

Animals in Disaster Advisory Group

Best Practices for Pet Evacuations and Sheltering



Stephenson Disaster Management Institute
at Louisiana State University
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Best Practices for Pet Evacuations and Sheltering

In October 2007, the Federal Emergency Management Agency (FEMA) put into place [Disaster Assistance Policy \(DAP\) #9523.19, Eligible Costs Related to Pet Evacuations and Sheltering](#) (see Appendix A). The policy was drafted to identify FEMA reimbursable activities for pet evacuations and sheltering by state and local governments¹ during major disasters or declared emergencies.

This document has been developed to detail best practices in the interpretation of FEMA DAP 9523.19, *Eligible Costs Related to Pet Evacuations and Sheltering*. Contributors to this project are members of the Animals in Disaster Advisory Group (ADAG) coordinated by the Stephenson Disaster Management Institute (SDMI) at Louisiana State University. They represent public sector agencies (state and federal) and non-governmental organizations from across the United States that perform critical roles in animal response and recovery activities during emergencies.

The best practices are categorized by three topics, 1) planning and agreements, 2) household pet rescue, and 3) congregate household pet shelters.

Planning and Agreements

- 1) Best Practice: Meet with local and state Offices of Emergency Preparedness, Agriculture County Agents, ESF 11, humane groups, Community Emergency Response Teams (CERT), and Community Animal Response Teams (CART) to discuss existing agreements/plans to aid in the development of plans.
- 2) Inclusion of animal response NGOs in state and local response organizations
 - A. Best Practice: Establish agreements with national and local non- governmental humane groups who have national disaster pet response experience, to partner in writing pet plans and to assist in disaster pet response.
 - B. Best Practice: Include cost of pet aid (evacuation, transportation, sheltering, and search and rescue) on the project worksheet.
 1. Pre-identify costs associated with resources.
 2. Include cost in MOA when applicable.
 3. Use an average rate or cost range.
 4. List eligible costs and attach as an annex.
 - C. Best Practice: Include a veterinarian as a subject matter expert in the response organization. There will be issues other than pets in a disaster.
 - D. Best Practice: The jurisdictional agencies coordinating animal response activities should consider integrating “Agency Representatives” (see ICS definition) from non-governmental and other groups into their ICS response organization to facilitate coordination of resources and communication.
- 3) Pre-negotiation of rates

¹ This policy applies to state and local governments as a direct eligible applicant. PNPs or contractors can only be reimbursed through mutual aid or other written agreement at the request of the eligible state or local government.

- A. Best Practice: Even though it is best to define pre-negotiated rates for services, this may be difficult. It may be a best practice to include the following verbiage:
 - 1. By entering into this Agreement, the ___ becomes a recognized participant in the State’s emergency response plan to provide aid for household pets and companion animals. ___ will pay the _____ for those expenses incurred by the ___ associated with the incident if those expenses were incurred with the prior written authorization of __ and those expenses qualify under U.S. FEMA DAP § 9523.19. ___ will provide ___ with a final accounting of eligible expenses at reasonable and customary rates within 30 days of demobilization. It is the ___ __ sole responsibility to provide accounting of eligible expenses to ___.
- B. Agreements
 - 1. MOUs and MOAs are the norm but FEMA only requires a written agreement² not a document with the legal binding of MOU/MOA.

Household Pet Rescue

- 1) Best Practice: Establish plans and agreements to support Emergency Support Function #9 (ESF-9): Search and Rescue. The development of Animal Search and Rescue (ASAR) teams to support ESF-9, upon request and when ESF-9 determines that the collection of pets cannot be completed or the completion would greatly hinder the human Search and Rescue effort.

Congregate Household Pet Sheltering

- 1) Facilities
 - A. Use of veterinary clinics/kennels instead of co-located sheltering
 - 1. Best Practice: Seek all options to locate pets with owners including co-located pet shelters, veterinary clinics and kennels. Make advanced agreements with veterinary clinics and kennels for disaster sheltering and emergency services.
 - B. Supplies and Commodities (Donations Management)
 - 1. Best Practice: Develop a donations management and donations solicitation for disasters plan utilizing the FEMA DAP for Donated Resources (9525.2)
 - 2. Best Practice: Donations management messaging should almost always include the request for funds or services over supplies or material resources. The donation of goods often creates more management problems.
 - C. Resource: Pet Evacuation Sheltering Standard Operating Procedures (SOPs)
 - 1. The Louisiana Department Agriculture and Forestry (LDAF) has developed extensive SOPs for evacuation, transport and sheltering of household pets. Further information about the methodology and procedures can be acquired through the LDAF Animal Health and Safety Office at 225.925.3962 or email: animalplan@ldaf.state.la.us.

² Agreements of this nature are not legally binding in the sense that you are obligated to respond, they simply outline the manner in which you will behave if you are available to respond.

2) Eligible Labor

- A. Regular time vs. overtime (OT) for employees with search and rescue as primary job duty
 - 1. It is the responsibility of a governmental agency to respond to a disaster as a primary duty, therefore only overtime is eligible. If the eligible applicant is performing eligible emergency work (Cat B), only OT is eligible. (When the Requesting Entity is the State or local government, the force account labor costs of the Providing Entity will not be treated as contract labor if the force account labor is employed by a governmental subdivision (such as an agency) within that Requesting Entity (Ref RP9523.6 D.2)
 - 2. If a responsible governmental agency utilizes the Emergency Management Assistance Compact (EMAC) or contracts the services of an entity (regardless if the entities primary job duty or function is the requested service), then regular and overtime are eligible.
- B. Utilization of NGO resource (time and in-kind) tracking mechanisms to account for the 75/25 cost share
 - 1. If the NGO services are contracted, those costs would be eligible as contracted costs.
 - 2. If the NGO is services are donated (in-kind), those volunteer hours could be applied to the non-federal share.
 - 3. If the question is can both paid services and volunteer hours be claimed for the purposes of a donated resource to offset the non-federal share, the answer would be "NO" because this would constitute a duplication of benefits (DOB).
- C. Job descriptions
 - 1. Best Practice: It is beneficial to create job descriptions for each job duty in a pet shelter. Technical knowledge levels or specific skill sets should be included.

3) Technical Resources

- A. Reference: According to the DAP 9523.19, the use of applicant-owned or leased equipment (such as buses, truck or other vehicles) to provide eligible pet evacuation or sheltering support may be reimbursed according to [44 CFR § 206.228\(1\)\(a\) Allowable Costs](#) (does not include operator labor). The cost of leasing equipment may also be an eligible expense for reimbursement.
- B. Veterinary services³
 - 1. Best Practice: Calculate the average cost of veterinarian services, including veterinary technicians, in an area to establish a fair and equitable cost of services.
 - 2. Best Practice: Establish agreements with local veterinarian clinics for support during all phases of a disaster. During evacuations, these agreements are especially beneficial for collection points and receiving locations.
 - 3. Best Practice: True cost of vaccinations may be eligible for reimbursement, not a percentage of the markup of a vaccine.
- C. Transportation

³ Veterinary Services should be limited to screening, triage, and treating minor illnesses and injuries (In other words it should be temporary while the shelter is needed).

1. Best Practice: Establish agreements for several types of transportation methods. This will address different types of disaster response and costs associated with activation.
 2. Resources:
 - a. National Alliance of State Animal and Agricultural Emergency Programs (NASAAEP) Emergency Animal Sheltering Best Practices Working Group <http://www.learn.cfsph.iastate.edu/dr/node/164>
 - b. NASAAEP Animal Evacuation and Transportation Best Practice document, <http://www.learn.cfsph.iastate.edu/dr/wg.docs/evactrans-whtpaper6-23-12.pdf>
 - c. NASAAEP Disaster Veterinary Care Best Practice Working Group <http://www.learn.cfsph.iastate.edu/dr/node/151>
 - d. NASAAEP Disaster Veterinary Care Best Practice document, <http://www.learn.cfsph.iastate.edu/dr/wg.docs/vetcare-whtpaper6-23-12.pdf>
- D. Shelter safety and security
1. Best Practice: Establish agreements with local and state law enforcement or security services to provide shelter security. Include a Shelter Safety officer in the pet plan (Local Fire department may be a good source for a safety officer).
 2. Best Practice: Many of these services may be available on state contracts.
- E. Cleaning and restoration
1. Best Practice: Services may be available on state contracts. Pest control is a necessity and often overlooked.
- F. Removal and disposal of pet carcasses
1. Best Practice: Utilize USDA information or establish an agreement with a disposal vendor.
 2. Resources
 - a. USDA Emergencies and Disaster Planning: <http://awic.nal.usda.gov/find-animal-emergency-and-disaster-planning-information>
- G. Cataloguing/tracking systems for pets
1. Best Practice: National humane groups and Animal Controls have established tracking systems. Many states have developed tracking and cataloguing systems.
 2. Best Practice: Animal Search and Rescue Rapid Pet ID System:
 - a. Purpose: Identify the pet and the owner in the event they are separated
 - b. Procedure: Animals can be tracked with a variety of methods including, but not limited to barcoded or handwritten Tyvek or Vinyl “pet” bands (see event entry wristbands), microchips, rabies tags numbers, animal control tag numbers, etc.
 3. Resources:
 - a. ASPCA: (<http://www.asPCA.org/pet-care/disaster-preparedness>)
 - b. Louisiana State Animal Response Team (LSART): http://www.lsart.org/site/view/107338_PlanningResources.pml
 - c. International Fund for Animal Welfare (IFAW): <http://www.ifaw.org/united-states>
 - d. Louisiana Department of Agriculture and Forestry Emergency Programs: <http://www.ldaf.state.la.us/portal/Offices/AnimalHealthandFoodSafety/EmergencyPrograms/tabid/526/Default.aspx>

About the Animals in Disaster Advisory Group

A coalition of organizations, including the LSU Stephenson Disaster Management Institute (SDMI) and the Louisiana Department of Agriculture & Forestry (LDAF), have banded together to reduce the harm animals suffer as a result of disasters.

The Animals in Disaster Advisory Group (ADAG) consists of individuals representing local, state and federal government; and academia and private institutions with expertise in emergency animal preparedness, response and recovery.

The ultimate objective of the group is to save lives and prevent the suffering of both humans and animals involved in a disaster.

“Animal care associated with disaster events and planning is an area of tremendous and growing importance to the disaster management community and affects decisions regarding human lives as well,” said Joseph Booth, SDMI Executive Director. “This advisory group is composed of some of the leading experts in the nation and will be instrumental in shaping the future of disaster management.”

The group’s members also include the American Society for Prevention of Cruelty to Animals, Louisiana State Animal Response Team, LSU School of Veterinary Medicine, United States Department of Agriculture, North Carolina Department of Agriculture Emergency Programs Division, Texas A&M Veterinary Medicine & Biomedical Sciences, the U.S. Department of Agriculture, and Louisiana Department of Health Hospitals, Infectious Disease Epidemiology Section.

Louisiana Agriculture and Forestry Commissioner Mike Strain said people do not want to leave their pets behind during an evacuation. “Our goal is to ensure that their four-legged family members are safe and secure, then we can ultimately get everyone out of harm’s way and eventually back home,” Strain said.

For more information on ADAG, please visit www.sdmi.lsu.edu.⁴

⁴ The Advocate, www.theadvocate.com. Published November 15.2013.

Appendix A: FEMA DAP 952.9: Eligible Costs Related to Pet Evacuations and Sheltering

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DISASTER ASSISTANCE POLICY

DAP9523.19

I. TITLE: Eligible Costs Related to Pet Evacuations and Sheltering

II. DATE: OCT 24 2007

III. PURPOSE:

The purpose of this policy is to identify the expenses related to State and local governments' emergency pet evacuation and sheltering activities that may be eligible for reimbursement following a major disaster or emergency declaration.

IV. SCOPE AND AUDIENCE:

This policy is applicable to all major disasters and emergencies declared on or after its date of issuance. It is intended to be used by FEMA personnel involved in making eligibility determinations under the Public Assistance Program.

V. AUTHORITY:

Sections 403 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5170b, 42 U.S.C. 5192; the Pets Evacuation and Transportation Standards Act (PETS Act) of 2006, P.L. No. 109-308, § 4, 120 Stat. 1725 (2006); and 44 CFR §§ 206.223(a), 206.225(a).

VI. BACKGROUND:

On October 6, 2006, the PETS Act was signed into law, amending Section 403 of the Stafford Act. Section 403, as amended by the PETS Act, authorizes FEMA to provide rescue, care, shelter, and essential needs for individuals with household pets and service animals, and to the household pets and animals themselves following a major disaster or emergency.

VII. POLICY:

A. Definitions:

1. Household Pet. A domesticated animal, such as a dog, cat, bird, rabbit, rodent, or turtle that is traditionally kept in the home for pleasure rather than for commercial purposes, can travel in commercial carriers, and be housed in temporary facilities. Household pets do not



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DAP9523.19

include reptiles (except turtles), amphibians, fish, insects/arachnids, farm animals (including horses), and animals kept for racing purposes.

2. Service Animal¹. Any guide dog, signal dog, or other animal individually trained to provide assistance to an individual with a disability including, but not limited to, guiding individuals with impaired vision, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items.

3. Congregate Household Pet Shelters. Any private or public facility that provides refuge to rescued household pets and the household pets of shelterees in response to a declared major disaster or emergency.

B. Eligibility. State and local governments that receive evacuees from areas declared a major disaster or an emergency may seek reimbursement for eligible pet rescue, sheltering, and evacuation-support costs.

1. State and local governments outside the designated disaster area may seek reimbursement under mutual aid protocols through the affected and supported state(s). (44 CFR § 206.223(a)(2)).

2. State and local governments are the only eligible applicants for sheltering and rescuing household pets and service animals. Contractors or private nonprofit (PNP) organizations that shelter or rescue household pets and service animals cannot be reimbursed directly as an applicant. However, contractors and PNPs can be reimbursed for sheltering and rescuing household pets and service animals through a state or local government, provided a written statement from an eligible applicant is presented in which the applicant verifies that the contractor or PNP is performing or has performed sheltering or rescuing operations on the applicant's behalf and the expenses are documented.

C. Household Pet Rescue. State and local governments may conduct rescue operations for household pets directly or they may contract with other providers for such services. Eligible costs include, but are not limited to, the following:

1. Overtime for regular full-time employees.

¹ Department of Justice, Americans with Disabilities Act (ADA), 42 USC 1201 et seq, implementing regulations at 28 CFR § 36.104.



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2. Regular-time and overtime for contract labor (including mutual aid agreements) specifically hired to provide additional support required as a result of the disaster.

3. The use of applicant-owned or leased equipment (such as buses or other vehicles) to provide eligible pet transportation to congregate pet shelters may be reimbursed according to 44 CFR § 206.228(1)(a) (does not include operator labor). The cost of leasing equipment for this purpose may also be eligible for reimbursement.

D. Congregate Household Pet Sheltering. State and local governments may conduct sheltering operations for pets directly, or may contract with other sheltering providers for such services. Eligible Category B congregate pet sheltering costs may include, but are not limited to, the *reasonable* costs for:

1. Facilities.

- Minor modifications to buildings used for congregate household pet sheltering, if necessary to provide increased capacity for the accommodation of shelterees' household pets.
- Facility lease or rent.
- Increase in utility costs, such as power, water, and telephone.
- Generator lease and operation (but not purchase).
- Shelter safety and security.
- Shelter management.
- Shelter and crate/cage cleaning.

2. Supplies and Commodities. Eligible items are those needed for, and used directly on, the declared disaster, and are reasonable in both cost and need. Examples include:

- Food, water, and bowls.
- Crates/Cages.
- Pet transport carriers.
- Animal cleaning tables and supplies.
- Medication for animal decontamination and parasite control to ensure that the animal is not a health threat to humans or other animals.

3. Eligible Labor. If the regular employees of an eligible applicant perform duties in direct support of congregate pet sheltering operations, any overtime pay related to such duties is eligible for reimbursement. However, the straight-time pay of these employees is not eligible. Regular-time and overtime for contract labor, including mutual aid agreements,



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specifically hired to provide additional support required as a result of the disaster or emergency is also eligible for reimbursement.

4. Equipment. The use of applicant-owned or leased equipment (such as buses, trucks, or other vehicles) to provide eligible pet evacuation or sheltering support may be reimbursed according to 44 CFR §206.228(1)(a) (does not include operator labor). The cost of leasing equipment may also be an eligible expense for reimbursement.

5. Emergency Veterinary Services. For the purposes of screening the health of household pets and service animals, and assessing and treating minor illnesses and injuries, congregate pet shelters may be staffed with emergency veterinary teams. The following costs related to the provision of emergency veterinary services in a congregate pet sheltering environment are eligible for reimbursement:

- Veterinary diagnosis, triage, treatment, and stabilization.
- Provision of first aid, including materials (bandages, etc.).
- Medicine.
- Supervision of paid and volunteer veterinary staff.
- Vaccinations administered to protect the health and safety of congregate shelter and supporting emergency workers including but not limited to tetanus and hepatitis.
- Vaccinations administered to protect the health and safety of congregate shelter pets for transmissible or contagious diseases including but not limited to bordetella/kennel cough.

6. Transportation. Transportation of evacuees' household pets and service animals to congregate shelters from pre-established pickup locations is an eligible expense when the means of transportation used is the most cost-effective available.

7. Shelter Safety and Security. Additional reimbursable safety and security services may be provided at congregate pet shelters, based upon need.

8. Cleaning and Restoration. The costs (to the Applicant) to clean, maintain, and restore a facility to pre-congregate pet shelter condition are eligible.

9. Removal and Disposal of Animal Carcasses. The costs (to the Applicant) to remove and dispose of animal carcasses in a safe and timely manner and in compliance with applicable laws and regulations are eligible.



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10. Cataloging/Tracking System for Pets. The reasonable costs (to the Applicant) for tracking animals at congregate pet shelters for the purposes of reuniting them with their owners are eligible.

E. **Service animals.** Service animals will be sheltered with their owners in congregate shelters.

F. **Length of Operation.** Costs of sheltering/caring for household pets will no longer be eligible for FEMA reimbursement when the pet owner transitions out of Section 403 emergency sheltering.

VIII. **ORIGINATING OFFICE:** Disaster Assistance Directorate (Public Assistance Division).

IX. **SUPERSESSION:** This policy supersedes all previous guidance on this subject.

X. **REVIEW DATE:** Three years from date of publication.

A handwritten signature in dark ink, appearing to read "Carlos J. Castillo".

Carlos J. Castillo
Assistant Administrator
Disaster Assistance Directorate