Finance Section Chief

ICS Institute  ●  August 12-16, 2019  ●  Philadelphia, PA
In consideration of your fellow students and the instructors, please silence all cell phones.

Lecture 1

Finance Section – Introduction

Philadelphia, PA
August 13-16, 2019

Instructor Introduction

Russell Harmon  U.S. EPA Region 10
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EPA FSC History

FSC Workgroup Development Team (post Katrina)
FSC National Workgroup
Purpose of Course

To provide training to agency personnel to develop and understand the skills necessary to perform as a Finance Section Chief on an Incident Management Team (IMT) in compliance with the direction and standards described in the National Incident Management System (NIMS).

Incident Management Team

Finance Section Overview

Finance/Admin Section

- Time Unit
- Procurement Unit
- Cost Unit
- Funds Certifying Official
- Field Accountant
- Compensation / Claims Unit

Equipment Time Recorder
Overall Course Objectives

- Common responsibilities and the Planning Cycle
- Funding Sources
- Key Responsibilities for each Finance Section Unit
- Discuss the Resource Requesting/Ordering process
- Discuss the Procurement process
- Discuss interaction and coordination with other units
- Discuss Demobilization

Course Materials

- Course Agenda
- Student Manual (electronic)
- Student Registration Card
- Student Evaluation Form

EPA Training, Qualification, and Certification Order

- In October 2016, EPA Order #2073 was signed to ensure EPA personnel are appropriately trained, qualified and certified to serve in a Key Leadership Position (KLP)
- EPA IMT and National IMAT positions will be filled only by personnel who are trained and meet Core Competencies & Professional Experience for the position (see Appendix 1 of Order #2073)
  - To ensure interoperability of EPA's NIMS personnel in an multi-agency ICS structure
Training Requirements (in order)

- Independent Study (IS) 100, 200, 700, and 800; offered online at: https://training.fema.gov/emiweb/is/crsresource/trainingmaterials.htm
- ICS 300 & 400 level (see trainex.org for offerings)
- This KLP training course
- Recommended: EPA 420 (simulated exercise)

Appendix 1 of Order #2073

FSC Qualifications

To perform the functions of the FSC effectively, personnel assigned should:
- Have three years of applicable professional experience
- Qualifications equivalent to those for each unit leader
- Document participation in exercises (e.g. Regional IMT), events or actual incidents while serving in your KLP
- Ensure you meet Core Competencies & Professional Experience identified for your KLP in Appendix 1 of Order #2073
Certification Process

► Fill out “Nomination for Qualification and Certification of NIMS Duties” form
  • Found at: https://response.epa.gov/NIMSIntegrationTeam
  • Fully complete and get required signatures from your supervisor and HQ/regional NIMS Coordinator
  • Have NIMS Coordinator or Data Manager enter the certification into the Field Readiness module, found at emp.epa.gov
► Must re-certify every 5 years

Student Introduction

Get to know your classmates. This is your Finance Section support group.
Initial Response

"Hello, Cindy. What are you doing for the next few weeks?"
"Great, can you help with finance?"

Hidden meaning . . .
You're the Finance Section Chief

Lecture Objectives

- Common Responsibilities
- Finance Section Responsibilities
- Considerations for Successfully Managing & Operating the Finance Section
- Finance Section's input into the Planning Cycle (Planning P), meetings, and briefings
Common Responsibilities

Functions that are applicable to all personnel that respond to an incident.

- Receive job assignment (e.g., Finance Section Chief)
- Receive reporting location, time, and travel instructions
- Review EPA Incident Management Handbook (IMH) and deployment, documentation, and demobilization plans.
- Review documentation & communications instructions (e.g., KLP email addresses, Response.epa.gov, SharePoint, etc.)

Finance Section Responsibilities

Functions specific to finance:

- Secure and administer funding sources
- Coordinate funding sources with ESF-10 representative located at the JFO for Stafford Act responses
- Provide financial and cost input for all planning meetings
- Provide financial input to the SitRep
- Review and sign all resource requests (213 RRs)
- Provide guidance to incident personnel for time, travel, costs, procurement (including resources requests and ordering)

Considerations for Successfully Managing & Operating the Finance Section

- You’ll interact the most with the LSC and PSC (including RESL and SITL)
- You have shared responsibilities with the LSC, so you should try to locate your section near them
- Identify the key functions you must perform (i.e., time, travel, costs, procurement including resource requests & ordering, attend meetings/briefings, etc.). Coordinate this with the LSC.
- Ensure you have staff with correct qualifications to perform the functions
- Develop timelines for completing functions
- COMMUNICATE, COMMUNICATE, COMMUNICATE
Operational Period Planning Cycle

- During the initial stages and throughout the response, the planning cycle is used to effectively plan and administer the response.
- The planning cycle is described using the “Planning P.”
- The Finance Section has direct/indirect activities associated with the different phases of the “Planning P.”
Initial Response & Assessment

Initial phase of the response that's usually one operational period.

- Financial activities:
  - Assess situation
  - Receive IC/UC brief
  - Activate Finance Section
  - Organize and brief subordinates
  - Acquire work materials
  - Forecast requirements

Incident Briefing (ICS-201)

This is the initial briefing and the ICS-201 can be used as the initial IAP.

- Finance activities:
  - Current overview
  - Anticipated Finance Section activities
  - Indication of required support
  - Determine funding source and estimate initial ceiling

Command & General Staff Meeting

This is the meeting where the IC provides overall direction.

- Finance activities:
  - Receive direction, limitations, constraints.
  - Get clarification on decisions, objectives, priorities, procedures and functional assignments.
  - Provide feedback on focus/direction
  - Discuss interagency issues
  - Discuss resource requesting, approval, and ordering process
  - Discuss funding source & ceilings
  - Discuss Finance Section needs
**Tactics Meeting**

This meeting is used by the OSC & PSC to discuss tactics for completing the IAP objectives and discuss progress.

- **Finance activities:**
  - Review proposed tactics
  - Identify funding needs and shortfalls (look at ICS-215 – Operational Planning Worksheet)

**Planning Meeting**

This meeting is used to define incident objectives, strategies, and tactics and identifies resource needs for the next operational period.

- **Finance activities:**
  - Brief (as needed) on funding sources, ceilings, burn rates, contract issues, etc.
  - Verify that we can support the upcoming plan.

**Incident Action Plan (IAP) Preparation and Approval**

KLPs prepare their input for the IAP components in time for IC/UC review and new operational period.

- **Finance activities:**
  - Verify financial requirements for IAP, if any.
  - Normally provide financial input to SitRep (ICS-209) instead of IAP.
Operations Briefing

Presents the IAP to the Operations Section oncoming shift supervisors (if needed)

- Finance activities:
  - Brief on funding issues (if needed)

Lecture Summary

At the conclusion of this unit, are you now able to:

- Common Responsibilities
- Finance Section Responsibilities
- Considerations for successfully managing & operating the Finance Section
- Finance Section's input into the Planning Cycle (Planning P), meetings, and briefings
- Communicate
Unit Objectives

Identify information to exchange with other incident personnel, within EPA and/or Unified Command (UC) or other agencies, for effective coordination and interaction.

- EPA Host (affected)/Home Region
- Other Finance Section Chief (FSC) with the Area Command environment
- FEMA
- USCG
- Other Federal, State and Local agencies

Unit Objectives

Describe FSCs responsibilities in regards to:

- Planning Meeting
- Command and General Staff Meeting
- Section Meetings
- Incident Action Plan (IAP)
- Operational Period Briefing
- Tactics Meeting is recommended (if allowed)
Interaction and Coordination Incident Commander

- Funding
- Personnel/resources
- Procurement
- Reporting

Interaction and Coordination

- FSC effectively communicates and coordinates with:
  - Command and General Staff
    - Planning Section Chief (PSC)
    - Operations Section Chief (OPS)
    - Logistics Section Chief (LSC)
    - Public Information Officer (PIO)
    - Safety Officer (SO)
    - Liaison Officer (LNO)
  - Responders (Incident Personnel)
  - Agency Admin Rep/Host Region
  - Home Region

Interaction and Coordination Planning Section

- FSC will obtain:
  - Status of deployed/demobed employees for Cost Projections
- FSC will provide:
  - Financial information for IAP/SitRep
  - Input into Demobilization Plan
  - Information to newly arrived personnel
  - ID Finance section resources for release
  - IAP Printing
Interaction and Coordination Operations Section

FSC Will
- Obtain:
  - Resource information for cost projections
  - Claim information
  - Information on additional contractor resources ordered from field
- Provide:
  - Cost information/projection to OPS as requested
  - Establish 1900-55 approval process

Interaction and Coordination Logistics Section

FSC will:
- Obtain information:
  - on facility, support, and property requirements
  - to develop Incident Procurement Plan
  - on goods/services ordered and received
  - ID non-tactical equipment for release or reassignment
- Provide information:
  - on goods/services ordered
  - regarding incident contracts and agreements
  - Regarding property accountability

Interaction and Coordination Public Information and Liaison Officer

FSC will provide:
- Information as requested
- Printing Procurement
  - Government Printing Office Process
Interaction and Coordination Safety Officer

- FSC will obtain:
  - Information regarding EPA employee illness and injury
  - Information concerning safety matters such as excess work hours or site conditions

Interaction and Coordination Incident Personnel

- Information exchange with all Incident personnel:
  - Pay, Time and Travel information
    - Premium pay issues
    - Time/Travel Voucher submission requirements and procedures
  - Worker’s Compensation/Claims

Interaction and Coordination Host Region

- The FSC should:
  - Coordinate:
    - All-inclusive waiver to lift bi-weekly pay cap
    - With host region on the Incident Procurement Plan
    - With host region regarding any claims
    - And participate in final closeout and review incident finance package
  - Obtain information regarding contractor resources deployed
  - Participate in briefing with host comptroller as requested
  - Provide timely information for the SitRep issues, concerns, and progress of section
Interaction and Coordination Home Region

- The FSC should:
  - Coordinate:
    - account charging in PeoplePlus
    - approval of travel authorization and travel vouchers with home region
    - with home region regarding any claims and employee issues
  - Provide information:
    - on lodging waivers/restrictions
    - on pay-cap waivers
Lecture 4 – Finance Section Chief
*Time Unit Leader (TIME)*

**Lecture Objectives**
- Qualifications
- Key Responsibilities

**Finance Section Overview**
Qualifications

- ICS 100-400 certified
- Have knowledge/experience with:
  - EPA Systems (e.g., People Plus, Concur, CDW, CBOR, OBIEE, WebEOC i.e., PRL)
  - Timekeeping and Travel Policy/Procedures (e.g., EPA Time & Attendance Policy, OPM Regulations, Federal Travel Regulations)
  - Pay Cap Waiver Process

Key Responsibilities

- Establish charging/recording procedures
- Communicate charging/recording procedures with all employees
- Collect, reconcile, and distribute time-in/time-out logs and timesheets (includes ensuring logs & timesheets are signed)
- Brief FSC on problems, issues, and follow-up requirements

Charging/Recording Procedures

- Create a charging/recording guide.
- The guide should include the following:
  - Incident specific work codes to charge.
  - Procedures to charge/record time on the time-in/time-out log, timesheet, and PeoplePlus.
  - Procedures to allocate time for trust vs non-trust funds
  - Procedures for requesting OT
  - Procedures for travel
  - Procedures for requesting pay cap waivers
Charging/Recording Procedures (cont.)

- Incident specific work codes.
  - Must have a signed mission assignment for Stafford Act responses.
  - Must prepare and submit a reservation of funds (RF) request in Compass.
  - Establish reimbursable authority and budget organization codes in Compass (Cincinnati).
  - Establish the work codes in Compass (OCFO/OC).
  - Load work codes in PeoplePlus profile (PPL coordinators).

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Charging/Recording Procedures (cont.)

- Example of work codes in charging/recording guide.

<table>
<thead>
<tr>
<th>Project/Work Code</th>
<th>Activity</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>V69681400226</td>
<td>Build Assignment</td>
<td>2021-09-07</td>
<td>2022-03-01</td>
</tr>
<tr>
<td>V69681400226</td>
<td>Build Assignment</td>
<td>2021-09-07</td>
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<td>Build Assignment</td>
<td>2021-09-07</td>
<td>2022-03-01</td>
</tr>
</tbody>
</table>

- Procedures to charge/record time on the time-in/time-out log, timesheet, and PeoplePlus.
  - Time-in/time-out logs should be prepared each operational period (get from WebEOC PRL).
  - Timesheets should be prepared each pay period.
  - Time should be entered daily for time logs, timesheets and PeoplePlus.
Charging/Recording Procedures (cont.)

- WebEOC
  - WebEOC is a web-based crisis management system designed for supporting the ICS method of response management for significant incidents, in addition to providing a unique toolset for supporting Daily Operations in the Regional Response Centers and the HQ Emergency Operations Center.
  - WebEOC can be accessed from the OSC Response website (response.epa.gov), and can be requested through RESL.
  - Request access to the Personnel Resource Log (PRL).

Charging/Recording Procedures (cont.)

- Accessing WebEOC from the OSC Response home page.

Charging/Recording Procedures (cont.)

- Example of time-in/time-out log from PRL.
Charging/Recording Procedures (cont.)

Example of timesheet.

<table>
<thead>
<tr>
<th>Date</th>
<th>Time In</th>
<th>Time Out</th>
<th>Time</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/1/20X1</td>
<td>08:00</td>
<td>09:00</td>
<td>01:00</td>
<td>Regular Time</td>
</tr>
<tr>
<td>1/1/20X1</td>
<td>09:00</td>
<td>10:00</td>
<td>02:00</td>
<td>OT</td>
</tr>
<tr>
<td>1/1/20X1</td>
<td>10:00</td>
<td>11:00</td>
<td>03:00</td>
<td>Regular Time</td>
</tr>
</tbody>
</table>

Charging/Recording Procedures (cont.)

Procedures to allocate and record time for trust vs non-trust funds:

- All OT and travel is reimbursable under Stafford Act (FEMA) for trust & non-trust fund accounts as well as regular time for trust funds (44 CFR 206.8).
- Employees with trust fund accounts (e.g., Superfund, Oil, LUST) can charge regular and OT to the response.
- Employees with non-trust fund accounts (e.g., EPM, Science & Technology) can only charge OT.

Charging/Recording Procedures (cont.)

An employee’s trust vs non-trust percentage allocation is determined from their HR work code account allocation.
- The trust vs non-trust percentage always equals 100%.
- You can look up the allocation percentage using the "Employee Payroll Setup Report" in CDW, or the Payroll Activity Query in Compass.
- For the R9 fire response, I created an Excel pivot table showing each employees allocation percentage using the Payroll Activity Query.
Charging/Recording Procedures (cont.)

- Example of charging/recording instructions for allocations.

Charging to FEMA WIs must occur based on FEMA charging guidelines (see attachment D). Each WI work code has one or more accounts, and WI time charging is dependent on your WI work code account distribution. For example, below are WI work code terms: 1) "HSC" has four accounts that make up the work code. Some of the accounts are trust funds, or Superfund, or ESF, and the remaining amount is non-trust fund, or EPA, or certain others. This example is for the "SITL" WI work code.

- Instructions on charging/recording instructions for allocations.

Charging to FEMA WIs must occur based on FEMA charging guidelines (see attachment D). Each WI work code has one or more accounts, and WI time charging is dependent on your WI work code account distribution. For example, below are WI work code terms: 1) "HSC" has four accounts that make up the work code. Some of the accounts are trust funds, or Superfund, or ESF, and the remaining amount is non-trust fund, or EPA, or certain others. This example is for the "SITL" WI work code.

- Recording time for 100% non-trust allocation.

Example:
The following example shows the proper timecard entry for an employee whose WI work code has 100% non-trust fund accounts (i.e., EPA, RRF). The employee must charge all regular hours to their WI work code, and all overtime hours to the FEMA WI code. The regular hours must include the 8438 (RRF) subproject code "NHSI" in the Comments section on the timecard.

- Recording time for 75% trust/25% non-trust allocation.

Example:
The following example shows the proper timecard entry for an employee whose WI work code has both trust fund (i.e., Superfund, RO LUST) and non-trust fund (i.e., EPA, RRF) account numbers. Only the percentage of trust fund hours and all overtime hours should be charged to the appropriate FEMA WI code. The percentage of non-trust fund hours must be charged to the WI work code with the FEMA WI subproject code "NHSI" entered in the Comments section on the timecard.
Charging/Recording Procedures (cont.)

- Procedures for Requesting Overtime (OT):
  - Request using EPA Form 2560-7 prior to deployment.
  - Example of instructions for OT requests:
    - Should you charge regular comptime instead of OT?
    - Can you use PeoplePlus to submit your OT requests?

Charging/Recording Procedures (cont.)

- Procedures for Travel:
  - The employee’s home region will prepare the travel, and uses a crossfunding account, which Cincinnati must add.
  - The host region (not the FSC) verifies the accounting in Concur using the crossfunding account.
  - The crossfunding account and accounting string is sent to the deploying employee via the deployment notice (email).
  - Waivers may be needed when exceeding 150% of maximum per diem, when trip expenses exceed $5,000, and 50-mile local travel. Watch for FEMA waivers.

Charging/Recording Procedures (cont.)

- Example of travel preparation instructions.

Section B. Travel

For Region 9 staff, travel authorizations (TAs)/Vouchers (VTs) will be completed by the individual employees who travel, not Region 9 staff. Account numbers will be provided by the Region 9 FSC staff based on assigned FSCM work. Travel/TAV will go through the supervisor’s normal routing for approval/submitting.

Region 9 staff whose duty station is the San Francisco Regional office will need to include Attachment B (Region 9 Memo 595-08-01 Re: Voucher for Lodging – 2017 National Park 1040-16-1-2) for any expense related lodging expenses within 50 miles of the regional office.

When submitting TA’s, Region 9 staff who’s lodging recommendations exceed 100% of the allowed lodging cost must include Attachment B (Region 9 Memo 595-08-01 Re: Voucher for Lodging – 2017 National Park 1040-16-1-2). Region 9 staff who’s travel expenses exceed $5,000 must include Attachment C (Region 9 Memo Expenses Exceeding $5,000 – 2017 National Park 1040-16-1-2).

For non-Region 9 staff, travel will be completed by their home region. The Region 9 FSC will provide a cross-funding account number that will be added to the TA by the Cincinnati Finance Center, either by emailing FSCM_DMSFunds@epa.gov or calling the helpdesk at (513) 427-2946.

When submitting TA’s, non-Region 9 staff who’s lodging recommendations exceed 100% of the allowed lodging cost must include Attachment B. Non-Region 9 staff whose travel expenses exceed $5,000 must include Attachment C.

All employees are responsible for maintaining their TA and TAV is complete (MM/DD/YYYY and avoid duplicate payments to the travel card, submit all the information and necessary documentation (e.g., receipts, travel waiver memo), and doing their vouchers MONDAY within 5 business days of the end of the travel.)
Charging/Recording Procedures (cont.)

- Example of deployment travel instructions.

TRAVEL AUTHORIZATION: To approve or deny any travel expense, please contact your Finance Section Chief (FSC) at least 5 days in advance of the travel date or within 2 business days of the travel request. For each项, you must provide a detailed description of the travel expense and the expected costs. The FSC will review the request and provide a response within 2 business days.

- Example of pay cap request spreadsheet.

<table>
<thead>
<tr>
<th>Name</th>
<th>Project Code</th>
<th>Pay Cap Request</th>
<th>Date of Request</th>
<th>Loss Amount</th>
<th>Payment Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane Smith</td>
<td>123456</td>
<td>$5000</td>
<td>01/01/2023</td>
<td>$1000</td>
<td>Wire Transfer</td>
</tr>
</tbody>
</table>

This spreadsheet is used for tracking pay cap requests and ensuring timely processing. All data is subject to review and approval by the FSC.

Charging/Recording Procedures (cont.)

- Current procedures for request pay cap waivers:
  - Each region will submit a request through their HR office who signs and forwards to the host region.
  - Host region forwards the request to the designated SSC for signature and entry into the OCFO SharePoint site.
  - OCFO then enters the coding in PeoplePlus to lift the pay cap.
  - FSC tracks the status of waivers using an Excel spreadsheet.
  - This process will be decentralized in the future, and administered by each region.
Charging/Recording Procedures (cont.)

- Example of pay cap waiver tracking spreadsheet.

Communicate procedures

- Use PRL to track deployments, and create email lists for distributing procedures and other important messages to employees.
- Work closely with the LSC to create a deployment package and/or deployment email notifications on procedures for time and travel.
- Identify key personnel (e.g., comptrollers, FMOs, PeoplePlus and travel coordinators, etc) in each home region that can provide assistance with time and travel.

Communicate procedures (cont.)

- Example of email to deploying employees about charging/recording procedures.
Lecture 4- Time Unit Leader (TIME)

Time - collect, reconcile, and distribute

- Collect time-in/time-out logs daily
- Collect copies of timesheets each pay period
- Reconcile time logs to timesheets
- Who should sign time logs and timesheets?
- Should time logs and timesheets be submitted to the timekeeper/time supervisor in the home region?
- Who should be responsible for reconciling timesheets to PeoplePlus?

Lecture Summary

At The Conclusion Of This Unit, Are You Now Able To?:

- Qualifications:
  - Understanding and access to EPA system (PPL, Concur)
  - Understanding of time and travel policies/regulations
  - Understanding of the pay caps and the waiver process
- Key responsibilities
  - Establish and distribute guidance
  - Manage time-in/time-out logs and timesheets
  - Keep the FSC updated on any issues
Lecture 5
Finance Section Chief
Funds Certifying Official (FUND)

Finance Section Overview

FUND Lecture Objectives
- Define qualifications
- Describe key responsibilities
- Discuss FUND flowchart
The Funds Certifying Official (FUND) is responsible for funding all aspects of the response.

FUND Qualifications
- Be a certified Funds Control Officer (FCO)
  - Have knowledge/experience/access to EPA's accounting, systems and policies
    - Systems (e.g., Compass, EAS, CDW, CBOR)
    - Spreadsheets
    - Reimbursable (e.g., FEMA Mission Assignments, IA's)
- ICS 100-400 certified (helpful)

FUND Key Responsibilities
- Understand CERCLA, OPA, and ESF-10 funding process
- Ensure funds are available
- Alert FSC on any potential funding problems
- Attend finance section meetings
FUND Lecture Summary

At The Conclusion Of This Unit, Are You Now Able To:

- Define qualifications
- Describe key responsibilities
- Discuss FUND flowchart
Lecture 6
Finance Section Chief
Cost Unit Leader (COST)

Lecture Objectives
- Qualifications
- Key Responsibilities

Finance Section Overview

Finance/Admin Section
- Time Unit
- Procurement Unit
- Equipment Time Recorder
- Cost Unit
- Funds Certifying Official
- Field Accountant
- Compensation/Claims Unit
Qualifications

- ICS 100-400 certified
- Have working knowledge/experience with:
  - EPA financial systems (e.g., Compass, CDW, CBOR)
  - EPA budgeting, accounting and other financial data contained in the EPA financial systems
  - Excel spreadsheets

Key Responsibilities

- Burn-rate calculations and cost tracking
- Prepare cost input to the situation report (SitRep)
- Ensure budgeted funds are sufficient, reimbursable authority is requested, and work codes are set up
- Brief FSC on problems, issues, and follow-up requirements

Burn rate calculations and cost tracking

- Burn rates should be calculated separately for:
  - Employees – We recommend a fully-loaded rate for a GS-13/10 as an estimate. Periodically adjust to actuals (BOC 10)
  - Travel - May include lodging, M&IE, rental car, and GOV. We recommend combining these costs for a daily average (BOC 21)
  - Contracts/Misc. – Includes ERRS, START, other national contracts, and miscellaneous costs. Burn rates, actuals, & days remaining provided by contractor accountants (BOCs 36 & 37)
Burn rate calculations and cost tracking

Example of the employee and travel burn rates:

<table>
<thead>
<tr>
<th>Department</th>
<th>Wage Rate</th>
<th>Hours</th>
<th>Total Burn Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee</td>
<td>10,000</td>
<td>100</td>
<td>1,000,000</td>
</tr>
<tr>
<td>Travel</td>
<td>5,000</td>
<td>50</td>
<td>250,000</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>1,250,000</td>
</tr>
</tbody>
</table>

Example of a GS-13/10 fully loaded hourly rate calculation:

<table>
<thead>
<tr>
<th>Payroll Account</th>
<th>Billing Rate Code</th>
<th>Percentage</th>
<th>Amount</th>
<th>Hours</th>
<th>BFY</th>
<th>GBF</th>
<th>Total</th>
<th>BFY/BF/Payroll</th>
<th>FSC</th>
<th>Project Code</th>
<th>Finance Object</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payroll</td>
<td></td>
<td>10%</td>
<td>$10,000</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>$10,000</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>$100</td>
</tr>
<tr>
<td>Total Payroll</td>
<td></td>
<td></td>
<td>$10,000</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>$10,000</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>$100</td>
</tr>
</tbody>
</table>

Example of contract and miscellaneous burn rates:

<table>
<thead>
<tr>
<th>Contract</th>
<th>Estimated Daily Burn Rate</th>
<th>Total Burn Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract 1</td>
<td>$10,000</td>
<td>$10,000</td>
</tr>
<tr>
<td>Contract 2</td>
<td>$20,000</td>
<td>$20,000</td>
</tr>
<tr>
<td>Contract 3</td>
<td>$30,000</td>
<td>$30,000</td>
</tr>
<tr>
<td>Total Contracts</td>
<td></td>
<td>$60,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>UDA/Supplies</th>
<th>Total Cost</th>
<th># Days of Incident</th>
<th>Total Expenses</th>
<th>Burn Rate</th>
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<tr>
<td>Office Supplies</td>
<td>$50,000</td>
<td>100</td>
<td>$50,000</td>
<td>$100</td>
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<tr>
<td>Total UDA/Supplies</td>
<td>$50,000</td>
<td></td>
<td>$50,000</td>
<td>$100</td>
</tr>
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</table>

Total Burn Rate: $120,000
### Example of contract and miscellaneous burn rates (cont.):

<table>
<thead>
<tr>
<th>Burn Rate Category</th>
<th>Contract Value</th>
<th>Burn Rate</th>
<th>Labor</th>
<th>Material</th>
<th>Description</th>
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<tbody>
<tr>
<td>ERRS</td>
<td>$500,000</td>
<td>5%</td>
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<td>Contract</td>
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<tr>
<td>ERRS</td>
<td>$200,000</td>
<td>3%</td>
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</tr>
<tr>
<td>ERRS</td>
<td>$300,000</td>
<td>2%</td>
<td></td>
<td></td>
<td>Contract</td>
</tr>
<tr>
<td>ERRS</td>
<td>$400,000</td>
<td>4%</td>
<td></td>
<td></td>
<td>Miscellaneous</td>
</tr>
</tbody>
</table>

### Example of ERRS burn rates and costs:

<table>
<thead>
<tr>
<th>Burn Rate Category</th>
<th>Contract Value</th>
<th>Burn Rate</th>
<th>Labor</th>
<th>Material</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ERRS</td>
<td>$500,000</td>
<td>5%</td>
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<td>Contract</td>
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<tr>
<td>ERRS</td>
<td>$200,000</td>
<td>3%</td>
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</tr>
<tr>
<td>ERRS</td>
<td>$300,000</td>
<td>2%</td>
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<tr>
<td>ERRS</td>
<td>$400,000</td>
<td>4%</td>
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<td></td>
<td>Miscellaneous</td>
</tr>
</tbody>
</table>

### Burn rate calculations and cost tracking

#### FEMA 2017 Task Order Burn Rate Report

**As of:** 2/1/2018

<table>
<thead>
<tr>
<th>Task Order Number</th>
<th>Contract Value</th>
<th>Burn Rate</th>
<th>Labor</th>
<th>Material</th>
<th>Description</th>
</tr>
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<tr>
<td>0123</td>
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<td>Contract</td>
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<td>4%</td>
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<td></td>
<td>Miscellaneous</td>
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</tbody>
</table>

**Note:** Specific burn rate values will be updated on next report.
Burn rate calculations and cost tracking

Example of START burn rates and costs:

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<thead>
<tr>
<th>Date</th>
<th>RAM</th>
<th>Equipment</th>
<th>Food/Op</th>
<th>Travel</th>
<th>Date</th>
<th>RAM</th>
<th>Equipment</th>
<th>Food/Op</th>
<th>Travel</th>
<th>Date</th>
<th>RAM</th>
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<th>Food/Op</th>
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<th>Equipment</th>
<th>Food/Op</th>
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<th>Date</th>
<th>RAM</th>
<th>Equipment</th>
<th>Food/Op</th>
<th>Travel</th>
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<td>$892,042.75</td>
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<td>6/11/2019</td>
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<td>6/12/2019</td>
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<td>16.20%</td>
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<td>6/14/2019</td>
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<td>$24,105.22</td>
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<td>16.00%</td>
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</tr>
<tr>
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</tr>
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</tr>
<tr>
<td>6/18/2019</td>
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<td>$5,505.01</td>
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<tr>
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<td>15.50%</td>
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<td></td>
</tr>
</tbody>
</table>

Total: $833,812.80 | $31,805.60 | $210,809.74 | $497,398.40 | $1,017,987.45 | $2,000,000.00 | $892,042.75 | 16.10% |
Burn rate calculations and cost tracking

Example using CDW Reimbursable Agreement Inquiry (cont.):

Prepare cost input to the SitRep

The SitRep should include:

- Budgeted or MA ceiling (for FEMA, OPA, etc.)
- Indirect costs set aside (for FEMA, OPA, etc.)
- Estimated payroll costs (to date)
- Estimated travel costs (to date)
- Estimated contract costs (to date)
- Remaining ceiling
- Daily burn rate (can include days remaining)
- Sent daily to SITL and briefed during Planning Meeting

Prepare cost input to the SitRep

Example of cost input to SitRep:
Ensure budgeted funds are sufficient...

- If funds aren't sufficient:
  - Brief the IC and OSC during the Planning Meeting
  - If additional funds are needed, brief ESF-10 liaison for MA amendments
  - Ensure amended MAs and reservation of funds (RFs) are processed and Cincinnati is notified to issue reimbursable authority
  - Ensure that any new work codes and budget orgs are included/updated in the charging guidance

Lecture Summary

At The Conclusion Of This Unit, Are You Now Able To?

- **Qualifications**
  - Understanding and access to EPA financial system (Compass, CDW, CBOR)
  - Understanding of EPA budget, accounting, and financial data
  - Understanding of Excel spreadsheets

- **Key Responsibilities**
  - Burn rate and cost tracking
  - Preparing cost input to the SitRep
  - Ensure funding is sufficient and in place
  - Keep the FSC updated on any issues
Lecture 7
Finance Section Chief

Funding Source

Lecture Objectives

- Discuss funding sources
- Identify funding source reference material and contacts

Funding Sources

- The Finance Section is responsible for all financial aspects of an incident. Multiple types of funding are generally used for Emergency Response.
Funding Sources

- **Agency Appropriated Funds**
  - Superfund (CERCLA)

- **Reimbursable Funding**
  - FEMA Mission Assignment (Stafford Act)
  - Oil Spill Liability Trust Fund (OPA)
  - Other (Reimbursable IA's, Special Account)

---

Funding Sources

- Comprehensive Environmental Response Compensation, and Liability Act (CERCLA or Superfund)
- EPA Appropriated funding
- Used for response to hazardous substance releases or substantial threats

---

Disaster Relief Fund (Stafford Act)

Stafford Act funding is managed by the Federal Emergency Management Agency (FEMA)
- Stafford Act funds are issued as Mission Assignments (MAs) by FEMA
- The MA tasks are issued under 15 distinct Emergency Support Functions (ESFs)
Funding Sources

Disaster Relief Fund (Stafford Act)
- EPA and the United States Coast Guard (USCG) serves as ESF-10 support for oil and hazardous material response and environmental safety and cleanup functions.

Disaster Relief Fund (Stafford Act)
- Multiple ESFs may be activated for a response
  - Example: a large-scale natural disaster or Nationally Significant Incident may require all 15 ESFs
  - A localized flood or tornado may only require activation of a few ESFs
Types of Mission Assignments

Two types of Mission Assignments:

**Federal Operating Support**

**Direct Federal Assistance (State cost share may be required)**

---

FEMA Funds – Allowable Charges

- **Payroll Charges:**
  - Overtime and premium pay for all employees
  - Base pay for only Trust Fund employees

- **Travel Charges**

- **Contract/Purchase Card/Purchase Orders**

- **IA's (including Emergency Funding Authorizations EFA's)**

---

Oil Spill Liability Trust Fund

- The "Oil fund" was created under the Oil Pollution Act (OPA). OSLTF managed by the National Pollution Funds Center (USCG -NPFC)

- EPA has an National IA with the USCG to access these funds
Inter-Agency Agreements

- IAs are issued to provide funding from an outside agency to the responding agency or from EPA to an Other Federal Agency (OFA).
- During a response, an Emergency Funding Authorization Document (EFA) can also be used. This is an emergency IA.

Inter-agency Agreements

WORKFLOW FOR PROCESSING EMERGENCY FUNDING ACTIONS

Lecture Summary

At the Conclusion of This Unit, Are You Now Able to:

- Discuss funding sources
- Discuss Mission Assignments (MA’s) and PRFA’s
- Identify funding source reference material
EPA 460 Lecture 8
Resource Requesting, Ordering, and Tracking System In EPA Incident Management Teams

Lecture Objectives
- Review importance and background of the Resource Request Process.
- Learn the Resource Request Process using ICS Form 213RR.
  - Requesting
  - Assigning
  - Ordering/Procuring
  - Receiving

Resource Ordering and Tracking
Importance of properly documenting and tracking resources:
- Financial/Physical accountability:
  - Ensures resources are:
    - ordered efficiently
    - assigned where they are most useful
    - released when no longer needed
  - Hold up to an audit
- EPA needed an agency specific process
EPA Resource Ordering and Tracking

- Workgroup was formed to develop an EPA specific:
  - Resource Requesting, Ordering, and Tracking process
  - ICS form 213-RR-EPA – All resources MUST be documented

RESOURCE "R"

THE RESOURCE REQUEST PROCESS

ICS Form 213-RR-EPA
Lecture 8- Resource Ordering Process

1. Initial Need/ Requestor

- Any staff may complete 213RR to request supplies, services, equipment, and personnel.

- Requester completes White part of form (Sections 1-6)

- All requests for tactical resources must be made through OPS.

- ICS Form 213RR-EPA must be signed off by a Section Chief or Command Staff.

2. Logistics Section

- Logs assigns unique tracking # to 213RR.

- Up to Logistics Section to setup their tracking system.

- Consult with FIN to complete Funding Source information.

- Consult with Planning Section and OPS to determine if requested resources are Tactical/Non-Tactical.

- Consult with Resources Unit to determine if On-Hand/Available or Needs to be Ordered.

- Approve Form and send copy to Host Region, and routes to next step.
  - If requested resource is Non-Tactical and Available, goes to Supply Unit in Logistics Section for assignment
  - If Tactical and Available, route to Resources Unit for assignment.
3a. Resource is Available – Reassignment

- Logistics Section reassigns Non-Tactical Resources using ICS Form 210.
- Resource Unit reassigns Tactical Resources using ICS Form 210.
- After reassignment, Logs attaches Form 210 to 213RR and copies Finance and Requestor to close out the request.

3b. Resource Not Available/Not On-hand: Ordering/Procurement Process

- Logistics Section (or Resources Unit for Tactical Resources) contacts REOC, Host Region, other EPA assets, or other government agencies to fill need.
- All government sources must be exhausted before going to procurement.
- If need cannot be met within the government, Logistics routes 213RR to Finance for procurement processing.
**Lecture 8 - Resource Ordering Process**

**Procurement Process**

- Follow Incident Procurement Plan established by Logistics and Finance at the beginning of the Response.
- Logistics and Finance determines appropriate procurement method.
- Prefer lease and not purchase if possible.
- Coordinate with Host Region FCO on funding.
- Finance certifies funds are available.
- Resources are procured and ETA is noted on 213RR, and Resources Unit is copied.

**Ordering START/ERRS Resources**

- START and ERRS can be ordered by the PO or in the field by a warranted EPA OSC.
- 213RR-EPA form must be completed and submitted to the LSC within 24hrs to document the order.
- Form should include:
  - TO and/or TDD number on form 213RR-EPA
  - routed as outlined in the resource ordering flowchart.
Ordering Warehouse Resources

- Complete Form 213RR-EPA for any equipment ordered from an EPA warehouse
- OPS will:
  - determine how section will comply with form 213RR-EPA submission requirements
  - developed process for submitting ICS Form 213RR-EPA to LSC

Emergency Use of Purchase Card

- Purchase Card used within IMT must be done in accordance with the Incident Procurement Plan (IPP)
- OPS must approve all purchase card orders for emergency use in the field and form 213RR-EPA completed and submitted to the LSC within 24hrs of the purchase
- ALL AGENCY RULES AND REGULATIONS APPLY

4. Resource Receiving

- All Resources are checked-in by Resources Unit using ICS Form 211.
- Personnel are badged during their check-in process.
- At end of Operational Periods, Resource Unit provides Logistics with all ICS 211 Forms for Logistics and Finance to update order status of received resources.
- Finance and Logistics notes on the 213RR that the resources have been received on the corresponding 213RR to complete Ordering/Procurement.
- Non-Tactical Resources are sent to Supply Unit for inventory tagging/tracking. Supply Unit assigns to the requester.
- At the beginning of a Response, initial resources on-hand are captured in Section 7 (pg. 4) in the ICS Form 201, the Incident Briefing document.
Lecture 8- Resource Ordering Process

Demobilize
- LSC in coordination with FSC notifies PSC (DMOB) to start demobilization process in accordance with Demob Plan.

Non-Tactical
- SUPL completes ICS Form 210-EPA and provides copy to FSC.

Overhead are sent to EPA's LSC, PSC, FSC and SO.

Tactical
- RESL assigns resource to the Section/Branch and moves T-card from "committed" to "assigned".
- Resource remains the responsibility of the assigned.
- All Overhead/Contractors are tracked by RESL.
- Overhead are sent to EPA's LSC, PSC, FSC and SO for processing.
- Contractors report to their LSC/PSC/FSC/SO for processing.

End of Assignment
- Appropriate Section Chief notifies SUPL or RESL when the resource is no longer required.

Reassignment
- SUPL or RESL determines if resource can be reassigned.

Non-Tactical
- RESL forwards resource to LSC (SUPL).
- For equipment, SPUL assigns decal number and adds to inventory.
- Resource remains the responsibility of the assigned.

Check-in
- All resources are checked in by RESL using ICS Form 211-EPA.
- Overhead and Contractors are badged.
- ICS Form 211-EPA provided to LSC/FSC.

Copy Distribution

<table>
<thead>
<tr>
<th>Copy Level</th>
<th>Color</th>
<th>Who</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (Top)</td>
<td>White</td>
<td>LSC</td>
<td>Documentation Unit - LSC/SUPL keep at completion of order – given to Documentation Unit for record keeping.</td>
</tr>
<tr>
<td>2</td>
<td>Goldenrod</td>
<td>RESL</td>
<td>RESL keeps copy to verify orders at check-in.</td>
</tr>
<tr>
<td>3</td>
<td>Blue</td>
<td>FSC</td>
<td>Completion of order when received.</td>
</tr>
<tr>
<td>4</td>
<td>Yellow</td>
<td>FSC/PROC</td>
<td>When order is placed through FSC.</td>
</tr>
<tr>
<td>5</td>
<td>Pink</td>
<td>LSC/SUPL</td>
<td>LSC/SUPL keeps copy for all 213RRs submitted.</td>
</tr>
<tr>
<td>6</td>
<td>Green</td>
<td>Requester</td>
<td>Copy to show the request was submitted.</td>
</tr>
</tbody>
</table>

ICS Form 213RR-EPA - Lessons Learned

All orders should be separated by:

- Resource Type:
  - Overhead/EPA Personnel
  - Contractors
  - Equipment
  - Supplies and Services
  - Vehicles

- Funding Source:
  - Stafford Act (FEMA)
    - Mission Assignment
  - Oil Protection Act (USCG)
  - CERCLA ("Superfund")
Form 213RR-EPA must be completed for all requests during responses where an IMT has been established.

The resource ordering and tracking flowcharts were developed to ensure accountability and proper documentation of resources ordered during EPA responses.

Agency rules and regulations still apply.

QUESTIONS
The PROC is responsible for:
- Administering all financial matters pertaining to procurements
- Providing general guidance for resource ordering
- Coordinating and acquiring requested goods and services related to the incident

PROC Lecture Objectives
- Define the qualifications needed for the Procurement Unit Leader to function effectively
- Describe the Procurement Unit Leader Key Responsibilities
- List the Procurement Unit Leader daily duties and task checklist
- Discuss the Purchase Card, Contracts, and Interagency Agreements flowcharts
- Identify the materials and references needed as the Procurement Unit Leader

PROC Qualifications
To effectively perform the functions of the PROC, personnel assigned should have a minimum of:
- ICS 400 training
- Contracting Officer's Representative (COR) related training and certification, at least Level I training
- Warrant authority (depending on the incident type) or access to a Procurement Official with warrant authority
Lecture Objectives

- Name the unit leader that procures goods and services within the Finance Section
- List the resources that discuss U.S. Government contracting rules
- Discuss general U.S. Government contracting rules
- Identify and discuss incident procurement options
- Discuss common procurement issues

Government Contracting

Contracts issued by government agencies must follow laws established by Congress. Contracting rules are discussed in:

- Federal Acquisitions Regulations (FAR)
- EPA Acquisition Regulations (EPAAR)
- EPA Acquisition Guide (EPAAG)
- Emergency Contracting Procedures guide

Bottom line:
Agency procurement processes and procedures must be followed.

Government Contracting (continued)

A contract is a binding commitment –

- Both agency and contractor are bound to do something (pay money, deliver supplies and/or services)
- With few exceptions, (e.g., EPA OSC have limited warrant authority) only a warranted contracting officer (CO) can bind the agency

Note: Know your level of procurement authority...and lack of planning does not constitute an emergency!
Government Contracting (continued)

- Federal Acquisition Regulations
  - Part 6 – Competition Requirements
  - Part 8 – GSA FSS Schedules
  - Part 13 – Simplified Acquisition Procedures
  - Part 15 – Contracting by Negotiation
  - Part 16 – Types of Contracts

- FAR PART 18 – Emergency Acquisitions “Identifies emergency acquisition flexibilities that are available with respect to any acquisition of goods and services”
  - Please see FAR 18.104: discusses unusual and compelling urgency, which is one of the emergency acquisition flexibilities
  - FAR 18.2 discusses ways the FAR may be modified for some disasters

Basic Terms to Know

- CO/CS – Contracting Officer / Contract Specialist
- RAM – Regional Acquisition Manager
- OAM – Office of Acquisition Management
- COR/PO/TOCOR
- Multiple Award Contract/IDIQ
- SOW/PWS – Statement of Work/Performance Work Statement
- Types of Contracts
  - Fixed Price
  - Fixed Rate/Time and Material/Labor Hour
Procurements Options
Examples of procurement options for an incident:
- Government Purchase Card
- Purchase Order
- Task Order (TO)/Technical Direction Document (TDD) via established contracts (i.e., START or ERRS)
- Blanket Purchase Agreement (BPA)
- Basic Ordering Agreements (BOA)
- Negotiated Stand Alone Contract
- Notice to Proceed

Procurements Options (continued)
- Other government agencies
  - Interagency Agreement (IA)
    - Can be initiated via an Emergency Funding Authorization (EFA)
- Pollution Removal Funding Authorizations (PRFAs)
  - Agreements funded by USCG for an OPA response

Government Purchase Cards
For purchases made on a purchase card (a.k.a. bankcard) during the incident, card holder must obtain and retain all:
- Requests (ICS-213RR or Procurement Request)
- Receipts
- Approved Purchase-Card statements
- PNET records

NOTE: Card holder must use card in accordance with the IPP
Government Purchase Cards (continued)
- May be used to purchase supplies and services
- Purchases are limited:
  - Standard single purchase limit varies by cardholder
    - Micro-Purchase Limit is $10,000.00
    - Construction is subject to the Davis-Bacon Act, limit is $2,000
    - Services are subject to Service Contract Act, the limit is $2,500
- Use of Purchase card must be in accordance with agency rules and Incident Procurement Plan
- Most have monthly limit of $10,000.00
  - COs monthly amount can vary based on their warrant limitations
- In emergency, approval of purchase obtained as soon as practicable following its use

Purchase Card
In addition to routine cardholder responsibilities, it is important that the purchase card holder:
- Provide supporting documentation to the Finance Section in accordance with Incident Procurement Plan
- Card holder must receive an approved ICS-213RR for and obtain the necessary account information to allocate costs prior to purchase
- Allocate purchases in PNET with backup documentation

Purchase Card (continued)
Examples of how a purchase card might be used:
- Purchase office/general supplies
- Temporary meeting space*
- Placing an advertisement in a local newspaper
- Renting equipment (short term)

* Requires additional approvals
Other Procurement Issues

- Incidental cost
- Overtime
- Food and water purchase
- Hotel agreements
- Demobilization

Incidental Cost

- Damage to agency-owned equipment - repair or replacement in kind
- Must follow agency Property procedures

Overtime

- Overtime premium authorization must be consistent with the basic terms and conditions of the contract
- Prior approval must be given in advance by the OSC or CO
Food and Water Purchase

- Government employees on travel are covered under FTR and receive per diem
- Food is not automatically acceptable even on an emergency
- Water/Electrolyte replacements are considered food unless a health and safety item

Hotel Agreements

- EPA policy is for all rental agreements to be reviewed by OGC
- Agreements must be signed by 1102 due to potential for changes
- If space is rented/rooms held on purchase card contact an 1102 ASAP. Ensure terms/period/cost are fixed and clear

Purchase Order (Simplified Acquisitions Procedures)

Types of purchases under Simplified Acquisitions Procedures:

- Micro purchases
  - Micro purchase (> $10,000.00) should be purchased by SPUL
  - Office supplies, do not require competition or small business considerations
- Other purchases
  - Goods and Services > $10,000.00 but not to exceed $250,000.00
  - Must be fair and allow local and small businesses to compete
- Simplified Acquisitions Procedures (see FAR SUBPART 13.5) may be used for commercial items up to $7 million
Purchase Order
(Simplified Acquisitions Procedures)

- Over $10,000.00 additional clauses and competitive requirements exist and must involve an 1102 (Contract Specialist)
- Between $10,000.00 and $25,000.00 EPA must solicit quotes and post publicly
- <$25,000.00 requirements under Part 13 must be posted to FedBizOpps
- Time frame under $250,000.00 is generally 14-21 days, may be up to 30 days

Delivery Order
(GSA Federal Supply Schedules)

- GSA has contracts with supplies and service providers
- Allows for faster award – prices are already set
- Competed differently – posted on GSA Advantage not FBO
- Terms and conditions predetermined
- FAR Part 8

- https://www.gsaadvantage.gov

Task Order / Technical Direction Document

- Pre-placed, existing contract for Region/Agency wide use
- TO or TDD under existing emergency response contracts are the most readily available and preferred contract tool for emergency and time-critical responses
- EPA Emergency Response contracts are:
  - START – Superfund Technical Assessment Response Team
  - ERRS – Emergency Rapid Response Services
  - SERAS – Scientific, Engineering, Response & Analytical Services (ERT)
  - Warehouse and Equipment Services
Blanket Purchase Agreement (BPA)

- Blanket Purchase Agreement (BPA) is an agreement with pre-determined prices and rates for specific supplies and services
  - A BPA is NOT a contract; a BPA Call is an order for supplies or services
- To access EPA’s BPAs:
  - Contact regional Contracting Office or Contracting Officer at HQ for each BPA
  - List of equipment BPAs is available at https://response.epa.gov/ (click on equipment)

Initiating Work Under Existing IAs or Contracts

- "A 213RR is required to initiate or document work under any existing contract or IA (e.g., issuing a TDD, TO or WAF)
- The PROC will coordinate closely with the PO/CO for the existing contract or IA to obtain information on changes made to the work to ensure proper cost documentation and cost tracking for the incident"

Basic Ordering Agreement (BOA)

- A task order is issued using a Basic Ordering Agreement (BOA) which is a schedule of pre-priced labor, equipment, and materials:
  - BOAs are NOT contracts
  - MUST coordinate with EPA CO to access BOAs; EPA OSC’s are NOT authorized
  - BOAs are awarded and managed by the USCG
  - BOAs are for use in emergency response
Negotiated Stand-Alone Contract

- If supplies and services cannot be ordered from an existing EPA contract, BPA, or BOA, a new procurement must be initiated.

Notice to Proceed (NTP)

- NTP is a type of Letter Contract (see FAR 16.603):
  - A written contract instrument authorizing contractor to begin work immediately
  - Used when Government interest demands a binding commitment to start work immediately
  - Negotiating a definitive contract not possible in time to meet requirement

Notice to Proceed

- Only a Warranted EPA OSC may issue a NTP
- Total value of an individual NTP may not exceed $200K
- See OSC Toolbox Guide, 4.1.2
Interagency Agreements (IAs) and Emergency Funding Authorizations (EFAs)

IAs and EFAs are agreements to exchange funds or services between Federal Agencies.
- EFAs are a simplified version of an IA
- Examples: USCG and USACE

Pollution Removal Funding Authorizations (PRFAs)

- Funding for PRFAs is managed by National Pollution Fund Center (NPFC)
- EPA OSCs can issue PRFAs to other federal, state, and local agencies for OPA responses

Presidential declarations frequently offer additional flexibilities and increased thresholds. Work closely with the Regional RAM/CO and OAM to determine if there will be changes to existing authorized levels.
Funding Requirements

- MUST be current year money. “B” money is two year appropriation. “T” money is no year
- Severable services can only be funded for 12 months maximum
- Non-severable services or supply purchases must be 100% funded at time of award
- Options may be used for additional time or product/service, but still limited by above restrictions

Questions So FAR??

PROC Task Checklist

The following are specific tasks that should be completed as soon as possible after arriving to an incident
- Attend status briefing regarding special concerns and fiscal limitations
- Establish filing system
PROC Key Responsibilities

The PROC is responsible for:

► Developing the Incident Procurement Plan (IPP) in coordination with the Resource Unit Leader (RESL), Logistics Chief (LSC) or Supply Unit Leader (SPUL), and/or Host/Home Region

- IPP establishes the incident procurement process (i.e., purchasing authority, warrant limits, bankcard use, etc.)

► Procuring goods and services in accordance with the IPP

Ensure obligating document and receiving report are distributed to the appropriate organizations (i.e., RTP) and the host region POC

Work with the Host region’s appointed POC to ensure the receipt and coordination of purchases

The host region will work with the PROC to best utilize existing regional contracts/orders or place new orders when necessary
PROC Key Responsibilities

- Ensure appropriate funding has been made available / committed
- Ensure copies of obligation documents are correct and sent to appropriate financing servicing organization (i.e., RTP)
- Perform contract administration functions for newly awarded contracts/coordinate with CORs
- Establish communication protocols within section, other sections, and Host Region

PROC Daily Duties

PROC Daily duties
- Attend daily OSC briefings
  - In briefing, listen to identify if there are any procurement related issues
- Coordinate with LSC and OSC section chiefs for acquisitions needs
- Review ICS-215 for procurement implications
- Complete procurement unit log and distribute accordingly

Demobilization

- Copies of all records, memos, documentation must remain with the incident documentation unit
- CO in the host region can provide documents not created locally
Purchase Card Flowchart

Note: Purchase card and warrant may not be used without appropriate IC or IMT approval

- Purchase card log package consists of: 213RR, Purchase Card Log (PNET), Original Receipts.
- PAO is the Property Accountability Officer in the host Region. FUND would include Funding Unit leader and/or regional finance personnel as appropriate.

Simplified Acquisitions Flowchart

Contracts

* Existing contracts use existing PO. New contracts should have a PO assigned from the affected Region.
### Funds-Out Interagency Agreements (IAs)

- **PROC** and **FSC** determine appropriate vehicle.
- **PROC** procurement process and notices.
- **FSC** initiates EPA procurement process and notifies PAO if there is property request.
- **PROC** notifies all parties involved once order is placed; PAO is notified so that property can be received.
- **FSC/PROC** forwards 213RR/PR including approvals to ESF 10 chair or designee for approval.
- **PO** notifies **PROC** when IA is executed.
- **FUND** forwards IA package to Grants Office.
- **PO** forwards 213RR/PR and IA package to **FUND** for funding.
- **ESF 10 chair** or designee forwards 213RR to **PROC** once work is issued.
- **PROC** notifies all parties involved once order is placed.

### PROC Materials

- **Required materials and system access for PROC:**
  - Links to reference documents (FAR, EPAAR, etc.)
  - Paper copies of contracting forms
  - Electronic copies of contracts/orders (via thumb drive or epaoasc.net)

- **PROC** materials:
  - Desktop / Laptop with access to appropriate Acquisitions and Finance systems (i.e., CDW, EAS)
  - Portable Drive
  - Cell Phone
  - Go Kit items as needed (refer to list)
PROC Incident-Specific Notes and Tips

Incident-specific notes and tips for the PROC:
- Incident specific waivers or increased purchasing threshold for incident
- Clearly define the Ordering/Funding process
- Submit all records/receipts before personnel and unit demobilization
- Return logs and coordinate with COST

PROC References

References for the PROC:
- List of all contracts (Response.epa.gov)
- OAM Knowledge Management
- JOFOC Template
- Points of contact lists
- EPA Strategic Sourcing (GSA Acquisition Gateway)
PROC Lecture Summary
At The Conclusion Of This Unit, Are You Now Able To?

- Define the qualifications needed for the Procurement Unit Leader to function effectively
- Describe the Procurement Unit Leader Key Responsibilities
- List the Procurement Unit Leader daily duties and task checklist
- Discuss the Purchase Card, Contracts, and Interagency Agreements flowcharts
- Identify the materials and references needed as the Procurement Unit Leader

Questions
Lecture 10
Finance Section Chief
Field Accountant (FACC)

Finance Section Overview

FACC Lecture Objectives
- Define the qualifications needed for the Field Accountant to function effectively
- Describe the Field Accountant key responsibilities
- List the Field Accountant daily duties
- Discuss the Field Accountant work flowchart
- Identify the materials and references needed as the Field Accountant
The FACC is responsible for:

- Providing contractor cost oversight
- Validating contractor’s field costs
- Administrative support in the field to Incident Management Team (IMT)

FACC Qualifications

To be an effective FACC, personnel assigned should:

- Be trained up to ICS 400
- Possess knowledge of the Removal Cost Management System (RCMS)
- Possess knowledge of EPA Emergency Response Contracts
- Certified Level 1 COR
- Possess knowledge of general accounting principles as applied to contractor cost accounting and controls (FAR 32)
- Complete required Health and Safety training and recertification

FACC Key Responsibilities

Responsibilities of the FACC:

- Establish close coordination with EPA Emergency Response Contracts PO/CO
- Coordinate with Cost Unit Leader (COST)
- Review (Form 1900 – 55)
- Resolve minor financial issues by working with EPA and Contractor personnel
- Establish contracts site file
FACC Key Responsibilities

- Consult with OSC/RESL to determine status of under-utilized contractor equipment on site and coordinate with EPA PO/CO and OSC as necessary
- Assist EPA personnel regarding terms and conditions of the appropriate ER contract

FACC Daily Duties

The Daily Duties of the FACC include:

- Attend briefings as required by the Finance Section Chief (FSC)
- Review 1900-55s on a daily basis and complete necessary related functions
- Using Removal Cost Management System (RCMS), track:
  - All contractor daily costs
  - Disputed contractor costs
  - Allowable contractor equipment costs
  - All other contractor charges billable to the government
FACC obtains copies of contracts/TO from Region
FACC completes the “1900-55 Tracking Log” maintained in the COST Unit
FACC reviews *1900-55 including the “Daily Work (Resource) Order” from the contractor (approved by EPA and contractor)
FACC reconciles all items on 1900-55 and ensures items that were pre-authorized on the Daily Work (resource) order
FACC creates “Exception/No Exception Log”
FACC initials signature page of original 1900-55 at end of review
Appropriate copies of the Signature page of the 1900-55 and Exception/No Exception Log are maintained in the IMT Finance Section and then forwards to the Group Division supervisor for review and signature
Group Division supervisor forwards signed 1900-55 back to FACC for distribution to contractor and CO

Note: the FSC/COST must deploy sufficient EPA resources to monitor and verify work ordered and delivered in the field.

FACC Materials
Materials needed as FACC:
- Computer with backup battery
- Copier/scanner/printer/fax
- Calculator
- General office and field supplies (i.e., safety/work boots)
- Cell phone/satellite phone
- Flash Drive or OneDrive access for off-line use
- Access to appropriate EPA financial systems
- Go Kit items as needed (refer to list)
- Locked file cabinet to secure contracts

FACC References
References for the FACC:
- Copies of all appropriate EPA ER contracts
- Names and contact information of all POs and COs of EPA ER contracts
- Federal Travel Regulation (FTR)
- EPAGG

https://easinfo.epa.gov/
FACC Lecture Summary

At the Conclusion of This Unit, Are You Now Able To?:

- Define the qualifications needed for the Field Accountant to function effectively
- Describe the Field Accountant key responsibilities
- List the Field Accountant daily duties
- Discuss the Field Accountant work flowchart
- Identify the materials and references needed as the Field Accountant

Always Be Safe

Questions??
Lecture 11
Compensation/Claims Unit Leader (COMP)

Finance Section Overview

Finance Section Objectives

- Define the qualifications needed for the Comp Unit Leader to function effectively
- Describe the Comp Unit Leader Key Responsibilities
- List the Comp Unit Leader daily duties
- Identify the materials and references needed as the Comp Unit Leader
The COMP is responsible for coordinating the processing of all claims which require payment.

COMP Qualifications
To be an effective COMP, personnel assigned should:
- Be trained up to ICS 400
- Have good working knowledge of the agency’s compensation/claims processes and procedures

COMP Key Responsibilities
- For EPA employee’s injuries or illnesses, coordinate with:
  - Medical Unit Leader (MEDL)
  - Safety Officer (SO)
  - Resource Unit (RESL)
  - Time Unit (TIME)
  - Host and Home Region
- Coordinate with Host Region on third party claims
- Complete or coordinate the completion of required documented paperwork
Comp/Claims Lecture Summary

At the Conclusion of this Unit, Are you able to?:

► Define qualifications
► Describe key responsibilities
► List daily duties
► Identify materials and references needed
Lecture 12 – Finance Section Chief

Finance Section Chief (FSC)

Incident Management Team

Course Objectives

- Explain FSC Qualifications/Training Requirements
- FSC Overview
- FSC Key Responsibilities
FSC Qualifications

- Have three years of applicable professional experience
- Clear understanding of Finance unit responsibilities

In addition, the FSC should have good working knowledge of:

- Federal/EPA accounting, travel and payroll regulations and policies
- EPA accounting, travel, payroll, and reporting systems
- Government Contracting
- Data analysis

ICS Training Requirements (in order)

- Independent Study (IS) 100, 200, 700, and 800; offered online at: https://training.fema.gov/emiweb/is/icsresource/trainingmaterials.htm
- ICS 300 & 400 level (see trainex.org for offerings)
- This KLP training course
- Recommended: EPA 420 (simulated exercise)

FSC Overview

Position Responsibilities Overview

- Procurement Unit Leader (PROC)
- Time Unit Leader (TIME)
- Comps / Claims Unit Leader (COMP)
- Cost Unit Leader (COST)
- Funds Certifying Official (FUND)
- Field Accountant (FACC)
Organizing the Finance Section

- Span of control
- Based on function
- Can expand and contract
  - Size of response
  - Nature of response
  - Stage of response

Finance Section Chief

The FSC may have a Deputy FSC. The Deputy FSC must have the same qualifications as the FSC, as they must be ready to take over that position at any time.

FSC Key Responsibilities

Responsibilities include:
- All financial and cost analysis aspects of the incident
- Supervising members of the Finance/Administration Section
  - Ensure that all subordinate unit duties are performed
Course Summary
At the conclusion of this unit, are you now able to:

► Explain FSC Qualifications/Training Requirements
► Understand FSC Overview
► Understand FSC Key Responsibilities
Lecture 13
Finance Section Chief
Demobilization

Lecture Objectives

- Describe FSC Responsibilities During the Response
- Describe FSC Responsibilities at End of Response (Closeout)
- Transition Plans

FSC Responsibilities During the Response

- Sign demobilization checkout form (ICS-221) for all personnel
- Ensure departing personnel with purchase cards provide copies of receipts and associated 213RRs
- Answer any time or travel charging questions
- Ensure all documentation has been provided to DOCL
- Have a transition plan for new staff rotating into finance
FSC Responsibilities at End of Response (Closeout)

- Have a transition plan for transferring functions and documentation to the host region, (this is referred to a Demob where no one is transferring in to replace the IMT, but all responsibilities are transferred to the HOST Region)

Transition Plans

- Provide details on functions being performed
- Provided details on status of funds, cost ceilings, burn rates
- Provide details on outstanding issues and action items
- Identify resources needed and submit resource requests
- Try to have replacements overlap one day for shadowing/training

Example of Demobilization Procedures during CA Wildfires

- As part of the Sit Rep or the IAP, a notice was included stating when the current Finance Section would be demobbing, and stating that the Region 9 office would be providing finance support to the IMT remotely
213-RRs

- All resource requests and procurement requests still require a completed 213RR with all necessary approvals.
- Per the Incident Procurement Plan (IPP) the 213RR should be routed, processed, and approved through the Logistics Section to the Finance Section before purchases are made.

People Plus

- People Plus charging questions should be directed to the Finance Section if they are still available or the HOST Region, or HOME Region People Plus Coordinator.
- Any needed Time Charging guidance will be provided by the Finance Section in the HOST Region.

Cost Charging

- After the Finance Section has demobilized, and another will not be transitioning in, all cost tracking and reporting will be done virtually at the HOST Region office.
Comp/Claims

- As the incident goes through close out, any worker’s compensation issues should be referred to the affected employee’s Home Region’s worker’s compensation coordinator, most likely in the Human Resources group.

- Any claims (such as property) resulting from the Incident/Event should be referred to the HOST Region’s Regional Counsel.

Host Region Closeout Responsibilities

- Closeout/Reconcile any Outstanding Procurement Actions
- Complete Final Cost Reporting
- Coordinate with Accounting Office on People Plus Charging and Reconciliation
- Coordinate with EPA Finance Center on De-obligating Funds
- Coordinate as needed with Regional Comptroller and FEMA regarding closeout of Mission Assignments

Lecture Summary

- Describe Finance Section responsibilities
- Describe section demobilization and closeout process
- Describe information for a transition plan
Demob ICS-221 from Hurricane Katrina

Demob ICS-221 from CA Fires

Demob ICS-221 Minimal form