



PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

Comments to the Federal Emergency Management Agency on the proposed FEMA Policy: Public Assistance Simplified Procedures

The Pennsylvania State Association of Township Supervisors (PSATS) is submitting these comments to the Federal Emergency Management Agency about its proposed Policy: Public Assistance Simplified Procedures.

PSATS represents Pennsylvania's 1,454 townships of the second class and is committed to preserving and strengthening township government and securing greater visibility and involvement for townships in the state and federal political arenas. Townships of the second class cover 95% of Pennsylvania's land mass and represent more residents — 5.7 million Pennsylvanians — than any other type of political subdivision in the commonwealth.

PSATS is greatly appreciative of the recent final rule to increase the threshold for small project maximum for the agency's Public Assistance (PA) program to \$1 million to reduce the administrative burden on state and local governments receiving FEMA grants after a disaster.

PSATS believes that the proposed Public Assistance Simplified Procedures would be a benefit to our members. We are supportive of eliminating Quarterly Progress Reports for small projects. We support reduced documentation for cost estimates and acceptance of estimates certifications for damages and work provided in lieu of providing comprehensive source documentation.

All townships have financial and staffing constraints and reducing the administrative burden required for the documentation, reporting, and closeout of small projects would be appreciated. Such changes reduce the burden on local government and allow elected officials and staff to focus on serving their constituents' needs rather than on burdensome paperwork.

We do have a concern that if an applicant has multiple projects, some completed and other to be completed, would they have to wait to receive the remaining non-federal cost share? If so, we would ask that these provisions be revisited to eliminate the possibility that an applicant must wait on large non-federal cost share because of an outstanding small project.

In closing, PSATS is supportive of the Proposed Policy: Public Assistance Simplified Procedures, with the exception of the concern noted above. Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "David M. Sanko". The signature is written in a cursive style.

David M. Sanko
Executive Director