

# Crisis Counseling Assistance and Training Program Alternatives for a Tribal Nation

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A Tribal Nation, which is a federally recognized Indian tribal government (Tribal Nation) has three choices if they would like to receive a Crisis Counseling Assistance and Training Program (CCP) Federal award, either directly from FEMA, as a recipient, or through a state or territory as a subrecipient. CCP is co-administered by FEMA and SAMHSA.<sup>1</sup>

CCP consists of two separate federal award programs available in the aftermath of Presidential declarations:

- Immediate Services Program (ISP)
  - Provides funds for up to 60 days immediately following the Presidentially declared event.
  - A state, Tribal Nation, or territory (STT) or STT mental health agency must submit an application for either the emergency declaration with CCP designated or the major disaster declaration with Individual Assistance (IA) designated.<sup>2</sup>
- Regular Services Program (RSP)
  - Provides funds for up to 9 months from the date of the Notice of Award.
  - A STT or STT mental health agency must submit an application within 60 days of either the emergency declaration with CCP designated or major disaster declaration with IA designated.<sup>2</sup>

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<sup>1</sup> SAMHSA is part of the U.S. Department of Health and Human Services and is FEMA's partner in implementing CCP. SAMHSA assigns a program officer to support each declared emergency with CCP designated or major disaster with IA designated.

<sup>2</sup> In rare cases, the timeline applies to the date CCP is authorized on the declaration when CCP is not included in the original IA designation.

## **Tribal Declaration – Tribal Nation as a Direct CCP Federal Award Recipient**

When a Tribal Nation receives a Presidentially declared emergency with CCP designated<sup>3</sup> or major disaster with IA designated<sup>2</sup>, the Tribal Nation may directly apply for a CCP Federal award to provide services to its tribal community<sup>4</sup>.

- The Tribal Nation must submit a CCP Federal award application for the Immediate Services Program (ISP) no later than 14 days after the IA<sup>2</sup> designation on the declaration for a major disaster, as required at 44 C.F.R. § 206.171(f)(1) and in the Individual Assistance Program and Policy Guide (IAPPG), Version 1.1, Ch.5, § II(B)(2). For declared emergencies, the ISP is due no later than 14 days after the CCP designation on the emergency declaration. <sup>5</sup>
- The Tribal Nation must submit a CCP Federal award application for a Regular Services Program no later than 60 days from the declaration date<sup>2</sup>, as required in 44 C.F.R. § 206.171(g)(1) and the IAPPG, Ch. 5, § III(B)(2).
- Prior to any Tribal Nation CCP Federal award approval and obligation of funding, the Tribal Nation and FEMA must execute a FEMA-Tribal Agreement.
- For information about emergency declarations that become major disaster declarations, see FEMA Crisis Counseling Assistance and Training Program for Emergency Declarations Fact Sheet.

## **State<sup>6</sup> Declaration – State as a Pass-Through Entity and Tribal Nation as a Subrecipient**

When a State receives a Presidentially declared emergency or major disaster, the tribal government may coordinate with the declared state partner to be a subrecipient under the state's CCP Federal award.

- This requires the state's concurrence.
- If the state agrees to include the Tribal Nation as a subrecipient, the state governor would designate the Tribal Nation's mental health agency or organization to deliver CCP services to the tribal community in the declared geographic boundaries.

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<sup>3</sup> The Robert T. Stafford Disaster Relief and Emergency Assistance Act has been amended to expand the Crisis Counseling Assistance and Training Program (CCP) to Presidentially declared emergencies. FEMA will apply the CCP implementing regulations for declared major disasters in 44 C.F.R. § 206.171 and the CCP policies in FEMA Policy 104-009-03 Individual Assistance Program and Policy Guide (IAPPG) to emergency declarations declared on or after December 23, 2022.

<sup>4</sup> "Tribal Community" in this document refers to both enrolled tribal members (including their households) and non-enrolled members of the tribal community, such as adopted children and widows. At the request of a Tribal Nation, FEMA may expand eligibility for an event from enrolled tribal members to both enrolled members and non-enrolled tribal community members. See Tribal Declarations Pilot Guidance (fema.gov).

<sup>5</sup> If a state, Tribal Nation, or territory wants CCP designated for an emergency, it should request CCP as part of its declaration request by checking off CCP on the declaration request form.

<sup>6</sup> The term "state" here includes the fifty states, the District of Columbia, and the territories.

- When the Tribal Nation is a subrecipient of a CCP federal award under a state declaration, there is no requirement to have a FEMA-Tribal Agreement.
- A Tribal Nation must submit all required documentation (such as funding estimates, geographic areas, plan of service, and other required documentation) to the state for either:
  - inclusion in the state's application prior to the 14-day deadline for ISP, or the 60-day deadline for RSP following the declaration<sup>3</sup>; OR
  - as a modification to the state's existing CCP that has already been awarded.

## **State Declaration – State as a Direct CCP Recipient and Tribal Nation as a Direct CCP Recipient**

When a State receives a Presidentially declared emergency or major disaster, the Tribal Nation may coordinate with the declared state partner to be a direct recipient of the CCP Federal award.

- This does not require the state's concurrence.
- A Tribal Nation must inform FEMA that it chooses to be a direct recipient for a CCP federal award. FEMA informs the state of the Tribal Nations decision. The state would not include providing services to the impacted Tribal Nation in their CCP application.
- Regardless of whether the state decides to apply for a direct CCP Federal award, the tribal government can submit their own, separate application for a direct CCP Federal award.
- Prior to any Tribal Nation CCP Federal award approval and obligation of funding, the Tribal Nation and FEMA must execute a FEMA-Tribal Agreement (even though there is no direct tribal declaration).
- The Tribal Nation must submit an application for a direct CCP Federal award to provide services to the tribal community located within the presidentially declared areas.
  - Part of a Tribal Nation's community may reside outside of the presidentially declared area. A Tribal Nation that is a direct CCP award recipient may only provide crisis counseling services to the parts of the tribal community impacted by the emergency or major disaster.
- If a Tribal Nation has members in multiple states and those states have received emergency declarations with CCP designated or major disasters with IA designated including CCP, then the Tribal Nation may apply as a direct recipient for CCP in each of the declared states to serve its tribal community. In addition to the FEMA-Tribal Agreement, the Tribal Nation must submit a CCP federal award application.