



February 25, 2021

Northeast Regional Office
Regional Manager
3235 Westwood Drive
Prince George, BC V2N 1S4

Via Email: embc.neaadmin@gov.bc.ca

To whom it may concern:

RE: Financial Assistance Guide for Emergency Response Costs: A Guide for First Nations and Local Authorities

The Government of BC has been making changes to modernize emergency management legislation. Efforts to modernize this legislation is greatly needed and the Province of BC should be commended on the adoption of the Sendai Model and the subsequent work done to date.

On November 3, 2020 Emergency Management BC (EMBC), through its regional offices, distributed by email an updated Financial Assistance Guide for Local Authorities and First Nations. On January 27, 2020 a follow up email was received seeking feedback on the Guide until the end of February 2021.

The Peace River Regional District (PRRD) has been in a state of local emergency since 2018 as a result of the Old Fort Landslide. As you know we continue to face growing geotechnical challenges in the region and continue to evaluate our emergency response plan for the region based off of previous responses to emergencies and after action reports.

In reviewing the Financial Assistance Guide (FinGuide) from 2005 and 2020, the PRRD has the following concerns based on a number of emergency operations centre (EOC) activations over the past 10+ years. While some of these guidelines have not changed since 2005, a number of core issues persist and new issues have appeared.

A) Expense Authorization Process

The FinGuide notes that “an EMBC task number does not guarantee that all response costs for an event are eligible.” As such the vast majority of expenses are required to be approved by EMBC through the Expense Authorization Form (EAF) process. The challenge is that the EAF approval process, in our experience, is generally very slow. It does not keep pace with the emergency and in some cases takes days to receive approval. There have been instances that by the time the EOC has received approval for an expense, that expense is no longer

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needed because the critical issue has either passed or has become more critical and the EOC is now working on approvals for an alternative plan.

Further the delay in EAF approvals in the past has resulted in residents taking things into their own hands and risking their safety. For instance in 2018 and 2020 residents crossed the active landslide by foot or all terrain vehicle in order to go to work, as there were no other transportation options available until the EAF for water taxi service was approved.

As some of these expenses are in the tens to hundreds of thousands of dollars each, EOC staff cannot risk moving ahead with actions that could result in a significant financial burden to their local government if these expenses are not approved through claim reimbursement.

The PRRD's recommendation is that:

- 1) EMBC increase the authorization limits of the PREOC so that fewer authorizations need to be reviewed by the Provincial Emergency Coordination Centre and staff and elected officials in Victoria.
- 2) For re-occurring events, that EMBC provide pre-approval of spending thresholds for expenses related to shelter in community costs and evacuation costs.

B) Provision of Water

While it does not appear in the FinGuide, it is the PRRD's understanding that there is a provincial policy that does not allow for the provision of water by a local authority to a community who is sheltering in place. While the PRRD understands that generally many local governments are purveyors of water and have water systems in place to provide service to their residents, this is not the case throughout all of BC or in the PRRD.

During the 2018 and 2020 Old Fort Landslides, there were challenges in providing water to residents who were effectively cut off from their private water purveyors. The PRRD does not own or operate a water system in Old Fort and water is trucked to the residents by private water haulers or the residents, themselves, haul water to their homes.

Going forward the PRRD would like to see the Province re-examine this policy acknowledging that where the local authority does not operate a water system and there is no immediate threat to a community, but they are cut off from essential services like water, that the provision of those services should be an eligible expense.

The PRRD's recommendation is that:

- 1) EMBC develop a policy that provides opportunities for the delivery of essential services, like water delivery, to communities that are sheltering in their community as a result of an emergency that has cut off their access to essential services.

C) Evacuation Costs

The FinGuide notes that “costs associated with the evacuation of pets, hobby farm animals or other animals not considered to be commercial livestock” are not eligible expenses for reimbursement. As many responders know, many individuals will not evacuate their homes if they cannot take their pets. While pet and hobby farm owners should have plans in place and the equipment needed to evacuate their pets and livestock, EMBC should establish a policy whereby assistance can be provided in exceptional circumstances. In some instances, the emergency event has created a situation where pet and hobby farm owners will need assistance from others and it is unreasonable to allow pets and livestock to suffer on their own because of a policy that does not provide expense reimbursement to assist with evacuation.

The PRRD’s recommendation is that:

- 1) EMBC establish a policy that provides criteria when assistance can be provided to evacuate pets and hobby farm livestock in exceptional circumstances.

D) EOC Personnel

In section “2.2 Eligible Expenditures Limits and Reasonability” it refers to staff overtime, deployment length and shift lengths as well as the use of contractors. While we agree with the principle in the guidelines to maintain adequate health of our staff as it relates to shifts and shift lengths, we have the following concerns:

1) Contract Personnel

The FinGuide notes that local authorities cannot utilize contractors in place of internal capacity. Many northern local authorities have limited staff and the use of contract personnel is critical to our operations for the following reasons:

- a. It helps to relieve some of the mental stress and pressure on our staff who have to continue to live in the communities in which they had to also assist with emergency response and sometimes make very challenging decisions;
- b. It allows the local authority to maintain some semblance of normalcy in their day to day operations by not having to deploy all staff to the EOC at once; and
- c. It allows the local authority to bring in contractors with expertise in emergency response and mentor and train our new staff beyond what can be accomplished in an exercise.

2) Backfilling

The FinGuide notes that incremental payroll costs to temporarily cover positions left vacant by staff working on response related activities in an eligible expense. While the PRRD appreciates this opportunity, EMBC needs to understand that in small local governments, it would be very rare that could we bring in temporary staff to cover off day to day positions. In order to do so, these temporary staff would need to be trained on how the PRRD operates, our internal structures, programs and projects which are unique to the PRRD – usually by staff who are working in the EOC. Instead it makes more sense to allow for contract personnel to work in the EOC, where the processes are standardized through the use of the Incident Command System.

3) Overtime

The FinGuide notes that costs related to overtime where the “overtime policies [are] designed specifically to be in effect only during EMBC response eligible events” are ineligible expenses. Many local governments have salaried staff who do not receive overtime for working extra hours to attend evening meetings in the community as part of their regular duties. While this is expected of salaried employees, the number of meetings they attend is usually limited throughout the year and they may work with their employer to juggle work hours or receive time in lieu of extra work.

During an emergency response, it is unreasonable to consider overtime would not be paid to salaried staff to the same extent as unionized employees in their organization. Working in an EOC is outside of the regular scope of work and generally involves (at least at the onset of an event) additional hours of work in the evenings and on weekends. Often taking time in lieu at a later date is not practical as staff have regular leave time they are trying to balance while catching up on the backlog of work as a result of an emergency event.

The PRRD’s recommendation is to:

- 1) Allow the use of contract personnel from the onset of a response for those local authorities who have limited internal capacity;
- 2) Establish contract personnel rates so that there is no disagreement regarding rates during the claim reimbursement process; and
- 3) Make overtime pay an eligible expense where the overtime rates match those of their unionized staff in their organization (e.g., if the union receive time and a half, so do the salaried employees).

E) Rates

1) Meal Allowances & Per Diem Rates

The FinGuide notes that the provision of food and water to EOC staff is an eligible expense but cannot exceed provincial per diem rates. While we understand that EMBC wants to be cognizant of costs, the rates for food and water should match the rates established by the local authority. In the case of the PRRD the per diem rates are higher than those established by the Province as the cost of food is greater in the north than it is in other parts of the province.

2) Blue Book Rates

The FinGuide notes that equipment rental rates will be reimbursed in line with the rates listed in the “Blue Book.” In the Peace Region it has been a challenge to contract equipment at these rates as a result of competition with the oil and gas industry. As such PRRD has had to submit EAF’s to seek authorization to contract equipment at higher rates. This has, as noted above, slowed the response. As such the PRRD would like EMBC to develop a written policy that provides allowances for equipment rental in the Peace Region at rates that exceed the Blue Book.

The PRRD's recommendation is to:

- 1) Allow local authorities to follow their own per diem rates for food and water and make those established rates an eligible expense with the submission of an established internal policy.
- 2) Establish a policy that allows for equipment rental rates to exceed Blue Book rates in the BC Peace Region.

F) Damaged equipment costs

The FinGuide notes that repair of equipment used during an event is not an eligible expense. It is unreasonable that the repair of equipment used during a response would not be eligible for reimbursement when it has been damaged as a result of a response. This puts an unreasonable financial burden on the local authority.

The PRRD's recommendation is to:

- 1) Where the local authority can prove that a piece of equipment was damaged as a result of an emergency response, the cost of repair should be an eligible expense for reimbursement.

G) ESS Staff Payment

The FinGuide notes that "As a volunteer based program, the payment of ESS staff providing direct interaction with evacuees is not eligible." Section 2(3)(f) of the Local Authority Emergency Management Regulation states that "A local authority as part of their emergency plan must ... coordinate the provision of food, clothing, shelter, transportation and medical services to victims of emergencies and disasters, whether that provision is made from within or outside of the local authority." The Regulation does not state that this assistance must be provided by volunteers. It therefore, should be up to the local authority to determine how to best provide these services, whether by volunteers or paid staff, and local authorities should be reimbursed accordingly.

Further, volunteerism is on the decline and finding individuals who are willing to take a leave from their employment to volunteer for ESS, for sometimes weeks at a time, is becoming increasingly rare to find. As such ESS personnel should be considered paid-on-call staff (if not regularly employed by a local authority in another role) and paid for their response work. Further a policy should be developed, similar to that used for BC Wildfire response that sets wage rates for volunteers who are deployed.

The PRRD's recommendation is to:

- 1) Establish a policy for wage reimbursement of ESS paid-on-call staff similar that which has been established by BC Wildfire for volunteer firefighters.
- 2) Provide reimbursement for regular and overtime staff costs associated with the provision of ESS.

H) Claim Reimbursement

The FinGuide outlines the documentation and process required to submit claim reimbursements. While the PRRD understands that there needs be documentation proving the expenditures, the amount of information required is arduous and excessive. Requiring the provision of invoices, cancelled cheques, GL's showing payment information and banking information is redundant and time consuming. Similarly, providing sign-in/out sheets, individual timesheets and payroll records is also redundant.

The PRRD's recommendation is that:

- 1) That EMBC re-examine the claim reimbursement process and streamline it to reduce the amount of unnecessary documentation while still achieving the same standard of evidence required for reimbursement.

We trust that you will consider this feedback and make amendments to the Financial Assistance Guideline as well as work towards developing further solutions that will assist all local authorities in BC to respond effectively and quickly to emergencies in their jurisdiction. Should you have any questions regarding our response, please feel free to contact Trish Morgan, General Manager of Community Services, at trish.morgan@prrd.bc.ca.

Yours truly,

Brad Sperling
Chair of the Regional Board