)

*Required Detail*

* Description of Work Performed for COVID-19 Emergency Response
* Description of Materials or Supplies Used
* Quantity Used
* Unit Cost
* Date Used

Note:

* If invoices are unavailable, quantify the unit cost based on historical data or prevailing market rates.
1. Purchased Materials & Supplies

*Summary Costs*

* SF Procurement or Emergency Projects & Cost Recovery Dashboard

*Supporting Documentation*

* ICS 213 RR – Resource Request (if available)
* Purchase Order (if applicable)
* Supplier Invoice
* Packing Slip
* Proof of Payment (include P-Card statement if paid with a P-Card)
* Receipt

*Required Detail*

* Description of Work Performed for COVID-19 Emergency Response
* Description of Materials or Supplies Used
* Purchase Order
* Quantity Used
* Supplier
* Date Used
* Proof of Payment (include P-Card statement if paid with a P-Card)

Optionally, you may use FEMA Form 009-0-124 – Materials Summary Record (in [PDF](https://www.fema.gov/media-library-data/1591810809404-9f07d59dcfe9e0dce65ac9d92aa6caa7/June6-FEMA-Form-009_0_124_Materials.pdf)) to report this information.

# **Contract Costs**

*Summary Costs*

* SF Procurement or Emergency Projects & Cost Recovery Dashboard

*Supporting Documentation*

* Contract (including signature pages, scope of work, amendments, change orders, and copies of required insurances)
* Description of Goods or Service Procured for COVID-19 Emergency Response
* Supplier Invoice
* Notice of Completion (if applicable)
* Proof of Payment (include P-Card statement if paid with a P-Card)
* Receipt

Note:

If a new contract (or amendment or change order to a pre-COVID-19 contract) was awarded:

* Include solicitation, and proof of three bids (if applicable) or
* If noncompetitive procurement methods were required, provide written justification of the exigency or emergency and why circumstances necessitated a noncompetitive procurement. An e-mail with narrative is acceptable.

**Other Costs**

For any other costs, please submit the following documentation (if applicable).

*Examples of Summary Costs*

* SF People & Pay
* SF Financials
* SF Procurement
* Emergency Projects & Cost Recovery Dashboard

*Examples of Supporting Documentation*

* Description of Work Performed for COVID-19 Emergency Response
* Purchase Order
* Supplier Invoice
* Packing Slip
* Proof of Payment (include P-Card statement if paid with a P-Card)
* Receipt
1. The Controller’s Office is the City’s authorized agent for federal and state disaster assistance funding. [↑](#footnote-ref-2)
2. This includes an anticipated 18.75 percent reimbursement from the state, however, California Office of Emergency Services has not activated the California Disaster Assistance Act yet, so only up to 75% of eligible costs may be reimbursed. [↑](#footnote-ref-3)
3. At the end of the emergency response period, the City must provide to FEMA the fair market value of any purchased equipment valued at more than $5,000 and with a useful life or more than one year. FEMA reduces the City’s eligible funding by this fair market value. [↑](#footnote-ref-4)