

RERP FUND DISBURSEMENT POLICY

DEPARTMENT OF PUBLIC SAFETY VERMONT EMERGENCY MANAGEMENT DIVISION



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Fiscal Year 2014 (July 1, 2013 – June 30, 2014)

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RERP FUND DISBURSEMENT POLICY

1. INTRODUCTION

A major function of the Radiological Emergency Response Program (RERP) is to manage the fund. Each year the Entergy Nuclear Vermont Yankee Corporation pays a sum to the Vermont Emergency Management, Department of Public Safety sufficient to bring the fund up to the level as set by the Vermont Legislature and State law.

The RERP budget is submitted to the Department of Public Safety by August 15th and then submitted along with the department's budget to the Finance and Management Department and then submitted to the Legislative House Appropriations Committee in January. After the normal Legislative approval process it becomes a part of the State Budget and is usually finalized in May of the Legislative session to be executed in the fiscal year beginning July 1.

2. PURPOSE

This policy is designed for five purposes.

- A. To assist applicants in applying for awards from the Radiological Emergency Response Plan Fund.
- B. To guide local response agencies in fiscal policy when conducting drills, exercises, and real events in a manner that will ensure appropriate reimbursement.
- C. To provide a written process for the RERP Program Manager and staff in administering the funds wisely and expeditiously.
- D. To make the various fiscal processes more efficient and expeditious.

3. PROGRAM SCOPE

The Vermont Radiological Emergency Response Plans primarily cover the Entergy Vermont Yankee plant in Vernon, Vermont.

4. STATUTORY AUTHORITY

VSA TITLE 20, Section 38, Special Funds as amended June 2007.

5. APPLICANT ELIGIBILITY

- A. An applicant who applies for expense reimbursement / support from the fund shall be an identified part of, or provide a specified service to, the Radiological Emergency Response Program.
- B. An applicant may be a state agency, local jurisdiction, county jurisdiction, a support organization, or individual providing radiological response services.
- C. Whenever possible, state agencies will absorb costs through their regular legislative appropriation.

6. EXPENDITURE ELIGIBILITY

Reimbursement or financial support shall be for **personnel costs, operational costs, training costs, and equipment costs** necessary in support of the Radiological Emergency Response Program. These costs which are necessary for an organization to meet its obligations for emergency preparedness as defined by federal guidance: "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (FEMA REP1/NUREG 0654)" and as further defined by other guidance memoranda, are eligible. In addition, costs will be reimbursed only to the extent that they are to be exclusively used in support of the Vermont Radiological Emergency Response Program (VRERP) and provisions contained in 20 VSA Section 38, Special Funds. **Whenever possible, expenses shall be anticipated and approved in advance.**

- A. **Personnel Costs** Individuals having an assigned response task under RERP may be reimbursed as pre-approved by the Director, Vermont Emergency Management. In the event of an actual emergency, the Price Anderson Act, (section 170, 42 U.S.C. 2210) as amended, provides for up to 500 million dollars in liability coverage.
 - (1) Expenses associated with the RERP Fund shall be approved by the chief or authorizing official of the requesting organization.
 - (2) Eligible costs are those personnel services provided for drills, exercises, training, or actual emergencies in accord with the VRERP. Requests for reimbursement should include the name of the individual, their responsibilities under the VRERP, and hours worked.

- (a) Towns and other response organizations with volunteers will submit requests for reimbursement to Vermont Emergency Management Division, Attention RERP Program, 230 Main Street, Suite 306, Brattleboro, Vermont 05301. The current hourly rate is \$20.00.
- (b) Towns with full or part-time paid staff will submit requests for reimbursement to Vermont Emergency Management Division, Attention RERP Program, 230 Main Street, Suite 306, Brattleboro, Vermont 05301. The amount of reimbursement for such activities will be based on the current salary level or hourly rate for the individual(s) as a town employee performing a response function.

B. Meals

(1) Groups

When an organization is providing meals for many people delivered to the local EOC/or meeting room during an exercise, drill or actual event, the responsible official can submit a copy of the bill and will also include a copy of the sign-in roster for the event.

- (2) Any applicable State of Vermont sales tax or room and meals tax is included in the total reimbursable limits listed.

C. Equipment Costs

- (1) As required by statute, any equipment requested by a municipality, state or county agency is to be used for the VRERP. Location and use of equipment requested must be consistent with the intent of the Vermont Radiological Emergency Response Plan and/or a current sub-plan and procedure, i.e., town plan, school plan, reception center plan, etc. If a requested equipment item will be used for other purposes, the percentage of its use for the other purposes must be described. Funding will be provided for only that portion that relates directly to the plan. For example if an item being requested will be used 50% of the time for VRERP, the state may provide 50% of the item's cost.
- (2) Equipment must be able to fulfill its intended use. If this cannot be reasonably guaranteed, the State may make alternative recommendations.
- (3) Equipment must be compatible with existing equipment in the town / organization as well as other equipment with which it may be expected to interface.
- (4) Equipment requested should be of high quality and durability consistent with its public safety role.

- (5) At least three quotes shall be supplied with the application on any single vendor purchase costing over \$1,000. Whenever possible, brochures describing equipment should accompany the request. If there is a strong reason why only a particular model and brand or a particular vendor is required, a detailed explanation must accompany the request. This is known as a request for “sole source”.

D. Equipment Ownership

Unless otherwise specified, all equipment provided becomes the property of the recipient and that recipient agrees to maintain the equipment at their expense and keep it in a state of readiness for actual events and training.

Note: All will need to be made part of the award process. The process needs to be in conjunction with your grant. You will need to fill out a Department of Public Safety Financial Report Form and any other required documentation that is stated in your grant.

7. THE APPLICATION PROCESS

- A. Annually** the Vermont Emergency Management Division will survey the local towns and organizations in the emergency planning zones to determine needs for radiological purposes. This is done through a series of budget meetings.
- B. Equipment requests** should be prepared on the application form provided with all pertinent information, including specifications, available vendors and at least three quotes. The request must be signed by the chief or authorizing official of the requesting organization (Chief Operating Officer [CEO], sole proprietor, senior partner, Chair of the Select Board and/or Town Manager, etc.). If the request is being submitted by the local Emergency Manager Director, it must be countersigned by either of the above local officials.
- C. Requests for personnel reimbursement**, either personnel costs, i.e., worker pay for an exercise or drill, etc., or operating costs, i.e., meals for a training session including an exercise or drill, or other training costs, may be submitted by the Town Clerk/Treasurer with the counter signature of the Select Board Chair and/or Town Manager. If the item for which reimbursement is being requested has been paid, a copy of the paid invoice and/or canceled check must accompany the request. This will need to be made part of the award process. The funds being requested needs to be in conjunction with your grant. You will need to fill out a Department of Public Safety Financial Report Form.
- D. The RERP Manager, acting on behalf of an applicant**, may request that certain item(s) related to the Radiological Emergency Response Program be made part of the award process.
- E. All covering letters** accompanying request forms or requests in letter form should be on town/organization stationary and the original sent by mail to the RERP

Office, Vermont Emergency Management Division, Attention RERP Program, 230 Main Street, Suite 306, Brattleboro, VT 05301.

- F. **The RERP Manager** with the advice and consent of the Director of the Vermont Emergency Management Division **will review all applications** and recommend payment of the ones providing the most benefit to the Vermont Radiological Response Program. Recommendations will specify the amount of fund monies to be spent on each item requested as a percent of the items total cost and a dollar amount.

8. **THE DECISION MAKING PROCESS**

In making these decisions, VEM / RERP will look at a variety of factors. Perhaps the most important is the impact that the request would have on the safety of the public in a radiological emergency caused by the nuclear power plant. Review of applicable portions of local or state plans and procedures may be useful. They will be recommending whether to fund a given item and also what percent of its cost should be borne by the Radiological Emergency Response Fund. The application forms have been designed to allow a separate review of each item in a request.

- A. **In deciding whether to fund an item**, its use in a radiological emergency response will be looked at. Applicants are encouraged to not look at the fund as an alternate source of funding for routine budget items. Review of the current inventory of an applicant and previous request history may also be useful.
- B. **In deciding what percentage to fund an item**, it is difficult to use a rigid schedule. It may be useful to ask, "If there was no nuclear power plant, would you still purchase this item?" In the interest of providing equitable treatment to all applicants, items that have a significant impact on a radiological emergency response are funded at 100%. Those items that would have some impact on a radiological emergency response but also have a frequent use in day-to-day operations may be funded at 50%. However each application should be looked at on a case-by-case basis as there can be many variables.
- C. **The decisions made by RERP** are subject to reconsideration upon written request by the recipient.

9. THE APPROVAL PROCESS

- A. **Once an application has been approved**, each applicant shall be notified of RERP's decision. If RERP's decision changes the funding share or the type of items being awarded in any significant way, the applicant will be advised and asked to confirm that they are able and willing to accept the award. This includes any award conditions.
- B. **Once the applicant(s) have agreed** to any significant change to their request, the application will be revised and included in the RERP budget for the next fiscal years beginning July 1.
- C. **The RERP budget is submitted** to the Department of Public Safety finance office by the middle of October and incorporated into the Department budget which is then submitted to the Department of Finance and Management.
- D. **The Public Safety budget is incorporated** into the State budget and submitted in January to the House Appropriations Committee for their review.
- E. **After the normal Legislative approval process** the entire state budget is normally approved in May and becomes a formal legal legislative Act. This is the budget the RERP program has available for the fiscal year starting July 1 to June 30.
- F. **After July 1, all applicants will be notified** of any significant change made to their requests by the legislature. Once the applicant has agreed to the changes a letter signed by the Director of Vermont Emergency Management will be prepared. That letter will include a description of what the award is for and will include a formal sub-grant award outlining the "Scope of Work" and any necessary limitations or conditions.
- G. **The Sub-Grant is to be signed** by the chief or authorizing official and returned to the RERP office, Vermont Emergency Management, Waterbury, VT., as soon as possible. When the sub-grant has been countersigned by VEM Director and/or Public Safety Commissioner, the applicant may proceed with their purchases.

10. THE PURCHASE PROCESS

It is understood that the prices quoted in the application are "worst case" prices and that in the purchase process the final price may be less. Each award will either have a "not to exceed" amount or a RERP participation percentage and a "not to exceed" amount. In the event of a final cost that is less than that quoted in the award, the amount of actual payment will not exceed the cost of the item or the award percentage of the actual payment. *(For example: a town is awarded 50% of the cost of a radio that is estimated to cost \$1,500.00 or \$750.00. When purchased it actually costs \$1,400.00. Therefore the amount paid to the town will be adjusted to \$700.00.)*

11. COMPLETION OF PURCHASES

A. **You may proceed with these purchases** and when completed, apply for reimbursement as follows.

- (1) Pay the vendor / installer totally for the costs.
- (2) Request reimbursement on official letterhead to RERP Manager, Vermont Emergency Management Division for the amount of the award along with the Department of Public Safety "Financial Report Form" (form was included in the sub-grant award document).
- (3) In your letter indicate that the purchase and installation has been completed and that the item is working properly. The request for reimbursement should include a copy of the total invoice along with a copy of the canceled check.
- (4) If the award is for a specified percentage of the cost of an item, the reimbursement shall not exceed that percentage.

B. **All billings for approved purchases** shall be completed and forwarded to Vermont Emergency Management as soon as possible. All reasonable efforts should be made to complete these purchases by March 14th of the current fiscal year. All paperwork for reimbursement must be submitted to VEM by May 1st of the current fiscal year. Any funds not expended by June 30th will **NOT** carry-over into the next year and are lost for program use.

12. EMERGENCY PREPAREDNESS MAINTENANCE CHECKLIST

The Maintenance Checklist in the Vermont RERP Briefing Book is provided to help award recipients perform required quarterly inspections in the areas of budgeting, stipends, emergency planning, emergency facilities, training, drills, and exercises. It should be submitted to Vermont Emergency Management no later than end of September, December, March, and June of each fiscal year.

13. EPZ PAGER CARRIER PAY

There is an EPZ pager group which provides immediate alert notification to state and local officials in the Emergency Planning Zone (EPZ). In most towns that have two pager carriers, the primary pager carrier is the Emergency Management Director (pager pay is included in the EMD compensation). The second pager carrier receives \$1,500.00 per year. Some towns assign pagers to the Police and Fire Departments. Response is made by the on-duty dispatcher in each department. Once the grant has been signed by all parties, Vermont Emergency Management assumes responsibility for making payment to each town. The town will then pay each pager carrier. It is recommended that towns disburse payments quarterly.

14. CONTINUING SERVICES

Those essential services that must be continued from year to year will not be subject to the awards process. They will be covered by contract, letter of agreement, or other applicable means. The provider will send a bill to the RERP Program Manager at the Emergency Management Division as stipulated in the agreement. Prompt submission of a clearly explained bill will increase the likelihood of prompt payment.

15. ANNUAL GUIDANCE

Each year **VEM / RERP** will provide eligible applicants with guidance on what needs should be given priority. Applicants shall review their plans and procedures (or their portion of an existing plan or procedure) for areas requiring improvement. Applicants are encouraged to cite the portion of a plan or procedure that their application will benefit and why that item is a priority.

16. ANNUAL POLICY REVIEW

This policy will be reviewed annually and revised as necessary. The distribution list for this policy will include Town Clerks, Town Managers, Town Emergency Management Directors, participating organizations, and appropriate State Agencies having involvement in the RERP program.

17. APPEAL PROCESS

Any applicant that feels that they were treated unfairly, should write a letter to the Director, Vermont Emergency Management Division, Department of Public Safety, 103 South Main Street, Waterbury, VT

THE APPLICATION / AWARDS PROCESS
RERP determines annual awards guidance
A series of Budget Meetings with EPZ participants
Applicant(s) return completed application to RERP
RERP personnel review applications for accuracy and applicability
RERP personnel meet with Applicant(s) to hear presentation, if necessary
VEM Director and RERP personnel confer on award decisions
RERP Fiscal Year Budget is submitted
Legislative and normal State approval process
Applicant(s) are sent a letter of award(s) along with a Sub-Grant Agreement and are requested to send it back with the signature of the Applicants authorizing agent
Award recipient purchases item(s)
Recipient sends invoice and proof of payment for awarded items to RERP
RERP sends documentation requesting reimbursement to Accounting, Public Safety Department
Recipient is sent either a reimbursement check or deposit to the Town directly from the Vermont State Treasurer's Office

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Application Forms

It is designed to provide information for the decision-makers and thereby speed up both the application and decision-making process. Constructive suggestions are encouraged.

Page One of the application is the cover sheet that tells about the applicant and summarizes the specific items being requested.

Page Two is used to describe in detail each item being requested. A separate **Page Two** is filled out for each different item and is indicated by **Item No.** from page one of **Total Items** from page one, e.g., Item Request Number 1 of 6.

If two or more identical items (or items that are identical except for some minor feature such as color) are being requested, they should all be included on the same page. If two or more identical or very similar items are being requested for different users within the applicant agency or organization, e.g., Fire Department and Police Department, a separate page two is used for each user.

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