



Homeland Security  
and Emergency Services



FEMA

# FEMA COVID-19 Interim Public Assistance Program Eligibility Guidance (DR-4480-NY)

September 21, 2020

# DR-4480 (COVID-19) FEMA's Interim Policy

- **September 1, 2020: FEMA Headquarters published Interim FEMA Policy FP 104-009-19: *Coronavirus (COVID-19) Pandemic: Work Eligible for Public Assistance.***
- **Posted on DHSES' website.**
- **Effective Date: **September 15, 2020.****
- **Interim Policy is *not retroactive.***



# DR-4480 (COVID-19) FEMA's Interim Policy

- The Interim Policy applies to work performed on or after the effective date of September 15, 2020.
- Work completed prior to September 15, 2020 is supported by prior interpretation of policy, regardless of project submittal date.
- If a project contains work performed in both periods, the applicant must document those costs separately.

# Impacts of FEMA's Policy Change

- **FEMA's Interim Policy **effective September 15, 2020** restricts eligibility of the below previously eligible work and materials/supplies**
  - **Disinfection**
    - Only eligible for reimbursement through Public Assistance in medical care, medical sheltering, and other eligible emergency services settings.
  - **PPE**
    - Only eligible for reimbursement through Public Assistance when necessary to conduct eligible emergency work, including PPE for healthcare workers and first responders.

# Impacts of FEMA's Policy Change

- **FEMA's initial policy allowed for broad reimbursement of cleaning/disinfecting and PPE for all applicants**
- **Policy change will impact nearly all applicants**
  - Schools, Houses of Worship, transit authorities, and non-medical Private Non-Profits (PNP's) will be particularly impacted as most DR-4480 projects for these applicants are solely for PPE and disinfection costs.
  - State, local, and tribal governmental entities will also be impacted

# Work Completed *Prior* to September 15, 2020

## Previously published policy guidance remaining in effect, including:

- Coronavirus (COVID-19) Pandemic: Medical Care Costs Eligible for Public Assistance (Interim), FEMA Policy FP 104-010-04 (May 9, 2020).
- Coronavirus (COVID-19) Pandemic: Alternate Care Site (ACS) “Warm Sites” Fact Sheet (May 12, 2020).
- Coronavirus (COVID-19) Pandemic: Emergency Medical Care, Fact Sheet dated March 30, 2020.
- Public Assistance: Non-Congregate Sheltering Delegation of Authority Fact Sheet (March 19, 2020) as clarified by Coronavirus (COVID-19) Pandemic: Non-Congregate Sheltering Frequently Asked Questions (March 31, 2020)
- Coronavirus (COVID-19) Pandemic: Purchase and Distribution of Food Eligible for Public Assistance, FEMA Policy FP 104-010-03 (April 11, 2020) as clarified in - Coronavirus (COVID-19) Pandemic Purchase and Distribution of Food Eligible for Public Assistance, FEMA ADVISORY (April 14, 2020).

# Work Performed *On or After* September 15, 2020

- **Superseded and no longer in effect: *Coronavirus (COVID-19) Pandemic: Eligible Emergency Protective Measures Fact Sheet (March 2020)*.**
- **Only work associated with the performance of emergency protective measures specifically listed in FEMA Policy FP 104-009-19 Paragraph C.4 is eligible for PA in COVID-19-declared events. Specifically:**
  - Medical care, in accordance with COVID-19 specific policy or subsequent updates.
  - Purchase and distribution of food, in accordance with COVID-19 specific policy or subsequent updates.
  - Non-congregate medical sheltering, in accordance with COVID-19 specific policy or subsequent updates.
  - Operation of Emergency Operations Centers to direct and coordinate resources and response activities for COVID-19 declarations.
  - Communications to disseminate public information regarding health and safety measures and provide warnings about risks and hazards.

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# Work Performed *On or After* September 15, 2020 - continued

- Mass casualty management, including storage of human remains and mass mortuary services, as necessary to manage fatalities caused by COVID-19.
- 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.
  - Funding for stockpiling a supply of eligible PPE (per above) is limited to a supply that is projected for up to 60 days from date of purchase.
  - Funding for storing eligible PPE (per above) is limited to what is necessary to store a projected 60-day PPE supply.

# Ineligible Costs

- **The following costs are not eligible for reimbursement through FEMA's Public Assistance Program:**
  - Increased operating costs, including costs associated with remote working, education and healthcare
  - Loss of revenue, income or donations
  - Costs associated with contact tracing
  - Costs of employees quarantined or out sick
  - Costs of re-opening facilities that closed due to pandemic or scheduled closures such as schools



# Documentation and Cost Reasonableness

## For all projects, FEMA will closely review applicant's documentation of:

- Specific Public Health guidance the applicant followed in incurring cost.
- Applicant's decision-making process in evaluating courses of action and associated costs.

## Costs Must Be:

- Reasonable and necessary to accomplish the work.
- Compliant with Federal, State AND Local procurement requirements.
- Reduced by any applicable credits such as insurance and other funding sources.
- Claimed costs must be necessary in order to respond to the COVID-19 pandemic and be reasonable pursuant to federal regulations and federal cost principles.

# Emergency Protective Measures Deadline for Completing Eligible Work

- **Extended by FEMA *without end date*.**
- **FEMA will provide at least 30 days notice before establishing a new deadline.**
- **DHSES will provide updates directly to Applicants and will post to the website ([dhses.ny.gov/recovery](https://dhses.ny.gov/recovery)).**

# Presentation Availability

- Policy and presentation will be available at:  
<http://www.dhSES.ny.gov/recovery/public/active-declarations.cfm>

