

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

The questions and answers listed below were taken from the Applicant Briefings for the DR-4520 (COVID-19) disaster declaration under the FEMA Public Assistance (PA) program. The answers provided are those guided by the policies in place at the time. As this is a very fluid event and FEMA regularly releases new and updated guidance, some things may change as the disaster progresses. If there are any questions or concerns, please contact the Wisconsin Emergency Management Recovery Section at [DMAWEMPublicAssistance@wisconsin.gov](mailto:DMAWEMPublicAssistance@wisconsin.gov).

The Applicant Briefing slides and presentation can be found on the PA Program webpage, <https://dma.wi.gov/DMA/wem/recovery/public-assistance-program>.

Last Updated: 06/16/2020

Newest updates highlighted in yellow.

### ELECTIONS QUESTIONS

#### **What are the eligible costs that can be claimed under the FEMA PA program related to the April 7, 2020, election?**

- Eligible Category B Emergency Protective Measures costs associated with the election include the cleaning/disinfecting/sanitizing of public spaces including polling sites.
- However, election related costs related to running the election (additional costs for printing extra absentee ballots, postage, time preparing, mailing, and counting ballots) would not be eligible as they are considered an increased operating expense and are not considered Emergency Protective Measures.

#### **Would creating barriers for election day (plexiglass, lumber, etc.) be eligible?**

- Not currently. The eligibility of reimbursement for barriers and related expenses under the FEMA Public Assistance program is currently under review with FEMA headquarters. It's actively being worked, and they can't give any guidance at this time. As more guidance from FEMA is released, we'll disseminate it.

#### **If a voting station had dedicated personnel cleaning each voting booth after each voter use, would this be eligible?**

- This will depend on the individual and in what capacity they were hired/working. Normally, only overtime hours are eligible for reimbursement under Category B, however for some temporary employees, straight time is also eligible. It is

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

recommended to track everyone's time spent sanitizing/disinfecting during the elections.

**For the protection of voters, would the cost associated with setting up drive-by voting and having extra election officials be eligible?**

- FEMA considers this an increased operating expense to run the election and would not be an eligible cost under the FEMA PA program.

**Can the costs for the extra ballots, postage, etc. regarding the April 7 election count towards the Village's contribution?**

- No, these are considered increased operating expenses and not emergency protective measures. To be eligible as donated resources, the resource must be used in the performance of eligible Emergency Work.

**For our election we used younger, higher paid employees to work so that we would eliminate the threat to lives, public health, and safety of our normal older poll workers. Can we claim the amount of wages that are over the hourly rates that the poll workers would have been paid?**

- FEMA considers this an increased operating expense to run the election and would not be an eligible cost under the FEMA PA program.

**When do election costs need to be submitted to the county?**

- There is currently no due date for costs to be submitted to FEMA for reimbursement under the Public Assistance program.

LABOR & PAY QUESTIONS

**Is Hazard pay an eligible expense if provided to staff that are in harm's way? (ex. Medical staff, EMS, Firefighters, Police, custodial staff)**

- FEMA would want to see the labor and payment policy that was in place prior to the start of the COVID-19 event (January 20, 2020). There may be some instances where this work would be eligible, but most cases it would probably be ineligible. This will also depend on the type of employee.

**Is labor eligible if the person is salary if performing eligible work? Could it be used as local**

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

**match?**

- Only overtime is an eligible expense for budgeted individuals directly responding to COVID-19. If a person is paid overtime, then yes. If they do not receive additional compensation for the overtime on top of their normal salary, then no.
- FEMA will want to see your labor/pay policy that was in place on 1/20/20 to determine the eligibility of overtime pay.
- Overtime worked by a salaried employee can not be used as a donated resource and would not count towards the non-federal costs share (local match).

**Would paying officers to disinfect their squad cars and facilities for the last 15 minutes of their shift be eligible?**

- If they are working their normal shift/hours and not incurring overtime, then their labor hours would not be eligible. The supplies used to disinfect the squad cars and facilities would be eligible.

**If an employee is sent home to quarantine because of travel, are those wages eligible?**

- No, their wages are not eligible.

**If a part-time employee that had been assigned to perform COVID-19 response with the Emergency Management department, would their wages be eligible under PA if the time exceeds their typical defined hours? Or is only overtime eligible?**

- The time spent over the normal amount of work hours would be eligible under the PA program if the work they were performing was disaster related/emergency work.

**Would stand-by or on-call pay for staff performing eligible work be eligible for reimbursement? (ex. Working in an EOC.)**

- Typically, only overtime is eligible in most cases depending on the type of employee and the work being done. There are some situations where it may be eligible like working as part of an EOC, which would be eligible.
- Subject to the provisions of labor cost eligibility criteria, FEMA provides PA funding for costs related to stand-by time incurred in preparation for and directly related to actions necessary to save lives and protect public health and safety. To be eligible, stand-by time must be reasonable, necessary, and consistent with the Applicant's practice in non-federally declared incidents.

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

**We had to pay some essential workers (ex. Police, or others) to stay at home "on call" to protect from spreading the virus to all staff - are those wages eligible?**

- This will be a no, unless the labor/pay policy in place on 1/20/20 says otherwise.

**If an Emergency Management staff person is only working on COVID-19 response, would their full wage be eligible?**

- Typically, only overtime would be eligible. FEMA would want to see the labor and payment policy that was in place prior to the start of the COVID-19 event (January 20, 2020).

**When is non-overtime employee expenses eligible? Specifically, we have expanded the hours we staff EMT's at our ambulance hall in response to COVID. The employees did not work enough hours to get overtime. Would those be eligible expenses?**

- If you have normal force account labor employees working normal time and not accruing overtime, those hours will not typically be eligible under Cat B. Non-overtime employees include temporary employees hired specifically to perform eligible work, then all of their time would be eligible. But if you have an EMT working their normal straight time hours, these would not be eligible. But any overtime hours would be eligible.
- If the EMTs are part-time employees working outside normal amount of hours, then that additional time above their normal hours would be eligible.

**Will base wages be eligible for employees assigned to work on response that would have otherwise been furloughed?**

- Budgeted employees are generally only eligible for overtime when performing emergency work.

**Would employees that were reassigned to work in areas or departments outside their normal assignment be eligible? (ex. Reassigned to dispatch to assist with increased call volume.)**

- Budgeted employees are generally only eligible for overtime when performing emergency work.

**Would police department expenses for enforcing the governor's orders regarding social**

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

### **distancing be considered an eligible law enforcement cost?**

- No, this would be considered increased operating costs as this is a normal police function. There might be some variations depending on the situation. Any overtime hours accrued performing emergency work would be eligible.

## PPE AND ELIGIBLE FACILITY RE-OPENING

### **What costs would be eligible for the re-opening of public facilities that were open when the COVID-19 event started? Would this include custodial contractor services?**

- FEMA is currently working on defining what would be eligible when it comes to opening facilities back up. It is recommended that you document what costs are incurred and what was done to open public facilities. Once additional guidance is provided by FEMA Headquarters, it will be communicated out to all eligible applicants.

### **Would buying plexiglass barriers for staff be an eligible cost?**

- Currently under the FEMA Public Assistance program, costs for those items would not be eligible for reimbursement. However, FEMA is formulating a “Reopening America” policy that may expand on the types of costs that would be eligible. We don’t know a release date for this further guidance, but when it’s released, we’ll disseminate it and post it to our website.

### **In public facilities that require close contact of people (i.e. court rooms), would the staff, equipment, and reconfiguration of the building physical space be eligible?**

- No, reconfiguration of physical space would be considered permanent work if changing the building itself. The cleaning/disinfecting/sanitizing would fall under FEMA’s Reopening America policy for eligibility. We don’t know a release date for this further guidance, but when it’s released, we’ll disseminate it and post it to our website.

### **Would on-going PPE costs for emergency services departments coming into contact with COVID be eligible?**

- Yes; police, fire, EMS, health workers, etc. are performing emergency protective work, those PPE costs would probably be eligible through the disaster’s incident period. Once the end of the incident period is determined, any costs after that day

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

would probably be ineligible.

**Would PPE used by Corrections Officers in jails be eligible for reimbursement?**

- Guidance from FEMA HQ is that PPE is only eligible for emergency medical and first responders, cloth face coverings or other non-PPE may be eligible. This will be a no at this time.

**Would PPE costs be eligible when a medical facility is partially open to provide required limited services while the rest of the building is closed?**

- The PPE costs can potentially be eligible because it is a medical facility and you are performing emergency protective work.

**If a publicly owned recycling yard is open to the public and staff are wearing masks, would the cost of the masks be eligible?**

- If the entity is an eligible applicant under the FEMA PA program and owns or operates an eligible facility in WI, then any emergency protective measures would be eligible for reimbursement, as long as they are properly documented etc.

CATEGORY B ELIGIBLE EXPENSES QUESTIONS

**What is the best resource to understand what costs can be included in the Category B Project?**

- FEMA Emergency Protective measures fact sheet found on FEMA's webpage: <https://www.fema.gov/coronavirus>.
- If not included on that sheet, then follow up with WEM at [dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov).

**We had to construct plexiglass barriers and do additional cleaning for required in-person meetings (ex. Board meetings) that had to be conducted during the Stay-at-Home order.**

**Would costs associated with that be eligible under Category B?**

- The cleaning, disinfection, and sanitation would be eligible.
- Currently under the FEMA Public Assistance program, costs for barriers would not be eligible for reimbursement. However, FEMA is formulating a "Reopening America" policy that may expand on the types of costs that would be eligible.

**Would the purchase of equipment be eligible for reimbursement? Typically, it is cheaper to**

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

**purchase the equipment rather than rent it in the long run.**

- The purchase of equipment under the PA program is tricky. FEMA will want to see if that is the lowest cost option and what the associated costs are if you are able to rent the equipment. If you purchase the equipment to keep, they will pay for the use of the newly purchased equipment.
- If you purchase the equipment and sell it after the event, then FEMA would pay for the difference between the new purchase and the amount it was sold for.
- Please follow up with WEM at [dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) with any equipment purchase questions.

**Can a group of counties get together and purchase a refrigerated trailer for cold storage of bodies to be utilized by the group?**

- An eligible applicant (i.e. one county) would need to incur a cost associated with the response to COVID-19. If it is a supply or piece of equipment that is purchased, how you share that after it has been purchased, is up to you.
- See previous question regarding the purchasing of equipment.

**If HEPA filters were added and exhaust fans were installed which were already installed or will be installed for this pandemic, but will remain in place, be eligible expenses?**

- This is situationally dependent. Please follow up with WEM at [dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) to discuss the specifics of the situation.

**If there are community members willing to make homemade masks that would be provided to members of a community, would the purchase of fabric be something that would be reimbursable through FEMA? Members of the community could include businesses, law enforcement staff, nursing home staff, and residents.**

- The eligibility of reimbursement for this and related expenses under the FEMA Public Assistance program is currently under review with FEMA headquarters. It's actively being worked, and they can't give any guidance at this time.

**If a law enforcement agency hires an outside service to transport prisoners in order to limit the spread of COVID-19 among staff and prisoners, would that be eligible?**

- According to FEMA policy for Emergency Work; transportation is eligible; however, they will have to show by hiring an outside agency to transport prisoners they were able to eliminate or lessen immediate threats to lives, public health or safety of the

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

prisoner and the employees. Routine transportation is not eligible. This may change.

**If a law enforcement agency puts additional prisoners on electronic monitoring to limit the spread of COVID-19 among staff and prisoners, would the costs associated with the monitoring equipment and service be eligible?**

- No, this would probably be considered an increased operating cost.

**Is estimated lost revenue eligible for reimbursement?**

- No, the loss of revenue is not an eligible expense under the FEMA public assistance program

**Is sending out newsletters to the community about safer at home practices eligible?**

- Yes, communications of general health and safety information to the public as directly related to the COVID-19 response is an eligible expense.

**Are related legal fees an eligible expense? (e.g. personnel policies, emergency measures)**

- Probably not. Only costs associated with the immediate response to protect life, public health, and safety directly related to the COVID-19 response is eligible

**If it is the Town's formal response to the emergency, would the development of a Continuity of Operations Plan be included as part of the Category B or Z eligible costs?**

- Currently, the answer is no. Category Z costs for management must be tied directly to the management of an eligible FEMA project. Planning or writing plans is not an eligible cost under Category B.

**Are emergency homeless shelters eligible under the PA program?**

- Yes, it is an eligible expense and would be considered non-congregate sheltering.

**Would any non-congregate sheltering be eligible, or would it only be eligible for those that were infected or at high risk?**

- Any sheltering solutions should be determined by the applicant requesting assistance. Options include hotels, motels, dormitories, or other forms of non-congregate sheltering. The solutions should meet the criteria of non-congregate sheltering for the COVID-19 emergency, including what is necessary to protect public health and safety, be in accordance with guidance provided by appropriate health officials, and be

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

reasonable and necessary to address the threat to public health and safety.

<https://www.fema.gov/news-release/2020/03/31/coronavirus-covid-19-pandemic-non-congregate-sheltering>

### **What type of costs are covered during a Community Based Testing event?**

- Community Based Testing may be eligible for reimbursement. It is recommended to document the labor, materials, etc. required for conducting the testing.

## CATEGORY Z QUESTIONS

### **For Category Z project, is only 5% of the administrative cost eligible or it can only be 5% of the total cost of the claim?**

- Category Z Management Cost projects are calculated as 5% of the Category B Protective Measure total project cost.
- Ex. If the Category B total project total is \$500, 000, the Category Z project worksheet for administrative costs is capped at \$25, 000.
- All Cat Z costs must still be documented and will be reimbursed on actual expenses up to the capped amount.

### **What sort of documentation do you need for a Category Z project? Is an excel spreadsheet log enough documentation, or would proof for webinars, emails, etc. be needed?**

- A spreadsheet or log document is just fine. Should include name, date, hours, and notation of work done in relation to your FEMA project.
- Ex. Bernie Brown, 05/02/20, 1 hour – submitted RPA and Grants Portal documentation work.

### **Would hiring of a consultant to assist with our projects be eligible for reimbursement under a Category Z project?**

- Yes, a consultant fee/time that is hired to assist with the administration of the DR-4520 projects could be claimed under the Cat Z project. But do keep in mind that your Cat Z project is capped. Hiring of a consultant is up to the applicant and how much time and staff they have to commit to processing the claims. It might depend on the size and complexity of your claim.

## CAGE CODE QUESTIONS

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

### **What is the contact info for WEM to provide our CAGE code?**

- Please send an email to [dmawempublicassistance@wisconsin.gov](mailto:dmawempublicassistance@wisconsin.gov)

### **Can the CAGE code verification be added to our application in Grants Portal or does it have to be emailed to WEM?**

- You'll have to send the CAGE code information to the [dmawempublicassistance@wisconsin.gov](mailto:dmawempublicassistance@wisconsin.gov). There is not a place in the FEMA Grants Portal to enter the CAGE code.

### **How do you determine if you have an active Cage Code with WEM?**

- It is recommended to first check within your organization to see if someone had previously registered with SAM.gov and has an active CAGE Code. There is a chance that if your organization has received a federal grant previously, someone would have registered in SAM.gov.
- You can always reach back out to the [dmawempublicassistance@wisconsin.gov](mailto:dmawempublicassistance@wisconsin.gov) email address and we can provide assistance too.

### **If we already have an RPA approval and are working on docs for costs, does WEM still need our CAGE code?**

- Yes, WEM needs to have an active CAGE Code on file before any awards can be made to an applicant.

## PNP ELIGIBILITY QUESTIONS

### **What types of PNPs are eligible applicants for the COVID-19 event? And would they apply like a local government?**

- FEMA has a PNP fact sheet that outlines what is considered an eligible PNP that is conducting eligible work. The PNP must own or operate an eligible facility and be performing eligible emergency protective measures (i.e. medical or custodial services) that they have the legal responsibility to perform. Examples include: Hospital, Clinic, etc.
- The COVID-19 Pandemic – Private Nonprofit Organizations fact sheet can be found on FEMA's <https://www.fema.gov/news-release/2020/04/02/coronavirus-covid19-pandemic-private-nonprofit-organizations>.
- In order to register in Grants Portal, PNPs must first contact WEM at

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

[dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) to get set-up. After the PNP is registered in the system, they would apply for assistance just like a local government for any eligible costs.

### **If a PNP is considered an essential service, but do not have the legal responsibility to perform the services, would they be eligible?**

- The PNP may be an eligible applicant under the FEMA PA program, but the costs they are incurring may not be eligible.
- The PNPs would still have to have the legal responsibility to provide services to eliminate or lessen the immediate threat to life, public health, or safety. Typically, a jurisdiction (i.e. Town, Village, City, County) has this legal responsibility, but usually a PNP does not.

### **If a PNP started an emergency meal program, but doesn't have an agreement with a government agency, would they be eligible applicants?**

- Eligible applicants must have the legal responsibility to incur these costs. PNPs rarely have the legal responsibility to provide food to populations, this typically falls under a governmental agency. So, if you don't have the legal responsibility to provide for the health and safety and well-being for the population, then those costs would not be eligible.

### **What counts as temporary vs. permanent work for eligible PNPs for the COVID-19 event?**

- Permanent work: If an eligible PNP would be building a new isolation facility or making permanent changes to a hospital or clinic due to this event, those would not be eligible costs.
- Temporary work: If a facility was modified to provide eligible work (like an isolation facility), but the long-term goal would be to take the isolation facility measures down to return the facility to its pre-COVID condition, then those costs would be eligible.

## SCHOOLS AND CHILDCARE QUESTIONS

### **Would a childcare center be eligible for the grant?**

- It would depend on the facility and specific situation. In general, if it is considered a PNP, and they have incurred eligible emergency protective measure costs that they are legally responsible to incur, then they would be eligible.
- If you have specific questions about a facility, contact WEM at

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

[dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) to discuss the specific situation.

**Is childcare for essential workers considered eligible?**

- If the childcare is considered part of a sheltering mission it would be eligible.
- If it isn't part of a sheltering mission, it would not be eligible.

**Has there been outreach to school districts about the FEMA PA program and eligible costs that school districts may have incurred?**

- Currently, there has not been an outreach specifically to public school districts. WEM will work with DPI to get the word out to the school district contacts in the state to notify them of the FEMA PA program.

**Do applicants include K-12 public school districts?**

- Public school districts are an eligible applicant for the FEMA public assistance program.
- Private Schools are ineligible applicants.

**What are some examples of eligible costs for public school districts?**

- The typical eligible costs include the cleaning, disinfection, and sanitization of eligible public facilities.

**Would providing internet to students with mobile hotspots for educational purposes be eligible?**

- No, educational purposes are not an eligible expense under Cat B.

**Is transporting meals to student's homes eligible?**

- Transporting meals must be the legal responsibility of the applicant to incur those costs, generally it falls under a governmental agency to provide that assistance, but if you have an agreement with that agency, if that need is there, then it could be eligible. This might be a situationally dependent issue.

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

### RPA SUBMISSION AND GRANTS PORTAL SET UP QUESTIONS

#### **Is there a deadline to submit an RPA?**

- Currently the deadline to submit an RPA is yet to be determined. Once a date has been determined, FEMA will give at least a 30-day notice of the deadline. WEM will communicate the date out once it is set.
- Eligible applicants can submit their RPA and start the project application today, if desired, or they can wait until all costs have been incurred to submit an RPA and start the project application development.

#### **Which types of applicants can use the self-registration available on the Grants Portal and who needs to email the WEM PA email box to get set up?**

- Local governments can self-register within the FEMA Grants Portal System, but private non-profits (PNPs) cannot. Local governments should verify if they have already registered in Grants Portal in the past before starting the self-registration process.
- PNPs will need to email WEM ([dmapublicassistance@wisconsin.gov](mailto:dmapublicassistance@wisconsin.gov)) for assistance registering in the system. WEM has someone working through the email queue right now and responding to them as they were received. We appreciated your patience as we are responding to many inquiries.
- The link for local governments to self-register in the FEMA Grants Portal: <https://grantee.fema.gov/>.

#### **I recently submitted an RPA, what are my next steps?**

- You should receive an email from the FEMA Grants Portal system within a couple days for confirmation of the RPA submittal. You will receive an email from: [support.pagrants@fema.gov](mailto:support.pagrants@fema.gov) saying that your submission has been approved.
- If you don't receive one, verify that the email did not go into your junk or spam folder. If it still hasn't been received, please contact the PA program by email [dmawempublicassistance@wisconsin.gov](mailto:dmawempublicassistance@wisconsin.gov) and WEM can look into it.
- Unlike past FEMA disasters, applicants will not be contacted by PDMGs as this is a nationwide event and there isn't enough FEMA staff to help each individual applicant through the process. This event will be purely applicant driven.

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

### **What does the status “Pending Grants Completion” mean in Grants Portal?**

- After an applicant has submitted an RPA and it’s approved, the Process Step for the disaster will be in “Pending Grant Completion” until all projects have been obligated.

### **Why do I not see the hyperlink to begin the RPA submission process when I am logged into Grants Portal and viewing my Dashboard?**

- Please send a follow up email to [dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) and staff will assist you with Grants Portal.

### **How does a different person for the town sign up as the designated person for an applicant organization?**

- The current primary point of contact can add you to the organization profile, or you can send an email to [dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov) and WEM can follow up with you regarding what roles you would need and work information (phone, email, etc.).

### **If an eligible PNP has locations in multiple states (i.e. A hospital system), do they submit one RPA? Or do they have to submit different ones by state?**

- No, it needs to be done by state. If there are multiple locations within Wisconsin, you can submit under one RPA. But for the other locations in different states, you would have to apply in those other states as an applicant.
- Only the eligible costs incurred within the state would be eligible for reimbursement in that particular state.

### **Should our fire department file their RPA separate from the Village or should we combine our applications?**

- It depends on if the fire department is considered part of the village and not a special district. If it is part of the village, then the eligible costs would be combined with the Village to be one applicant and project.
- If it is considered a special district, then the fire department would be a separate applicant from the Village.

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

### **Are fire districts eligible?**

- Fire districts are an eligible applicant under the FEMA PA program and would be considered a special district.

### **If a company has multiple locations, in multiple counties, do we need to file a claim for each location?**

- That will depend on how the company is set up. If you have one EIN number, generally ask that you file as a single entity and then submit multiple project worksheets, one for each location.
- If the different locations have different EIN numbers, then each location can file separately or come in under a single entity.

## PROJECT FORMULATION & DOCUMENTATION QUESTIONS

### **If we already submitted an RPA, when should the project formulation process start?**

- As soon as an applicant receives confirmation that their submitted RPA has been approved, an applicant can begin to formulate a project. An applicant may also choose to wait until all costs have been incurred before starting the project application process.

### **Is there a specific format or set of forms required for submitting documentation or specific forms?**

- FEMA does have an online process to submit documentation which is a Turbo-Tax like process, but there are no specific forms that have to be filled out at this time. There are some templates available in Grants Portal that can be used for documenting labor, materials, and equipment. It is better to capture more information rather than less for documenting any incurred costs.

### **Is a small project defined as all PPE purchases lumped together or is it just one invoice purchase for each project?**

- A small or large project is defined by the total dollar amount of the project.

### **Can an eligible applicant have more than one small project?**

- In most cases, all of your emergency protective measures will be combined into one project (i.e. cleaning, disinfecting, sanitization, PPE, overtime, etc.). There may be some limited cases where an applicant may have multiple Category B projects.

## DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

**Can an eligible applicant split their projects up into multiple projects as long as they meet the project minimum threshold of \$3,300? For example, submitting one project for costs that have already been incurred, and submitting additional ones as needed for costs yet to be incurred (ex. An EOC that is still open and operating, or medical facility still operating).**

- Applicants can start submitting costs in Grants Portal under DR-4520 for expenses incurred conducting emergency protective measures in response to COVID-19. All costs incurred to date can be entered, along with supporting documentation, as well as estimated costs out to Oct. 1, 2020. FEMA is still figuring out how any costs incurred after that date will be handled.

**Can an applicant break up projects by agency to keep them under the large project threshold?**

- Costs can't be split up to simply avoid becoming a large project. Costs must be grouped and submitted in a logical manner. Organizing costs by different agencies and submitting different projects would be a logical method.

**Does supporting documentation need to be compiled prior to submitting an RPA?**

- RPA submittal is just an indication that the applicant wants to participate in the FEMA PA program, and does not require that supporting cost documentation be submitted with it. You do need to make sure that this is submitted by the RPA deadline, when one is determined.
- If an eligible applicant is unsure if their eligible costs will meet or exceed the project minimum threshold of \$3,300, then you can submit the RPA at a later date when you have a better idea of the eligible costs incurred.

**Should documentation be submitted at the end of incurring the eligible expenses or as they are incurred?**

- Applicants can start submitting costs in Grants Portal under DR-4520 for expenses incurred conducting emergency protective measures in response to COVID-19. All costs incurred to date can be entered, along with supporting documentation, as well as estimated costs out to Oct. 1, 2020. FEMA is still figuring out how any costs incurred after that date will be handled.

**Is the project minimum threshold like an insurance deductible where the reimbursable amount is only amount above \$3,300? Or if an eligible applicant has at least \$3,300 in eligible costs, they would qualify for PA reimbursement.**

### DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

- An applicant must have incurred at least \$3,300 in eligible public assistance costs to submit a project to FEMA for reimbursement. Once this threshold is met, all eligible costs, including the first \$3,300, is included in the reimbursement.
- The total project costs would be split into the 75% federal cost share and 12.5% state cost share, leaving the applicant responsible for 12.5% of the total project costs.
- If an applicant has any donated resources, that would reduce the non-federal share.
- For example, the Total project cost is \$5,000.
  - Fed Share (75%) →\$3,750
  - State Share (12.5%)→\$625
  - Local Share (12.5%) →\$625

#### **Does an applicant have to have at least one Category B project with a total of \$3,300 or more before they would be eligible for Category Z costs?**

- Yes. The Category B projects are the only ones that would have to meet or exceed the minimum of \$3,300. If you have one eligible Cat B project, then you would also be eligible for a Cat Z project. Donated resources projects do not have a minimum threshold.

#### **What documentation is needed to support the cost of volunteers or donated resources? What is the volunteer labor rate for Wisconsin?**

- Volunteer Labor – keep a log that includes name, date, hours worked by day, description of work performed related to COVID-19. You can also have them sign-in/sign-out.
- Equipment: type of equipment, hours of use, location, and operator name.
- Supplies/materials: what type of supply and quantity.
  
- Wisconsin's volunteer labor rate associated with donated resources is \$25.43/Hr.

### OTHER QUESTIONS

#### **Is the Assurances Packet Electronic or Mailed?**

- Assurance packets for this event will be electronic and sent to the applicant primary point of contact by email for signature. A physical copy can be sent upon request.

#### **Is WEM offering Expedited projects through FEMA? And if it's case by case basis, how do we start that conversation?**

### DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

- Expedited projects are offered through the public assistance (PA) program. These requests will be reviewed on a case by case basis. The intent of the expedited funding is for those organization that have spent a **substantial** amount of money and need further money to continue operations. If you think that your organization falls into that category, send an email to the WEM PA email box ([dmawempubliassistance@wisconsin.gov](mailto:dmawempubliassistance@wisconsin.gov)) to start that conversation.

### Which link on the WEM webpage has the list of eligible EPM costs?

- [https://www.fema.gov/media-library-data/1587382887848-f9def17e6317d54da7db7f1fd3081559/EligibleEmergencyProtectiveMeasuresFactSheetforCOVID-19\(03.19.20\).pdf](https://www.fema.gov/media-library-data/1587382887848-f9def17e6317d54da7db7f1fd3081559/EligibleEmergencyProtectiveMeasuresFactSheetforCOVID-19(03.19.20).pdf)

### Being a National Emergency, is there a chance the Feds will be going to a 90/10 share split?

- Currently the cost share is 75% federal/12.5% state/12.5% local share. There is a very slim chance that the cost share for this event would be modified, but plan for the current cost share.

### If my county already declared a COVID emergency, do we extend our declaration to continue to qualify for federal reimbursement?

- For the FEMA Public Assistance program, a county (or town, village, city) is not required to have an emergency declaration in place to be a part of a federal declared disaster. All 72 counties were declared a disaster area for COVID-19 (DR-4520) on April 4, 2020, with the incident period beginning on January 20 and is still ongoing. Costs still being incurred as part of the response to COVID-19 still may be eligible under DR-4520 as the incident period is still open. The incident period for the COVID-19 response is determined by the Department of Health and Human Services at the federal level.

### What communications expenses are eligible in Category B? (ex. Laptops, cell phones, hot spots, etc.)

- It depends on what the communication expenses are associated with. Regular meetings or teleworking on normal business would be ineligible. This would include the initial set-up costs and any on-going costs.
- If expenses are directly related to eligible Category B work (i.e. running an EOC remotely) then they would be eligible.

DR-4520 COVID-19 FEMA PA Program Frequently Asked Questions (FAQ)

**Do bidding requirements apply to PPE purchases, especially for supplies that were only available from one supplier?**

- Procurement under exigent or emergency circumstances (including PPE) will need to follow the FEMA guidelines specific to COVID-19, which are found here: <https://www.fema.gov/news-release/2020/03/20/procurement-under-grants-under-exigent-or-emergency-circumstances>

**Is Wisconsin more restrictive as it relates to the bidding process?**

- Yes, there are lower dollar thresholds for procurement under state policy than federal. Procurement is a complicated process. Work with your finance department and/or procurement section for purchases. There are a few differences between the state procurement rules and FEMA procurement rules. Below is some information that may help with your questions though.
- There are the emergency and exigent procurement rules for COVID-19: [www.fema.gov/news-release/2020/03/20/procurement-under-grants-under-exigent-or-emergency-circumstances](http://www.fema.gov/news-release/2020/03/20/procurement-under-grants-under-exigent-or-emergency-circumstances) or you can also refer to the PDAT resources that FEMA offers: [www.fema.gov/procurement-disaster-assistance-team](http://www.fema.gov/procurement-disaster-assistance-team)

**With all the other potential reimbursement programs available for the COVID event, can an eligible applicant apply for reimbursement through multiple programs? Examples of Potential funding options: CARES Act, AFG, EHH/WIBOSCOC, insurance, DHHS, CDC, etc.**

- It is recommended to apply to other programs that an eligible applicant may qualify for along with submitting an RPA with the FEMA PA program. Just note that if the eligible costs are covered by another funding source, they cannot also be claimed under the PA program.
- You will have to attest that you aren't receiving reimbursement for the costs being claimed under the PA program from another source. If receiving reimbursement for a percentage of work or supplies from another source, document the costs that you incur in total and then document the various other funding sources that you are receiving assistance from.
- An RPA can always be withdrawn, at no penalty, if needed at a later date if the costs are covered by a different program or the eligible costs no longer meet the project minimum of \$3,300.