

FEMA Public Assistance Overview: COVID-19 Pandemic Policies & Equitable COVID-19 Response and Recovery

April 2021



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An aerial photograph of a coastal town, likely in New England, featuring a harbor filled with numerous sailboats and yachts. The town is built on a hillside, with a prominent church steeple visible on the right. The entire image is overlaid with a semi-transparent blue gradient.

Public Assistance COVID-19 Overview and General Eligibility Considerations

General Eligibility Considerations for COVID-19

- Work must be the legal responsibility of an eligible applicant.
 - Measures to protect life, public health, and safety are generally the responsibility of SLTT governments.
- Legally-responsible SLTT governments may enter into formal agreements or contracts with private organizations, including PNP organizations.
- For COVID-19 declarations only, FEMA is waiving the primary use and primary ownership requirements for PNPs.
- For all COVID-19 declarations, FEMA has extended the deadline for emergency work indefinitely and will notify applicants no less than 30 days prior to establishment of the deadline.



Additional Considerations – Allowability of Costs

- To be eligible, claimed costs must be necessary and be reasonably pursuant to federal regulations and federal cost principles including:
 - Not exceeding that which would be incurred by a prudent person under the circumstances prevailing at the time;
 - Conforming to standard PA program eligibility and other federal requirements;
 - Following established practices, policies, and procedures that apply when federal funding is not available; and
 - Documenting with sufficient detail.



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Additional Considerations – Duplication of Benefits

- FEMA is prohibited from providing financial assistance where such assistance would duplicate funding available from another program, insurance, or any other source for the same purpose including:
 - Assistance provided by other federal departments and agencies
 - Funding for clinical care costs funded by another source
- At no time will FEMA request or accept any Personally Identifiable Information related to the medical care of individual COVID-19 patients.
- FEMA will reconcile final funding based on any funding provided by another agency or covered by insurance or any other source for the same purpose.



Additional Considerations – Cost Share

- The federal cost share under PA for all COVID-19 declarations was increased from 75% to 100% for all eligible work already performed or to be performed from January 20, 2020 through December 31, 2021.
- For previously awarded projects, FEMA will obligate additional funding to increase the federal cost share from 75% to 100%.



Public Assistance vs. Other Programs of Federal Assistance

- Applicants should determine which source of funding best meets the need.
- If an eligible applicant applies for PA funding and then determines it will instead seek funding from another federal agency, the applicant should notify FEMA as soon as possible.
 - PA should not be considered funding of last resort
 - PA should be considered concurrently with other federal programs and sources
- FEMA has determined that it will not provide reimbursement through the PA program for certain types of work that may be eligible for funding under another agency's authorities.



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COVID-19 Safe Opening and Operation Policy

Safe Opening and Operation Policy – Background

- On January 21, 2021, the President issued the “[Memorandum to Extend Federal Support to Governors’ Use of the National Guard to Respond to COVID-19 and to Increase Reimbursement and Other Assistance Provided to States.](#)”
- FEMA issued a policy on April 5, 2021 implementing the increase in eligibility for funding under the Public Assistance Program for safe opening and operation costs, as authorized by the Presidential Memo.
- The interim policy published on September 8, 2021 supersedes version 1 of the Coronavirus (COVID-19) Pandemic: Safe Opening and Operation Work Eligible for Public Assistance (Interim) published on April 5, 2021, and extends the applicable period of eligibility to the beginning of the incident period and the period of 100 percent federal cost share from the beginning of the incident period to December 31, 2021



Safe Opening and Operation Policy – Applicability

- Timeframe
 - Applies to work performed from January 20, 2020 through December 1, 2021, to support the safe opening and operations of PA-eligible facilities.
 - Work that is otherwise eligible under the [COVID-19 Work Eligible for Public Assistance Interim Policy](#) remains eligible for assistance.
- Cost Share
 - FEMA is funding the entire cost (i.e., 100% federal share) for the measures included in this policy.



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Safe Opening and Operation Policy – Eligible Costs

- FEMA may provide assistance to all eligible PA applicants, including SLTTs and eligible PNPs, for the following measures implemented to facilitate the safe opening and operation of eligible facilities:
 - Purchase and distribution of face masks, including cloth face coverings, and Personal Protective Equipment (PPE).
 - Cleaning and disinfection, in accordance with CDC guidance or that of an appropriate Public Health official available at the time the work was completed, including the purchase and provision of necessary supplies and equipment in excess of the Applicant’s regularly budgeted costs.
 - COVID-19 diagnostic testing.
 - Screening and temperature scanning, including, but not limited to, the purchase and distribution of hand-held temperature measuring devices or temperature screening equipment.
 - Acquisition and installation of temporary physical barriers, such as plexiglass barriers and screens/dividers, and signage to support social distancing, such as floor decals.
 - Purchase and storage of PPE and other supplies listed in this section based on projected needs.



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Diagnostic Testing Eligibility

FEMA will fund testing to detect COVID-19 infections both in a medical setting and testing needed to safely open and operate public facilities, including schools. Funding may be used to support both diagnostic and screening protocols. Funding guidelines for medical settings are outlined in FEMA Policy 104-010-04, Coronavirus (COVID-19) Pandemic: Medical Care Costs Eligible for Public Assistance. Guidelines for other facility settings are outlined in FEMA Policy 104-21-0003, Coronavirus (COVID-19) Pandemic: Safe Opening and Operation Work Eligible for Public Assistance (Interim). In general, FEMA will fund diagnostic and screening testing to determine if an active coronavirus infection is present and if an individual should take steps to quarantine or isolate from others.

This funding can include costs for:

- Laboratory testing materials and test kits including antigen self-tests;
- Contracting for testing support by a third party;
- Staffing to administer tests;
- Training for individuals to administer tests;
- Signage and other communication materials;
- Personal protective equipment and other administrative supplies to conduct testing; and,
- Technology to register and track testing results



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**Public Assistance COVID-19:
COVID-19 Eligibility Policy (September 2020)**

September 1, 2020 Eligibility Policy

- FEMA released a policy on September 1, 2020 defining the scope of eligible work and costs for COVID-19.
- The policy is applicable to work performed on or after September 15, 2020.
- It specified that only emergency protective measures specific to responding to COVID-19 were eligible, specifically citing eligible emergency work at Section C.4.
- Additional ancillary measures are provided at Section C.5 (e.g., disinfection and screening) and are only eligible, when necessary, to support eligible emergency work defined at Section C.4.
- This policy is still in effect where the eligible work and costs defined at Sections C.4 and C.5 are still applicable; however, the Safe Opening and Operations Policy allows certain measures for all Applicants to support reopening and daily operations in a pandemic environment from January 21, 2021 to September 30, 2021.



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September 1, 2020 Eligibility Policy

Section C.4

FEMA may provide assistance only for the following emergency protective measures in response to COVID-19 declared events:

- a. Medical care, in accordance with COVID-19 specific policy or subsequent updates.
- b. Purchase and distribution of food, in accordance with COVID-19 specific policy or subsequent updates.
- c. Non-congregate medical sheltering, in accordance with COVID-19 specific policy or subsequent updates.
- d. Operation of Emergency Operations Centers to direct and coordinate resources and response activities for COVID-19 declarations.
- e. Communications to disseminate public information regarding health and safety measures and provide warnings about risks and hazards.
- f. Mass casualty management, including storage of human remains and mass mortuary services, as necessary to manage fatalities caused by COVID-19.
- g. Purchase and distribution of Personal Protective Equipment (PPE) that is directly related to the performance of otherwise eligible emergency work, or is provided to healthcare workers, patients with confirmed or suspected COVID-19 infection, and first responders.
 - i. Funding for stockpiling a supply of eligible PPE is limited to a supply that is projected for up to 60 days from date of purchase.
 - ii. Funding for storing eligible PPE is limited to what is necessary to store a projected 60-day PPE supply.



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September 1, 2020 Eligibility Policy

Section 5

FEMA may provide assistance for the following activities in response to COVID-19-declared events only when *necessary to perform otherwise eligible emergency work listed in C.4*:

- a. Purchase and distribution of face masks, including cloth facial coverings, provided to persons conducting eligible emergency work and/or in facilities where eligible emergency work is performed.
- b. Temperature scanning, including purchase and distribution of hand-held temperature measuring devices and associated supplies, in facilities where eligible emergency work is performed.
- c. Disinfection, in accordance with CDC guidance, in facilities where eligible emergency work is performed, including purchase and provision of necessary supplies and equipment, and in excess of current operating costs.
- d. Acquisition and installation of temporary physical barriers, such as plexiglass barriers, in facilities where eligible emergency work is conducted.
- e. Law enforcement and security.
- f. Training and technical assistance specific to the declared event.
- g. Reimbursement for force account overtime costs, costs related to hiring temporary employees, and contract labor costs associated with performance of eligible emergency protective measures.
- h. Movement of equipment and supplies, including transportation and storage.
- i. Other work and costs delineated within COVID-19 policies referenced in C.4.



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COVID-19 Public Assistance Eligible Work – Comparison Table

		Initial Eligibility Jan. 20, 2020 – Sept. 14, 2020	Ongoing Eligibility Sept. 15, 2020 – Jan. 20, 2021	Eligibility Under Updated Policies Jan. 21, 2021 – Sep. 30, 2021
Medical Care	Clinical Care for COVID patients	✓	✓	✓
	Vaccination	⚠	✓	✓
	Alternate Care Sites & Community Testing Sites	✓	✓	✓
	Contact Tracing Disease & Research	⊘	⊘	⊘
Opening & Operating	Personal Protective Equipment	✓	⚠	✓
	Cleaning & Disinfecting	📄	⚠	✓
	Screening incl. Testing & Temp. Checks	📄	⚠	✓
	Temp. Physical Barriers	📄	⚠	✓
	Virtual Operations	⊘	⊘	⊘
Mass Care	Non. Cong. Sheltering	✓	✓	✓
	Emergency Feeding	✓	✓	✓

Legend ✓ Eligible Work 📄 Limited Eligibility with Specific Documentation ⚠ Very Limited Eligibility with Specific Criteria ⊘ Ineligible Work

An aerial photograph of a coastal town, likely in New England, featuring a large marina filled with numerous sailboats and yachts. The town is built on a hillside, with a mix of residential houses and larger commercial buildings. A prominent church with a tall steeple is visible on the right side. The entire image is overlaid with a semi-transparent blue filter.

COVID-19 Medical Care Policy (Version 2)

Medical Care Costs Eligible for Public Assistance – Background

- For COVID-19, SLTT government entities and certain PNP organizations are eligible to apply for PA for COVID-related medical care.
- The updated version of the policy issued on March 16, 2021, supersedes the previous version that was issued on May 9, 2020.
- Medical care and associated costs refer to assistance to support the provision of medical care, including eligible facility, equipment, supplies, staffing, and wraparound services as well as assistance for clinical care of patients not covered by another funding source.



Medical Care Costs Eligible for Public Assistance – Eligibility

- Eligible PA Applicants under the COVID-19 emergency declaration or any subsequent COVID-19 major disaster declaration include:
 - SLTT government entities; and
 - PNP organizations that own and/or operate medical facilities, as defined in Title 44 of the Code of Federal Regulations (44 C.F.R.) §206.221(e)(5).
- This policy does not apply to any other emergency or major disaster declaration.



Medical Care Costs Eligible for Public Assistance Policy – Facility Type

- **Primary Medical Care Facility – Ongoing Eligibility**
 - Emergency and inpatient clinical care for COVID-19 patients only;
 - Purchase/lease and delivery of specialized medical equipment necessary to respond to COVID-19;
 - Purchase and delivery of Personal Protective Equipment (PPE), durable medical equipment, and consumable medical supplies necessary to respond to COVID-19;
 - Medical waste disposal related to COVID-19;
 - Certain labor costs; and
 - Increased operating costs for administrative activities (e.g., medical billing) are not eligible.



Medical Care Costs Eligible for Public Assistance Policy – Facility Type

- **Temporary and Expanded Medical Facilities**
 - Lease, purchase, or construction costs of a temporary facility as well as alterations to a facility necessary to provide medical care services, as reasonable and necessary;
 - Mobilization and demobilization costs;
 - Operating costs including equipment, supplies, staffing, wraparound services, and clinical care (COVID and non-COVID) not covered by another funding source; and
 - Maintenance of a temporary or expanded medical facility in an operationally ready but unused status available for surge capacity (“Warm Sites”).



Medical Care Costs Eligible for Public Assistance Policy – Vaccinations

- The updated version of the policy includes work and associated costs to support the distribution and administration of COVID-19 vaccines may be eligible for PA.
 - The cost of the vaccine itself is covered by the federal government.
 - Additional costs to support the distribution and administration of the vaccine may be eligible under PA when consistent with established vaccine protocols, CDC and/or other applicable public health guidance, and PA program requirements.



Vaccination Eligible Work and Costs (1 of 6)

- Community Vaccination Sites
- Facility support costs, including leasing space, utilities, maintenance, and security (for temporary facilities only)
- PPE, other equipment, and supplies required for storing, handling, distributing, transporting, and/or administering COVID-19 vaccinations, such as:
 - Equipment includes coolers, freezers, temperature monitoring devices, and portable vaccine storage units for transportation;
 - Supplies include emergency medical supplies and sharps containers; and
 - Transportation support such as refrigerated trucks and transport security.



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Vaccination Eligible Work and Costs (2 of 6)

- Additional staff, including medical and support staff
- Resources to support mobile COVID-19 vaccination in remote areas and/or transportation support for individuals with limited mobility, including:
 - Equipment and supplies necessary to support mobile vaccination units;
 - Medical and support staff for mobile vaccination units; and
 - Transportation to and from vaccination sites for individuals with limited mobility.
 - “Limited mobility” means any individual that cannot get to and from vaccinations sites without transportation assistance (due to physical disabilities, economic hardships, or other factors that may hinder an individual’s ability to get to and from a vaccination site without assistance).



Vaccination Eligible Work and Costs (3 of 6)

- Onsite infection control measures and emergency medical care for COVID-19 vaccine administration sites, including:
 - Masks/cloth facial coverings for patients;
 - Disinfection of facility and equipment in accordance with CDC guidance;
 - Temperature scanning;
 - Acquisition and installation of portable temporary physical barriers;
 - Medical waste disposal related to vaccinations; and
 - Onsite emergency medical care.



Vaccination Eligible Work and Costs (4 of 6)

- Communications to disseminate public information regarding vaccinations including translation and interpretation services as necessary (including call centers or websites when reasonable and necessary)
- Training and technical assistance specific to the proper storage, handling, distribution, and/or administration of COVID-19 vaccines in accordance with CDC guidance
- Vaccine-related costs incurred by a Federally Qualified Health Center (FQHC), Rural Health Clinics, and Critical Access Hospitals (not covered by HHS or another funding source)



Vaccination Eligible Work and Costs (5 of 6)

- Information Technology (IT) equipment and systems for patient registration and tracking, vaccine-related inventory management, and/or analytics and reporting needs.
 - To the extent possible, vaccine providers should utilize existing IT systems and processes.
 - The CDC developed the Vaccine Administration Management System (VAMS) for jurisdictions and healthcare providers that do not have existing IT systems for vaccination management.
 - In the event existing IT systems and VAMS are both inadequate to meet the needs of vaccine providers, IT equipment and systems necessary for the distribution and administration of COVID-19 vaccines are eligible for PA .



Vaccination Eligible Work and Costs (6 of 6)

- PA may provide funding for costs that are not paid for by another funding source, such as other Federal programs or insurance, including Medicare and Medicaid.
- Applicants are expected to follow their regular patient billing procedures where those may apply.
- SLTT governments administering COVID-19 vaccinations are not required to establish and implement new patient billing systems where they did not have them previously.



Questions?

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