MEMORANDUM

State of Alaska

Department of Transportation & Public Facilities
Office of the Commissioner

TO: DOT&PF Incident Command Team

DATE: November 7, 2025

FROM: Ryan Anderson, P.E.
Commissioner

SUBJECT: Contracting, Accounting, and Project Alignment with FEMA Requirements – Typhoon Halong Disaster Declaration

As our operations expand under the federal disaster declaration and transition into a Unified Command This memorandum provides guidance to ensure that all DOT&PF activities related to the Typhoon *Halong* disaster declaration are fully consistent with FEMA Public Assistance (PA) program requirements and the specific terms of the Federal and State disaster declarations.

<u>FEMA Cost Share and Time Limitation</u>

The disaster declaration for Typhoon *Halong* authorizes 100% federal cost participation for eligible emergency work for a period of 90 days from the date of the declaration. After that 90-day period, the federal cost share typically reverts to 75%, with the remaining 25% as the state and local match, unless extended by FEMA or adjusted through coordination with our State partners at the Division of Homeland Security and Emergency Management (DHSEM) and FEMA Federal Coordinating Officers.

This 90-day period represents the window during which emergency protective measures and debris removal (Categories A and B) are eligible for full federal reimbursement. As the declaration transitions beyond that initial period, FEMA will begin reviewing work for permanent restoration (Categories C–G) under standard cost-share provisions.

<u>Contracting Guidance</u>

To align our work with these requirements, all contracts and task orders associated with Typhoon *Halong* response and recovery must be structured to reflect the 90-day federal cost-share period. Specifically:

1. Include clear contract language that allows DOT&PF to:
    - Complete, suspend, or close out emergency work at the end of the 90-day period; and
    - Extend the contract, modify scope, or issue new authorizations as directed by DHSEM and FEMA based on any cost-share or eligibility updates.
2. Clearly define scope and deliverables to correspond with FEMA's categories of work (Emergency vs. Permanent), ensuring costs can be tracked and documented by project and activity type.
3. Avoid commitments that extend beyond the 90-day 100% cost-share period unless coordinated through the incident commander and approved by the Commissioner.
4. Identify any costs currently projected that would be incurred beyond the 90-day federal cost share period and report to the Incident Commander.

5. Contracts will be administered at the statewide level and will not be divided along regional boundaries, even when a contractor's scope of work spans multiple regions.

It is critical that this message not be interpreted as the Department stepping back from assisting communities after 90 days. Rather, this is an operational adjustment to ensure our contracting and documentation processes align with federal eligibility requirements. Our commitment to supporting affected communities remains unchanged—we will continue to assist through both the emergency and recovery phases.

FEMA Eligibility and Documentation

All work performed under this declaration must meet FEMA's four fundamental eligibility criteria:

1. Applicant Eligibility – DOT&PF or its contractors performing work under state mission assignments;
2. Facility Eligibility – Work performed on eligible public infrastructure or facilities;
3. Work Eligibility – Clearly categorized as emergency or permanent work consistent with FEMA's definitions;
4. Cost Eligibility – Costs must be reasonable, necessary, and adequately documented.

Every project must include thorough accounting records, invoices, timekeeping, equipment logs, and procurement documentation. Accurate and complete records will ensure that FEMA reimburses eligible costs and avoids potential non-participating expenses during audit or closeout.

Next Steps

- Command staff should provide a copy of this memo to all staff involved in reviewing contracts and upcoming scopes of work to ensure compliance with this guidance.
- Coordinate any extensions, amendments, or changes in scope through the Incident Commander.
- Finance and Administrative staff should maintain close coordination with DHSEM counterparts to confirm eligibility, cost-share status, and reporting timelines.

Our ability to provide effective and timely recovery assistance depends on disciplined contracting, accurate accounting, and close coordination with our federal and state partners. Thank you for your leadership and continued commitment to serving Alaskans during this recovery effort.