

Disaster Procurement and Expense Documentation Local Government Purchasing Officers Best Practices

Listed below are suggested best practices offered by North Carolina local government purchasing officers to help ensure compliance with Uniform Guidance (2 CFR Part 200) procurement requirements in disaster contracting and document expenses for FEMA Public Assistance reimbursement.

PROCUREMENT COMPLIANCE

- Educate your department heads on Uniform Guidance procurement requirements (ex: \$10,000 federal micropurchase threshold compared to state \$30,000 informal bidding threshold).
- Create a “UG Checklist” for all department heads and other personnel who have contracting authority to use to for each procurement.
- Have your attorney develop boilerplate template for required contract provisions (2 CFR Part 200, Appendix II).
- Check cost reasonableness of purchases by using the SOG purchasing officer’s listserv to compare pricing.
- Save all cost reasonableness online price comparison research to your procurement file – you never know when you will get audited.
- Where you can, preposition contracts following all UG requirements.
- Bookmark the FEMA PDAT website: <https://www.fema.gov/procurement-disaster-assistance-team>
- Create a separate file for disaster procurements to save procurement process documentation (ex: solicitation, MWBE/HUB outreach, bids, bid tabs, contract, etc.).
- Post bids on state HUB Office website for MWBE/HUB outreach efforts: <https://ncadmin.nc.gov/businesses/historically-underutilized-businesses-hub/submit-bid-opportunity-hub>
- Post bids on State IPS website for broader solicitation: <https://files.nc.gov/ncdoa/pandc/Documents/IPS/PostingBidsPresentation.pdf>



DOCUMENTING EXPENSES FOR FEMA REIMBURSEMENT

- Create a shared folder on your service for all staff involved in disaster recovery to save documentation in one place.
- Train staff who are incurring expenses (making purchases, driving vehicles, etc.) on how to fill out paperwork documenting expenses.
- Create separate project code/account number for the disaster in your finance system – this makes it easier to track disaster-related expenses.
- Set up separate fund with separate account number within your General Fund so you can track all expenditures.
- Have dedicated P-Cards to use just for the disaster – this makes it easier to track receipts for disaster-related purchases.
- Learn how to use the FEMA Grants portal so you can submit your documentation and reimbursement requests yourself and do so correctly – this saves on having to submit information you forgot the first time (or didn't know was required).
- Learn the rules for reimbursement so you can advocate for yourself and get more FEMA dollars; ask for help from your FEMA or State Public Assistance grants manager.
- Ask lots of questions and push for examples on how to document expenses, submit reimbursement requests, and properly describe expenses so they don't be denied.
- Bid projects with mitigation alternates to show FEMA the cost-benefit of mitigation measures (only applicable to permanent work projects – FEMA PA Categories C-G).
- Document expenses as you go along – it is very hard to recreate documentation later (ex: vehicle mileage – create vehicle log specific for the disaster event and have personnel who drive the vehicle fill out mileage log each time they turn the vehicle back in).
- Document expenses in excel spreadsheet and then transfer totals to FEMA reimbursement form – this makes it easier to add up total costs in each expense category since FEMA forms are pdfs and don't auto-calculate totals.
- Use excel spreadsheet to track expenses and include column for notes to document how each expense was related to the disaster.
- Write notes on receipts and invoices as they are turned in so you can remember what the purchase was for and how it is related to the disaster event (ex: "Sanitizer equipment; sanitizing public lobby; COVID-19 response").



- Keep track of insurance proceeds and other sources of disaster funding (like private grant or other federal funds) to avoid duplication of benefits – remember, FEMA is funder of last resort.
- Set regular schedule for submitting reimbursement requests for Category B expenses (emergency protective measures) so you don't have to do it all at one time at the end of the disaster (ex: submit overtime each time payroll is processed). For small jurisdictions, this can help with cash flow.
- Respond quickly to requests for more information from FEMA or the State; the longer you wait to respond, the longer it will take for FEMA and the State to process your reimbursement request.