



Homeland Security
and Emergency Services



FEMA

Coronavirus (COVID-19) Pandemic: Medical Care Eligible for Public Assistance (Interim) (Version 2) (DR-4480-NY)

FEMA Policy #104-21-0004

<http://www.dhSES.ny.gov/recovery/public/active-declarations.cfm>

April 2, 2021

Medical Care Eligible for Public Assistance (Interim) (Version 2)

- **March 15, 2021:** Medical Care Eligible for Public Assistance (Interim) (Version 2) FEMA Policy FP 104-21-0004
 - Supersedes FEMA Policy FP-104-10-04 (Medical Care Policy Version 1) issued May 9, 2020
 - Increases Federal Cost share to 100% for eligible work performed or to be performed from January 20, 2020 through September 30, 2021.
 - Posted on DHSES's website.
- **March 15, 2021:** Equitable COVID-19 Response and Recovery Recipient and Subrecipient Job Aid

Medical Care Eligible for Public Assistance (Interim) (Version 2)

- **Applies to:**
 - Primary Medical Care Facilities
 - Temporary and Expanded Medical Facilities
 - Vaccinations

What are the impacts of FEMA's Interim Medical Care Eligibility Policy?

- **General Eligibility Considerations for COVID-19 Medical Care:**
 - Equitable Response and Recovery
 - All work must be required as a direct result of the COVID-19 pandemic incident
 - Medical care and associated costs refer to assistance to support the provision of medical care, including eligible facility, equipment, supplies, staffing and wrap around services

What are the impacts of FEMA's Interim Medical Care Eligibility Policy?

- **Key provisions in new Vaccination section:**
 - Equitable Response and Recovery
 - Data collection and reporting requirements
 - Insurance/Billing requirements
 - Onsite infection control measures (i.e. Plexiglass barriers)
 - Resources to support mobile COVID-19 Vaccination and/or transportation

Equitable Pandemic Response and Recovery



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Equitable Pandemic Response and Recovery

Recipient and Subrecipient Job Aid

- **Equity considerations for all COVID-19 work**
 - Job Aid provides the steps Recipients and Subrecipients must take to document that the pandemic response and recovery efforts are conducted in an equitable manner to communities of color and other underserved populations.
 - FEMA will monitor compliance with this grant condition in concert with federal regulation and law.

Equitable Pandemic Response and Recovery

- **Equity considerations for all COVID-19 work**
 - As a condition of receiving Public Assistance funding for the COVID-19 declaration, Recipients and Subrecipients must focus the use of FEMA funding on the highest-risk communities and underserved populations.
 - These requirements are retroactive to January 20, 2020

Equitable Pandemic Response and Recovery

- **The Interim Medical Care Policy includes a section on Equitable Pandemic Response and Recovery**
 - As a condition of receiving Public 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.
 - FEMA will monitor compliance with this grant condition in concert with federal regulation and law

Primary Medical Care Facility



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Medical Care – Primary Medical Care Facility

- Work must be directly related to the treatment of COVID-19 patients.
- May include both emergency and inpatient clinical care for COVID-19 patients
 - Includes both confirmed and suspected cases of COVID-19.
- Medical care related to treatment of a non-COVID-19 illness or injury in a primary medical care facility is **not** eligible.

Medical Care – Primary Medical Care Facility

The following medical care activities and associated costs are eligible in primary medical care facilities:

- Purchase, lease, and delivery of specialized medical equipment necessary to respond to COVID-19.
- Purchase and delivery of PPE, durable medical equipment, and consumable medical supplies necessary to respond to COVID-19 including the costs of eligible SLT government Applicants providing PPE to any public or private medical care facility that treats COVID-19 patients.
- Medical waste disposal related to COVID-19.

Medical Care – Primary Medical Care Facility

The following medical care activities and associated costs are eligible in primary medical care facilities:

- Certain labor costs associated with medical staff providing treatment to COVID-19 patients may be eligible
- Straight time, overtime, and other necessary costs for contract medical staff providing treatment to COVID-19 patients. Work and associated costs must be consistent with the scope of the contract and may include costs for travel, lodging, and per diem for contract medical staff from outside the local commuting area.
- Increased operating costs for administrative activities (such as medical billing) **are not eligible.**

Temporary and Expanded Medical Facilities



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Medical Care – Temporary and Expanded Medical Facilities

- FEMA may approve work and costs associated with temporary medical facilities or expanded medical facilities when necessary, in response to the COVID-19 Public Health Emergency.
- These facilities may be used to treat COVID-19 patients, non-COVID-19 patients, or both, as necessary.
- Medical care activities and associated costs related to treating both COVID-19 and non-COVID-19 patients in a temporary or expanded medical facility may be eligible.
- **May include Alternate Care Sites or Community Based Testing Sites if eligible work and costs are incurred by eligible PA applicants.**

Medical Care – Temporary and Expanded Medical Facilities

- Costs must be reasonable and necessary based on the actual or projected need.
 - The projected needs (i.e., capacity and capability) for a temporary or expanded medical facility must be supported by predictive modeling or other substantiating information used to determine the projected need.
- Contract costs related to establishing and/or operating a temporary or expanded medical facility, contracts must include a termination for convenience clause that will be implemented if the site is ultimately:
 - not needed, or
 - the needs are less than projected, as determined by the legally responsible entity.

Medical Care – Temporary and Expanded Medical Facilities

- Eligible costs for temporary and expanded medical facilities include:
 - All eligible items and stipulations included in Primary Medical Care Facility, but applicable to both COVID-19 and non-COVID-19 patients;
 - Lease, purchase, or construction costs, as reasonable and necessary, of a temporary facility as well as reasonable alterations to a facility necessary to provide medical care services;
 - Mobilization and demobilization costs associated with setting up and closing the temporary or expanded medical facility;
 - Operating costs including equipment, supplies, staffing, wraparound services, and clinical care 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 for COVID-19.

Vaccinations



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Medical Care – Vaccinations

- **Work and associated costs to support the distribution and administration of COVID-19 vaccines may be eligible for PA.**
- **The federal government will provide the vaccine itself at no cost.**

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations include:

- Community vaccination centers
- PPE, other equipment, and supplies required for storing, handling, distributing/transporting, and administering COVID-19 vaccinations
 - PPE includes items necessary for proper handling and administration of vaccinations as well as handling dry ice for storage and transportation needs;
 - Equipment includes coolers, freezers, temperature monitoring devices, and portable vaccine storage units for transportation;
 - Supplies include emergency medical supplies (for emergency medical care needs that may arise in the administration of the vaccine), sharps containers (for medical waste), and supplies necessary for proper storage like dry ice; and,
 - Transportation support such as refrigerated trucks and transport security when reasonable and necessary.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Facility support costs, including leasing space for storage and/or administration of vaccines, utilities, maintenance, and security.
- Additional staff, if necessary, including medical and support staff not paid for by another funding source and consistent with FEMA PA labor policies.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Onsite infection control measures and emergency medical care for COVID-19 vaccination administration sites
 - Masks/cloth facial coverings for patients;
 - Disinfection of facility and equipment in accordance with CDC guidance;
 - Temperature scanning, including purchase and distribution of handheld temperature measuring devices and associated supplies;
 - Acquisition and installation of portable temporary physical barriers, such as plexiglass barriers and medical screens/dividers;
 - Medical waste disposal related to vaccinations; and
 - Onsite emergency medical care to address adverse reactions to vaccinations or other emergency medical care needs that may arise while administering COVID-19 vaccinations.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Resources to support mobile COVID-19 vaccination in remote areas and/or transportation support for individuals with limited mobility or lack of access to transportation, when reasonable and necessary.
 - Equipment and supplies necessary for proper storage, handling, and transport in accordance with CDC guidance to support mobile vaccination units;
 - Medical and support staff for mobile vaccination units in accordance with PA labor policies and this policy; and
 - Transportation to and from vaccination sites for individuals with limited mobility. “Limited mobility” includes individuals with disabilities that require transportation assistance and individuals that are otherwise unable to get to and from vaccination sites without transportation assistance.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Federally Qualified Health Centers– Vaccine-related costs incurred by a Federally Qualified Health Center (FQHC), Rural Health Clinics and Critical Access Hospitals that are not covered by HHS or another funding source.
- FQHCs fall under the authority of HHS.
- PA funding can be provided for eligible costs that are not covered under this authority or another source of funding.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Communications to disseminate public information regarding vaccinations including translation and interpretation services as necessary.
- May include work and costs associated with setting up and operating a call center or website, when reasonable and necessary, for the purpose of sharing vaccination information with the public and/or to support the implementation and management of COVID-19 vaccination plans

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Information Technology (IT) equipment and systems, when reasonable and necessary, for patient registration and tracking, vaccine-related inventory management, and/or analytics and reporting needs.
 - To the extent possible, vaccination providers should utilize existing IT systems and processes for managing the distribution and administration of COVID-19 vaccines.
 - The CDC also 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 vaccination providers, IT equipment and systems necessary for the distribution and administration of COVID-19 vaccines are eligible for PA.
 - The systems should collect demographic data required under the Stafford Act and consistent with guidance from FEMA, and the system must be able to report data to FEMA when requested.

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Training and technical assistance specific to the proper storage, handling, distribution, and administration of COVID-19 vaccinations in accordance with CDC guidance

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Vaccination administration consistent with equitable pandemic response and recovery.
 - Recipients and Subrecipients of FEMA assistance shall collect data on race, ethnicity and disability status.
 - Recipients must also make best efforts to collect additional anonymized equity-focused person-level data, including information on primary language, and sexual orientation or gender identity (SO/GI).

Medical Care – Vaccinations

Eligible work and costs for COVID-19 vaccinations (cont):

- Recipients and Subrecipients must submit to FEMA information documenting the following for sites selected for vaccination administration every 30 days
 - For each site, provide a score on the CDC's Social Vulnerability Index or a similar social deprivation, disadvantage, or vulnerability composite index.
 - A description of how the location of the site(s)—relative to other candidate locations—best advances FEMA's focus on supporting the highest-risk communities. This justification may also include a comparison of vaccination rates for demographic groups by geographic area.
 - A site strategy to operationalize equitable access.

Medical Care – Vaccinations

Timeframes to Submit Information for Vaccination sites

- (Group 1) Recipients or Subrecipients that completed all their vaccination work and that:
 - FEMA has obligated funding, must submit the information within 30 days of the issuance of the Medical Care Policy **due April 14, 2021**.
 - Have applied for, but FEMA has not yet obligated funding, must submit the information within 30 days of the vaccine-related obligation.
 - Have not yet applied for FEMA funding, must submit the information with their initial request for FEMA vaccination funding.
- FEMA reviews these submission once for completeness and compliance. FEMA may request additional information as necessary.

Medical Care – Vaccinations

Timeframes to Submit Information for Vaccination sites

- (Group 2) Recipients or Subrecipients that have *not yet* completed all their vaccination work and that:
 - FEMA has obligated funding, must submit the information within 30 days of the issuance of the Medical Care Policy **due April 14, 2021**.
 - Have applied for, but FEMA has not yet obligated funding, must submit the information within 30 days of the *initial* vaccine-related obligation.
 - Have not yet applied for FEMA funding, must submit the information within 30 days of the initial vaccine-related obligation.
- Must submit ongoing updates every 30 days until the completeness of vaccination work.
- FEMA will review submission monthly for completeness, and quarterly for compliance.

General Eligibility Considerations



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General Eligibility Considerations- Allowability of Costs

- **Costs must be necessary and reasonable in order to respond to the COVID-19 pandemic**
- **Costs should conform to standard PA program eligibility and other federal requirements.**

General Eligibility Considerations- Allowability of Costs

- **Applicants should follow its established practices and policies and procedures that apply when federal funding is not available, including standard billing and fee collection.**
 - FEMA does not require applicants to create a new billing process at temporary medical facilities
 - All work conducted and costs incurred in Primary Medical Care Facilities should follow the facility's standard billing practice.
 - If the Primary Medical Care Facility did not follow its standard billing practice, the applicant must demonstrate why following such practices would have increased an immediate threat to life and demonstrate that all costs not reimbursed by FEMA followed the same procedures.

General Eligibility Considerations- Allowability of Costs

FEMA will scrutinize the applicant's documentation of:

- Compliance with Federal laws, rules and other PA requirements
- Adherence to procurement requirements; including reasonableness of cost and how the item was procured, if applicable
- Invoices and proof of payment, if applicable
- Shipping information, if applicable
- Asset distribution of all locations (e.g., Staging areas, stockpiles, storage)
- Usage in the performance of eligible work

Rule of thumb: document, document, document

General Eligibility Considerations- Cost Share for COVID-19

- **In accordance with the February 17, 2021 memorandum from the FEMA recovery Assistant Administrator titled “100% Federal Cost Share for COVID-19 Public Assistance Funding,” FEMA will increase the federal cost share for all COVID-19 declarations from 75% to 100% for eligible work performed or to be performed from January 20, 2020 through September 30, 2021.**



General Eligibility Considerations- Duplication of Benefits

- **FEMA cannot duplicate assistance provided by HHS or other federal department and agencies.**
- **A list of funding that may be considered duplicative is provided in Version 2 of the Interim policy.**
- **Federal and State funds received to combat the virus will have to be deducted from any eligible project if used for any portion of that project.**

Questions For FEMA Region 2