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Subject: DR-4520 (COVID-19) Eligible Costs & Tracking
Attachments: [COVID-19 Eligible Emergency Protective Measures Fact Sheet \(FINAL\)\(3.19.20\).pdf](#)
[Public Assistance Donated Resources Policy \(2018\).pdf](#)
[DRRA - Fact Sheet PA management costs interim policy.final.pdf](#)
[DRRA - PA Management Costs \(Interim\) FEMA FP 104-11-2.pdf](#)

Good morning,

Listed below are the three categories of work that will be eligible for reimbursement under FEMA's Public Assistance (PA) program for DR-4520 (COVID-19). As a reminder, the incident period for this event is January 20, 2020, and continuing until further notice. Any costs incurred before then will not be eligible under the FEMA PA program for DR-4520.

Category B – Protective Measures

As previously sent out, attached is the "COVID-19 Eligible Protective Measures Fact Sheet" that FEMA released for the PA program that supplements the normal Category B - Protective Measures eligibility criteria. The normal Cat. B - Protective Measures eligible costs are still in play as the fact sheet is supplemental guidance. Existing program policy and procedures for Cat. B - Protective Measures already in place should be the starting point and general way forward. The Public Assistance Program and Policy Guide (PAPPG) V3.1 can be found here: <https://www.fema.gov/media-library/assets/documents/111781>. Cost eligibility for the PA program is on pages 21-42 and specific Category B eligible costs is on pages 57-82.

Under the COVID-19 Emergency Declaration, FEMA may provide assistance for emergency protective measures including, but not limited to, what is outlined in the fact sheet, if not funded by the HHS/CDC or other federal agency. While some activities listed may be eligible for funding through HHS/CDC, final reimbursement determinations will be coordinated by HHS and FEMA. ***FEMA will not duplicate any assistance provided by HHS/CDC or any other source.***

Eligibility questions under the PA program are purposely left as gray areas for interpretation because the PA program covers all states, tribes, and territories, where there is much variability. As long as the work being performed is to protect life and property and is directly related to the COVID-19 response, then there is a good chance that it is eligible. Be sure, to the best of your ability, that all work is documented and the reason behind why it was done.

Category B – Donated Resources

As part of the PA program, FEMA does allow the value of eligible donated resources (e.g. labor, equipment, or supplies/materials) received by an entity to offset the non-federal share of eligible costs incurred from performing emergency protective measures. If an entity is claiming donated resources, costs that are deemed eligible will be captured on a separate Cat. B - Donated Resource

project and processed separately from the Cat. B - Protective Measures project.

To accurately track donated resources, FEMA typically requires the following information:

- For donated labor: Who did what, when (the date), and for how long (in hours).
- For donated equipment hours: Type of equipment, name of the operator, what they did, when, and for how long.
- For donated materials: What was donated, the quantity, date, and who donated it.

Attached is the current FEMA “Public Assistance Donated Resources Policy” with additional information.

Category Z – Management Costs

Under the FEMA PA program, administrative time spent working on grant related activities is also eligible for reimbursement. A separate project (Category Z project) will be written to reflect administrative costs incurred. This project is reimbursed on actual, eligible administrative costs incurred up to 5% of the Cat. B - Protective Measures project. An example is if you incurred \$100,000 in COVID-19 response costs that are FEMA eligible, you could get up to \$5,000 additional in administrative reimbursement. This administrative reimbursement is paid on actual costs incurred, which means you will need to track the administrative time spent with FEMA projects.

To accurately track administrative time, FEMA typically requires the following information:

- Name of person and title
- Date
- Time spent (hrs)
- What was done / explanation of work

Labor/pay policies for employees will be needed as well.

Examples of eligible administrative time:

- Direct and indirect administrative costs to manage FEMA grants
- Collecting paperwork and other supporting documentation
- Participating on calls and/or sending emails
- FEMA correspondence
- Grants Portal work
- Procurement work

Also attached are two information sheets if you would like further information about Category Z projects and administrative reimbursement.

Thank you,

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<https://dma.wi.gov/DMA/wem/recovery/public-assistance-program>