Private Non-Profit

COVID-19 Cost Recovery Webinar

Virginia Emergency Support Team

Finance and Admin Section
Recovery Section

Private Non-Profit (PNP) Specific COVID-19 Cost Recovery Webinar

Agenda

- FEMA Authorized Assistance
- PNP Eligibility Guidance & Criteria
- PNP Eligibility Screening Process
- Overview of Resources Available
- PNP POCs

Federal Assistance – Declaration

- April 2, 2020 Major Disaster Declaration for Virginia received

  This allows state agencies, local governments, and certain non-profit organizations to purchase additional supplies and receive reimbursements for COVID-19 related costs under the FEMA Public Assistance program.

- The President Declared a National Emergency on March 13, 2020

Federal Assistance – Declaration

- **January 20, 2020 - and ongoing *(the date in which costs begin, no end date, as of now)***

  Authorized for the reimbursement of Category B *(emergency protective measures)* under the Public Assistance grant program at a 75% federal cost share

  - Minimum threshold of $3,300

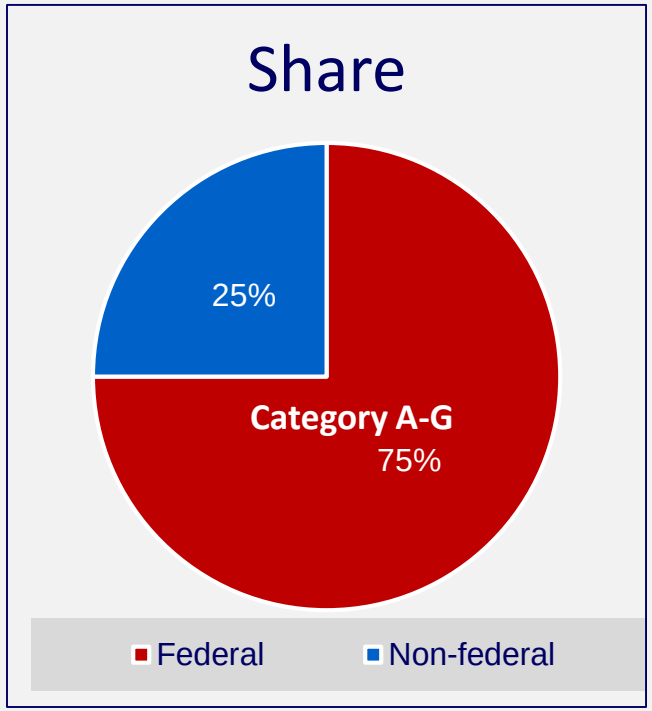
  Authorized the ability for the Commonwealth to request direct federal assistance to fulfill a specific gap or need at a 75% federal cost share *(mission requests through the Virginia Emergency Operations Center)*

VDEM's Role in the PA Program

- VDEM is the pass-through state agency for funds obligated by FEMA through this program
- Coordinate cost recovery operations with FEMA
- Provide technical assistance to potential applicants
- Grant administration and reimbursement

Public Assistance Program Cost Share

- FEMA will reimburse no less than 75% of eligible costs for project within the Category B Guidance specific to COVID-19.
- The non-federal share, remaining 25%, will be the responsibility of the PNP.
- Thirds party donations for eligible work performed, if documented, may off-set the 25% non-federal share.



FEMA Eligibility Guidance

COST

WORK

FACILITY

APPLICANT

FEMA makes final determination

PNP Applicant Eligibility

Documentation to Support PNP Eligibility

- Private Non-Profit organizations must have a ruling letter from the Internal Revenue Service (IRS) granting a tax exemption under Section 501(c), (d), or (e) of the IRS Code of 1954; or
- They must have documentation from the State substantiating that the non-revenue producing organization or entity is a non-profit entity organized or doing business under state law.

PNP Facility Eligibility

COST

WORK

FACILITY

APPLICANT

PNPs must own or operate an eligible facility to be an eligible applicant

PNP Facility Eligibility

- For PNPs, an eligible facility is one that provides an eligible service, which includes education, utilities, emergency, medical, custodial care, and other essential social services.

PNP Facility Eligibility – Required Documentation

- If the Applicant owns the facility, proof of ownership
- If the Applicant leases the facility, proof of legal responsibility to perform eligible work
- List of services provided in the facility and when and to whom
- Who is allowed membership
- What fees are charged
- Policy regarding waiving memberships

Special Facility Considerations

- Education/School
  - Proof that the school is accredited or recognized b the state Department of Education.
- Child Care Facility
  - Proof that the State Department of Children and Family Services, Department of Human Services, or a similar agency, recognizes it as a licensed child care facility.
  - Child care has been deemed ineligible at this time by FEMA in relation to COVID-19.
- Mixed-use facility
  - Proof of the established purpose of the facility with documentation such as:
    - Pre-disaster charter, bylaws, and amendments
    - Calendar of activities

Eligible Work Under COVID-19

Must be the legal responsibility of the PNP to perform the work

COST

WORK

FACILITY

APPLICANT

FEMA COVID-19 Work Eligibility Guidance

- Management and Control to Reduce the Immediate Threat
- Medical Sheltering (when existing facilities cannot accommodate)
- Emergency Medical Care
- Other Resources

Eligible Work for PNPs – Management and Control

Eligible Work
Emergency Operation Center costs
Training specific to the declared event
Disinfection of eligible public facilities
Technical assistance to state, tribal, or local governments on emergency management and control of immediate threats to public health and safety

Management and Control to Reduce the Immediate Threat

Eligible Work for PNPs – Medical Care

Eligible Work
Non-deferrable medical treatment of infected persons in a shelter or temporary medical facility
Related medical facility services and supplies
Temporary medical facilities and/or enhanced medical/hospital capacity (for treatment when existing facilities are reasonably forecasted to become overloaded in the near term and cannot accommodate the patient load or to quarantine potentially infected persons)
Use of specialized medical equipment
Medical waste disposal
Emergency medical transport

Emergency Medical Care

Eligible Work for PNPs - Medical Sheltering*

Eligible Work
All sheltering must be conducted in accordance with standards and/or guidance approved by HHS/CDC and must be implemented in a manner that incorporates social distancing measures
Non-congregate medical sheltering is subject to **prior approval by FEMA** and is limited to that which is reasonable and necessary to address the public health needs of the event, is pursuant to the direction of appropriate public health officials and does not extend beyond the duration of the Public Health Emergency

***Medical Sheltering is further defined by FEMA for COVID-19** (e.g. when existing facilities are reasonably forecasted to become overloaded in the near future and cannot accommodate needs)

Medical Sheltering (when existing facilities cannot accommodate)

Eligible Work for PNPs – Other Resources

Eligible Work
Purchase and distribution of food, water, ice, medicine, and other consumable supplies, to include personal protective equipment and hazardous material suits Movement of supplies and persons
Security and law enforcement
Communications of general health and safety information to the public
Search and rescue to locate and recover members of the population requiring assistance Reimbursement for state, tribe, territory and/or local government force account overtime costs
Household pet sheltering and containment actions related to household pets in accordance with CDC guidelines

Other Resources

Private Non-Profit (PNPs) and Government Entities

PNP as Applicant:

– PNPs that **<u>own or operate an eligible facility and perform eligible work</u>**, such as providing emergency, medical or custodial/sanitation services for which they are **legally responsible** for in response to the COVID-19 incident, may be eligible for reimbursement of costs as a Public Assistance Applicant independent of another entity.

Government Entity as Applicant:

– A government entity may be legally responsible to provide services and enter into a memorandum of agreement (MOU) with a PNP to provide those services (e.g., sheltering or food distribution).

– In these cases, Public Assistance funding is provided to the legally responsible government entity, which then reimburse the PNP for the cost of providing those services under the agreement.

Eligibility Process Flow

▼ Private-Non-Profit Guidance

Resource	File
PNP COVID-19 Eligibility Fact Sheet Final	PDF
COVID-19 Private Nonprofit Organizations Fact Sheet	PDF
PNP Eligibility Process Flow	PDF

Eligibility of Costs

COST

WORK

FACILITY

APPLICANT

Costs Must Be

- Tied directly to eligible work
- NECESSARY AND REASONABLE
- Reduced by all applicable credits
  - Ex: Insurance, other federal programs (CDC/HHS)
- Consistent with applicant's policies and procedures
  - Policies and procedures must be in place prior to the event
- NOT ELIGIBLE – Loss of Revenue

22

Cost Categories

- Force Account *(Inside Sources)*:
  - Labor
  - Equipment (FEMA Equip rates apply)
  - Materials/Supplies
- Contract Costs – *(Outside Sources)*

23

Cost: Labor

- Labor rates must be based on the applicant's pre-disaster labor policy, that is uniformly applied
- Category B – Only overtime is eligible

24

Cost: Equipment

- Force Account Equipment
- State, Local, or FEMA 2019 Equipment Rates https://www.fema.gov/schedule-equipment-rates
- Other Leased/Rental Equipment

25

Cost: Supplies and Materials

- Used for eligible work
- Reasonable and Necessary

26

Cost: Contracts

- Eligible if:
  - Comply w/Federal, State, and Local procurement procedures 2 CFR 200.317-326
  - Procurement Disaster Assistance Team
    - https://www.fema.gov/procurement-disaster-assistance-team
  - Contract Provisions Template
    - https://www.vaemergency.gov/wp-content/uploads/2020/04/Procurement-Disaster-Assistance-Team-Contract-Provisions-Template.pdf

27

Documentation Requirements for Potential Reimbursement

- Obtain cost estimates and determine eligibility
- Coordinate with FEMA on setting up account in the FEMA Grants Portal
- Grant writing process/eligibility review (new guidance for this event)
- FEMA obligates funding to VDEM at 75% of total costs
- Grant management processes for post-obligation are being developed for this disaster
- **Due to the unprecedented nature of this event, it is unclear how quickly federal funding will be available**

Next Steps

Getting Started

Step 1: Track your costs related to COVID-19 back to January 20, 2020.

Step 2:

For state, local, and tribal governments Submit your cost estimates in https://VirginiaPA.org (see "COVID-19 Cost Recovery Instructions")

For private non-profit organizations fill out eligibility screening survey:

- Downloadable word version template with instructions Download Template (.docx)
- Web-Portal to Submit PNP Pre-Screening Eligibility Survey

Next Steps continued…

Virginia Department of Emergency Management (VDEM)
COVID-19 Public Assistance (PA) Pre-Screening
FEMA-DR-4512-VA

VDEM has set up this tool to gain the necessary information from your organization to pre-screen eligibility for the FEMA PA Program. This tool is set up to mirror the FEMA requirements, and ultimately FEMA makes the final eligibility determination for PNP applicants. In addition to determining eligibility, the intent of this tool is to prevent un-necessary efforts from your organization if the eligibility requirements for the PA Program are not met.

Due Date for Submitting your PNP's Pre-Application Portal

- Please submit your organization's pre-application screening through the portal by COB April 30, 2020

Requests for Public Assistance

- No due date set – it will be 30 days after the National Public Health Emergency is over

Resources and Next Steps:

- Look for updates on the COVID-19 disaster as they become available https://www.vaemergency.gov/coronavirus

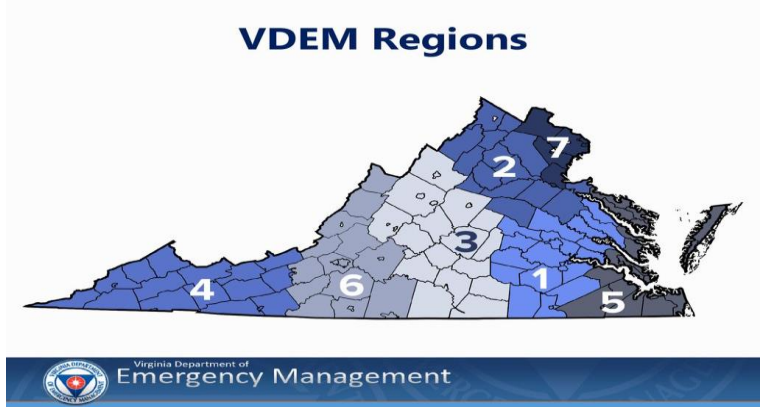
- Take advantage of our Public Assistance resource library, including Job Aids and Cost-Tracking templates https://virginiapa.org/site/resources.cfm

- Pay particular attention to the 2018 version of the FEMA Public Assistance Program and Policy Guide (PAPPG) and the Commonwealth Public Assistance Administrative Plan (2020) for cost-tracking guidance and supporting documentation requirements

- PNP expenses not reimbursable by HHS, FEMA, nor any Other Federal Agency should be tracked as they may be reimbursable by other means.

- For more information and disaster-specific guidance from FEMA, please visit https://www.fema.gov/coronavirus

Technical Support for PNPs:

For assistance submitting your assessment, please utilize the following contacts:

Geographic Area	PA/Recovery Coordinator	Contact
VDEM Regions 2, 3, 4, 6 (West)	Andrew Forcucci	andrew.forcucci@vdem.virginia.gov
VDEM Regions 1, 5, 7 (East)	Heather Williams	heather.williams@vdem.virginia.gov
Recovery Team (alternate)	Recovery Team (alternate)	Recovery@vdem.virginia.gov