

Chapter 2
THREE LEVELS OF RESPONSE
&
DOCUMENTATION FLOW

CHAPTER 2 - LEVELS OF CASES & DOCUMENTATION FLOW

- A. Based on historical data, a three level system was designed to help determine the complexity of a case and its required resource documentation. Some factors for determining the level of a spill are given below. The FOOSC is considered to be the best judge of the factors involved in an event and is expected to select the level of documentation appropriate for the circumstances.

1. Level I - Routine:

Routine incidents represent approximately 85% of all oil incidents. A routine incident is one where:

- a. Total removal costs to the government will not exceed \$50,000;
- b. Removal activities will probably be completed within one to two weeks;
- c. Removal activities are localized;
- d. Primarily unit resources are involved.

Documentation from all resources is submitted to the FOOSC at completion of removal activities.

2. Level II - Moderately Complex:

Level II cases represent 10-15% of all oil incidents. A moderately complex incident is one where:

- a. Total removal costs are between \$50,000 and \$200,000;
- b. Removal activities take place in several locations;
- c. There are several external resources such as a strike team, a state agency, and other government units involved; and
- d. Removal activities will take longer than two weeks to complete.

Documentation from all resources is submitted to the FOOSC as often as practical (daily if possible) until final removal activities are completed.

3. Level III - Significantly Complex:

Level III cases typically represent less than 5% of all oil incidents. A significantly complex incident is one where:

- a. Total removal costs are greater than \$200,000;
- b. Removal activities involve numerous contractors;
- c. Removal activities take place at several locations; and
- d. As in Level II, there are several external resources involved.

Documentation is submitted as in Level II.

DOCUMENTATION FLOW - FOR ALL LEVELS

B. FOSC ACTIONS:

1. Responsibilities/Document Flow:

- a. Include removal ceiling information in each POLREP for:
 1. The Approved Project Ceiling; and
 2. Total Cumulative Obligations against the ceiling (See Chapter 1).
- b. Complete the Incident Report when removal activities are finished (See Chapter 5).
- c. Complete the Daily Resource Report (Dailies) covering unit resources involved in removal activities (See Chapter 6).
- d. Collect Daily Resource Reports and official records (i.e., aircraft blue sheets and cutter navigation logs) from other Coast Guard units.
- e. Issue "Pollution Removal Funding Authorizations" (PRFA) to other government agencies for removal activities (See Chapter 8).
- f. Review the SF-1080/1081 and Daily Resource Reports submitted by other government agencies, and certify that services were authorized and completed. (See Chapter 8). Documentation should be provided that supports a clear audit trail for reimbursement. The FOSC should send this documentation to the NPFC where it will be reviewed for continuity and propriety. The NPFC may return incomplete submittals to other government agencies.
- g. Review contractor invoices against Daily Resource Reports, and certify that services were authorized and completed. The FOSC:
 - (1) Sends the "original" invoice with daily reports to the appropriate contracting officer (MLCLANT or MLCPAC);
 - (2) Sends a copy of certified invoice to the NPFC (**Do not send contractor dailies to the NPFC**); and
 - (3) Keeps a copy for the unit's file.

The FOSC is not required to validate the invoice(s) against the BOA to verify personnel, equipment, etc.

- h. Resolve any discrepancies between government agencies and contractors prior to submitting documentation.
- i. Consolidate information and submit a Financial Summary Report to the NPFC (See Chapter 4).

2. Ceiling Management Requirements:
 - a. For Ceiling Management, use CG Form CG-5136F, CG-5136F-1, or a local log.
3. Resource Documentation Requirements:
 - a. CG Form CG-5136A through 5136E

C. CONTRACTOR ACTIONS:

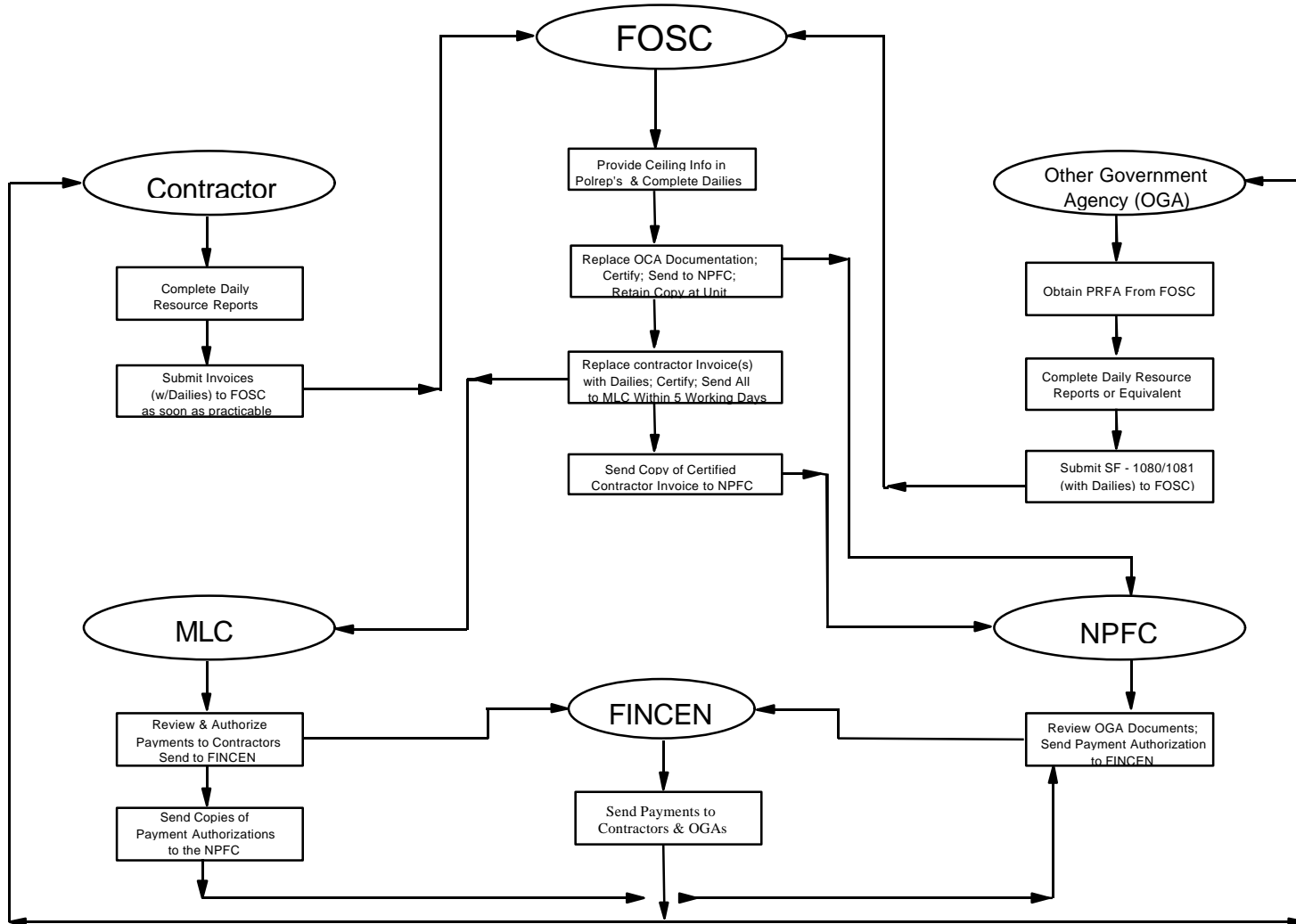
1. Responsibilities/Document Flow:
 - a. Complete Daily Resource Reports for removal activities.
 - b. Prepare an invoice supported by Daily Resource Reports upon completion of removal activities or in at least 30 day periods (for long term removal activities) to the FOSC.
2. Resource Documentation Requirements:
 - a. Use CG-5136E (1-4).
 - b. Use in-house invoices to bill for removal activities prepared from the forms mentioned above.

D. OTHER GOVERNMENT AGENCIES ACTIONS:

1. Responsibilities/Document Flow:
 - a. Obtain "Pollution Removal Funding Authorization" (PRFA) from FOSC for removal activities (See Chapter 8).
 - b. Maintain Daily Resource Reports (Dailies) or equivalent forms approved by the NPFC, and submit to the FOSC upon completion of removal activities.
 - c. Government agencies should prepare a SF-1080/1081 based on information gathered from Daily Resource Reports. This task is usually handled by the agency's accounting office. Documentation should be organized that provides a clear audit trail for reimbursement. (The NPFC may return incomplete submittals to other government agencies for corrective action.)
 - d. Send the SF-1080/1081 with Daily Resource Reports as required in the PRFA within 30 days after completion of removal activities to the FOSC.
 - e. Identify a point of contact on resource documentation for discrepancy resolution.
2. Resource Documentation Requirements:
 - a. Use one of the following: CG-5136A-E, or another equivalent form approved by the NPFC.
 - b. Government agencies should use SF-1080/1081 to request reimbursement for removal costs, attaching copies of Daily Resource Reports.

Documentation Flow

The following flowchart shows the documentation flow for Levels I, II, and III incidents. See text in preceding pages for detailed information.



Note: LEVEL 1 documentation should be submitted at the completion of removal activities.
 LEVEL II and II documentation should be submitted as soon as practicable (at least in 30 day cycles)