COVID-19 Pandemic: Public Assistance Policy Updates and Implementation

April 2021
PART I: COVID-19 Policy Overview
- COVID-19 Eligibility Overview
- Safe Opening and Operations Policy
- Medical Care Policy (V2)

PART II: Equitable Pandemic Response and Recovery Requirements
- General Equity Provisions
- Reporting Requirements for Vaccine Administration
Overview of COVID-19 Eligibility
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.
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 September 30, 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.
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.
## COVID-19 Public Assistance Eligible Work – Comparison Table

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Clinical Care for COVID patients</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Vaccination</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Alternate Care Sites &amp; Community Testing Sites</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Contact Tracing Disease &amp; Research</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Medical Care</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Personal Protective Equipment</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Cleaning &amp; Disinfecting</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Screening incl. Testing &amp; Temp. Checks</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Temp. Physical Barriers</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Virtual Operations</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Opening &amp; Operating</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non. Cong. Sheltering</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Emergency Feeding</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
</tbody>
</table>

**Legend**:
- ✔ Eligible Work
- ▲ Limited Eligibility with Specific Documentation
- △ Very Limited Eligibility with Specific Criteria
- ✗ Ineligible Work
COVID-19 Safe Opening and Operations 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.
Safe Operation and Opening Policy – Applicability

- **Timeframe**
  - Applies to work performed from January 21, 2021 through September 30, 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**
  - Through September 30, 2021, FEMA is funding the entire cost (i.e., 100% federal share) for the measures included in this policy
Safe Operation and Opening 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 cloth face coverings and PPE;
  - Cleaning and disinfection;
  - COVID-19 testing;
  - Screening and temperature scanning;
  - Acquisition and installation of portable temporary physical barriers; and
  - Purchase and storage of PPE and other supplies based on projected needs.
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.

- The policy was amended to add provisions for vaccinations and equity language.

- No other changes were made; provisions for primary and temporary medical care facilities remains the same.
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; any claimed costs related to Applicants purchasing vaccines are not eligible under PA.
  - 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
  - Equipment includes coolers, freezers, temperature monitoring devices, and portable vaccine storage units for transportation
  - Supplies include emergency medical supplies and sharps containers
  - Transportation support such as refrigerated trucks and transport security
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)
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.
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.
Applicants will need to provide the following information and supporting documentation in their Streamlined Project Application (SPA):

- A description of the activities including when, where, and by whom the activities were completed or will be completed.
  - List of vaccination sites
  - Number of vaccinations provided by day/site
  - Identification of supported population (statewide, countywide, citywide, etc)
- Itemized summaries of claimed costs, including contracts, labor, equipment, materials/supplies, rental costs, and estimates for anticipated future costs.
- Additional documentation supporting completed activities and claimed costs.
Applicable PA Guidance

- Public Assistance Program and Policy Guide (PAPPG) v. 3.1 FP 104-009-2/April 2018
- Coronavirus (COVID-19) Pandemic Work Eligible for Public Assistance (Interim) FP 104-009-19
- Coronavirus (COVID-19) Pandemic: Medical Care Costs Eligible for Public Assistance (Version 2) FP 104-010-04
- Coronavirus (COVID-19) Pandemic: Safe Opening and Operations
- CDC Vaccine Storage and Handling Toolkit (www.cdc.gov/vaccines/hcp/admin/storage/toolkit/index.html)
COVID-19 Equity Requirements
On January 21, 2021, the President issued the “Executive Order on Ensuring an Equitable Pandemic Response and Recovery” which stated:

- COVID-19 has a disproportionate impact on communities of color and other underserved populations.
- SLTT governments must focus the use of FEMA funding on the highest-risk and hardest-hit communities and underserved populations.
- SLTT governments must prioritize limited resources to ensure an equitable pandemic response.
- The distribution of disaster relief must be accomplished in an equitable and impartial manner without discrimination.
COVID-19 Equity: General Requirements

General equity provision applies to all COVID-19 response and recovery work:

“As a condition of receiving this financial assistance, Recipients and Subrecipients must focus the use of FEMA funding on the highest-risk communities and underserved populations as determined by established measures of social and economic disadvantage (e.g., the CDC Social Vulnerability Index). Recipients and Subrecipients must prioritize limited resources to ensure an equitable pandemic response. Failure to adhere to this policy could result in funding reductions and/or delays.”

(Emphasis added)

Coronavirus (COVID-19) Pandemic Medical Care Eligible for Public Assistance (Medical Care Policy) Section B.3.c., March 2021.
Equitable Vaccine Administration: Information Requirements

- Medical Care Policy (V2) includes specific data collection and reporting requirements for Recipients and Subrecipients’, including SLTTs and PNPs, vaccine administration:
  - “Recipients and Subrecipients of FEMA assistance shall collect data on race, ethnicity and disability status.” *(Medical Care Policy Section C.3.k.i.)*
    - FEMA will not request, and Recipients and Subrecipients should not submit to FEMA, personally identifiable information.
  - Recipients and Subrecipients must submit information every 30 days for ongoing work:
    - Social Vulnerability Index or similar index score for each site.
    - Description of how the location of each site best advances FEMA’s focus on supporting the highest-risk communities.
    - Strategy to operationalize equitable access at each site.
## Equitable Vaccine Administration: Information Requirements

<table>
<thead>
<tr>
<th>Vaccination Work Status</th>
<th>Group 1</th>
<th>Group 2</th>
<th>Group 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>All vaccination work is complete</td>
<td>1</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Vaccination work not yet complete</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>FEMA has already obligated funding for vaccination work</th>
<th>Recipient/ Subrecipient has applied, but FEMA has not yet obligated</th>
<th>Recipient/ Subrecipient has not yet applied</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group A</strong></td>
<td>One submission no later than 4/14/21 (30 days from issuance of the Medical Care Policy)</td>
<td>One submission, within 30 days of obligation</td>
<td>One submission, with initial request for FEMA vaccination funding</td>
</tr>
<tr>
<td><strong>Group B</strong></td>
<td>First submission no later than 4/14/21 (30 days from issuance of the Medical Care Policy), updates every 30 days until work is complete</td>
<td>First submission within 30 days of obligation, updates every 30 days until work is complete</td>
<td>First submission within 30 days of obligation, updates every 30 days until work is complete</td>
</tr>
</tbody>
</table>

**Table 1. Information Submittal Requirements and Deadlines**
Equitable Vaccine Administration: Information Requirements

- **Social Vulnerability Scores**
  - Recipients/Subrecipients must provide for every site
  - Can be CDC Social Vulnerability Index or other, similar score

- **Vaccine Administration Strategy:**
  - Outreach and Engagement
  - Registration Process
  - Vaccine Site Selection
  - Site Accessibility
  - Evaluation and Continuous Improvement

![Figure 1. PA Review Checklist for Equitable COVID-19 Vaccine Administration](image-url)
## Vaccine Administration Information Considerations

<table>
<thead>
<tr>
<th>Component</th>
<th>Considerations may include...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outreach and Engagement</td>
<td>• Engagement with community leaders and community-based organizations</td>
</tr>
<tr>
<td></td>
<td>• Engagement events accessible to individuals with disabilities or limited English proficiency</td>
</tr>
<tr>
<td>Registration Process</td>
<td>• Prioritization of minoritized, marginalized, and other disadvantaged groups</td>
</tr>
<tr>
<td></td>
<td>• Support to meet scheduled appointments</td>
</tr>
<tr>
<td>Vaccine Site Selection</td>
<td>• Identifying populations with socioeconomic status barriers, individuals with disabilities,</td>
</tr>
<tr>
<td></td>
<td>minority status, and limited English proficiency</td>
</tr>
<tr>
<td></td>
<td>• Housing and transportation barriers</td>
</tr>
<tr>
<td>Site Accessibility</td>
<td>• Access for individuals with disabilities or limited English proficiency</td>
</tr>
<tr>
<td></td>
<td>• Assistive technology</td>
</tr>
<tr>
<td></td>
<td>• Accessibility by transportation</td>
</tr>
<tr>
<td>Evaluation and Continuous</td>
<td>• Evaluating approach to equitable vaccine administration</td>
</tr>
<tr>
<td>Improvement</td>
<td>• Tactical adjustments to improve equity</td>
</tr>
</tbody>
</table>
Submitting Information Requirements

- Upload information via PA Grants Portal

- Information submission format options:
  - Use FEMA-provided template
  - Provide pre-existing report/status update, such as CDC report

- Information submissions must be updated monthly as long as vaccine work is ongoing

Figure 2. PA Grants Portal Applicant Profile Page
Applicants will upload the Equitable Vaccine Administration Information to their Applicant Event Profile.
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 3: Click Upload
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 4: Drag and drop file from desktop to this box or Click to Select Document
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 5: Click Edit
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 6: Enter Description

Step 7: Select ‘Other’ for Category Filter

Step 8: Select ‘Not Listed’ for Category
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 9: Click Save
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Step 10: Click to Upload Pending Documents

Dragging and dropping files here, or clicking here to select files.

Documents Pending Upload

<table>
<thead>
<tr>
<th>Filename</th>
<th>Description</th>
<th>Size</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equitable Vaccine Admin Info PE 4-14-21.pdf</td>
<td>Equitable Vaccine Admin Info PE 4-14-21.pdf</td>
<td>24.5 KB</td>
<td>Not Used</td>
</tr>
</tbody>
</table>

Showing 1 to 1 of 1 entries

Uploaded pending documents.
Grants Portal: Steps to Upload Equitable Vaccine Administration Info

Success!! The file is now viewable in the Document Section of the Applicant’s Profile.