

COVID-19 Public Assistance Programmatic Deadlines (Interim) Policy Version 2

Webinar | April 2023



FEMA

Objective and Agenda

Objective

Provide an overview of the COVID-19 Programmatic Deadlines (Interim) Policy Version 2 and a status update of the COVID-19 Disposition FAQ Version 2.

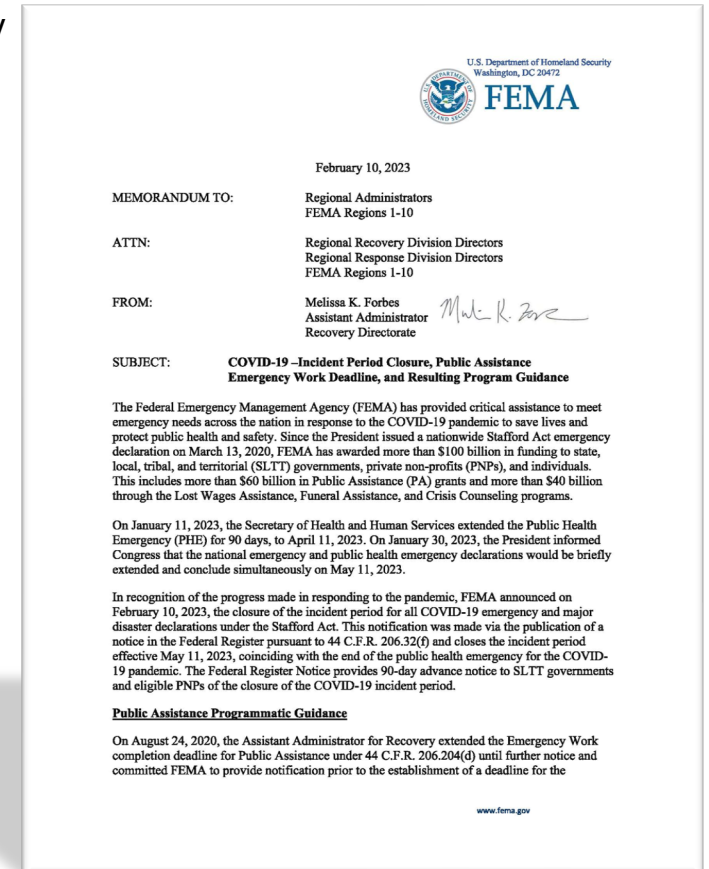
Agenda

- Opening Remarks
- General Overview and Background
- COVID-19 Programmatic Deadlines (Interim) Policy Version 2
- COVID-19 Disposition FAQ Version 2
- Questions and Answers Session



COVID-19 Overview

- On January 30, 2023, the POTUS announced both the national emergency declaration and public health emergency will conclude on May 11, 2023.
- On February 10, 2023, FEMA announced the COVID-19 incident period closure, effective May 11, 2023.
- FEMA approved a 90-day extension for demobilization, disposition, and disposal activities.
- On April 10, 2023, President Biden signed a Joint Resolution terminating the national emergency declared on March 13, 2020.
- As of April 2023, FEMA's Public Assistance Program has provided more than \$62 billion to SLTTs and PNPs.



COVID-19 PA Programmatic Deadlines Policy Version 1

In June 2022, FEMA released Version 1 of the COVID-19 PA Programmatic Deadlines Policy. This policy included the following:

- **Request for Public Assistance (RPA) Deadline: July 1, 2022**
- **Project Application Submittal (January 2020 – July 1, 2022) Deadline: December 31, 2022**
- **Expedited Funding Projects**
- **100% Federal Cost Share Application**
- **90% Federal Cost Share Application**
- **Project Completion Certification and Closeout Deadline**
- **Management Costs Deadline**
- **Time Extension Requests: RPA, Project Application Submittal, Closeout, Management Costs**



COVID-19 Programmatic Deadlines (Interim) Policy Version 2

On March 30, 2023, FEMA released the COVID-19 Programmatic Deadlines (Interim) Policy Version 2. This policy:

- Supersedes Version 1 of the Programmatic Deadlines Policy Version 1 released on June 15, 2022 and is applicable to all COVID-19 declarations.
- Establishes PA eligibility and programmatic deadlines across all COVID-19 emergency and major disaster declarations;
- Describes application of the 100% federal cost share from January 20, 2020 through July 1, 2022;
- Describes application of the 90% federal cost share from July 2, 2022 through May 11, 2023; and,
- Provides guidance for limited, eligible work performed up to 90 days from May 11, 2023 (August 9, 2023), to complete demobilization, disposition, and/or disposal of equipment, supplies, or real property.



COVID-19 Programmatic Deadlines Version 2



*Note: All management costs are covered at 100% federal cost share.
For further details regarding time extension requests, see the Programmatic Deadlines Policy (Appendix A).*

	Fed. Cost Share	Work Completion Deadline	Project Submission Deadline	Closeout Deadline	Management Cost Deadline
Costs Incurred for Work Performed Jan. 20, 2020 – Jul. 1, 2022	100%	Jul. 1, 2022	Dec. 31, 2022	May 6, 2024	May 11, 2025
Costs Incurred for Work Performed Jul. 2, 2022 – May 11, 2023	90%	May 11, 2023	Nov. 7, 2023	May 6, 2024	May 11, 2025
Costs Incurred for Only Demobilization, Disposition, and Disposal Work Performed May 11, 2023 – Aug. 9, 2023	90%	Aug. 9, 2023	Nov. 7, 2023	May 6, 2024	May 11, 2025

COVID-19 Time Extension Requests

	Request for Public Assistance Deadline	Work Completion Deadline	Project Submission Deadline
Costs Incurred for Work Performed January 20, 2020 – July 1, 2022		N/A	<ul style="list-style-type: none"> RA up to 90 days (March 31, 2023) AA of Recovery concurrence beyond 90 days
Costs Incurred for Work Performed July 2, 2022 – May 11, 2023	<ul style="list-style-type: none"> Regional Administrator (RA) up to 90 days (September 29, 2022) Associate Administrator (AA) of Recovery concurrence beyond 90 days 	N/A	<ul style="list-style-type: none"> RA up to 90 days (February 5, 2024) AA of Recovery concurrence beyond 90 days
Costs Incurred for Only Demobilization, Disposition, and Disposal Work Performed May 11, 2023 – August 9, 2023		<ul style="list-style-type: none"> RA up to 90 days (November 7, 2023) with no further allowances 	<ul style="list-style-type: none"> RA up to 90 days (February 5, 2024) AA of Recovery concurrence beyond 90 days



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COVID-19 Time Extension Requests

	Closeout	Management Cost
Costs Incurred for Work Performed January 20, 2020 – July 1, 2022		
Costs Incurred for Work Performed July 2, 2022 – May 11, 2023	<ul style="list-style-type: none"> • RA up to 90 days (August 5, 2024) • AA of Recovery concurrence beyond 90 days 	RA may extend deadlines for submittal of management costs, not to exceed deadline for prime award period of performance.
Costs Incurred for Only Demobilization, Disposition, and Disposal Work Performed May 11, 2023 – August 9, 2023		



90% Federal Cost Share (July 2, 2022 – May 11, 2023)

- **Employee Labor:** Costs for hours worked through May 11, 2023.
- **Purchased Supplies:** Costs to purchase supplies used or distributed through May 11, 2023. FEMA only provides PA funding for the purchase of supplies projected to be used or distributed in the next 60 days. Any supplies purchased for a 60-day timeframe are eligible for 90% federal funding only if the items were used or distributed by May 11, 2023.
- **Purchased Equipment:** Costs to purchase equipment that the Applicant used or distributed by May 11, 2023, and the cost for usage through May 11, 2023.
- **Leased Equipment and Facilities:** Lease costs on or after July 2, 2022. FEMA may calculate the cost based on a proration of time. FEMA only provides funding for storage that is necessary to store 60 days of PPE and other necessary supplies.
- **Contract Costs:** Costs for work performed from July 2, 2022, through May 11, 2023.



90% Federal Cost Share (May 11, 2023 – Aug. 9, 2023)

- **Employee Labor:** Hours worked for eligible demobilization, disposition, and disposal work performed through August 9, 2023.
- **Purchased Supplies:** Costs to purchase any necessary supplies to complete eligible demobilization, disposition, and disposal work used through August 9, 2023. FEMA only provides PA funding for the purchase of supplies projected to be used by August 9, 2023 for this limited work.
- **Purchased Equipment:** Costs to purchase any necessary equipment to complete eligible demobilization, disposition and disposal work used through August 9, 2023, and the cost for usage through August 9, 2023.
- **Leased Equipment and Facilities:** Lease costs after May 11, 2023 to complete eligible demobilization, disposition, and disposal work used through August 9, 2023. FEMA may calculate the cost based on a proration of time. FEMA only provides funding for storage, including warehousing costs, that is necessary for up to 90 days to complete demobilization, disposition, and disposal efforts.
- **Contract Costs:** Costs for work performed from May 11, 2023, through August 9, 2023 to support eligible demobilization, disposition, and disposal work.



Federal Cost Share Application

- **Separation of Costs:** Applicants must delineate costs for work performed prior to July 2, 2022, from costs for work performed from July 2, 2022, through May 11, 2023. Applicants must also delineate costs for demobilization, disposition, and disposal activities.
- **Donated Resources:** Applicants may use the value of donated resources to offset the non-federal cost share. The value of donated resources used prior to July 2, 2022 may be used to offset the 10% non-federal cost share for eligible work performed on or after July 2, 2022.
- **Project Thresholds:** The project thresholds for minimum project amounts, and small and large projects as defined in Chapter 3.IV. B. Project Thresholds of the PAPPG apply to each individual Project Application. On August 3, 2022, FEMA implemented a regulatory change to increase the small project maximum for the agency's PA program to \$1 million. The \$1 million threshold applies to COVID-19 projects that had not been obligated as of August 3, 2022.



Federal Funding

- Section 312 of the Stafford Act prohibits FEMA from duplicating benefits from other sources.
- FEMA's PA policy is that if an applicant does not receive funding from another source for the same exact cost item that PA funding is provided, FEMA will not consider it to be a duplication of benefits.
- For example, if FEMA provides PA funding for eligible COVID-19 medical care costs and the applicant also receives funding from another source for COVID-19 medical care, FEMA will only consider it a duplication of benefits if the applicant uses the other sources of funding for the same cost items that were eligible and submitted to FEMA for PA funding.



Non-Discrimination and Equity Requirements

- As a condition to receiving PA funding, Recipients and Subrecipients must comply with all laws and authorities prohibiting discrimination, including but not limited to, Title 44 of the Code of Federal Regulations Part 7 and Title VI of the Civil Rights Act, which prohibit discrimination based on race, color or national origin (including limited English proficiency); and the Stafford Act's Section 308, which requires the impartial and equitable delivery of disaster services and activities without discrimination on the grounds of race, color, religion, nationality, sex, age, disability, English proficiency, or economic status.



COVID-19 Disposition FAQ Version 2

- FEMA will be issuing an updated version of the COVID-19 Disposition FAQ released last year.
- This document will provide answers to frequently asked questions about disposition and disposal requirements for equipment and supplies, and demobilization, including warehousing costs, for all emergency and major disaster declarations for COVID-19.
- This FAQ will apply to all FEMA PA projects funded under a COVID-19 emergency or major disaster declaration, as well as equipment or supplies provided by FEMA as Direct Federal Assistance.

