

FINANCIAL PROCEDURES FOR EMERGENCY INCIDENTS

SUMMARY

This procedure outlines the financial and administrative processes that Miami-Dade County follows before, during, and after emergency incidents. It ensures compliance with federal, state, and local regulations, including the Uniform Administrative Requirements (2 CFR Part 200) for managing disaster-related financial activities and federally funded grants. Specifically, it describes the procedures for establishing emergency-specific Chartfields in INFORMS, maintaining supporting documentation, preparing for reimbursement claims, managing grant revenues and expenditures, and overseeing the closeout process. It also incorporates policies for equipment and supply disposition and interest income management, as required by 2 CFR §§ 200.302–316.

The Office of Management and Budget – Program Management (OMB-PM) leads the County's disaster cost recovery efforts by providing technical guidance, training, documentation standards, and compliance support to County departments. This procedure ensures effective coordination among departments, timely and accurate documentation of costs, and maximization of eligible reimbursements from federal and state disaster relief programs.

PROCEDURE

OMB-PM Staff Training

Personnel within OMB-PM are required to remain current on policies and requirements for the federal grant programs they oversee. This includes monitoring updates, amendments, and addendums to relevant regulations. Staff must complete general grants management training covering the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200). In addition, staff must obtain Public Assistance Program Certification from the Florida Division of Emergency Management (FDEM), which requires successful completion of the following courses:

- FL-603: Public Assistance 101 & Grants Management
- FL-608: Emergency Work Eligibility
- FL-609: Permanent Work Eligibility

Staff must also complete FEMA Emergency Management Institute Independent Study Program (IS) courses as required.

Pre-disaster Procedures

Annually, OMB-PM provides training to update department emergency liaisons on funders' policy changes and requirements, establishing documentation standards to support reimbursement claims, communicate requirements for record retention and prevention of Duplication of Benefits (DOB), and review procedures established for recording expenses, completing Daily Activity Reports (DARs) for force account costs.

Long and short work-performed descriptions are shared with departments to ensure completeness and newly created work activities are loaded into the EMASS time reporting system for selection by responding personnel during an event. OMB-PM reviews the Federal Emergency Management Agency (FEMA) equipment rate sheet online and updates EMASS to reflect changes. Departments provide the Department and Fund information that OMB-PM will use to create the Chartfields that will identify the event-specific costs incurred by their department.

Copies of updated Miami-Dade County's policies for payroll and procurement are acquired and saved on OMB-PM's network as well as collective bargaining agreements, insurance policy documents for County buildings and assets, the updated debris management plan, fringe benefit rate sheets, and copies of prepositioned contracts for goods, services, and construction that may have been established for disasters. These documents are maintained to support any resulting reimbursement claims for disaster events.

Prior to an event, OMB-PM establishes the following Chartfields: one **event-specific program** and **pre-obligation projects** and **task profiles** for each County department to track contract, rental equipment, supplies, labor, equipment, and materials costs incurred by departments for their emergency response. The program and pre-obligation projects are created in the project costing financial module of the Enterprise Resource Planning system, INFORMS. The task profiles are created within the payroll Human Capital Management module. A project costing business unit called **EMASS** was created to segregate all activities related to Countywide emergency events that may exceed the County's resources and capabilities.

The program Chartfield enables reporting to be generated for all the pre-obligation projects created for the disaster. The program consolidates all transactions recorded by departments in their pre-obligation project to enable identification of the expense. An activity is associated with each pre-obligation project to denote the FEMA category (Category A or Category B) the expense is related to.

When there is an imminent threat to human life and property due to a natural disaster, public health, or man-made emergency event in Miami-Dade County, OMB-PM creates the pre-obligation projects and task profiles for the fifteen (15) Departments that have immediate responsibility for preparing for and responding to the emergency event. These departments include: the Department of Emergency Management (DEM), Miami-Dade Sheriff's Office (MDSO), Miami-Dade Fire-Rescue (MDFR), Miami-Dade Corrections and Rehabilitation Department (MDCR), Water and Sewer Department (WASD), Department of Transportation and Public Works (DTPW), Department of Solid Waste Management (DSWM), Regulatory and Economic Resources Department (RER), and the Parks, Recreation, and Open Spaces Department (PROS), Communications, Information & Technology (CITD), Office of Management and Budget (OMB), People and Internal Operations Department (PIOD), Clerk of Court and Comptroller (COCC), Miami-Dade Aviation Department (MDAD), Miami-Dade Seaport Department (MDSD). OMB-PM continuously remains in contact with department emergency liaisons to stay abreast of each department's response activities and the resources they have leveraged for the event. If additional departments are called upon to assist with the emergency event, pre-obligation projects and task profiles are created for these departments. Once the

Chartfields are created, the Clerk of Court and Comptroller (COCC) reviews the accounting fields and information associated with the pre-obligation projects and task profiles and approves them.

Once the program, pre-obligation projects, and task profiles are approved by the COCC, OMB-PM disseminates the information to the County departments with instructions on appropriately using these Chartfields to incur expenses. At the onset of the event, where there may not be a Presidential declaration and a grant award has not been made, departments incur their expenses within their operating fund and department using their assigned pre-obligation project. It is critical that departments use their assigned pre-obligation project and task profile. These Chartfields will enable OMB-PM to identify and capture expenses for any reimbursement opportunities that may become available for the emergency event.

Cost Estimation and Tracking During a Disaster Event:

With the assistance of the County's Office of Enterprise Strategies Management (OES), OMB-PM developed a detailed transaction report that provides itemized details of expenses incurred including the purchase order number and details of items or services purchased, the invoice number, and payment reference number and date. The report also provides an asset ID for any capital equipment purchased for the emergency event to enable disposition of the item, if federal funding is received. The report is used to estimate contract, rental equipment, and supplies costs related to the emergency event as well as to track actual costs incurred. The report is also hyperlinked to attachments in INFORMS, which allows OMB-PM to begin gathering purchase order and invoice documents from the system as transactions occur.

OMB-PM works with the department that incurred the expense to obtain details regarding the expenses' applicability to the emergency event, such as:

- obtaining information on the emergency protective measure that the good or service purchased supported,
- the location where the goods or services were used, including GPS coordinates,
- the quantity used, and
- contract documentation in accordance with the method of procurement used;
 - non-competitive purchases: purchase order, federal provisions rider, emergency/exigency justification in accordance with the Federal Emergency Management Agency's Procurement Disaster Assistance Team (PDAT) Manual, or
 - pool/competitive purchase: bid, vendor proposal, tally, award recommendation, PO, and notice to proceed.

These details are used by OMB-PM to build reimbursement claims if funding becomes available for the emergency event. A SharePoint site has been developed to enable departments to share supporting documentation with OMB-PM. Through the site, OMB-PM also provides departments checklists, resources, and other guidance materials to assist them in complying with funder guidelines.

Various reports are used to compile force account labor, equipment, and materials costs. To identify these costs, it is critical for departments to use their assigned task profile for the emergency event. Reports for force account labor, equipment and materials were developed in INFORMS' Human Capital Management module as well as digitized Daily Activity Reports

(DARs). The reports are generated from information populated in the EMASS Labor and Work Performed form (form) in INFORMS. This form is completed in the system by personnel that work on the event or their department's timekeepers as applicable. Because payroll is housed in the same system as the form, built-in controls were developed to prevent personnel from overreporting work hours to the emergency. Equipment hours reported also cannot exceed labor hours reported for the emergency. Work performed descriptions are loaded into the form for the employee to select from as well as FEMA's most recently updated equipment rate sheet. Draft force account claims can be downloaded from INFORMS using the task profile if funding is available for the event. The data in these claims matches the required data elements in FEMA's Public Assistance Program and Policy Guide, which include:

- Employee name and ID,
- Job title,
- Type of employee (i.e., full-time exempt, full-time non-exempt, part-time, temporary, etc.),
- Days and hours worked,
- Pay rates and fringe benefit rate,
- Description of work performed,
- Type of equipment and attachments used, including year, make, and model,
- Size/capacity (e.g., horsepower, wattage),
- Locations and days and hours of equipment, and
- Equipment operator name.

Accessing Other Government Contracts (Piggybacking)

Prior to accessing a cooperative or joint purchasing (piggy-back) contract of another governmental entity for the acquisition of goods and services, during a period of emergency or exigency circumstances, procurement personnel and designated disaster liaisons of County departments will obtain and review the original solicitation, competitive quotes, vendor bids, contract documentation, purchase orders, and other pertinent records for goods and/or services received, and will conduct due diligence and market research, as needed to verify the following:

- The original contract was procured competitively and in compliance with the applicable federal procurement under grants rules and regulations, including but not limited to termination for cause and convenience, remedies, Byrd Anti-Lobbying, Clean Air Act, domestic preferences, contract work hours and covered telecommunications, debarment and suspension, kidnapping, custody offenses, human trafficking and related offenses, contracting with entities of foreign countries of concern prohibited, and others as defined in the [General Terms and Conditions](#) applicable to all Miami-Dade County contracts.
- The scope of work to be performed falls within and does not exceed what was contemplated by the original contract, and there are no cardinal changes to the contract, including but not limited to type of goods and/or services, locations, performance period, and total contract amount.
- The original contract is still active and contains appropriate assignability provisions that allow the assignment of all or a portion of the specified deliverables under the terms

originally advertised, competed, evaluated, and awarded, or contains other appropriate assignment provisions; and

- The cost is fair and reasonable, and the vendor has performed satisfactorily, as confirmed by the other government agency, and has agreed in writing to extend the same prices under the same terms and conditions to the County.

If one or more of the above conditions are not met, the County department will not pursue piggybacking under emergency or exigency.

While preparing cost claims for disaster cost recovery, OMB-PM will review the complete procurement and contract documentation, and evidence of reviews and verifications completed by departments for any expenses associated with piggyback contracts from other governmental entities and will determine if the federal procurement under grants requirements are met.

If one or more requirements are not met, OMB-PM will exclude the costs associated with piggyback contracts from claims to be submitted to federal funding agencies.

Applying/Receiving Funding for Emergencies:

OMB-PM will complete applicable documentation or requests to assist the County in receiving funding available for emergency events. This includes completing, within the funder(s)' timelines, Requests for Public Assistance (RPAs) for FEMA Public Assistance or executing certifications for other funding sources. All other required steps such as developing damage inventories and cost estimates, formulating projects for reimbursement, interfacing with the funder's designated lead, preparing requests for reimbursement (RFRs), preparing funder-required reports, and closing out projects will be overseen by OMB-PM in collaboration with department emergency liaisons, the COCC, and other County subject matters experts/project managers assigned to work on the emergency.

If funding is approved, OMB-PM will process signatures of any resulting funding agreements and will prepare legislative items to obtain approval/ratification from the Board of County Commissioners (Board). OMB-PM will work to prepare the reimbursement claims with the departments involved. Costs will be reviewed for allowability and eligibility in accordance with the funders' guidelines and compiled, packaged, and labeled with the nomenclature agreed-upon with the funder if the cost is appropriate. Some of the eligibility reviews conducted by OMB-PM for FEMA PA claims include ensuring that the cost was incurred during the period of performance, that the work performed was reasonable, necessary, and resulting from the incident, that work activities were appropriate emergency protective measures and/or debris disposal and monitoring activities, that all FEMA required data elements have been included for all employees, and verification of hours worked and amounts paid. Approval of final claims will be obtained from departments prior to submitting claims to funders. Once approved, claims will be submitted in accordance with the funder's process or instructions. To maximize reimbursement, OMB-PM will regularly run EMASS project costing and force account reports to fully allocate all potentially eligible costs to available funding sources.

Activation of the Cost Recovery Consultant Contract:

If reasonable and necessary, OMB-PM may request additional expertise or staff augmentation from approved vendors in the Grants Management and Cost Recovery Services pool. OMB-PM will assign and oversee the consultant's work based on the County's needs.

Grant Chartfields and Recording Revenues and Expenses:

When a grant agreement is executed and approved by the Board, the COCC will open an obligated special revenue fund and OMB-PM will open grant and obligated projects (that will match the FEMA Grants Portal number if the funding source is the Public Assistance Program). Approved and reimbursed expenses will be transferred from the department's operating funds to the special revenue fund and grant by journal entries prepared by OMB-PM and reviewed and approved by the COCC. A non-obligated fund with no grant will also be created to transfer costs that have either been submitted to funders but have not been approved or costs that have not been submitted to funders but have been validated and deemed eligible. Posting to the non-obligated funds will be done under limited circumstances in consultation with the COCC. If the costs are denied by the funder, the expenses will be reversed from the special revenues non-obligated fund and charged to the department that incurred the expense. Reimbursements received from the funding sources are recorded in the obligated special revenues fund and grant by the COCC after OMB-PM prepares the deposit.

Duplication of Benefits (DOB) Prevention and Monitoring

OMB-PM will implement internal controls and procedures to identify and prevent Duplication of Benefits (DOB) throughout the disaster cost recovery process. These controls ensure that revenues received from FEMA or other federal agencies do not duplicate payments from insurance, grants, or other funding sources.

During preparation of disaster cost claims, OMB-PM will meet and coordinate with departmental disaster liaisons, and the respective Finance, Grants, and Risk Management personnel, to review the following records for applicability to damages and expenses (labor, equipment and contract costs) to be included in the claims for each event and project:

- Existing federal and state grant agreements and pending grant applications
- Revenues received or anticipated from other local government of other sources
- Insurance claims and proceeds, including those from prior losses

Any costs that have been or are expected to be funded from other sources will be removed from the claim. When insurance policies exclude costs to be claimed but cover other expenses related to the same project, departments must prepare and maintain an Insurance Proceeds Log (with INFORMS transaction crosswalk) and supporting documentation - such as damage inspection reports, pictures, insurance claims, proof-of-coverage or denial letters, insurance payments received, and correspondence in a shared data folder created by OMB-PM.

Before submitting claims to FEMA or other federal funders, departments must provide OMB-PM with:

- Grant Assessment Form (GAF): Listing active and pending awards and confirming that costs claimed from FEMA are not, and will not be, claimed under other grants or programs.

- Notice of Accident or Property Damage Form (NAPD): Listing damages to be reported to the central Risk Management Liability Unit of the People and Internal Operations Department (PIOD) related to the specific incident. Departments must identify and describe any damaged property consistent with the descriptions used for FEMA damage inventories and disaster-grant claims. Departments' authorized personnel must review the NAPD and confirm that damages claimed under insurance are not, and will not be, claimed under FEMA Public Assistance or other federal grants.

Prior to submitting Requests for Reimbursement (RFRs) to FEMA, and again at project closeout, OMB-PM Business Analysts will run reports from INFORMS, the County's Enterprise Resource Planning (ERP) system which houses the financial and human capital management (payroll) modules, as well as the EMASS business module. Using unique Grant Chartfields, Project ID, Task Profile, and Activity ID, the expenses in these reports will be compared against those charged to other disaster or non-federal grants and programs, as identified departments' completed GAFs. OMB-PM Coordinator or Business Analyst will review the reconciliations to verify cost exclusivity among funding sources.

To confirm insurance payments do not result in DOB, OMB-PM staff will obtain from departmental liaisons, Finance and Risk Management staff the transactional details and itemization of insurance payments received for damages listed in department's NAPD Form. OMB-PM will review these records to confirm that costs already covered from insurance are not included in RFRs. Reconciliations will be reviewed by OMB-PM Coordinator or Business Analyst Manager. If duplicate payments are identified, will notify the affected department, the Clerk of Courts Finance Unit, and state or federal agency representatives, as applicable. OMB-PM will process refunds of any duplicated benefits with the appropriate references of FEMA project and work category, and including cost breakdown and proof of payment documentation, which will be uploaded to the Florida PA website.

OMB-PM will retain all DOB verification and support documentation—including GAFs, NAPDs, insurance logs, and INFORMS grant reconciliation reports—for federal grant records retention and audit purposes.

Reporting:

OMB-PM will complete reporting required by funders in accordance with the schedule and format established by the funding agency. The OMB-PM staff member assigned to oversee the project will prepare a draft of the report, which will be reviewed and approved by one of the Business Analyst Managers.

Reimbursement Requests:

The OMB-PM Coordinator will review reimbursement requests submitted through FloridaPA. In the absence of the OMB-PM Coordinator, one of the Business Analyst Managers may review the reimbursement requests prior to submission. As part of the County's internal control system, the OMB-PM Coordinator establishes guidelines for the preparation of Request for Reimbursement (RFR) packages and ensures that each RFR is reviewed for accuracy of cost data, completeness and appropriateness of supporting documentation, and compliance with FEMA Public Assistance eligibility rules. Prior to submission, the PM Coordinator or Business Analyst Manager verifies that all documentation (e.g., payroll records, contracts, invoices, proof of payment, and activity

logs) is included and consistent with the obligated scope of work. If any portion of a request requires clarification, the OMB-PM Coordinator may include an explanatory narrative or contact the responsible party for correction. Once the Florida Division of Emergency Management (FDEM) validates the RFR, the PM Coordinator conducts a final review and addresses any outstanding discrepancies with FDEM personnel or contractors before formally advancing the RFR in FloridaPA.

Final Reconciliation and Closeout:

OMB-PM will perform a final reconciliation of the pre-obligated project and task profile to identify any costs that posted after submission of project costs to the funder(s). The COCC will perform a reconciliation of the special revenues obligated and non-obligated funds with OMB-PM to ensure posted expenses are appropriate. During this process all eligible and reimbursed costs will be transferred to the obligated special revenue fund and any remaining ineligible costs will be reversed from the special revenue fund and charged to the department that incurred the expense. Departments will receive a final report of the costs that were applied to funding sources and those deemed ineligible. Once fully reconciled, the pre-obligated and obligated projects, and department task profiles for the emergency event will be closed to prevent any transactions from posting against them. OMB-PM will prepare any final reports due to funders and confer with the funder's project manager that the County has satisfactorily met all closeout requirements.

Disposition of Federally Funded Equipment, Supplies, and Real Property:

The County will request written instructions from federal-funding agencies regarding the disposition of equipment, supplies, and real property purchased when no longer needed for a federal program. Federally acquired equipment is identified upon transfer to the grant Chartfields. Equipment and property meeting capitalization requirements are generally posted to the appropriate account beginning with the number "595." Unused supplies will be tracked at the department level. Unused supplies purchased with federal funds and with a total aggregate value of \$5,000 or more will be identified by the department for disposition. Once items for disposition have been identified, OMB-PM will work with County departments in obtaining the fair market value of these items. Fair market value is either the selling price or the advertised price for a similar item in a competitive market. When there is a residual inventory of unused supplies exceeding \$5,000 or equipment/property with a current per-unit fair market value exceeding \$5,000, the County is required to dispose these items at closeout or when no longer needed for the federal program.

The County will dispose of the items in one of three ways:

1. It may transfer equipment, supplies, or real property to be used for other federally funded programs or projects. The federal funding agency that paid for the item must be informed in writing of the transfer.
2. It may sell equipment, supplies, or real property. The federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the federal awarding agency may permit the County to deduct and retain from the federal share \$500 or ten percent of the proceeds, whichever

is less, for its selling and handling expenses. (See Implementing Orders 8-2 and 8-4 for further County procedures).

3. It may retain, supplies, or real property. The federal awarding agency is entitled to an amount calculated by multiplying the current market value by the federal awarding agency's percentage of participation in the cost of the original purchase.

OMB-PM will work with the federal funding agency to determine how they would like to receive disposition payments (i.e. offset a future payment to the County or refunded through check/ACH).

Equipment/property with a per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation. Documentation supporting fair market value analyses conducted, sales or transfers, or communications/notifications to federal funding agencies, will be maintained in accordance with the record retention requirements of the program. For Public Assistance Program grants, the minimum retention period shall be five years from submission of the final expenditure report.

Interest Income:

Payment advances received from funders will accrue interest income. If the daily cash balance was positive during the month, INFORMS will prorate interest earned by those grants with a positive cash balance or that had a positive cash balance at any time during the month. The COCC-General Ledger Section runs the interest allocation job that generates and posts the interest allocation journal entries after month-end. The journal entries post in the grant Chartfields provided during the setup of the Grant Chartfield. Interest revenue is posted to account 4611000001 to separate interest earned from federal/state revenues. OMB-PM will consult funders regarding the appropriate treatment of interest income earned on advanced payments. In the case of FEMA PA grants, interest income will be offset from future payments that are pending or will be returned via check/ACH payment in accordance with the funder's instructions.

Procedure Revisions:

This document will be reviewed annually and updated if there are any changes to this procedure.