

## FUNDING MECHANISMS

Funding Mechanism	Advantages	Disadvantages	Comments
1. From DOE to regional organizations	<ul style="list-style-type: none"> <li>• Facilitates a broad, regional approach to planning and implementation that enhances consistency and uniformity</li> <li>• Especially beneficial for new programs where early planning is needed</li> <li>• Simplifies communication for DOE to have only one point of contact for information and discussion</li> <li>• Cooperative agreement mechanism has proven relatively simple to administer</li> </ul>	<ul style="list-style-type: none"> <li>• Approach would require modification for Tribes</li> <li>• Would also require that funding be provided to individual States to enable them to participate in the process, since planning authority and responsibility rests with the individual State</li> <li>• Differs from OCRWM approach to 180(c) funding</li> <li>• Introduces another layer of management between DOE and State</li> <li>• States may prefer to talk directly with DOE</li> </ul>	<ul style="list-style-type: none"> <li>• Some EM funding is already being provided to States this way</li> <li>• Tribal input on possible modifications is needed</li> </ul>

<b>Funding Mechanism</b>	<b>Advantages</b>	<b>Disadvantages</b>	<b>Comments</b>
2. Directly from EM to States and Tribes	<ul style="list-style-type: none"> <li>• DOE deals directly with the entity with authority and responsibility for planning</li> <li>• DOE deals directly with each Tribe</li> <li>• Facilitates establishment of a structured approach that, once established, may be less susceptible to political pressures</li> </ul>	<ul style="list-style-type: none"> <li>• Does not address DOE's need for joint planning and coordination among States</li> <li>• Would require DOE to adapt to procedures of different State agencies to whom funding is provided</li> </ul>	<ul style="list-style-type: none"> <li>• Could be supplemented by provision of a limited amount of funding to regional organizations to facilitate joint planning</li> <li>• Could avoid problem of State agency selection by DOE requiring State to designate the responsible State agency and/or by State establishing a coordination mechanism (e.g. New Mexico's Task Force)</li> </ul>

<b>Funding Mechanism</b>	<b>Advantages</b>	<b>Disadvantages</b>	<b>Comments</b>
<p>3. DOE payment of shipment fees to States and Tribes</p>	<ul style="list-style-type: none"> <li>• Offers an equitable mechanism for ensuring that service users pay for actual services and facilities used</li> <li>• Would not place entire burden of payment on DOE (other shippers would also have to pay)</li> <li>• Eliminates middleman and need for DOE administrative structure</li> </ul>	<ul style="list-style-type: none"> <li>• Tribal application uncertain: <ul style="list-style-type: none"> <li>- Tribal legal authority unclear</li> <li>- Infrastructure may not be in place</li> <li>- State/Tribal issues on jurisdiction may arise</li> <li>- Could result in requirement to pay a series of fees</li> </ul> </li> <li>• Potential for State political problems in adding or increasing fees</li> <li>• Some State legislators prefer to control use of State- assessed fees</li> <li>• DOE would have no ability to provide for communities along shipment routes</li> <li>• ATA has successfully challenged assessment of flat fees; alternatives are complex</li> <li>• Would require offset for 180(c) payments</li> <li>• States may expect EM funding also</li> <li>• Would require assessment of proportional DOE shipping impact</li> </ul>	<ul style="list-style-type: none"> <li>• Detailed discussion of this mechanism revealed many practical problems</li> </ul>

<b>Funding Mechanism</b>	<b>Advantages</b>	<b>Disadvantages</b>	<b>Comments</b>
4. Through another Federal agency	<ul style="list-style-type: none"> <li>• May be more administratively efficient to use an existing Federal agency structure</li> <li>• May facilitate coordination among the Federal agencies currently involved in funding various emergency management and safe transport activities</li> </ul>	<ul style="list-style-type: none"> <li>• Focus on radiological shipments and direct contact/discussion with DOE would be diminished</li> <li>• FEMA the most feasible agency, given existing structure and regulations; however, opposition was expressed based on: <ul style="list-style-type: none"> <li>- previous State experience</li> <li>- Tribal concerns that FEMA lacks an effective mechanism for addressing Tribal needs</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Topic group members expressed little support for this mechanism</li> </ul>

<b>Funding Mechanism</b>	<b>Advantages</b>	<b>Disadvantages</b>	<b>Comments</b>
5. DOE-wide umbrella grant	<ul style="list-style-type: none"> <li>• May be more efficient and could cut administrative burden and costs</li> <li>• Provides one, rather than multiple DOE points of contact</li> <li>• Could facilitate coordination among DOE programs and shipments and lead to comprehensive, radiological transportation planning</li> <li>• An open, structured funding program could reduce political pressure on DOE</li> </ul>	<ul style="list-style-type: none"> <li>• Current programs have differing requirements and may be subject to separate authorizing legislation ( e.g., WIPP, NWPA )</li> <li>• Even when not constrained by legislation, programs have different funding histories and requirements, including recipient expectations</li> <li>• May be politically difficult to establish such a mechanism</li> <li>• May encounter internal stumbling blocks, including: <ul style="list-style-type: none"> <li>-Turf battles, especially at the Field Office level</li> <li>-Possible OCRWM wish to maintain a separate 180(c) program</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Overall, topic group participants concluded that this mechanism “made sense” and that the issue was one of will rather than technical difficulties</li> <li>• Legal issues such as commingling of funds could be overcome by adopting FEMA’s annex approach</li> <li>• Topic group members’ broad discussion of this mechanism leaves unresolved several key issues, as itemized in Attachment A</li> </ul>