



FEMA

November 23, 2020

MEMORANDUM FOR: Regional Administrators  
Regions I – X

FROM: Keith Turi  
Assistant Administrator  
Recovery Directorate

A handwritten signature in blue ink, appearing to read "K. Turi".

SUBJECT: Title 32 National Guard Support for COVID-19 Vaccination Efforts

In accordance with the Presidential Memoranda providing for state and territorial National Guard units and members to be deployed in a Title 32 duty status in support of FEMA mission assignments (MAs) responding to the coronavirus (COVID-19) pandemic, FEMA is managing open MAs to the Department of Defense (DOD) to fund Title 32 National Guard deployments to support state and territorial efforts. Eligible work under these MAs remains limited to those activities which constitute Emergency Protective Measures, as defined by [Public Assistance \(PA\) policies for COVID-19](#).

Based on continued coordination with the Department of Health and Human Services and officials participating in Operation Warp Speed, FEMA has determined that certain costs incurred by state, local, tribal, and territorial (SLTT) governments for the effective distribution and administration of COVID-19 vaccines are eligible for PA. Further, when a SLTT government is unable to secure resources that are necessary to effectively support COVID-19 vaccine implementation efforts, it may request resources directly from the Federal government through Direct Federal Assistance (see [Vaccination Planning FAQ](#)).

Accordingly, COVID-19 vaccine distribution and administration will be considered allowable within the existing scope of work for any FEMA MAs to DOD for use of National Guard personnel in a Title 32 duty status until the President's direction to provide such support expires. The National Guard personnel deployed in response to such MAs must meet any health-care licensing requirements and follow any Federal and state/territorial credentialing, certification, and training requirements necessary to provide this support.

cc: David Bibo, Associate Administrator for Response and Recovery (Acting)  
Jeff Dorko, Deputy Associate Administrator for Response and Recovery (Acting)  
Damon Penn, Assistant Administrator for Response