

REIMBURSEMENT TIPS

for Emergency Laboratory Support



The Water Laboratory Alliance (WLA) provides the Water Sector with an integrated nationwide network of laboratories with the analytical capabilities and capacity to support monitoring and surveillance, and response and remediation in the event of intentional, unintentional, and natural water contamination. Emergency response and recovery costs incurred by laboratories supporting the Water Sector following an incident may be eligible for reimbursement through local, state, or federal level mechanisms. The WLA's Response Plan provides a comprehensive approach to providing a coordinated multi-laboratory response to these events but does not include detailed guidance on reimbursement. EPA is considering various reimbursement options/mechanisms to address

laboratory support, including "fee for service" agreements. This tips sheet has been developed to facilitate public laboratory reimbursement when fee for service agreements have not been established.

While the rules for allowable activities vary between reimbursement mechanisms, lessons learned from past incidents reveal that reimbursement is commonly not maximized due to either lack of knowledge or failure to follow proper procedures and processes specific to a particular mechanism. This document presents tips laboratories can use to develop or refine internal processes and procedures that may maximize their ability to receive reimbursement.

Before an Incident

Identification of appropriate resources and mechanisms facilitates the reimbursement process.

In general, laboratories that may provide emergency support services in response to an authorized Analytical Services Requester (ASR) (e.g., Incident Commander, Analytical Coordinator, Primary Responding Laboratory [PRL], and local, state or federal emergency operations center representative) and seek reimbursement for these services should prepare in advance. Consideration of the following pre-incident planning and preparation activities may be helpful:

- **Review reimbursement eligibility, mechanisms, and resources** for laboratory support activities and how they might differ if response is at a local, state, or federal level.
- **Establish emergency procurement procedures and logistics** for essential laboratory supplies.
- **Review current staffing and identify personnel and procedures** to support contingency or extraordinary staffing requirements.
- **Review requirements** (e.g., sample identification) for criminal and forensic sample analyses.
- **Establish accounting codes** to capture, track, and distinguish routine operational costs from incident support-

Develop...

- **and maintain a thorough pre-incident inventory of critical resources**, including equipment and instrumentation, reagents, supplies, and consumables related to specialized or anticipated support activities.
- **a comprehensive listing of available support resources** (e.g., personnel, analytical capabilities and capacities, analytical instrumentation, sampling equipment, and supplies) and **register your laboratory with EPA's Compendium of Environmental Testing Laboratories** (www.epa.gov/compendium), if appropriate.
- **and maintain records of all routine Quality Assurance and Quality Control (QA/QC) procedures** (types and frequency).
- **and maintain thorough maintenance and calibration records** for laboratory equipment and instrumentation including all required procedures and intervals.
- **and maintain standard sample evidentiary chain of custody protocols** (Note: a link to internal chain of custody training is available on the WLA Web site).

- related costs (including pre-incident emergency work).
- **Describe compensation** (e.g., overtime) in the personnel policy and review any limitations on analyst hours (e.g., maximum number of hours in Biosafety Level 3 on a daily basis).
- **Document routine hours of use** for equipment and instrumentation.
- **Provide secure on-site and off-site storage of all records** – documentation (through Federal Office of Management and Budget) should be maintained for a minimum of three years following final payment.

During and After an Incident

When the potential exists for laboratory support reimbursement, laboratories must maintain accurate records of expenditures associated with support of an incident.

The following activities and accounting procedures may be helpful during and after an incident:

- **Coordinate with emergency management agencies at local, state, and federal levels to identify all incident-related activities and ensure that a complete list is provided** to State Emergency Management Agency (EMA), Federal Emergency Management Agency (FEMA) officials and the Incident Commander, or other responsible designee.
- **Review** reimbursement eligibility, mechanisms, and resources for laboratory support activities.
- **Review time limitations for potential reimbursement sources**, as well as any deadlines for requesting extensions.
- **Develop a detailed cost summary sheet** to support claims for reimbursement.
- **Develop and maintain a system to cross-check and validate all records.**

Document...

- **labor costs** in detail utilizing pre-established accounting codes to identify incident-related costs (including emergency work conducted before a state or federal declaration of disaster). Ensure that documentation can 1) distinguish between regular and overtime hours, 2) provide hours on a per-person, per-day basis, and 3) provide detail on all tasks performed, including hours per task and task location. **In particular, track costs for...**
 - staff exchange.
 - consulting services.
 - data review.
 - sample collection, analysis, disposition, and disposal.
- **non-labor costs** through pre-established accounting codes and/or detailed logs that 1) separate emergency from permanent work, 2) provide detail on date, location, task, analyst/technician, and hours of use, and 3) account for equipment damage/extraordinary use. **In particular, track...**
 - analytical costs, including use/replacement of reagents and supplies and QA/QC analyses.
 - courier/transport costs for samples; disposition, storage and disposal of samples, and/or records.
 - acquisition of equipment (e.g., autoclaves and computers) and equipment usage costs associated with the incident (e.g., need for accelerated equipment maintenance and calibration, need for earlier replacement of parts, such as microscope bulbs).
 - overflow laboratory costs (i.e., the cost of contracting laboratories to cover routine support).
 - incidental costs, such as temporary relocation (e.g., airfare, lodging, food, rental vehicle).

This resource may be useful in determining eligibility and reimbursement requirements:
FEMA Public Assistance Information: www.fema.gov/government/grant/pa/index.shtm

CONTACT US: For additional information on the Water Laboratory Alliance, please contact WLA@epa.gov or see <http://cfpub.epa.gov/safewater/watersecurity/wla.cfm>. Latisha Mapp may also be contacted directly at mapp.latisha@epa.gov.