



Disaster Strikes — Environmental Health Responds: Stories from the Field

Reporting, Documentation, & Record-Keeping

*The capacity to produce reports to document actions,
keep records, and inform appropriate parties*

1: Overview

Why are Reporting, Documentation, and Record-Keeping important?

During disaster and emergency response and recovery, you will need to perform a multitude of tasks— quickly and concurrently. You may lack resources, and the hours will be long. But no matter how busy you are, reporting and record-keeping during a disaster or emergency must be part of your routine. Daily activity reports prevent duplication of effort and serve as communication tools. Records are necessary for financial reimbursement and helpful for future disaster and emergency preparedness.

What is the role of the environmental health professional in Reporting, Documentation, and Record-Keeping?

- Be prepared.
 - Develop a system of reporting and record-keeping.
 - Develop a redundancy plan
- Produce reports to document actions.
- Document expenses (supplies and equipment, hours worked, loss of revenue—e.g., licenses, permits) for reimbursement.
 - FEMA
 - Insurance companies
- Keep records for legal proceedings.
 - Patient confidentiality
- Keep records as learning tools.

What can you learn from this lesson?

In this lesson, you will learn to:

- Create reports and retain them as valuable records of activities and processes.
- Keep detailed records for insurance and government reimbursement or potential litigation.
- Develop a redundancy plan for your records.

2: Stories

Documenting Information

What are the best ways to document information during a disaster or emergency? The type and severity of the disaster or emergency will often dictate your documentation method—at least in the early stages. If you have no operational electronic devices (such as laptops or PDAs), handwritten notes and photographs work just fine. What’s important is that the information be *recorded and preserved* for future review. In times of stress and overwork, your memory may not be reliable.

Be Prepared

Ideally, you should develop a system of reporting and record-keeping as part of your disaster and emergency plan. Discuss with your team the types of information you should document, as well as how and how often you should document it. Remember, too, that you—and your office—may be victims of an event. Videotapes and floor plans of your office and inventory lists will prove invaluable if your office is destroyed and you need to rebuild.

Develop a system of reporting and record-keeping

The National Incident Management System (NIMS) includes 25 ICS forms that address a variety of topics such as incident briefing, assignment lists, and unit logs. Together these forms comprise a record-keeping process that your environmental health department can follow. Remember to review the process—and learn how it works—*before* you face a disaster or emergency.

Develop a redundancy plan

A redundancy plan for all of your information—both electronic and print—is essential.

Produce Reports to Document Actions



Action: Make sure your reports are accurate enough to prevent duplication of effort.

“We used handwritten notes and took photos to document our activities. But we didn’t have good maps to use, so our reports weren’t clear on the locations where we had worked. As a result, a lot of work was re-done.”

Document Expenses for Reimbursement

“The benefit of keeping records is huge. All of a sudden, you might be asked to account for your time. I had to consult my handwritten notes two weeks after our response! When you look back to evaluate your response, and have no notes of what you did when, the information is going to be lost. I cannot emphasize strongly enough the need for keeping records.”

It is crucial to keep a comprehensive record of your time and expenses during response and recovery. Detailed records are required for financial reimbursement from FEMA, insurance companies, and other organizations.

FEMA

It's important to know how FEMA reimbursement works *before* a disaster or emergency strikes. FEMA's *Applicant Handbook* provides simple instructions on how to apply for reimbursement for damages sustained during a Presidentially-declared disaster. The *Handbook* will help you determine exactly what type of information—and how much information—to record.



Personnel costs

“Make sure your staff reports all of the time they work. This sounds simple, but people who are on salary tend to under-report their time because they aren't reimbursed for overtime. This is critical to the reporting because FEMA will not reimburse for the normal and ordinary expenses of personnel time. That is, if a person normally works 40 hours in a week, then there is no reimbursement available for those 40 hours, even if the time was entirely devoted to the cleanup. The hours above and beyond the 40 are reimbursed. This gets more complicated for hourly staff members, who are paid time and a half, but just figure this as you normally would. And don't forget to include benefits. We were able to figure the FICA, retirement, health and all other benefits into our calculations and obtain reimbursements for those as well.”

Equipment costs

“Remember to keep good records of vehicle mileage, and also of the time vehicles are on the scene. Some vehicles are compensated just by being on scene and available, and this is one of the highest reimbursement areas. For example, our large response vehicle never left the site once it was there, so mileage was irrelevant. However, because it was in operation each day as a central command post for health department employees, we were reimbursed for the total hours of cleanup each day the command vehicle was on location! This turned out to be a nice reimbursement, as each day was 16 hours or longer.”

Supplies and materials used

“Keep records of and receipts for supplies that are used or bought for the event. You may need to provide justification for some purchases, but this should be easy and straightforward.”

FEMA Applicant Handbook

Work done by contract

Record the time period covered and the dates the contractor worked on the project, a brief description of the type of work that was performed, the billing or invoice number submitted by the contractor, and the total dollar figures listed on the invoice.

Associated environmental health department costs

Record any environmental health department costs above and beyond normal operations that were specifically associated with the response-and-recovery effort (such as costs of rented or leased equipment, and of building habitability safety inspection). For equipment that was rented or leased in order to respond to the disaster or that was used in making repairs to damages caused by the disaster, record information such as the physical address of the site, a brief description of the work performed, the type of equipment leased or rented (including the rated horsepower or capacity of the equipment), the dates and hours the equipment was used, and the hourly, daily, weekly or monthly rate to rent or lease the equipment.



Action: Keep your reporting process as simple and as easy to use as possible.

“For our reporting, I created spreadsheets with simple equations and formulas for our calculations. We kept everything transparent. We presented a summary sheet, followed by itemized calculation pages, and we highlighted copies of our records for each category. We placed as much information at FEMA’s fingertips as possible. I would have to say that our records were very organized and well received by FEMA. So much so that nothing we presented for reimbursement was questioned by FEMA.”



Action: Use your normal, everyday recording methods.

“We learned that it’s best to avoid using ‘special’ recording methods during an event. According to the FEMA people, this raises flags all over the place. You may want to modify your everyday business records to be more accommodating of disaster or emergency events.”

“We didn’t use any special time sheets or recording formats. Since our time sheets are in somewhat of a ledger format, we simply added a line to our sheets for our cleanup work.”

Think about it



In what ways could you modify your current record-keeping practices to make them more effective during a disaster or emergency?

Here are some ideas for modifying record-keeping practices:

- Have systems in place for recording information (such as personnel costs, equipment costs, supplies purchased and used, and work performed by contractors), and ensure that staff understand how to use these systems.
- Research FEMA’s reimbursement guidelines and ensure that record-keeping systems are compatible with federal reporting requirements.
- Talk with staff about the types of disaster you are likely to experience, the kinds of information you would need to document, and the best methods to use.
- Develop redundancy in your systems, so that you’ll have the information you need both electronically and in print.
- Ensure that staff have access to cameras, video recorders, and other tools necessary for effective documentation of necessary information.
- Incorporate relevant ICS forms into your planning process, as appropriate.
- Make sure existing timesheets can accommodate the tracking of time dedicated to emergency response work.



Action: Make sure that mutual-aid agreements are in place before a disaster or emergency strikes.

FEMA generally will reimburse reasonable costs associated with mutual-aid agreements and others that were established before the disaster.

“I can’t emphasize enough the importance of having mutual-aid and other agreements in place before a disaster. For example, our household hazardous waste contract allowed participation not just by citizens, but city and county agencies and small businesses. In addition, we had inter-local agreements with each village and the county on solid-waste management. And we had a hazardous waste clean-up contract that applied county-wide. These agreements were key to our ability to be reimbursed for hazardous materials and solid waste work. Our record-keeping went incredibly well; we were reimbursed for every dime by FEMA.”

Mutual Aid Agreements are a means to secure supplementary resources when those of your jurisdiction are already committed or will be overwhelmed by the scale of the emergency. Such agreements are negotiated between local governments and specify the terms and conditions under which sharing will occur. These agreements are usually reciprocal (mutual). [Source: “Writing a Disaster Plan: A Guide for Health Departments,” UCLA Center for Public Health and Disasters, July 2005, p.18.]

For information about mutual-aid agreements, go to: <https://www.cphd.ucla.edu/disasterguidebook.html>
Note: Access to this publication requires a one-time, free registration to the site.

See the Collaboration lesson in this module for more information about formal agreements.

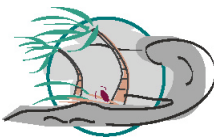
Insurance Companies

Local environmental health professionals can help their community members follow the procedures for reimbursement from insurance companies—and prepare for the future.



Action: Tell your permitted establishments what information they need to keep.

“We talk to the restaurants about disaster and emergency preparedness all the time now. We ask them: ‘Do you have enough insurance?’ We tell them: ‘Keep records. Once you get everybody safe, write down everything that you do and everything that you throw away, touch, and move. Document. Document. Document!’”



Action: Document environmental information.

“We were responsible for the rounding up and recording of all the materials taken out of the buildings. We worked with the HAZMAT team to keep manifests of all the hazardous materials before they were shipped off for incineration. Contractors removing lead and asbestos had to do the correct paperwork. And the researchers had to record all of their ruined materials for insurance purposes. We had to sign off on the manifests.”

Keep Records for Legal Proceedings

Detailed records are beneficial if litigation and/or criminal investigations arise as a result of a disaster or emergency. You might be asked to deliver records to the authorities regarding another party's wrongdoing.



Action: Check with your legal advisor about record-keeping requirements during a disaster or emergency.

The trucking company was believed to be responsible for the diazinon-spill accident but refused to admit it. This environmental health department kept careful records that aided the investigation.

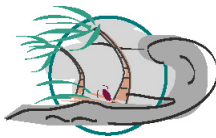
“In this particular case, we had a monster pile of incident response documents for the first day, and then we transitioned to a generic investigation report, which included a summary of each meeting that was held. The main reason we kept the file initially was because we knew there would be litigation and possible criminal charges and so forth. So we were doing it much more as an enforcement tool than a training tool.”

Record-Keeping and Patient Confidentiality

It's important to know how the HIPAA patient confidentiality and privacy rights can affect the type of epidemiological information that you can gather and share during a disaster or emergency. Check with your department's health-services staff and/or legal advisor for more information.

Keep Records as Learning Tools

Documentation of your experience will help you prepare for potential future disasters and emergencies. An after-action report is a great learning tool, as are post-incident meetings, in which all responders come together to discuss best practices, lessons learned, and areas to improve. Your planning will always be a work-in-progress as you learn from each experience, and written documentation is key to its success.



Action: Conduct a critique of your response.

“Past experience plays a lot into preparedness for the future. You learn what does and what doesn't work. That's the reason you do the 'hot washes' afterwards. You go over what went well, what needs to be improved, and how it should be improved. We tweak our plans based on this input; we're always trying to make our plan better.”

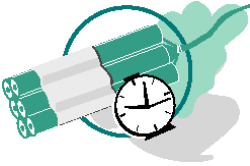
3: Lessons Learned



1: Develop a redundancy system for your office.

This environmental health team learned the hard way about the importance of redundancy.

“After our entire office was destroyed, we learned that you’ve got to have all of your information stored off-site as well as backed up on-site. Now we have two sites outside of town that we can go to in case of a disaster. And even if you have redundant systems, you can’t always rely on computer data. You’d better have your information in hard copy somewhere, too.”



2: Assign a person responsible for data entry.

This environmental health team learned that consistent data entry can be a challenge.

“We used forms for data collection, but we also tried direct-entry of data into the computer—so the information would be available to everybody immediately. Direct-entry didn’t work as well as it was supposed to because people were so involved in what they were doing, and there was so much going on, that the data wasn’t up-to-date. We learned that someone needs to be dedicated to data entry.”



3: Develop a checklist for needed FEMA information.

Previous knowledge of FEMA can work to your advantage.

“Some people didn’t report all the time they spent in the recovery effort, and that became an issue in getting money from FEMA. We found out about FEMA’s rules a week after the earthquake, so we had to try to reconstruct everything that had already been done. We had to ask people to go back and identify what they had been doing.”

4: Resources

NIMS ICS forms

The National Incident Management System (NIMS) includes 25 ICS forms that address a variety of topics such as incident briefing, assignment lists, and unit logs. Together these forms comprise a record-keeping process that your environmental health department can follow. Remember that it’s ideal to review the process—and learn how it works—*before* you face a disaster or emergency.

To access the forms, go to:

http://training.fema.gov/EMIWeb/IS/ICSResource/ICSResCntr_Forms.htm

FEMA Applicant Handbook

Consult FEMA's *Applicant Handbook* for more information about how to apply for public assistance grants. The Handbook walks applicants through the procedures and forms necessary to determine eligibility and receive money for damages sustained as a result of a Presidentially declared disaster.

To download the Handbook, go to:

<http://www.fema.gov/pdf/government/grant/pa/apphndbk.pdf>

HIPAA Privacy Rule Decision Tool for Emergency Preparedness Planning

This tool, created by the U.S. Department of Health and Human Services, can help you to determine the type of epidemiological information that you can gather and share during a disaster or emergency.

To access the tool, go to: <http://www.hhs.gov/ocr/hipaa/decisiontool/>