



Coronavirus (COVID-19) Pandemic: Public Assistance Programmatic Deadlines

FEMA Policy

BACKGROUND

Pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), the President issued a nationwide emergency declaration¹ and major disaster declarations for the COVID-19 pandemic. This policy applies to the emergency assistance authorized by these declarations. Except where specifically stated otherwise in this policy and other COVID-19 specific policies, assistance is subject to Public Assistance (PA) Program requirements as defined in Version 3.1 of the Public Assistance Program and Policy Guide (PAPPG).²

PURPOSE

This policy establishes PA programmatic deadlines across all COVID-19 emergency and major disaster declarations and describes application of the 100% and 90% federal cost shares.

PRINCIPLES

- A. FEMA remains committed to providing support to meet emergency needs during the COVID-19 pandemic.
- B. FEMA will implement this policy in a consistent and equitable manner through informed decision making.

REQUIREMENTS

A. REQUEST FOR PUBLIC ASSISTANCE DEADLINE:

1. The regulatory deadline for a Request for Public Assistance (RPA) submittal to FEMA is 30 days after an area is designated in a federal disaster declaration.³ On March 21, 2020, FEMA extended the RPA submission period to remain open for the duration of the Public Health Emergency unless an earlier deadline was deemed

¹ www.fema.gov/news-release/2020/03/13/covid-19-emergency-declaration.

² [Public Assistance Program and Policy Guide \(PAPPG\) Version 3.1](#).

³ See Title 44 Code of Federal Regulations (C.F.R.) § 206.202(c).



33 appropriate. FEMA has determined July 1, 2022, to be an appropriate RPA
34 deadline for all COVID-19 declarations.

- 35 2. Applicants submit RPAs through FEMA’s [Grants Portal](#) system.⁴ The RPA is the
36 first step in applying for PA funding. Recipients should encourage all potential
37 Applicants to submit an RPA. Approval of an RPA signifies that FEMA has
38 determined the Applicant is eligible for PA funding. Once approved, the Applicant
39 must submit Project Applications for work and costs related to the COVID-19
40 response in order to receive funding.

41 **B. STREAMLINED PROJECT APPLICATION SUBMITTAL DEADLINE:**

42 **1. Deadline to Identify and Report Damage:**

43 On May 14, 2020, FEMA extended the deadline to identify and report damage
44 stating it would remain open for the duration of the Public Health Emergency unless
45 an earlier deadline was deemed appropriate. As per the PAPPG, identifying and
46 reporting damage includes reporting of emergency work activities.⁵ FEMA typically
47 considers the deadline for identifying and reporting damage to be met upon receipt
48 of a Damage Inventory/Impact List. For COVID-19 declarations, FEMA created a
49 Streamlined Project Application to identify and report COVID-19 activities in lieu of
50 requiring Damage Inventories/Impact Lists. Applicants list the work they performed,
51 or will perform, in the streamlined Project Application. The regulatory deadline for
52 Applicants to identify and report damage is 60 days from its first substantive meeting
53 with FEMA (typically the Recovery Scoping Meeting).⁶ Applicants may either watch
54 a Recovery Scoping Video in lieu of a meeting or FEMA will work with the Applicant
55 to conduct a Recovery Scoping Meeting prior to October 31, 2022. Applicants must
56 submit the Streamlined Project Applications to FEMA via the PA Grants Portal by the
57 following deadlines:
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- 59 a. By December 31, 2022, Applicants must submit all streamlined Project
60 Applications for work completed through July 1, 2022. The streamlined
61 Project Application must include information and documentation sufficient for
62 FEMA to determine whether the work is eligible, and either the actual or
63 estimated cost of the work.
- 64 b. Applicants must submit separate streamlined Project Applications for work
65 performed after July 1, 2022. The deadline for identifying and reporting
66 COVID-19 emergency work activities for work to be completed after July 1,
67 2022, will remain open. FEMA will notify Applicants no less than 30 days
68 prior to establishing the deadline for work performed after July 1, 2022.

69 ⁴ See [Grants Portal Account and Request for Public Assistance Guide](#) for additional information.

⁵ See page 134 of [PAPPG Version 3.1](#).

⁶ See 44 C.F.R. § 206.202(d)(1)(ii).



70 **2. Expedited Funding Projects:**

71 By December 31, 2022, Applicants must submit a streamlined Project Application
72 as an amendment to the expedited funding project, *to define all work activities*
73 *through July 1, 2022, along with an updated cost estimate*. If the expedited funding
74 project covers a timeframe after July 1, 2022, and funding is still justifiably needed,
75 FEMA will work with the Applicant to ensure continuance of expedited funding.
76 Recipients must limit advance payments, even under expedited funding projects, to
77 the “minimum amounts needed” and timed based on the “actual, immediate cash
78 requirements” to perform the eligible work.⁷

79 **3. Cost Share Application:**

80 The President authorized 100% federal funding for all eligible emergency work
81 costs under the COVID-19 declarations through July 1, 2022.

82 a. **100% Funding:** FEMA will apply 100% federal funding to all eligible COVID-
83 19 costs for work performed and items used from the beginning of the
84 incident period through 11:59 p.m. on July 1, 2022, as follows:

85 i. **Employee Labor:** Costs for hours worked prior to July 2, 2022.

86 ii. **Purchased Supplies:** Costs to purchase supplies used prior to July
87 2, 2022. As described in the *COVID-19 Pandemic: Work Eligible for*
88 *Public Assistance (Interim)* policy, FEMA only provides PA funding for
89 the purchase of personal protective equipment (PPE) and other
90 supplies projected to be used in the next 60 days.⁸ Any PPE or other
91 supplies purchased for a 60-day timeframe prior to July 2, 2022, are
92 eligible for 100% federal funding only if the items were also used prior
93 to July 2, 2022.

94 iii. **Purchased Equipment:** Costs to purchase equipment that the
95 Applicant used prior to July 2, 2022, and the cost for usage prior to
96 July 2, 2022.

97 iv. **Leased Equipment and Facilities:** Lease costs prior to July 2, 2022.
98 FEMA may calculate the cost based on a proration of time (e.g., if a
99 facility is leased for six months based on a monthly rate and the
100 100% federal cost share expired 45 days after the start of the lease,
101 FEMA applies the increased federal cost share to the cost to lease
102 the facility for 45 days based on a proration of the monthly rate). As
103 described in the *COVID-19 Pandemic: Work Eligible for Public*
104 *Assistance (Interim)* policy, FEMA only provides funding for storage

⁷ 2 C.F.R. § 200.305(b).

⁸ This 60-day limit includes personal protective equipment (PPE) and other supplies associated with safe opening and operating.



105 that is necessary to store 60 days of PPE and other necessary
106 supplies.⁹

107 v. **Contract Costs:** Costs for work performed prior to July 2, 2022. If
108 costs cannot be distinguished by date performed, FEMA may prorate
109 costs based on the percentage of work completed prior to the
110 deadline versus the percentage of work remaining. However, to the
111 greatest extent possible, Applicants should work with contractors to
112 delineate dates associated with work.

113 b. **90% Funding:** In Section 311 of the Consolidated Appropriations Act, 2022,
114 Congress directed the federal share of assistance for the COVID-19 disaster
115 declarations be at least 90%. FEMA will apply the 90% federal cost share to
116 funding for all eligible costs for work performed and items used on or after
117 July 2, 2022. This includes any PPE or other supplies purchased for a 60-
118 day timeframe prior to July 2, 2022, but not used until on or after July 2,
119 2022.

120 c. **Separation of Costs:** The Applicant must delineate costs for work
121 performed and items used prior to July 2, 2022, from costs for work
122 performed and items used on or after July 2, 2022.

123 d. **Donated Resources:** FEMA does not provide PA funding for donated
124 resources; however, the Applicant may use the value of donated resources
125 to offset the non-federal cost share of its eligible Emergency Work projects
126 and Direct Federal Assistance. If the Applicant used donated resources prior
127 to July 2, 2022, it may use the value of those donated resources to offset the
128 10% non-federal cost share for eligible work performed on or after July 2,
129 2022.

130 4. **Project Thresholds:**

131 The project thresholds for minimum project amounts, and small and large projects
132 as defined in Chapter 3 (IV. B. Project Thresholds) of the PAPPG apply to each
133 individual streamlined Project Application.
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135 C. **WORK COMPLETION DEADLINE:**

136 The regulatory deadline for completion of Emergency Work is six months from the
137 declaration date. The unprecedented nature of COVID-19 events and the impacts of
138 the pandemic necessitated emergency protective measures to continue beyond 6
139 months. On August 24, 2020, FEMA extended the emergency work completion
140 deadline for COVID-19 until further notice. FEMA is continuing this extension until

⁹ This 60-day limit includes storage for PPE and other supplies associated with safe opening and operating.



further notice. FEMA will provide notification no less than 30 days prior to establishing a deadline for completion of COVID-19 emergency protective measures.

D. PROJECT COMPLETION CERTIFICATION AND CLOSEOUT DEADLINE:

1. Small Projects:

- a. The Recipient must submit to FEMA certification of completion for all Subrecipient Small Projects within 180 days of the Subrecipient's latest Small Project work completion date.¹⁰
- b. The Recipient must submit to FEMA certification of completion for all of the Recipient's Small Projects within 90 days of the latest Small Project work completion date.¹¹

2. Large Projects:

- a. Subrecipients must submit to the Recipient all actual cost documentation for each large project within 90 days of the work completion date or the date of obligation, whichever is later.¹²
- b. The Recipient must submit to FEMA all actual cost documentation for each of its own Large Projects with certification of completion within 90 days of the work completion date or the date of obligation, whichever is later.
- c. The Recipient must submit to FEMA its certification of the Subrecipient's completion of each Large Project with the final claim for PA funding and all supporting documentation within 180 days of the work completion date or the date of obligation, whichever is later.

3. FEMA makes its eligibility determination and processes the project based on the documentation received within the deadline.

E. MANAGEMENT COST DEADLINES:

Section 324 of the Stafford Act authorizes PA funding for management costs.

The Recipient may claim management costs incurred until one of the following occurs¹³:

- 180 days after work is completed on the last non-management cost PA project for the declaration; or
- 180 days after the latest performance period of a non-management cost PA project for the declaration; or

¹⁰ 2 C.F.R. § 200.343. FEMA allows 180 days based on the combined allowance of 90 days for the Subrecipient and 90 days for the Recipient.

¹¹ 2 C.F.R. § 200.343.

¹² 44 C.F.R. § 206.205(b)(1) and 2 C.F.R. § 200.343.

¹³ [PA Management Costs Interim Policy \(FP 104-11-2\) \(fema.gov\)](#)



- Two years from the end date of the incident period for an Emergency Declaration¹⁴; or
- Eight years from the date of the Major Disaster Declaration.

The Subrecipient may claim management costs incurred until one of the following occurs:

- 180 days after the Subrecipient completes its last non-management cost PA project; or
- 180 days after the latest performance period of the Subrecipient's non-management cost PA project; or
- Two years from the end date of the incident period for an Emergency Declaration; or
- Eight years from the date of the Major Disaster Declaration.

F. TIME EXTENSIONS

If a Recipient or Subrecipient/Applicant determines it needs additional time to meet one of the above deadlines, it must submit a written time extension request to FEMA with a detailed justification and any documentation to substantiate delays beyond its control. Subrecipients/Applicants must route requests through the Recipient to FEMA.

A. Request for Public Assistance Time Extensions:

- a. FEMA Regional Administrators may extend the RPA deadline for a potential Applicant up to 90 days after July 1, 2022, when the request is justified based on extenuating circumstances beyond the Recipient's or Applicant's control.
- b. For time extensions beyond 90 days, Regional Administrators must coordinate with the Assistant Administrator, Recovery Directorate at FEMA Headquarters for concurrence.
- c. An example of an extenuating circumstance that may justify a time extension for RPA submittal is:
 - i. When an Applicant did not conduct any COVID-19 work until after July 1, 2022.

B. Project Application Submittal Time Extensions:

- a. FEMA Regional Administrators may extend the Project Application Submittal deadline up to 90 days after December 31, 2022, when the request is

¹⁴ The PA Management Costs Interim Policy (FP 104-11-2) states that the deadline for emergency declarations is two years from the declaration date; however, for COVID-19 emergency declarations, this date has expired on March 12, 2022, and the incident period remains open. Therefore, FEMA is extending this portion of the management cost deadline to the end date of the incident period for COVID-19 emergency declarations.



205 justified based on extenuating circumstances beyond the Recipient's or
206 Applicant's control.

- 207 b. For time extensions beyond 90 days, Regional Administrators must
208 coordinate with the Assistant Administrator, Recovery Directorate at FEMA
209 Headquarters for concurrence.
- 210 c. The following are examples of circumstances that may justify a time
211 extension:
- 212 i. When the respective Applicant has insufficient personnel due to active
213 incident response activities on non-COVID-19 declarations.
 - 214 ii. When the respective Applicant has an overwhelming quantity of
215 project applications for which the deadline applies.

216 C. Project Completion Certification and Closeout Time Extensions:

217 FEMA Regional Administrators may extend deadlines for submittal of project
218 completion and certification when the request is justified based on extenuating
219 circumstances beyond the Recipient's or Subrecipient's control.¹⁵

- 220 a. The following are examples of circumstances that may justify a time
221 extension:
- 222 i. Projects with open and active correspondence pending that is related to
223 the scope or cost of the project;
 - 224 ii. When the respective Subrecipient or Recipient has insufficient personnel
225 available to process project closeout and documentation reviews due to
226 active incident response activities; or
 - 227 iii. When the respective Subrecipient or Recipient has a significant amount
228 of project closeouts due simultaneously.

229 G. OVERLAPPING SOURCES OF FUNDING

230 Section 312 of the Stafford Act prohibits FEMA from duplicating benefits from other
231 sources.¹⁶ Per the PAPPG, if an Applicant receives funding from another source for the
232 same work that FEMA funded, FEMA reduces the eligible cost or de-obligates funding to
233 prevent a duplication of benefits. Under Section 312, multiple agencies having authority
234 to expend funds for the same purpose is not, by itself, a duplication of benefits.
235 Therefore, for COVID-19 declarations, FEMA's PA policy is that if an Applicant does not
236 receive funding from another source for the same exact cost item that PA funding is
237 provided, FEMA will not consider it to be a duplication of benefits. If an Applicant
238 receives funding from another source for the same exact cost item that FEMA funded,
239 FEMA will reduce the eligible amount to prevent a duplication of benefits. For example, if

¹⁵ Title 2 C.F.R. § 200.406343(a).

¹⁶ Stafford Act § 312, 42 U.S.C. § 5155, and 2 C.F.R. § 200.406.



FEMA provides PA funding for eligible COVID-19 medical care costs and the Applicant also receives funding from another source for COVID-19 medical care, FEMA will only consider it a duplication of benefits if the Applicant uses the other sources funding for the same exact work and costs that were eligible and claimed to FEMA for PA funding. When providing funding, FEMA cannot provide funding for the same dollar that is covered with funding from another federal or non-federal source.

1. Federal Funding:

Congress has appropriated over \$3 trillion to multiple federal agencies to assist state, local, tribal, and territorial (SLTT) governments in addressing immediate needs in responding to COVID-19. FEMA’s authority to respond to COVID-19 thus in some cases overlaps with that of other federal agencies. Given the need of SLTTs to quickly address the public health threats of COVID-19 and the funding availability from several federal agencies for this purpose, PA Applicants have flexibility to determine which source of funding to use for their costs to best meet their needs, subject to the purpose and eligibility requirements of each federal program and funding source.

Under COVID-19 declarations, FEMA may provide PA funding to Applicants for eligible costs that may also be eligible for funding under another federal agency’s authorities. However, FEMA will not deny a PA eligible cost under a COVID-19 declaration solely because that cost may be eligible under another federal agency’s authorities. As federal agencies are prohibited by Section 312 from paying SLTTs for the same cost twice, Applicants must ensure they do not receive FEMA PA funding for the same item of cost funded by another federal agency. If this occurs, applicants must return the duplicated amount to FEMA.¹⁷

2. Patient Care Revenue:

FEMA cannot provide PA funding for clinical care and other costs funded by another source, including private insurance, Medicare, Medicaid/CHIP, other public insurance, a pre-existing private payment agreement, the COVID-19 Uninsured Program for uninsured patients, or payments received directly from patients. To address potential duplication of benefits:

- a. Applicants must provide documentation to show actual medical care revenue received, including insurance proceeds and revenue from direct billing to patients, and the types of work and costs covered, including but not limited to labor, supplies, and equipment, as well as costs that are ineligible under the PA Program. This supporting documentation may include an Applicant’s audited financial statements or other accounting documentation.
- b. FEMA reduces eligible costs by the amount of actual or anticipated amount of insurance proceeds or other patient care revenue. For instance,

¹⁷ [Coordinating Public Assistance and Other Sources of Federal Funding \(fema.gov\)](https://www.fema.gov/coordination)



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if an Applicant has received funding from FEMA and then bills and receives funding from a patient or a patient’s insurance for the same costs, FEMA must reduce its assistance by the amount of funding received from the patient or the patient’s insurance.

Recipients and Subrecipients are responsible for ensuring that they do not accept payment for the same dollar twice. Applicants must certify in the Project Application that assistance has not and will not be duplicated.

H. EQUITY REQUIREMENTS

As a condition of receiving Public Assistance funding, Recipients and Subrecipients must comply with all laws and authorities prohibiting discrimination, including but not limited to, Title 44 Code of Federal Regulations Part 7 and Title VI of the Civil Rights Act, which prohibit discrimination based on race, color or national origin (including limited English proficiency); and the Stafford Act Section 308, which requires the impartial and equitable delivery of disaster services and activities without discrimination on the grounds of race, color, religion, nationality, sex, age, disability, English proficiency, or economic status.

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Date

ADDITIONAL INFORMATION

REVIEW CYCLE

FEMA Policy #[INSERT NUMBER], will be reviewed and evaluated as necessary.

AUTHORITIES and REFERENCES

Authorities

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 51215207, as amended
- Title 44 of the Code of Federal Regulations, Part 206, Subpart H
- Title 2 of the Code of Federal Regulations, Part 200

MONITORING AND EVALUATION

FEMA will closely monitor the implementation of this policy through coordination with regional and field staff, as appropriate, as well as interagency partners and SLTT stakeholders.

QUESTIONS

Direct questions to fema-recovery-pa-executive-office@fema.dhs.gov.