<table>
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<tr>
<th>Topic</th>
<th>Sub-Topic v2</th>
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<th>Answer</th>
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<tr>
<td>CAT B Eligibility</td>
<td>Casualty Management</td>
<td>I am working on a Fatality Management Crisis Action Planning Team and wanted to ensure I include correct guidance regarding State and Tribal reimbursement. In the PAPPG it states the following: a. 5B – Eligible Expenses (Storage and interment of UNIDENTIFIED human remains and Mass Mortuary Services). The assumption is that the remains are identifiable/identified. Would that change the ability for states and tribes to receive reimbursement? Is there any additional information you could provide? Have you received any inquiries from states or tribes?</td>
<td>Yes, under the Stafford Act declarations for COVID-19, casualty management is eligible as an Emergency Protective Measure.</td>
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<tr>
<td>CAT B Eligibility</td>
<td>Charter Flights to Transport Residents</td>
<td>State has posed the following: Scenario A: state want reimbursement under Category B of the Stafford Act for chartering flights to return residents of the state from other state. The residents will be: A. Residents who have been exposed to COVID-19 and will be quarantined upon their return to their home state; and or B. Residents who have been quarantined in other states and found non-symptomatic; and or C. Residents who have tested positive for COVID-19 and will be treated in their home state.</td>
<td>These costs may be eligible for short-term DFA for emergency public transportation. This request should be submitted via a Resource Request form through the applicable State for submission to the RRCC and NRCC for evaluation of a mission assignment. The request should identify the immediate threat to lives, public health, or safety that these measures eliminate or lessen.</td>
</tr>
<tr>
<td>CAT B Eligibility</td>
<td>Day Care / Child Care</td>
<td>Question to EA on Child Care: We need a determination quickly whether childcare costs incurred by the city on behalf of first responders (FD, IMPD, EMS), which may be necessary in order to keep them working, will be reimbursable by disaster relief funds.</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and therefore is not eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>Day Care / Child Care</td>
<td>Is there a state-by-state list of which state agencies receive and administer PA and category B child care?</td>
<td>All States or Tribes administer, as Recipients, the Public Assistance grant in Stafford Act Declared areas. There is not a nation list of the States and Tribes contacts. With regard to COVID-19 and child care, FEMA is not providing reimbursements for child care through Category B work.</td>
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<td>CAT B Eligibility</td>
<td>Day Care / Child Care</td>
<td>The state is wondering if day care costs would be reimbursable. The scenario is the state or other government agencies setting up or establishing Day Care facilities for State Agency works and first responders</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and therefore is not eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>CAT B Eligibility</td>
<td>Day Care / Child Care</td>
<td>Would establishing/contracting childcare services for critical/essential employees be considered eligible under CAT B?</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and therefore is not eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>CAT B Eligibility</td>
<td>Day Care / Child Care</td>
<td>County EM Coordinator: Could day care for children of essential employees be considered an eligible Cat. B expense?</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and therefore is not eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>CAT B Eligibility</td>
<td>Day Care / Child Care</td>
<td>We are looking at providing child care services to essential employees for our city through our Parks Department. Would you be able to point me in the direction for tracking these costs? The fact sheet talked about non-congregate and pet, but what about child care?</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>Would establishing/contracting childcare services for critical/essential employees under be eligible? Further more, is the use of non-standard force account labor be eligible? And if so, how should the applicant track these costs?</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>Day Care / Child Care</td>
<td>Question is whether childcare costs incurred by the city on behalf of first responders (FD, IMPD, EMS), which may be necessary in order to keep them working, will be reimbursable by disaster relief funds. Please advise on draft response below / other guidance.</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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<td>Day Care / Child Care</td>
<td>Received question from State. Is child care services eligible for first responder children</td>
<td>Child care costs for health care workers, first responders, and essential employees is not the legal responsibility of the SLTT and would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
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**CAT B Eligibility**

### Disinfecting Facility

Is extra sanitizing / disinfecting / cleaning of City facilities because of COVID-19 by our custodial vendor would be eligible work under Category B.

- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
  - www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

- In cases where disinfection may appear to be an increased operating cost (e.g., cleaning and disinfection are a part of normal operating costs), funding may be eligible if:
  - The facility provides services that are specifically related to eligible emergency actions to save lives or protect public health and safety or improved property;
  - The costs are for a limited time based on the exigency of the circumstances; and
  - The Applicant tracks and documents the additional costs.

- Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

- Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).

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**CAT B Eligibility**

### Disinfecting Facility

2. Are cleaning supplies (disinfecting agents, sanitizer supplies, PPE for cleaning staff) and additional increased costs (staff overtime, contract cleaning, etc.) for schools who have a positive or presumptive positive eligible under CAT B?

- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
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  - The Applicant tracks and documents the additional costs.

- Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

- Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).
2a. Are the cleaning supplies and additional costs for schools who take precautionary measures, where no positive or presumptive positive COVID-19 has occurred eligible under CAT B?

• For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
  - www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

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  - The Applicant tracks and documents the additional costs.
Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

• Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).

Is extra sanitation of schools/facilities an "increased operational cost" or will it be considered similar/related to exigent circumstances.

• For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
  - www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

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Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

• Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).
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<td><strong>Pastors</strong> are asking if they can be reimbursed for the deep cleaning and sanitizing of their buildings when a confirmed case is reported, as their insurance does not cover that. They think that would be considered Category B: Emergency Protective Measures.</td>
<td></td>
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- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
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Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

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<td><strong>We have a HOT Congressional inquiry in regards to large scale industrial cleaning for public buildings and are in need of your assistance.</strong> A couple of mayors are trying to figure out if large scale industrial cleaning for public buildings would be considered Class B reimbursements for emergency protective measures. They spoke to FDEM who suggested that it would be, but needed guidance from FEM to know for certain. Can you provide guidance on this?</td>
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- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
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Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

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CAT B Eligibility

**Disinfecting Facility**

**Actual Questions (MS)**

- School Districts - Whether we are out for a week or out for eight weeks, each district will be required to deep clean classrooms, restrooms, cafeterias, auditoriums, playground equipment, buses, and many other areas/things in order to do our due diligence to keep our students and staff as safe as possible. That said, there will be thousands and thousands of extra dollars spend due to the effects of the COVID-19 outbreak. Request specific guidance for school districts specifically related to cleaning supplies, use of contractors, and the many things that the CDC and MSDH are advising in regards to cleaning facilities and the things that will be required to return to school. There are many things that will be required of us as school districts before we can return to any type normality. There is also the thought that the schools being closed addresses the immediate threat but if the CDC cannot confirm how long the virus lives on surfaces is it safe to assume that costs for cleaning should be eligible regardless of facilities being closed for an extended period of time?

- As a result of COVID-19, will the Department of Education provide grants or resources to schools that purchase supplies/equipment (or rent) to permit students to complete remote schooling/education during school closures? (Remote schooling from home, or another communal facility) Would these costs be eligible under the PA Program?

- We have a few COVID projects in development that are claiming costs for disinfecting an Applicant owned building. I’d be interested to understand if this is eligible at all, and if so, are there requirements? Please reach out to me if you would like to discuss.

- The State of NC has asked for a costing (FEMA Equipment Rate) of Rapid Deployment Sheltering Systems (Deployed logix tents, Western Shelter tents complete with heating and air). I’m guessing we will need to do a cost comparison between rental and purchase due to the potential long term need?

- In the factsheet released by FEMA regarding eligible emergency protective measures, it states that FEMA will not duplicate any assistance provided by HHS/CDC. Could funding sources other than those from HHS and CDC be used?

- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
  - www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

- In cases where disinfection may appear to be an increased operating cost (e.g., cleaning and disinfection are a part of normal operating costs), funding may be eligible if:
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  - The costs are for a limited time based on the exigency of the circumstances; and
  - The Applicant tracks and documents the additional costs.

- Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

- Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).

**EOC**

- Are EOC operations for the COVID-19 eligible for reimbursement by FEMA under the Stafford Act?

- The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.

- COVID-19 EFM Fact Sheet issued 3/19/2020 states that EOC operations are eligible.

**DOB**

- In the factsheet released by FEMA regarding eligible emergency protective measures, it states that FEMA will not duplicate any assistance provided by HHS/CDC. Could funding sources other than those from HHS and CDC be used?

- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
  - www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

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  - The Applicant tracks and documents the additional costs.

- Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

- Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).

**Equipment Rate**

- The State of NC has asked for a costing (FEMA Equipment Rate) of Rapid Deployment Sheltering Systems (Deployed logix tents, Western Shelter tents complete with heating and air). I’m guessing we will need to do a cost comparison between rental and purchase due to the potential long term need?

- If the applicant is purchasing or renting items, then yes, they need to do a cost comparison to ensure the least costly option between rental vs. purchase.
## CAT B Eligibility

### Equipment-Medical

**Question:** Are oxygen concentrators eligible for PA funds? (Oxygen concentrators are medical devices that are generally used for delivering oxygen to individuals with breathing-related disorders)

**Proposed Courses of Action (suggest COA1):**
- COA1: Fund project with stipulation that if oxygen concentrators are used for patient treatment and the patients or their insurance carrier are billed the costs will be ineligible.
- COA2: Exclude the cost as generally not eligible under PA funding.
- COA3: Obtain additional information from Applicant on the intended use of the machines prior to continuing to draft the project.

**Background:**
- Project 114902—$285K: EOC costs that are specifically public health focused, to include: “Activities include public health department response, case management, contact tracing and outreach, community services outreach, Behavioral Health outreach, Information Technology support for community meetings in virtual setting and website support for communicating.” In addition to these public health activities, it also specifically includes $30K for oxygen concentrators.
- The Applicant has not provided details on anticipated use (i.e. patient treatment), nor have they if patients would be charged if treated with oxygen concentrators.
- Additional information (from Project):
  - Materials/Commodities Request: “O2 Concentrators with Tubing, O2 Startup kits Qty, includes oxygen concentrators and boost oxygen canisters: 40, total cost is estimated at $30,000 with each unit costing approximately $750. Cost includes the tubing and oxygen canisters.”

**Materials/Commodities Request:**
- COA1: Fund project with stipulation that if oxygen concentrators are used for patient treatment and the patients or their insurance carrier are billed the costs will be ineligible.
- COA2: Exclude the cost as generally not eligible under PA funding.
- COA3: Obtain additional information from Applicant on the intended use of the machines prior to continuing to draft the project.

**Additional Information:**
- www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

**Policy:**
- For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:
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  - The Applicant tracks and documents the additional costs. Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.
- Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).
Would PA be able to field a representative to provide answers to questions? If possible, The Salvation Army would like to request for a PA representative to join a Salvation Army COVID-19 Coordination call to field questions about the PA process, eligibility, etc. The Salvation Army should direct its member chapters to contact their respective State Emergency Management Agencies to the FEMA Regional Office for general PA eligibility and process questions that aren’t answered in these fact sheets:

PA is starting to be presented with quite a few questions regarding Category B Policy and the continuation of essential community services i.e. schools that were forced to send staff and students home due to health officials and Governors mandating they close in order to protect life and health and prevent the spread of the COVID-19 virus. We researched the Q and A spreadsheet and it seems we (through that spreadsheet) are being told that some parts of Category B are not going to be eligible (continuation of some critical or essential community services). Regions will need a directive clearly articulating that this is the case as States, Applicants, and Consultants will be reading eligible Cat B policy and not understand exactly why FEMA is saying no. I am not sure if the Fact Sheet for Emergency Protective Measures for COVID-19 will stand up in appeals. Below is a scenario that our Region is trying to get ahead of and expecting to come full force.

Scenario: School District A sends staff and students home as mandated by Governor with the direction of health official. School District A purchases equipment for students in order to continue the rest of the school semester and education in order to provide an essential community service. School District A presents case to FEMA under the guidelines as set forth in the section of Category B: Emergency protective measures. Questions may also arise regarding the temporary purchase of wi-fi. These costs are still considered increased operating costs. Temporary relocation of essential services is tied to setting up a temporary facility to provide the service. In this case, there is no temporary facility. The requested costs are for equipment and supplies which, for some schools/school districts, is an increased operating cost. As the school is not providing a service that is necessary to save lives or protect public health and safety, the increased costs are not eligible under PA. There is a possibility that funding for this purpose becomes available through the Department of Education.

What is the start date for cost tracking?
Although the declaration occurred on March 13. The incident period started January 20th. Follow regular policy guidance from PAPPG on charging and tracking costs.

Can FEMA provide some recent instances when hazard pay was used during disasters?
No – we don’t have a way to report on this.
Is hazard pay only available to those called back from admin leave or is it available to anyone performing eligible work regardless if they were on admin leave?
Only overtime is eligible for budgeted employees performing eligible emergency work. Extraordinary costs like hazardous duty pay are considered premium pay. FEMA determines the eligibility of overtime, premium pay, and compensatory time costs based on the Applicant’s pre-disaster written labor policy, provided the policy:
• Does not include a contingency clause that payment is subject to Federal funding;
• Is applied uniformly regardless of a Presidential declaration; and
• Has set non-discretionary criteria for when the Applicant activates various pay types. If these requirements are not met, FEMA limits PA funding to the Applicant’s non-discretionary, uniformly applied pay rates. See PAPPG V3.1, Chapter 2: V.A. Applicant (Force Account) Labor.
In most cases, straight time for a reassigned employee performing emergency work is not eligible. It may be eligible if the employee is funded from an external source. A reassigned employee implies a budgeted employee (as opposed to temporary or contract labor). A budgeted employee is employed by the Applicant and his/her salary is paid out of the Applicant’s normal operating budget. Straight time is not eligible for emergency work for budgeted employees even if they are performing work outside of their normal duties. Straight time may be eligible if the reassigned employee is funded by an external source and the eligible emergency work is not covered by the same or another external source (FEMA cannot duplicate funding). The work being performed by the reassigned staff must also be eligible emergency work under the declared event. “Health and safety support” is too vague to determine if the work is eligible emergency work. An employee reassigned to cover normal duties for an employee that cannot work due to illness would not be eligible for PA funds. Standard PA policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed). See PAPPG (V3.1), Chapter 2.V.A.2 on page 24.

In Public Assistance, the work being performed must be COVID19 eligible work in order for reimbursement. The key is the work be directly related to COVID-19 eligible activities, for instance helping support medical operations. Without knowing the full extent of the work that is being conducted under State Active Duty (SAD) I am unable to provide an exact yes or no. It should also be noted that anything funded by Department of Defense (DoD) under Title 32 and Title 10 activations are ineligible under the Public Assistance Program as they are funded through DoD. Below is the citation of the policy.

Public Assistance Program and Policy Guide (PAPPG) p. 34 and 35
The Governor may activate National Guard personnel to State Active Duty in response to an incident. Labor costs and per diem, if applicable, are eligible for State Active Duty personnel performing eligible work. Both straight-time and overtime are eligible, including fringe benefits.

The U.S. Department of Defense funds National Guard personnel activated under Full-Time National Guard Duty (Title 32) or Active Duty (Title 10). Therefore, Title 32 and Title 10 personnel costs, and any other costs funded by the U.S. Department of Defense, such as training, are not eligible.

In summary eligible costs related to the performance of COVID19 eligible work for SAD personnel would be eligible under PA unless covered by another funding source. If the State receives funding from DoD, it would not be eligible under PA.

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In summary eligible costs related to the performance of COVID19 eligible work for SAD personnel would be eligible under PA unless covered by another funding source. If the State receives funding from DoD, it would not be eligible under PA.

In most cases, straight time for a reassigned employee performing emergency work is not eligible. It may be eligible if the employee is funded from an external source. A reassigned employee implies a budgeted employee (as opposed to temporary or contract labor). A budgeted employee is employed by the Applicant and his/her salary is paid out of the Applicant’s normal operating budget. Straight time is not eligible for emergency work for budgeted employees even if they are performing work outside of their normal duties. Straight time may be eligible if the reassigned employee is funded by an external source and the eligible emergency work is not covered by the same or another external source (FEMA cannot duplicate funding). The work being performed by the reassigned staff must also be eligible emergency work under the declared event. “Health and safety support” is too vague to determine if the work is eligible emergency work. An employee reassigned to cover normal duties for an employee that cannot work due to illness would not be eligible for PA funds. Standard PA policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed). See PAPPG (V3.1), Chapter 2.V.A.2 on page 24.

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The U.S. Department of Defense funds National Guard personnel activated under Full-Time National Guard Duty (Title 32) or Active Duty (Title 10). Therefore, Title 32 and Title 10 personnel costs, and any other costs funded by the U.S. Department of Defense, such as training, are not eligible.

In summary eligible costs related to the performance of COVID19 eligible work for SAD personnel would be eligible under PA unless covered by another funding source. If the State receives funding from DoD, it would not be eligible under PA.

In Public Assistance, the work being performed must be COVID19 eligible work in order for reimbursement. The key is the work be directly related to COVID-19 eligible activities, for instance helping support medical operations. Without knowing the full extent of the work that is being conducted under State Active Duty (SAD) I am unable to provide an exact yes or no. It should also be noted that anything funded by Department of Defense (DoD) under Title 32 and Title 10 activations are ineligible under the Public Assistance Program as they are funded through DoD. Below is the citation of the policy.

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### CAT B Eligibility: Labor Cost

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
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<tbody>
<tr>
<td><strong>Overtime</strong></td>
<td>For the backfill employee to be eligible as long as the employee the backfill employee is replacing is performing eligible emergency work, straight time would also be eligible if the backfill employee is a contracted or temporary employee. In this case, it hinges on whether the person backfilling is otherwise employed by the Applicant or is only employed while the employee he/she is replacing is unavailable due to the performance of eligible disaster-related emergency work. See PAPPG (V3.1), Chapter 2:V.A.2 on pages 24-25.</td>
</tr>
<tr>
<td><strong>Backfilling Costs</strong></td>
<td>Whether using tribal police to enforce stay at home orders related to COVID-19 is eligible for PA (Cat B) reimbursement? Unfortunately, we did not catch which tribe it was to guide them to the region. I thought this might be a good addition to PA’s Q &amp; A. Per below, Don Lawn of OCC is asking for validation that this is an eligible activity. I have confirmed that using tribal police to enforce stay at home orders related to COVID-19 are eligible for PA Cat B reimbursement. We do have an issue of duplication of benefits for this work since BIA and perhaps DOJ have funding for tribal law enforcement. I know we are supposed to be concerned about duplication of benefits, but err on the side of providing assistance. Can you let me know what position we will take on reimbursing these activities? Thanks</td>
</tr>
<tr>
<td><strong>COVID-19 Eligibility</strong></td>
<td>CAT B Eligibility: Labor Cost 4. Would costs associated with backfilling a Public Works-Engineer (regular employee) who is now assigned to COVID-19 EOC response be eligible? Since the engineer is unable to perform normal duties due to performing eligible emergency work (in this case, working the EOC for the declared event), certain costs associated with backfilling the engineer are eligible. If backfilling with a budgeted employee, only overtime related to the backfill employee’s work would be eligible. If the backfill employee is not a budgeted employee (e.g., contract or temporary labor), then straight time and overtime are eligible.</td>
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<td><strong>COVID-19 Eligibility</strong></td>
<td>CAT B Eligibility: Labor Cost Budgeted employees placed on administrative leave or furloughed because they are non-essential brought back in a reassigned COVID-19 related emergency work. Is this eligible? The budgeted employee must be performing COVID-19 eligible work, for it to be eligible under PA. Specific eligibility considerations depend on a few considerations: 1. First, S&amp;B plus any extraordinary costs (e.g., call-back pay since the employee was on administrative leave/furlough) depends on the pre-existing labor policy provided the policy: 1) Does not include a contingency clause that payment is subject to Federal funding; 2) Is applied uniformly regardless of a Presidential declaration; and 3) Has set non-discretionary criteria for when the Applicant activates various pay types. If these requirements are not met, FEMA limits PA funding to the Applicant’s non-discretionary, uniformly applied pay rates. 2. Second, as a non-essential reassigned budgeted employees, FEMA provides PA funding based on the reassigned employee’s normal pay rate, not the pay level appropriate to the eligible work being performed, because the Applicant’s incurred cost is the employee’s normal pay rate. Also, only overtime would be eligible unless the reassigned employee is funded from an external source and that source does not fund the eligible emergency work being performed by the reassigned employee. 3. Lastly, the applicant must avoid duplication of benefits. If funding is available from HHS, CDC, CARES Act, or another federal funding source, or if staffing costs are factored into patient billing through private insurance, Medicare, Medicaid, or a private payment agreement, those costs are not eligible under PA.</td>
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</table>

Given many applicants have transitioned to a telework status for staff where possible, applicants are asking if the software to a hosted application to allow more self-service and online functions, thus reducing foot traffic. We are upgrading our Internet and data lines to Admin and Courthouse to support video arraignment and allow Actual Scenario cover some of the full-time employees' job will this be reimbursed covered that allows the employees to work from home will this be covered/reimbursed under category B of the agency's county government business continuity, due to COVID-19 a Disaster Category B purchase? Corrections manufactures PPE, is that cost eligible for the PA program? And if so, under what circumstances? From my own research, I know that inmate labor is included within the PA program as an eligible cost, but I'm wondering how that would work under COVID19 and the national emergency declaration. When a Department of Corrections manufactures PPE, is that cost eligible for the PA program? And if so, under what circumstances? Hello, we received the following question re: labor costs for State Police Officers who are covering normal shifts/patrols/duties for local police officers who have tested positive for COVID-19 and are unable to work. Here's the State’s question: Many local police departments are now being covered by State Police (SP) because of the virus. ABC County and City Park were two examples of where SP are now handling law enforcement for those communities because their own law enforcement agency has tested positive or is under quarantine. Also, City PD is dropping quickly so that is probably going to be a big undertaking of the department. Are these labor costs SP eligible? Our initial thought on this is that this may not be eligible because the troopers are just covering regular law enforcement activities, instead of activities specifically related to emergency measures for COVID19 (i.e., providing security to medical care facilities, enforcing stay at home orders, etc). From the question, it appears that the state troopers would just be filling in for sick local employees for continuity of govt reasons, but to be eligible, they would need to show specific emergency actions performed related to COVID19 instead of normal traffic duty, patrols, etc. However, I feel like this might be a bit of a grey area since law enforcement is a critical service, and the lack of staffing and resources at the local levels was directly caused by the Covid19 emergency. Plus, this feels like a mutual aid situation where State agrees to provide staffing and resources in these types of emergencies. Can you please provide some guidance on this issue? This is not eligible work reimbursable under the PA program (i.e., Dept of Corrections labor producing PPE for FEMA). PA provides assistance to State, local, tribal, territorial governments and certain PNP’s. An eligible SLTT could potentially purchase PPE produced by Dept of Corrections inmates and the SLTT could request reimbursement through PA. The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant. The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant. The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. 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These could be considered increased operating costs which are generally not eligible under PA except under certain conditions. The Applicant may incur additional costs related to providing a service as a result of the incident; in this case, due to local law enforcement officers unable to perform normal duties because of testing positive for COVID-19 or are otherwise under quarantine. These additional costs are only eligible if: • The services are specifically related to eligible emergency actions to save lives or protect public health and safety or improved property; • The costs are for a limited period of time based on the exigency of the circumstances; and • The Applicant tracks and documents the additional costs. In this case, it is likely that additional costs would be eligible since law enforcement is service that protects lives and public safety and the costs are for a limited period of time (i.e., the duration of the quarantine for officers recovering from COVID-19). The legally responsible entity has to incur an additional cost. In this case, the legally responsible entity is the local jurisdiction. The local jurisdiction would only be eligible for costs incurred for the State law enforcement officers (i.e., if the State billed the local jurisdiction for the work). This is also true if the State provided resources at the request of the local jurisdiction under a mutual aid agreement. The eligible applicant is the local law enforcement agency and reimbursement of costs paid to the State may be eligible, assuming all other PA program requirements are met. PA funds could not be provided directly to the State as the Providing Entity, but only to the local jurisdiction as the Requesting Entity. The applicant must avoid duplication of benefits; funding may be available from HHS, CDC, CARES Act, or another federal funding source.
CAT B Eligibility | Laptop/Software | Is there any circumstance where costs related to equipment and supplies for schools to engage in remote learning are eligible for PA funding?
---|---|---

I know that the current Covid Q&A spreadsheet somewhat addresses this issue [in line item #105](https://www.fema.gov/covid-19-question-and-answer-spreadsheet), and stated: “The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property.” However, couldn’t these costs related to education be eligible under the provisions for “Temporary Relocation of Essential Services” [PAPPG pp. 76-79](https://www.fema.gov/covid-19-question-and-answer-spreadsheet)?

Education is listed as an essential community service provided by a State, Territorial, Tribal, or local government. Applicant that is eligible to be relocated. In addition, the rental or purchase of equipment necessary to continue services in the temp facility, is listed as an eligible work or cost associated with temporary facilities. Increased operating costs (utilities, maintenance, etc) are still not eligible with temporary facilities, but wouldn’t equipment (laptops, ipads, etc) or supplies for students for remote learning be eligible?

Although applicants may experience a loss of revenue due to shelter-in-place orders as a result of the COVID-19 pandemic, FEMA cannot provide PA funding for lost revenue as a result of the incident. [PAPPG V3.1, Chapter 2-V.R.1](https://www.fema.gov/covid-19-question-and-answer-spreadsheet)

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CAT B Eligibility | Loss of Income | Are the costs incurred by food banks for buying and distributing food for COVID-19 eligible for reimbursement from FEMA PA?
---|---|---

Not directly. The FEMA Public Assistance Program cannot reimburse food banks directly for the costs of buying and distributing food, because these activities are not PA eligible emergency protective measures for PNP food banks. However, SLTT governments may enter into formal agreements or contracts with food banks to provide necessary food commodities. FEMA PA may provide funding to a SLTT government for the cost of providing necessary food commodities through food banks, through a formal agreement or contract, when food security has been impacted and food distribution is necessary to protect public health and safety. Indicators of negative food security impacts include documented decreases of in-kind donations to food banks; reduced mobility of those in need due to government imposed restrictions; marked increase or atypical demand for feeding resources; or disruptions to the typical food supply chain within the relevant jurisdiction. In order to address immediate needs resulting from the COVID-19 pandemic, FEMA may approve funding to the SLTT for an initial 30 days, notwithstanding that another federal agency may have funding for this activity. FEMA Regions will re-assess before the end of the 30 days and may grant another 30-day extension as warranted. FEMA cannot duplicate funding provided by another source, and will reconcile final funding based on any funding provided by another agency for the same costs. Foodbanks may not seek direct cost reimbursement from the FEMA Public Assistance program.

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CAT B Eligibility | Meals | Policy FP-104-010-03 - COVID19 Purchase & Distribution of Food, dated 04.11.20, has time limitations that state that:
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Time Limitations.

a. FEMA may provide funding for an initial 30-day time period.
b. SLTT governments may request a 30-day time extension from the Regional Administrator (RA) with documentation showing continued need.
c. Work may not extend beyond the duration of the COVID-19 Public Health Emergency, as determined by HHS.

Question: When does that 30 days start? Should the 30 days start at the time of when the assistance/PW was approved or at the date of the declaration?

The policy doesn’t specify, but it is generally meant to be prospective and to meet immediate needs. Going back to the beginning of the incident period would mean that the 30 days is already done, and the need may not have emerged until later, so that may not be a very effective date. An effective date could be from the RA’s approval of the states request for meal delivery which would start the 30 - day period.

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Would insurance costs for temporary medical facilities be reimbursable?

We originally answered this question with the following response: No, insurance costs related to temporary medical facilities are not reimbursable under the PA program. According to the PAPPG Page 79 (PDF Page 90), “FEMA does not provide PA funding for utility, maintenance, or operating costs in a temporary facility, even if these costs increase.” Additionally, “FEMA does not require the Applicant to obtain and maintain insurance for temporary facilities.” Insurance is considered an operating cost of the temporary facility and is not required under the PA program. As such, insurance is not eligible for reimbursement. However, we want to make sure we are not misapplying the policy since those costs in the case of COVID-19 truly are extraordinary costs separate from the Applicant’s normal operating budget since the original facility is still functional. Can you please clarify whether insurance and other operating costs for temporary medical facilities may be eligible?

FEMA-approved temporary medical facilities for COVID-19 declarations are subject to requirements as described in Chapter 2: VI.B.17

Temporary Relocation of Essential Services of the PAPPG (VI.1).

As stated, FEMA-approved temporary facilities are not subject to the obtain and maintain requirements; additionally, insurance costs for the temporary facility are not eligible. The cost of obtaining and maintaining insurance is not an eligible PA cost.

• Utility, maintenance, and operating costs are also not eligible for temporary facilities as stated in Chapter 2: VI.B.17(g). This is the same for COVID-19 declarations.


Can states be eligible for reimbursement for COVID-19 symptom screening services?

The answer to your question would depend whether or not the lab is an eligible applicant under FEMA’S Public Assistance Program. The Public Assistance (PA) program is designed to reimburse state, tribal, territorial, and local governments, and certain types of private non-profits. A private lab would not be eligible for reimbursement under the PA program, though payment for contract services provided to an eligible applicant, as the list above defines, may be reimbursable to the applicant if otherwise eligible under FEMA policy.

PA eligibility of specific medical care costs is dependent on the facility, other sources of funding, and other considerations specific to the circumstances of the incurred costs. FEMA cannot provide PA funding for clinical care costs if they are covered by another source, including private insurance, Medicare, Medicaid, or a pre-existing private payment agreement.

• The Applicant must pursue funding from private insurance, Medicare, and/or Medicaid, as appropriate;
• The Applicant must pursue funding through the CARES Act for uninsured patients; and
• The Applicant must not receive funding from another federal agency or any other funding source for the same purpose. This includes, but is not limited to, funding provided by:
  o The Public Health Emergency Preparedness Cooperative Agreement Program;
  o The Public Health Crisis Response Cooperative Agreement;
  o The Epidemiology and Laboratory Capacity for Prevention and Control of Emerging Infectious Diseases; and
  o Grants available from the HHS Office of the Assistant Secretary for Preparedness and Response; and
  o The Coronavirus Relief Fund (Title V of the CARES Act).

Under the PA program, the default cost share is 75 percent federal; the remaining 25 percent of costs come from non-federal sources

Can all Florida laboratories charge FEMA for analyzing the COVID-19 tests of uninsured persons?

FEMA recognizes that non-congregate sheltering may be necessary in this Public Health Emergency to save lives, to protect property and public health, and to ensure public safety, as well as to lessen or avert the threat of a catastrophe. Non-congregate sheltering under Category B emergency protective measures may be approved for vulnerable at-risk populations. Sheltering specific populations in non-congregate shelters should be determined by a public health official’s direction or in accordance with the direction or guidance of health officials by the appropriate state or local entities and when assistance is not duplicated by another federal agency. Alternate care sites and temporary hospitals are not considered non-congregate sheltering and such requests should be routed through the proper channels. Please refer to the Emergency Medical Care for COVID-19 Fact Sheet.

During a sync call with other federal partners today, several questions came up regarding eligible FEMA-funded activities on Federally-owned property.

Would actions that occur on property that is owned or under the jurisdiction of another federal agency be eligible for FEMA funding? For example, if an Applicant (non-federal) were to place temporary facilities were to place parking lots owned by a federal facility, is that eligible for FEMA-funding? Or non-congregate sheltering in a National Park, etc.

This could be eligible assuming that:
• It is an eligible applicant;
• The work being performed is the legal responsibility of the applicant;
• The work being performed is necessary to address the COVID19 pandemic;
• The applicant is performing eligible work (i.e., temporary facilities, approved non-congregate sheltering);
• The work is not being funded by another federal agency; and
• The applicant has attained the proper written approval and/or documentation for the use of the federal facility or land
<table>
<thead>
<tr>
<th>CAT B Eligibility</th>
<th>Non-Congregate Sheltering</th>
<th>Does non-congregate sheltering delegation to Regional Administrator’s require pre-approval?</th>
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<tbody>
<tr>
<td></td>
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<td>The requirement for pre-approval still applies. The memo delegated the approval authority to the Region, but did not alter the requirement that FEMA has to pre-approve non-congregate sheltering before the work actually takes place. If work has already started, the authority to approve a waiver is delegated to the Region. Please reference the Non-Congregate Sheltering Delegation of Authority Public Assistance Program and Policy Guide Waiver (<a href="https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/Allitems.aspx">https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/Allitems.aspx</a>).</td>
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| CAT B Eligibility | Non-congregate sheltering | 1. Is the treatment of non-congregate sheltering different for this disaster than for your typical disaster?  
2. Can states/tribes/territories request reimbursement for non-congregate sheltering in any declared disaster?  
3. Is this time different as regards reimbursement for non-congregate sheltering? |
|-------------------|---------------------------|--------------------------------------------------------------------------------------------------|
|                   |                           | A1. FEMA is expediting decision making on non-congregate sheltering in the context of this national health emergency. This incident has unprecedented challenges and FEMA is applying our authorities to meet the needs of those affected and to help States and localities protect public health and safety in this pandemic.  
A2. When this type of assistance is authorized in an emergency or major declarations, FEMA has established policy and processes for State, localities, tribes and territories to request non-congregate sheltering.  
A3. This incident is presenting some unique challenges in particular with regard to health and medical concerns. FEMA will provide all of the assistance we can under our authorities and is coordinating with HHS and CDC to help make sure needs are being met. |

| CAT B Eligibility | Non-congregate sheltering | Question from State of MN EOC on definition of medical shelter:  
Minnesota EOC is seeking FEMA’s operational definition of “medical sheltering.” In particular, in our worse case scenario, we’re anticipating over 5,000 Minnesotans without a place to live will become infected with the novel coronavirus. While a portion of them will likely be hospitalized with severe COVID-19 illness, many would just need to be isolated yet can’t be given that they are either staying somewhere not meant for habitation (building doorways, bus shelters, etc.) or are in a congregate shelter setting that cannot isolate them. In addition, if Minnesota adopts a shelter in place order, people who are unsheltered or staying in an emergency shelter that closes during the day would not be able to comply. Would providing shelter arrangements for these scenarios fit with FEMA’s definition of medical sheltering? |
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<td>See FEMA FACT SHEET Coronavirus (COVID-19) Pandemic: Emergency Medical Care, dated March 30, 2020</td>
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| CAT B Eligibility | Non-congregate sheltering vs Medical Temporary facilities | States want to know if you all are reviewing them at HQ:  
• The disconnect related to what’s covered under a MA for temporary medical facility vs what’s covered under Cat B  
• States can get Mas that include wrap-around services and healthcare providers  
• Cat B funding is only available to set up the facility and to provide emergency medical care (not medical care for admitted patients)  
State is also very concerned about how reasonable costs will be determined if sole source contracting is used. We have told them that we have to look at reasonableness of costs when there is no competition and we use the Reasonable Cost Job Aid to guide the analysis but there is no additional guidance and we do not expect additional guidance to come out. We have told them that we totally understand that costs are going up due to the demand, but State asked us to bring this to HQ’s attention and to tell HQ that the Job Aid is insufficient to address the issue for this event. |
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<td></td>
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<td>Refer to Federal Healthcare Resilience Task Force Alternate Care Site (ACS) Toolkit and Talking Points issued 4/1/2020</td>
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We have a couple new policy questions:

1. Is there any possible waiver available for the requirement that applicants register at www.SAM.gov? There is a concern from one of our Recipients, that this requirement will be a roadblock to some applicants.

2. We received the following question from one of our Recipients related to increased operating costs:

   "Our Dept. Of Innovation and Technology has had to scale up our State IT and web services in order for websites to remain up during this crush of information that is going out regarding COVID-19. They've also had to provide extraordinary services to keep state employees working remotely and services available to the public. They have incurred additional expenses primarily for adding system capacity (licenses, equipment, contract labor), so that important state messaging and functions continue. Their work are helping Emergency Management Agency to remotely collaborate and coordinate with other state agencies, and they are critical in keeping information flowing from our Department of Public Health and Governor’s Office."

   - Are these operating costs eligible under Cat B? Also, would they only be eligible costs for the specific agencies who are performing emergency activities? For instance, Emergency Management Agency and Dept. of Public Health could claim the increased IT costs since they are related to providing critical information to citizens and carrying out emergency response activities, but Streets and Sanitation or Department of Employment would not be able to link them to an eligible emergency activity?

#1 per Memo from Bridget E. Bean, Short Term Administrative Relief for Recipients and Subrecipients of FEMA Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) Due to Loss of Operations, dated March 27, 2020. "Flexibility with SAM registration. (2 C.F.R. § 200.205): SAM registrations expiring before May 16, 2020 will be afforded a one-time 60-day extension. In conjunction with this exception, GSA has initiated 60-day extensions to SAM.gov registrations that have expiration dates ranging between March 19, 2020 and May 17, 2020. It will take GSA until March 28, 2020 to complete all extensions. This effort is intended as relief for those otherwise required to renew their SAM registrations during that time frame. At the time of award, the requirements of 2 C.F.R. § 200.205 Federal awarding agency review of risk posed by applicants continue to apply. Applicants who are not already registered in SAM.gov will still need to register in SAM before the applicable grant application deadlines in order to apply for grant funding."

#2 The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.

For eligible public and PNP facilities, costs associated with disinfecting the facility to eliminate or lessen an immediate threat to lives, public health, and safety are eligible. The work should be consistent with current public health guidance as it relates to disinfection recommendations. The following CDC guidance for disinfection is available online at:

- www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html for community facilities; and

In cases where disinfection may appear to be an increased operating cost (e.g., cleaning and disinfection are a part of normal operating costs), funding may be eligible if:

- The facility provides services that are specifically related to eligible emergency actions to save lives or protect public health and safety or improved property;
- The costs are for a limited time based on the exigency of the circumstances; and
- The Applicant tracks and documents the additional costs.

Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities treating patients infected with COVID-19.

Policies on labor costs, purchase of supplies and equipment, and contracted services apply as with any other incident (e.g., costs must be reasonable and procurement requirements must be followed).
<table>
<thead>
<tr>
<th>CAT B Eligibility</th>
<th>Purchases</th>
</tr>
</thead>
<tbody>
<tr>
<td>A question regarding the eligibility of purchasing equipment by County 911 Center as a contingency to enable remote operations if necessary. We have an eligible applicant purchasing equipment that they believe is necessary to ensure continuity of the essential 911 functions by providing the capability to work remotely. We believe County has a legal responsibility to provide 911 services, and the disaster (COVID-19) has the very real potential to disrupt the services – so this is something that could be considered an emergency protective measure required to address the immediate threat caused by the disaster. However, we have concerns about the contingency aspects of their purchase and whether it will actually be needed and used.</td>
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<tr>
<td><strong>Situation:</strong> County is requesting a determination on the eligibility of virtualizing their 9-1-1 center as a contingency in the event of sickness and absenteeism due to Covid19. This would require the purchase of approximately $250,000 in equipment to allow the 911 center to perform its essential call processing and dispatch responsibilities remotely. It will take a number of weeks for the equipment to be fully operational. County would like to purchase the equipment in advance of the potential need.</td>
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<tr>
<td><strong>Questions:</strong> 1. Is the purchase of equipment, supplies, or services to allow the performance of essential government services (lifesaving or life sustaining) in a remote or virtual environment an eligible emergency protective measure in response to Covid19? 2. Is the purchase of this equipment eligible if the need hasn’t been realized at the time of purchase? 3. Is the purchase of this equipment eligible if an emergency protective measure if the equipment is not ultimately used during the Covid19 public health emergency? 4. If the essential government service being performed is not involved or only partly involved in response to Covid19 is the purchase of the equipment an eligible emergency protective measure?</td>
<td></td>
</tr>
<tr>
<td>1. <strong>Answer:</strong> The DHS Cybersecurity &amp; Infrastructure Security Agency advisory, dated March 28, 2020, specifically lists “911 call center employees” as essential critical infrastructure workers during the COVID-19 public health emergency. Unless the 911 call center is ordered to close its facility at the direction of public health officials, costs associated with transitioning to a virtual/remote operational environment are not eligible under PA. 2. <strong>Answer:</strong> If a need does not exist or has not been identified, the costs are not eligible. 3. <strong>Answer:</strong> Purchases of equipment and supplies that are not used to perform eligible work are not eligible. 4. <strong>Answer:</strong> The service provided is necessary to save lives and protect public health and safety. The need to transition to a virtual/remote operational environment has to be required as a result of the emergency or major disaster event. If the need is identified and the associated costs are determined eligible for PA funding, it would not matter if the emergency calls were related to the declared event or not. However, at this time 911 call centers are deemed essential critical infrastructure during the COVID-19 public health emergency and must remain operational.</td>
<td></td>
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<tr>
<th>CAT B Eligibility</th>
<th>Purchases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicants want to know if eligible school districts/applicants that purchase supplies/equipment (or rent) to permit students to complete remote schooling/education during school closures, would that be potentially eligible? (remote schooling from home, or another communal facility)</td>
<td></td>
</tr>
<tr>
<td><strong>No,</strong> it is not directly required to save lives, protect public health and safety. Purchase of supplies/equipment (or rent) to permit students to complete remote schooling/education during school closures is not an eligible Cat B expense.</td>
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</tbody>
</table>
Purchases

Test kits are popping up from various vendors. The President said they would be free. If jurisdictions buy them, a) will they be reimbursable through their Cat B PW and b) competition for pricing is the "Wild West" will federal procurement rules be waived and finally c) is or will there be a federally approved source and price structure?

Please reference the Procurement Under EE Circumstances Memo (https://www.fema.gov/media-library/assets/documents/186350). Per the Memo, for the duration of the COVID-19 Public Health Emergency, which began on January 27, 2020, "local governments, tribal governments, nonprofits, and other non-state entities may proceed with new and existing noncompetitively procured contracts in order to protect property and public health and safety, or to lessen or avert the threats created by emergency situations for 1) Emergency Protective measures under FEMA’s Public Assistance Program and 2) Use of FEMA non-disaster grant funds by non-state recipients and sub-recipients to respond to or address COVID-19.” It has been determined that emergency and exigent circumstances exist based on the President’s Nationwide Emergency Declaration and the Secretary of the Health and Human Services’ (HHS) declaration of a Public Health Emergency for COVID-19 and therefore, non-state entities are permitted to non-competitively procure contracts (sole source) pursuant to 2 CFR § 200.320(f)(2) for the duration of the COVID-19 Public Health Emergency as determined by HHS.

The Memo and Fact Sheet (https://www.fema.gov/media-library/assets/documents/186350) provide information for applicants purchasing under exigent or emergency circumstances. State entities must follow their own rules pursuant to 2 CFR 200.317 and non-state entities (which include any other eligible applicant) must follow the rules for purchasing under emergency/exigent circumstances outlined in the attached fact sheet.

Also see the PA Reasonable Cost Job Aid, dated October 13, 2018 (https://www.fema.gov/media-library/assets/documents/90743) that provides guidance on how PA determines reasonable costs. Applicants should note that pursuant to 2 CFR § 200.404, “a cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.” Additionally, the attached Pricing Guide for Recipients and Subrecipients Under the Uniform Rules, dated May 1, 2016, (https://www.fema.gov/media-library-data/1466006124785-1e7a3c99e51a4663f307613a9107f7df/2016-06-101310_clean_FEMA/PricingGuideforRecipientsandSubrecipients.pdf) assists applicants in conducting a price or cost analysis. This will hopefully help ensure that applicants have properly conducted/documented their cost or price analysis; the proper cost or price analysis will certainly aid in the determination of reasonable cost.

1. As the State focuses more and more on teleworking and shutting down facilities, would the costs associated with equipment purchases (printers, monitors, laptops, etc.) as well as costs for VPN services to increase cyber security be eligible under this current EM declaration?

Purchase of IT equipment and software would be considered an increased operating cost. Increased operating costs are not eligible emergency protective measures and are therefore, ineligible for Category B Public Assistance funding.

2. As schools move to online for the considerable future, are the purchase of computers, laptops, internet service and other related expenses associated with online teaching and learning eligible under Category B Public Assistance?

The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.

The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. The purchase of computers, laptops, internet service, and other related expenses associated with online teaching and learning eligible under Category B Public Assistance if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.” Additionally, the attached Pricing Guide for Recipients and Subrecipients Under the Uniform Rules, dated May 1, 2016, (https://www.fema.gov/media-library-data/1466006124785-1e7a3c99e51a4663f307613a9107f7df/2016-06-101310_clean_FEMA/PricingGuideforRecipientsandSubrecipients.pdf) assists applicants in conducting a price or cost analysis. This will hopefully help ensure that applicants have properly conducted/documented their cost or price analysis; the proper cost or price analysis will certainly aid in the determination of reasonable cost.

The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.

Could an applicant purchase equipment/services in order to initiate continuity of government?

The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety or improved property. For PNP Applicants, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.

Could a jurisdiction purchase cleaning/sanitation supplies for their citizens if local businesses run out.

This is not the legal responsibility of the SLTT and therefore would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.

Medical ventilators are a critical need item for COVID-19 treatment. States were unable to obtain medical ventilators needed for COVID-19 treatment from the Strategic National Stockpile (SNS) and purchased a proportion of their need commercially. Are these costs eligible for reimbursement under PA?

Yes, to the extent these costs are not covered by another source, the use (i.e., purchase) or lease of specialized medical equipment necessary to respond to COVID-19 cases such as medical ventilators is eligible for PA Category B reimbursement, subject to disposition requirements.
<table>
<thead>
<tr>
<th>CAT B Eligibility</th>
<th>Security</th>
<th>School districts have been inquiring about accessing FEMA funding to be used for miscellaneous costs that they have incurred due to COVID-19. For example, one school district has experienced a major uptick in vandalism to school sites due to school closures and would like to access funding to install better security measures. Are you aware of any FEMA funding that could be used for these sorts of things? Under the eligible emergency protective measures fact sheet I believe that the school district believed that the “security and law enforcement” category would make school security an allowable use of FEMA funding. I know that this may refer to states and actual local law enforcement activities, but wanted to confirm. Increased school security would be considered an increased operating cost. Increased operating costs are not eligible emergency protective measures and are therefore, ineligible for Category B Public Assistance funding. Security and law enforcement as referenced in the EPM Fact Sheet does mean SLTT law enforcement activities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAT B Eligibility</td>
<td>Sewer Systems</td>
<td>If an Applicant located in a rural part of the State, allows school students the use of a Rec Center to complete on-line school assignments, would this be an eligible PA reimbursable expense? The purchase of computers, laptops, internet service, and other related expenses is not eligible as an emergency protective measure. These purchases would be considered increased operating costs which are not eligible for public entities unless the additional cost is specifically related to eligible emergency actions to save lives or protect public health and safety. For PNPs, increased operating costs are generally ineligible even if the facility is providing an emergency service, unless doing so on behalf of and at the direction of the legally responsible government entity. In such cases, PA funding is provided through that government entity as the eligible Applicant.</td>
</tr>
<tr>
<td>CAT B Eligibility</td>
<td>Temporary Relocation</td>
<td>1. This question is related to the HQ decision that the “Purchase of supplies/equipment (or rent) to permit students to complete remote schooling/education during school closures is not an eligible Cat B expense (COVID Q and A – 03.24.20).” Understanding that these costs will likely be reimbursed by DOE, can you please clarify why the eligibility of purchases for remote schooling are not being considered under PAPPG “Temporary Relocation of Essential Services” policy? HQ’s 03.24 response focuses on the action of purchasing supplies as an ineligible EPM; however, we were initially considering the act of closing the schools as the EPM which subsequently triggered the need for temporary relocation of services. Understanding why the temporary relocation policy does not apply in this case will allow us to provide better guidance to our states. These costs are still considered increased operating costs. Temporary relocation of essential services is tied to setting up a temporary facility to provide the service. In this case, there is no temporary facility. The requested costs are for equipment and supplies which, for some schools/school districts, is an increased operating cost. As the school is not providing a service that is necessary to save lives or protect public health and safety, the increased costs are not eligible under PA. There is a possibility that funding for this purpose becomes available through the Department of Education.</td>
</tr>
<tr>
<td>CAT B Eligibility</td>
<td>Transportation</td>
<td>Is the transportation of inmates eligible for Public Assistance reimbursement? The transportation of inmates for life-saving medical or evacuation purposes related to the COVID-19 pandemic may be considered an eligible emergency protective measure. If they are moving inmates per their normal operations it is an increased operating cost not eligible for Public Assistance funding.</td>
</tr>
<tr>
<td>CAT B Eligibility</td>
<td>Utility Bill for Residents</td>
<td>Could a jurisdiction pay/waive the utility bills for residents directly and indirectly affected by COVID-19 under CAT B measures? Payment of residents’ utility bills is not the legal responsibility of the SLTT and therefore would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures. Additionally, it is not an emergency protective measure that is required as a direct result of a Public Health Emergency in communities.</td>
</tr>
<tr>
<td>CAT B Eligibility</td>
<td>Utility Bill for Residents</td>
<td>Question: The State Utilities wants to turn on water, sewer and power that was shut off prior to the declaration. Would that be a covered expense? Is the costs of connection and potential loss of revenue eligible in this atypical event under cat B sheltering costs? The connection of water for residents that do not have a water connection is not an emergency protective measure that is required as a direct result of a Public Health Emergency in communities where 1) water is easily accessible for purchase and 2) there is no contamination of the water supply due to the disaster. Secondly, it is also not the legal responsibility of the SLTT and therefore would not be eligible for reimbursement under Public Assistance, Category B Emergency Protective Measures.</td>
</tr>
<tr>
<td>Cost Share</td>
<td>Cost Share</td>
<td>4. 90/10 cost share states are asking whether or not that is being considered Under Emergency Declarations, 44 CFR § 206.65, Federal share for assistance provided shall not be less than 75 percent of the eligible costs. At this time, FEMA assistance is approved at a 75/25 percent cost share.</td>
</tr>
<tr>
<td>EM CAP</td>
<td>EM CAP</td>
<td>1. $5M cap for EM. States are asking is that going to be waived The $5 million amount can be exceeded. It requires congressional notification, which is being handled at FEMA Headquarters. Will not impact State or locals ability to respend.</td>
</tr>
<tr>
<td>Topic</td>
<td>Question</td>
<td>Answer</td>
</tr>
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<tr>
<td>Emergency Declaration</td>
<td>Request for Public Assistance</td>
<td>Has the Assistant Administrator, Recovery Directorate issued a deadline for tribal nations who wish to go through the direct recipient application process under the President’s March 13, 2020, nationwide emergency declaration?</td>
</tr>
<tr>
<td>Emergency Declaration</td>
<td>Request for Public Assistance</td>
<td>Has FEMA Administrator Gaynor or other relevant FEMA leadership issued a deadline for tribal nations who wish to go through the direct recipient application process under the President’s March 13, 2020, nationwide emergency declaration?</td>
</tr>
<tr>
<td>Emergency Declaration</td>
<td>Tribal</td>
<td>The following question was forwarded to us from our PA Tribal Team Lead, as a follow up from tribes in our Region who are asking for clarification on the requirement to activate their emergency plan, when the COVID dec was issued at the direction of the President and not at their request. The attached states that a tribal government must confirm activation of its emergency plan to receive assistance as a Recipient. However, this regulation relied upon for this requirement appears to apply to the State or tribe’s request for a declaration: 44 CFR 206.35 (C) (1) Confirmation that the Governor has taken appropriate action under State law and directed the execution of the State emergency plan; Since the declaration is already in place, is activation of an emergency plan still a requirement? Section 501 (b) nor 502 of Stafford specify that in this type of declaration the State emergency plan be activated. Can clarification be issued as to the basis for this requirement?</td>
</tr>
<tr>
<td>General Information</td>
<td>Declaration</td>
<td>Question from R9 – they have 9 tribal nations (listed below) that would like to serve as direct Recipients under the national Emergency Declaration for COVID-19. In other regions direct recipient tribes have been issued there own EM number. What procedures should the region follow to get these tribes issued EM numbers?</td>
</tr>
<tr>
<td>General Information</td>
<td>DFA</td>
<td>1. What is Direct Federal Assistance?** 2. Does a tribe have to be a Recipient under the nationwide emergency declaration for COVID-19 to request Direct Federal Assistance (e.g., equipment, supplies, personnel, evacuation assistance) directly from FEMA? 3. Does the Public Assistance 75 percent Federal/25 percent Non-Federal cost share under the nationwide emergency declaration for COVID-19 apply to direct federal assistance?</td>
</tr>
<tr>
<td>General Information</td>
<td>HHS/CDC DOH</td>
<td>5. Clear Cat B eligibility: states are asking for FEMA ramp up and giving them clear guidelines on what is covered by FEMA and not by HHS and what is funding runs out from activities also covered by FEMA</td>
</tr>
</tbody>
</table>
### General Information

**Meals - USDA**

Does USDA have a program that allow commodities to be distributed house-by-house?

Yes, USDA has a “Disaster Household Distribution” (DHD) program, which is an existing federal program that allows for USDA food commodities to be distributed house by house. Under a Presidential Declaration of a National Emergency, USDA Food Nutrition Service may approve state requests for DHDs for targeted areas to meet specific needs when traditional channels of food are unavailable and not being replenished on a regular basis. DHD provides boxed foods to households using existing inventories of USDA-purchased foods. More information is on the USDA’s website: https://www.fns.usda.gov/usda-foods/covid-19-disaster-household-distribution

**Non-Congregate**

“If Illinois experienced flooding or other severe weather this weekend which forced the evacuation of persons from their primary residence (both persons who are self-quarantined and persons who are subjected to a “Stay at Home Order”), could those persons be placed in non-congregate lodging approved by FEMA for the COVID incident to maintain appropriate social distancing? If so would the lodging costs be covered by the 75 percent federal cost share?”

Sheltering in subsequent events will be implemented to meet the needs of that incident and in accordance with guidelines on how to appropriately provide sheltering in a pandemic environment. This may include non-congregate sheltering, however that would need to be implemented in accordance with PA policy in the PAPPG. (Mark Tinsman referenced some draft sheltering guidance a couple of weeks ago; if that’s been finalized may reference it as an example of guidance for shelters).

**PDMG**

With the latest technology involving Skype, Microsoft Team, access to systems from remote locations, increase in PDMG Skill level will any consideration be given to PDMGs transitioning from hotels and working remote from home to reduce the risk of coronavirus and support initiative for businesses to transition employees to work from home?

FOD is developing guidance for JFOs currently deployed staff.

**PNP Fact Sheet**

noticed that you have been the primary person uploading documents to the COVID-19 HQ document site, and I was wondering if we will be receiving a PNP Factsheet any time soon? Any guidance would be greatly appreciated.


**Can Regional Q & A’s be uploaded to the SharePoint site?**

Regional Q & A’s can be provided to the COVID19PAOperations@fema.dhs.gov mailbox for posting on the ESW site

**What documentation is necessary to document reasonable costs (we explained to them but they wanted an answer from FEMA HQ)?**

Guidance on how FEMA determines reasonable cost is located at [https://www.fema.gov/media-library-data/1539879525279-d00ae1c43f9765ca4b415eaa31202c55/PA_Reasonable_Cost_Evaluation_Job_Aid_508_FINAL_10-16-2018.pdf](https://www.fema.gov/media-library-data/1539879525279-d00ae1c43f9765ca4b415eaa31202c55/PA_Reasonable_Cost_Evaluation_Job_Aid_508_FINAL_10-16-2018.pdf). Documentation requirements are provided in chapter 3 of the PAPPG [https://www.fema.gov/media-library-data/1525463283824-4d63b8d49b08c7f07538e771aa9c76/PAAPPG_3.1_508_FINAL_5-4-2018.pdf](https://www.fema.gov/media-library-data/1525463283824-4d63b8d49b08c7f07538e771aa9c76/PAAPPG_3.1_508_FINAL_5-4-2018.pdf). FEMA is developing a templated Project Worksheet that define documentation requirements for COVID-19. As soon as it is available FEMA will update this FAQ.

**What documentation is necessary to document reasonable costs?**

Applicants should be prepared to provide information about the activities undertaken and associated costs of COVID-19 response.

Applicants should be prepared to provide information about the activities conducted, the resources used to complete those activities, and the associated costs. Examples of resources used could be existing or temporary employees (often called Force Account Labor), existing supply or stock (often called Force Account Material), Contracts, or Mutual Aid.

Unfortunately, at this time we do not currently have specific guidance on medical waste.

**Is this the correct PA RFA Form to use? It was shared in this week’s FEMA Bulletin but appears to have expired December 2019 (“Request for Public Assistance” (FF 90-49) exp. Dec 2019, https://www.fema.gov/media-library/assets/documents/50145?d=2658)**

That’s the correct form. All PA forms have expired, but OMB has given us approval to continue using them. OMB is currently reviewing them to give us an official 3-year extension.

**What schedule of equipment rates should be used?**

The equipment rate will vary based on the disaster. Please reach out to your contact at CRC Central to best determine the specific equipment rate for the particular disaster you are referencing. Specifically, for the COVID 19 Declarations, please use FEMA Schedule of Equipment Rates dated August 27, 2019, [https://www.fema.gov/media-library/assets/documents/136901](https://www.fema.gov/media-library/assets/documents/136901).
We will be issuing process overviews for the COVID-19 streamlined process, including direct application. It will include step-by-step information and flow on what applicants and recipients and FEMA must do.

Grants Manager

Forms

After April 10th, when Applicants will be able to complete the pdf version of the COVID19 PW Template (Project Application), and then upload directly to Grants Portal, Applicants submit the application directly to a CRC review queue, or will the FEMA field staff get a notification of the upload and have to go into the Applicant Profile and review the project application and then manually submit forward to CRC?

• Will FEMA PAGS get a notification or email when an Applicant uploads a PW Template/Project Application or when it is submitted to CRC?
  
  I am just looking for some more general information to be able to provide our States on the expected workflow after the April 10th date. Is the process:
  
  • Applicant uploads completed PW Template and submits → Recipient Review Queue; and then Recipient submits → FEMA Field Review Queue; and then FEMA submits → CRC Project Development Queue?

Grants Manager

Funding

2. How quickly will reimbursement be expedited for these costs? (Note: State Legislature in recess)

Grants Manager

Funding

White House Governmental Affairs is requesting a breakdown of funds by state for one-pagers they are creating. Is there a document in existence or a source that can be accessed by White House staff that provides this information?

Grants Manager

General Eligibility

The 50 State Mass Care Coordinators received the PA Guidance along with the fact sheets. What would they really like to know is the step by step process on how to apply for the grant and the reporting requirements. I’m sure we have many other questions but any guidance would be greatly appreciated. I have copied Alynda Ponder who asked this on behalf of the States.

Grants Manager

General Information

2. What are the guidelines/formatting for grant requests?

Grants Manager

Training

3. Grants portal training for new applicants states are asking how that will happen

IA Related

IA Related

1. IA IHF DUA states are asking again since no PDA what is the requirement to show burden beyond their capabilities.

IA Related

IA Related

7. IA IHF DUA states are asking again since no PDA what is the requirement to show burden beyond their capabilities.

Management Cost

Management Cost

Will Cat 2 Management Cost be obligated for recipients based on their per capita indicators in accordance with FP 104-11-27? Is there any restrictions on the obligations of Management Costs (Category 2) funds for Emergency Decs?

Yes, Cat 2 Management Costs Projects under the Emergency Declarations can be obligated for Recipients based on the Recipients’ per capita indicators; the per capita indicators are used in evaluating Major Disaster Declarations. Emergency Declaration Cat 2s will be obligated similar to the Cat 2s in a Major Declaration.

Management Cost

Management Cost

How are we determining initial management cost award obligations for recipients? Existing guidance states initial obligations should use the state per capita indicator. Is this still valid for Ems? Thanks in advance!
Procurement  Emergency Exigent

6. Procurement procedures under emergency exigent circumstances. Is there a way for procurement regs to be waived or suspended (from 2 CFR $300) for any purchase or acquisition that falls under the simplified acquisition threshold (SAT) during this event. The current SAT is $500,000.

Please see the Procurement Under EE Circumstances Memo (https://www.fema.gov/media-library/assets/documents/186350). Per the Memo, for the duration of the COVID-19 Public Health Emergency, which began on January 27, 2020, "local governments, tribal governments, nonprofit, and other non-state entities may proceed with new and existing noncompetitively procured contracts in order to protect property and public health and safety, or to lessen or avert the threats created by emergency situations for 1) Emergency Protective measures under FEMA’s Public Assistance Program and 2) Use of FEMA non-disaster grant funds by non-state recipients and sub-recipients to respond to or address COVID-19." It has been determined that emergency and exigent circumstances exist based on the President’s Nationwide Emergency Declaration and the Secretary of the Health and Human Services’ (HHS) declaration of a Public Health Emergency for COVID-19 and therefore, non-state entities are permitted to non-competitively procure contracts (sole source) pursuant to 2 CFR § 200.320(f)(2) for the duration of the COVID-19 Public Health Emergency as determined by HHS.

Procurement  Emergency Exigent

7. What is the criteria and timeline for exigent procurement?

Please see the Procurement Under EE Circumstances Memo and Fact Sheet (https://www.fema.gov/media-library/assets/documents/186350). Per the Memo, for the duration of the COVID-19 Public Health Emergency, which began on January 27, 2020, "local governments, tribal governments, nonprofit, and other non-state entities may proceed with new and existing noncompetitively procured contracts in order to protect property and public health and safety, or to lessen or avert the threats created by emergency situations for 1) Emergency Protective measures under FEMA’s Public Assistance Program and 2) Use of FEMA non-disaster grant funds by non-state recipients and sub-recipients to respond to or address COVID-19." It has been determined that emergency and exigent circumstances exist based on the President’s Nationwide Emergency Declaration and the Secretary of the Health and Human Services’ (HHS) declaration of a Public Health Emergency for COVID-19 and therefore, non-state entities are permitted to non-competitively procure contracts (sole source) pursuant to 2 CFR § 200.320(f)(2) for the duration of the COVID-19 Public Health Emergency as determined by HHS.

Procurement  Emergency Exigent

4. Can you please clarify what is meant by the last sentence of the “Procurement Under EE Circumstances Memo” and the fact that non-disaster grant funds can be used for Cat B work? Our current understanding is that if the States needs to access currently obligated funds from non-disaster grants to respond to this emergency, we can do so, regardless of the reason for their obligation. Would the funds then be replenished through PA?

"For the duration of the Public Health Emergency, which began January 27, 2020 as determined by HHS, local governments, tribal governments, nonprofit, and other non-state entities may proceed with new and existing noncompetitively procured contracts in order to protect property and public health and safety, or to lessen or avert the threats created by emergency situations for 1) Emergency Protective measures under FEMA’s Public Assistance Program and 2) Use of FEMA non-disaster grant funds by non-state recipients and sub-recipients to respond to or address COVID-19.”

The memo does not speak to using non-disaster grants for Cat B work. Rather, the memo clarifies that non-state entities may execute non-competitive contracts under Public Assistance grants and non-disaster grants if the acquisition under the non-disaster grant is for the purpose of responding or addressing COVID-19.

Cat B emergency protective measures is a distinct concept from the emergency/exigent circumstances exception to the federal procurement regulations. The federal procurement regulations at 2 C.F.R. §§ 200.317 – 200.326 apply to all of FEMA’s grant programs, both disaster and non-disaster, whereas Cat B emergency protective measures is specific to the Public Assistance program regarding eligibility of work under that program. The recent FEMA memo was stating that for purposes of all of FEMA’s grant programs, FEMA has determined that an exigency/emergency exists for the duration of the public health emergency, meaning non-state entities may utilize the exigency/emergency exception to the competition requirements of the federal procurement regulations. It is not stating that non-disaster funds can be used for Cat B emergency protective measures under the Public Assistance Program.

All grant funds must be used in accordance with the terms and conditions of their awards, including any statutory, regulatory, or policy requirements – the reason for the obligation matters. It may be that non-disaster funds can be used to address COVID-19 matters, but it will largely depend on the individual grant program. If you have questions about using funds from a particular FEMA non-disaster program for COVID-19 matters, please reach out to the applicable program analyst/program office for that grant program. Additionally, funds provided through an emergency declaration or major disaster declaration for Public Assistance cannot be used to "replenish" non-disaster funds provided under a different grant program. As a reminder, under 2 C.F.R. § 200.92(a), all non-federal entities must maintain documentation and financial systems to be able to trace funding and expenditures adequate to establish that those funds have been used in accordance with the statutes, regulations, and terms and conditions of the award applicable to those funds.
### Procurement

**Piggyback**

Clarify piggyback language - fact sheet uses the word “may” too ambiguous - they recommend changing to “shall” or clarifying

A non-state applicant is allowed to utilize a piggyback contract, if allowable under applicable local or state laws, under exigent/emergency circumstances, provided that they comply with the sole sourcing requirements under emergency/exigency circumstances. The term “may” is used because the federal procurement rules permit applicants to piggyback if they so choose. If the contract the applicant seeks to use is not in compliance with the sole sourcing requirements for exigent/emergency circumstances, then piggybacking would be problematic.

### Request for Public Assistance

**Applicant Eligibility**

We received an inquiry from Congressman Welch who represents Vermont. Vermont doesn’t have a Major Declaration. They are inquiring about the following:

- Vermont is seeing restaurants and other food business come together on their own to provide emergency food distribution to their local communities. Will these businesses be eligible for FEMA reimbursement under this disaster declaration?

Private businesses are not eligible to receive Public Assistance.

**Grant Manager**

We are starting to get RPAs submitted in Grants Manager/Portal in Region V. Is there any reason we should be holding off on approving these RPAs in GM – meaning should we be waiting for the new COVID-19 PA processing guidance to come out from HQ, or do we need to wait for any functionality in GM/SP to be updated to allow for direct applications, before we can approve RPAs?

Please move forward with evaluating the RPAs in GM. PNP RPAs should be evaluated like they would be in any other incident. Regions may want to consider managing expectations based on the limited work that PNPs can be reimbursed for but RPAs can and should be approved if the PNP is an eligible applicant.

### Request for Public Assistance

**General Eligibility**

4. Who are the eligible applicants and eligible activities under the FEMA PA program?


### Request for Public Assistance

**Grant Manager**

Has the Assistant Administrator, Recovery Directorate issued a deadline for Public Assistant Applicants?

At this time there is no deadline. The deadline for public assistance applicants to submit a Request for Public Assistance (RPA) (FEMA Form 90-49) is nationally extended and will remain open for the duration of the Public Health Emergency, as declared by the Secretary of Health and Human Services, unless an earlier deadline is deemed appropriate by the Assistant Administrator, Recovery.

### Request for Public Assistance

**Grant Manager**

Biggest concern was the processing of PNPs due to the expected volume of these coming in (remembering Sandy)

We are not looking at facility damage for this event but Recipient has to answer the question...do they “own” the facility? Then system is then requiring to attach documentation to show ownership and facility damage. Facility is not damaged, but in order to push them through the answer has to be Yes. (then they are triggered to attach insurance and other supporting docs, etc). Will the same functionality of PNP processing continue in light of COVID? Or should they continue to fake the system? (it can be bypassed with blank documents but this isn’t right) or should they be gathering all of these documents to support the facility.

Currently, there are 13 hospitals on hold with one Recipient, as they don’t have the docs the system wants.

The PNP review process is still the same, the PNP still has to have an eligible facility. However, specific to COVID-19 we are updating the questions and documentation process. The “FEMA RPA Review Job Aid” and “Applicant Quick Guide for PNP’s” will go into detail on what applicants need to provide. Once finalized (within the next 24/48 hr) the Grants Manager/Grants Portal system will be modified to reflect those changes. We anticipate most of the cat B projects will be for reimbursement for supplies, testing, and temp facilities; in those cases we would not anticipate insurance coverage. Once they start cleaning and disinfecting buildings we need to take a look at the insurance.

The insurance team has seen coverage for pandemic preparations and biological related coverage on previous events so a comment saying no insurance coverage available should be sufficient for most of these.
| Request for Public Assistance | Request for Public Assistance | Q: How do you apply for FEMA Public Assistance? | A: Interested eligible applicants should submit a Request for Public Assistance, FEMA Form 009-0-49, (https://www.fema.gov/medi-library/assets/documents/10145) through their State Office of Emergency Management. In addition, eligible applicants that already have an account can apply through the online FEMA Grants Portal (https://grantee.fema.gov/). If you don’t have an account, eligible applicants can reach out to your State Emergency Management representative.

Additionally, FEMA will be issuing a PNP Fact Sheet early next week.

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<tr>
<td>Request for Public Assistance</td>
<td>Request for Public Assistance</td>
<td>We have received multiple regional staff asking how RPAs from local governments that have no eligible work for COVID-19 should be handled. Example: A grader district or road district that only have roads as their facility, and do not have any legal responsibility for COVID-19 projects. There questions are below:</td>
<td>1. Should the State make their RPA ineligible? 2. Should FEMA also mark their RPA ineligible (if the State does?) 3. Should a DM be written?</td>
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<td>Request for Public Assistance</td>
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<td>Question regarding a recommendation on process. Have we looked at the potential to have the state be the sole RPA submitted similar to a host state process to cut down on the amount of RPAs that may come in and allow the state to be the only applicant and have the state work directly with entities?</td>
<td>Some states have police powers designated to the lowest level government so we cannot do this across the board. For Regions that have states for which this could work it would be could to have regions coordinate directly with their states on whether there are entities that could be rolled up to the county or state level and the county or state would take legal authority for the activities in those jurisdictions and set up their own written agreements for paying for items directly or via Mutual Aid agreements, etc.</td>
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<td>Request for Public Assistance</td>
<td>Request for Public Assistance</td>
<td>What is the RPA deadline for this declaration? Are there any other critical deadlines?</td>
<td>Updated answer on March 21, 2020: The deadline to submit the Request for Public Assistance (RPA) for the COVID-19 the RPA deadline is nationally extended and will remain open for the duration of the Public Health Emergency, as declared by the Secretary of Health and Human Services, unless an earlier deadline is deemed appropriate by the Assistant Administrator, Recovery Directorate. Reference Memorandum from the Assistant Administrator of the Recovery Directorate, dated March 30, 2020 (<a href="https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx">https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx</a>).</td>
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<tr>
<td>Request for Public Assistance</td>
<td>Request for Public Assistance</td>
<td>What is the RPA process for this declaration?</td>
<td>Use normal RPA process. A package of documents to assist applicants with RPAs will be available in Grants Portal in the next several days (answer posted March 18, 2020).</td>
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<tr>
<td>Request for Public Assistance</td>
<td>Time Extension</td>
<td>2. RPAs extension states are foreseeing needing more with the number of applicant they are expecting</td>
<td>Updated answer on March 21, 2020: The deadline to submit the Request for Public Assistance (RPA) for the COVID-19 the RPA deadline is nationally extended and will remain open for the duration of the Public Health Emergency, as declared by the Secretary of Health and Human Services, unless an earlier deadline is deemed appropriate by the Assistant Administrator, Recovery Directorate. Reference Memorandum from the Assistant Administrator of the Recovery Directorate, dated March 30, 2020 (<a href="https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx">https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx</a>).</td>
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<td>TAC</td>
<td>Remote Work</td>
<td>2. PA TAC Remote Work ROR: Should Remote ROR initiates, may TACs currently on rotations remain at ROR, if return date is near the initiation of instituting remote ROR?</td>
<td>If it is known that the operation is instituting remote work, then the individuals currently on rotations can remain at their ROR. They can either remain on rotation or, as other operations have implemented, ship the equipment to the individuals (at FEMA’s expense) so that they can support remotely.</td>
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<td>TAC</td>
<td>Remote Work</td>
<td>Is there official guidance on whether the TAC can work from home?</td>
<td>PA’s Contracts and Financial Management Branch is providing guidance to the Task Monitors. That guidance is posted under Coronavirus PA - It is under Program Deliver's folder. (<a href="https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Program%20Delivery/TAC%20scenario%20decision%20COA%20for%20COVID-19%20v3.18.20_v2.pdf">https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Program%20Delivery/TAC%20scenario%20decision%20COA%20for%20COVID-19%20v3.18.20_v2.pdf</a>)</td>
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<tr>
<td>TAC</td>
<td>Remote Work</td>
<td>Can TAC’s perform their duties remotely?</td>
<td>Yes, TACs who can perform their duties remotely are authorized to work at an alternate work site (e.g. Residence of Record or hotel). We request the region/disasters identify positions that cannot be performed remotely ASAP. If a TAC’s duties can be performed remotely, please consider that they do not stay from their ROR instead of a hotel. Lastly, all contractor employees need to be logged into Skype at all times while they are working, no exceptions. We will be using Skype to the maximum extent for meetings and communications. Please see the COVID-19 PA-TAC CONTRACTOR SCENARIO and COAs document for additional information (<a href="https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx">https://intranet.fema.net/org/orr/recovery/pad/Coronavirus%20PA/Forms/AllItems.aspx</a>).</td>
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### Training
1. PA TAC Training: With maximized telework, mini micro training courses are being offered to all staff on connectivity, conferencing abilities and options, and even a Grants Manager adobe connect training. These are all beneficial for TACs given the scenario we are in. How are we to go about making training mandatory to ensure the consistency for telework?

   We can recommend to the contractors that additional training is available, but we cannot make it mandatory.

### Travel
3. PA TAC Travel: Can we have TACs change the dates to accommodate the need to return ROR (should it initiate) even if shy of a few days? Would this option be available as it may serve as a cost savings to the contract?

   The contractors can change their dates to accommodate the need to return to their ROR.

3. PA TAC Travel: TACs with previously approved rotations [airline tickets already purchased...can we utilize those tickets for them to return to ROR, should it initiate?]

   The contractors can utilize already purchased tickets to return to their ROR. The Government will cover the change fees.