



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

FEMA Policy # 104-22-0002

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. Appendix A includes a table of the programmatic deadlines established in this policy.

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.

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

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



REQUIREMENTS

A. REQUEST FOR PUBLIC ASSISTANCE DEADLINE:

1. Applicants³ and Recipients⁴ must submit all RPAs to FEMA via the [Grants Portal](#) system no later than July 1, 2022.⁵ The RPA is the first step in applying for PA funding. Recipients should encourage all potential Applicants to submit an RPA. Approval of an RPA signifies that FEMA has determined the Applicant is eligible for PA funding. Once approved, the Applicant must submit Project Applications for work and costs related to the COVID-19 response in order to receive funding.
2. 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:
 - If an Applicant did not anticipate conducting any COVID-19 work and did not conduct work until after July 1, 2022.

B. PROJECT APPLICATION SUBMITTAL DEADLINE:

1. Deadline to Identify and Report Damage:

The regulatory deadline for Applicants to identify and report damage is 60 days from its first substantive meeting with FEMA (typically the Recovery Scoping Meeting).⁶ On May 14, 2020, FEMA extended the deadline to identify and report damage stating it would remain open for the duration of the Public Health Emergency unless an earlier deadline was deemed appropriate. As per the PAPPG, identifying and reporting damage includes reporting of emergency work activities.⁷ FEMA is establishing December 31, 2022, as the deadline to identify and report all emergency work activities performed through July 1, 2022, for all COVID-19 declarations. FEMA typically considers the deadline for identifying and reporting damage to be met upon receipt of a Damage Inventory/Impact List. For COVID-19

³ Applicant: A non-federal entity submitting an application for assistance under the Recipient's federal award.

⁴ Recipient: A non-federal entity that receives a federal award directly from a federal awarding agency to carry out an activity under a federal program.

⁵ See [Grants Portal Account and Request for Public Assistance Guide](#) for additional information.

⁶ See Title 44 Code of Federal Regulations (C.F.R.) § 206.202(d)(1)(ii). Applicants may either watch a Recovery Scoping Video in lieu of a meeting or FEMA will work with the Applicant to conduct a Recovery Scoping Meeting prior to October 31, 2022.

⁷ See page 134 of [PAPPG Version 3.1](#).



declarations, FEMA created a streamlined Project Application to identify and report COVID-19 activities in lieu of requiring Damage Inventories/Impact Lists. Applicants list the work they performed, or will perform, in the Project Application. Applicants must submit Project Applications to FEMA via the PA Grants Portal by the following deadlines:

a. Work Performed through July 1, 2022:

By December 31, 2022, Applicants and Recipients must submit to FEMA all Project Applications⁸ for work performed through 11:59 p.m. on July 1, 2022. The Project Application must include information and documentation sufficient for FEMA to determine whether the work is eligible for PA funding and must include either the actual or estimated cost for work performed through July 1, 2022.

b. Time Extensions:

- i. FEMA Regional Administrators may extend the Project Application Submittal deadline up to 90 days after December 31, 2022, when the request is justified based on extenuating circumstances beyond the Recipient's or Applicant's control.
- ii. For time extensions beyond 90 days, Regional Administrators must coordinate with the Assistant Administrator, Recovery Directorate at FEMA Headquarters for concurrence.
- iii. The following are examples of circumstances that may justify a time extension:
 - If an Applicant's RPA was not approved by October 2022.
 - When the respective Applicant has insufficient personnel due to active incident response activities on non-COVID-19 declarations.
 - When the respective Applicant has an overwhelming quantity of project applications for which the deadline applies.

c. Work Completed on or After July 2, 2022:

Applicants must submit separate Project Applications to FEMA for work performed on or after July 2, 2022. The deadline for identifying and reporting COVID-19 emergency work activities for work to be performed on or after July 2, 2022, will remain open until further notice. FEMA will notify Applicants no less than 30 days prior to establishing such deadline.

d. Expedited Funding Projects:

By December 31, 2022, Applicants must amend expedited funding projects by submitting a streamlined Project Application as an amendment to the project to define all work activities through July 1, 2022, along with an updated cost estimate. If the expedited funding project covered a timeframe after July 1,

⁸ For more information: <https://www.fema.gov/fact-sheet/public-assistance-simplified-application>.



2022, and funding is still justifiably needed, FEMA will work with the Applicant to ensure continuance of expedited funding. Recipients must limit advance payments, even under expedited funding projects, to the “minimum amounts needed” and timed based on the “actual, immediate cash requirements” to perform the eligible work.⁹

2. Cost Share Application:

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

- a. **100% Funding:** FEMA will apply 100% federal funding to all eligible COVID-19 costs for work performed and items used from the beginning of the incident period through 11:59 p.m. on July 1, 2022, as follows:
 - i. **Employee Labor:** Costs for hours worked through July 1, 2022.
 - ii. **Purchased Supplies:** Costs to purchase supplies¹⁰ used through July 1, 2022. FEMA only provides PA funding for the purchase of supplies projected to be used in the next 60 days. Any supplies purchased for a 60-day timeframe are eligible for 100% federal funding only if the items were used or distributed for use by July 1, 2022.
 - iii. **Purchased Equipment:** Costs to purchase equipment that the Applicant used by July 1, 2022, and the cost for usage through July 1, 2022.
 - iv. **Leased Equipment and Facilities:** Lease costs prior to July 2, 2022. FEMA may calculate the cost based on a proration of time (e.g., if a facility is leased for six months based on a monthly rate and the 100% federal cost share expired 45 days after the start of the lease, FEMA applies the increased federal cost share to the cost to lease the facility for 45 days based on a proration of the monthly rate). FEMA only provides funding for storage that is necessary to store 60 days of PPE and other necessary supplies.¹¹
 - v. **Contract Costs:** Costs for work performed prior to July 2, 2022. If costs cannot be distinguished by date performed, FEMA may prorate costs based on the percentage of work performed prior to the deadline versus the percentage of work remaining. However, to the greatest extent possible, Applicants should work with contractors to delineate dates associated with work.
- b. **90% Funding:** In Section 311 of the Department of Homeland Security Appropriations Act, 2022, Congress directed the federal share of assistance for the COVID-19 disaster declarations be at least 90%. FEMA will apply the 90% federal cost share to funding for all eligible costs for work performed and items

⁹ 2 C.F.R. § 200.305(b).

¹⁰ Supplies includes personal protective equipment (PPE).

¹¹ This 60-day limit includes storage for PPE and other supplies associated with safe opening and operating.



used on or after July 2, 2022. This includes any supplies purchased, but not used or distributed for use until on or after July 2, 2022.

- c. **Separation of Costs:** The Applicant must delineate costs for work performed and items used prior to July 2, 2022, from costs for work performed and items used on or after July 2, 2022. FEMA and the Recipient will work with Applicants to process project amendments to ensure work and costs align to the timeframe of work performed.
- d. **Donated Resources:** FEMA does not provide PA funding for donated resources; however, the Applicant may use the value of donated resources to offset the non-federal cost share of its eligible Emergency Work projects and Direct Federal Assistance. If the Applicant used donated resources prior to July 2, 2022, it may use the value of those donated resources to offset the 10% non-federal cost share for eligible work performed on or after July 2, 2022.

3. Project Thresholds:

The project thresholds¹² for minimum project amounts, and small and large projects as defined in Chapter 3.IV. B. Project Thresholds of the PAPPG apply to each individual Project Application.

C. WORK COMPLETION DEADLINE:

The regulatory deadline for completion of Emergency Work is six months from the declaration date. The unprecedented nature of COVID-19 events and the impacts of the pandemic necessitated emergency protective measures to continue beyond 6 months. On August 24, 2020, FEMA extended the emergency work completion deadline for COVID-19 until further notice. FEMA is continuing the work completion deadline extension for work completed on or after July 2, 2022, until further notice and will provide notification no less than 30 days prior to establishing such deadline.

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 deadline or the date of obligation, whichever is later.¹³
- b. The Recipient must submit to FEMA certification of completion for all of the Recipient's Small Projects within 180 days of the latest Small Project work completion deadline or the date of obligation, whichever is later.¹⁴

2. Large Projects:

¹² [Per Capita Impact Indicator and Project Thresholds | FEMA.gov](#)

¹³ 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.

¹⁴ 2 C.F.R. § 200.343.



The Recipient must submit to FEMA the final actual cost claim and supporting documentation for each Large Project with certification of completion within 180 days of the work completion deadline or the date of obligation, whichever is later.¹⁵

3. Time Extensions:

FEMA Regional Administrators may extend deadlines for submittal of project completion and certification when the request is justified based on extenuating circumstances beyond the Recipient's or Subrecipient's control. The following are examples of circumstances that may justify a time extension:

- Projects with open and active correspondence pending that is related to the scope or cost of the project;
- When the respective Subrecipient or Recipient has insufficient personnel available to process project closeout and documentation reviews due to active incident response activities; or
- When the respective Subrecipient or Recipient has a significant amount of project closeouts due simultaneously.

4. 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.¹⁶

1. Recipients:

Recipients may claim management costs incurred¹⁷ up to 180 days after either the work completion date or the work completion deadline of the last non-management cost PA project for the declaration, whichever is sooner.

2. Subrecipients:

Subrecipients may claim management costs incurred¹⁸ up to 180 days after either the work completion date or the work completion deadline of its last non-management cost PA project for the declaration, whichever is sooner.

3. Time Extensions:

A Recipient or Subrecipient may request a time extension based on extenuating circumstances. Such request must include a schedule for completion of any remaining PA-related administrative activities. FEMA Regional Administrators may extend deadlines for submittal of management costs up to two years from the end of

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

¹⁶ See FEMA's [PA Management Costs Interim Policy \(FP 104-11-2\) \(fema.gov\)](https://www.fema.gov/pa-management-costs-interim-policy)

¹⁷ This deadline is the timeframe for which management costs are eligible. It is not the deadline for submitting a management cost project application.

¹⁸ This deadline is the timeframe for which management costs are eligible. It is not the deadline for submitting a management cost project application.



the incident period, not to exceed the deadline for the prime award period of performance. Time extensions beyond this timeframe must be approved by FEMA's Assistant Administrator of Recovery. The following are examples of extenuating circumstances that may justify a time extension for reimbursement of ongoing administrative activities related to PA:

- When the respective Subrecipient or Recipient has projects with open and active correspondence pending that is related to the scope or cost of the project;
- When the respective Subrecipient or Recipient has insufficient personnel available to process project closeout and documentation reviews due to active incident response activities; or
- When the respective Subrecipient or Recipient has a significant number of open projects.

G. OVERLAPPING SOURCES OF 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.

Section 312 of the Stafford Act prohibits FEMA from duplicating benefits from other sources.¹⁹ Per the PAPPG, if an Applicant receives funding from another source for the same work that FEMA funded, FEMA reduces the eligible cost or de-obligates funding to prevent a duplication of benefits. Under Section 312, multiple agencies having authority to expend funds for the same purpose is not, by itself, a duplication of benefits.

Therefore, for COVID-19 declarations, FEMA's PA policy is that if an Applicant does not receive funding from another source for the same exact cost item that PA funding is provided, FEMA will not consider it to be a duplication of benefits. If an Applicant receives funding from another source for the same exact cost item that FEMA funded, FEMA will reduce the eligible amount to prevent a duplication of benefits. For example, if 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 cost items that were eligible and claimed to FEMA for PA funding.

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

¹⁹ Stafford Act § 312, 42 U.S.C. § 5155, and 2 C.F.R. § 200.406.



because that cost may be eligible under another federal agency’s authorities. As FEMA is prohibited by Section 312 from paying SLTTs for the same exact cost item twice, Applicants must ensure they do not receive FEMA PA funding for the same exact cost item funded by another federal agency or any other source such as private insurance or patient payments. If this occurs, applicants must return the duplicated amount to FEMA.²⁰

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. NON-DISCRIMINATION AND 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.

Melissa K. Forbes
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June 13, 2022

Date

²⁰ [Coordinating Public Assistance and Other Sources of Federal Funding \(fema.gov\)](https://www.fema.gov)

ADDITIONAL INFORMATION

REVIEW CYCLE

FEMA Policy #104-22-0002, will be reviewed and evaluated as necessary.

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.

Appendix A – Programmatic Deadlines Chart

Cost Share		Work Conducted
100% Federal Funding	Costs for work performed and items used or distributed for use through 11:59 p.m. on July 1, 2022	
90% Federal Funding	Costs for work performed and items used or distributed for use on or after July 2, 2022	
Type	Deadline	Time Extensions
Request for Public Assistance	July 1, 2022	<ul style="list-style-type: none"> Regional Administrator up to 90 days Assistant Administrator of Recovery concurrence beyond 90 days
Work Completion Deadline for work performed through July 1, 2022	July 1, 2022	N/A
Work Completion Deadline for work performed on or after July 2, 2022	Not yet established	N/A
Project Application Submission / Damage Identification Deadline for work performed through 11:59 p.m. on July 1, 2022	December 31, 2022	<ul style="list-style-type: none"> Regional Administrator up to 90 days Assistant Administrator of Recovery concurrence beyond 90 days
Project Application Submission / Damage Identification Deadline for all work performed on or after July 2, 2022	Not yet established	N/A
Closeout Deadline for large projects obligated on or after the work completion deadline	180 days from obligation date	Regional Administrator
Closeout Deadline for large projects obligated prior to the work completion deadline	180 days from work completion deadline	Regional Administrator
Closeout Deadline for small projects	180 days from last Small Project work completion deadline or date of obligation, whichever is later	Regional Administrator
Management Costs	180 days after work completion date or the work completion deadline of last non-management cost project, whichever is sooner	<ul style="list-style-type: none"> Regional Administrator up to two years from the end of the incident period Assistant Administrator of Recovery concurrence beyond two years from the end of the incident period