

Response to Questions from “What you need to know for FEMA Public Assistance (PA) Reimbursement for Non-Congregate Shelter (NCS)” In-focus Session from March 26th, 2021

Additional materials include Oregon Emergency Management [presentation](#), [FEMA NCS requests](#) as of 12/20, and the [NCS Shelter Guidance Briefs Analysis](#). You can find the meeting recording and other information under the March 26th, 2021 – In Focus Session pop-out on the Oregon Statewide Unhoused Response & Recovery Network webpage here: <https://www.oregon.gov/ohcs/get-involved/Pages/oregon-unhoused-response-recovery-network-covid-19-wildfires.aspx>

Questions and responses in **red** from OEM’s Public Assistance Officer. For follow-up questions, please feel free to contact Julie Slevin at julie.slevin@state.or.us and CC connor.mcdonnell@oregon.gov.

Q1: The meeting invite mentioned FEMA reimbursement for operations at Project Turnkey motel locations. What operations can FEMA reimburse - case management? Any idea of how long that operations reimbursement will last for the motel locations? Q from Julie Arena.

R1: The NCS would need preapproval/waiver from FEMA Region Ten through OEM for wrap around services to be eligible to include the following:

Setup, care, food and staffing and decommission to ensure the sheltering operations are in-line with HHS/CDC guidelines on sheltering in covid situations. Additional reference for eligible sheltering expenses, see the FEMA Public Assistance Policy Guide (PAPPG) V3.1, page 65-69.

https://www.fema.gov/sites/default/files/documents/fema_pappg-v3.1-archived_policy_5-4-2018.pdf

Unfortunately, case management is specifically named as not eligible as shown below from FEMA FAQ, COVID 19 Pandemic: Non-Congregate Sheltering #10 -

10. What wrap-around services are eligible? For example, are food or mental health counseling eligible?

Eligible costs related to sheltering should be necessary based on the type of shelter, the specific needs of those sheltered, and determined necessary to protect public health and safety and in accordance with guidance provided by appropriate health officials. However, support services such as case management, mental health counseling, and others are not eligible.

<https://www.fema.gov/media-collection/public-assistance-disaster-specific-guidance-covid-19-declarations>

Of course, the NCS would have to preapproved/waived by FEMA Region Ten administrator in order for wrap around costs to be eligible.

Q2: The FEMA Public Assistance guidance reports the program ends 6/30/2021, with possible extensions. Will non-congregate administrative costs incurred after 6/30/2021 be reimbursed after

6/30/2021 shelter closure? Q from Annette Evans.

R2: The deadline above is specific to FEMA Policy 104-009-18, version 3, FEMA Emergency NCS during the COVID-19 Public Health Emergency. FEMA developed this policy due to recognize the extraordinary challenges involved with operating a shelter program for disasters during the COVID-19 pandemic. This Policy is for non-COVID Declarations, for instance the Labor Day wildfires fall under this NCS shelter policy, for NCS operations for the targeted populations such as those who had to evacuate and those that lost their homes due to the fires.

COVID 19 Declarations, Oregon DR4499, has an open incident period starting from January 20, 20 and continuing so the 6/30/21 does not apply. NCS requires preapproval/waiver and a 30-day reporting requirement after December 16, 2020.

Reference:

NCS sheltering Delegation Authority, March 19, 2020.

FEMA Memorandum dated 12/16/20 for Regional Administrators, waiving the time extension requirements of the Public Assistance program policy Guide V3.1 (PAPPG) requirement for time extensions for NCS every 30 days.

Timelines: For all COVID 19 Declarations (Oregon is DR4499), FEMA has extended the deadline for completing emergency work indefinitely and will make notification no later than 30 days prior to established deadline. This is for work; payments can be continuing beyond the completion of work deadline.

Q3: Are there Administrative Cost limits? For example, can we use a federal approved NICRA (negotiated indirect cost rate agreement) value?

R3: Please refer to 2 CFR 200.414 which can be found here: https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1414&rgn=div8

Q4: Is postage costs to assist homeless individual obtain I.D. documentation eligible, e.g., birth certificate?

R4: Please see PAPPG page 65-69 for list of typical shelter costs and services that may be eligible (can you link this task with a service?)

Q5: What is the process for FEMA funding for other operations of need for houseless populations at NCS, e.g., feeding? Q from Adam Danforth.

R5: The applicant must be an eligible applicant (State, Local, Tribal Territory and certain Private Nonprofits) and must have the legal authority and responsibility for the NCS (typically this is a State,

local or Tribal territory). The Applicant must submit a Request for Public Assistance in FEMA Grants Portal and Request a Preapproval/waiver for NCS to the State for FEMA Region Ten approval. Once approved a project can be written for eligible wrap around services for NCS.

Q6: To your point about decommissioning, would that include costs related to repairing damages that have occurred while the non-congregate shelter is in operation - i.e., returning to pre-lease condition?

Q from Adam Brown.

R6: Yes, within reason.

Q7: When do we think we will know if there will be an extension beyond 6/30? Q from Katharine Ryan.

See Q2.

Q8: Is NICRA rate not allowed even though approved for federal work? I recall Julie stating 5% Admin Cap on Direct Costs. Q from Annette Evans.

R8: See 2 CFR 200.414 regarding indirect costs, I believe we need more information to be able to answer your question on indirect administrative cost allowability.

Correct in accordance to Public Assistance Management Costs (Interim), FEMA Recovery Policy FP 104-11-2, and applicant will receive 5% cap for management costs, indirect costs, direct administrative and other administrative expenses associated with the specific project. The final eligible management contribution is based upon actual costs up to the capped amount.

Typical activities eligible as management costs include:

Activities eligible as management costs include those related to developing eligible PA projects and receiving reimbursement. These activities may include, but are not limited to:

- a. Preliminary Damage Assessments
- b. Meetings regarding the PA Program or overall, PA damage claim
- c. Organizing PA damage sites into logical groups.
- d. Preparing correspondence.
- e. Site inspections
- f. Travel expenses
- g. Developing the detailed site-specific damage description.
- h. Evaluating Section 406 hazard mitigation measures.

i. Preparing Small and Large Projects

j. Reviewing PWs k. Collecting copying, filing, or submitting documents to support a claim.

l. Requesting disbursement of PA funds.

m. Training

<https://www.fema.gov/assistance/public/policy-guidance-fact-sheets/section-1215-management-costs>

Q9: It seems like this has potential to dovetail with the Emergency Operations and Wrap Around Services RFP. Do we have any sense of where we should use both in complementary ways?

R9: Can context be provided; not sure I understand question?

Q10: how long is FEMA taking to reimburse?

R10: Timelines: For all COVID 19 Declarations (Oregon is DR4499), FEMA has extended the deadline for completing emergency work indefinitely and will make notification no later than 30 days prior to established deadline. This is for work; payments can be continuing beyond the completion of work deadline, based upon actual supporting and submitted cost documentation.
