



## **Disaster Documentation Webinar -- June 2020** **Resources and Q&A**

**CADRE Website Current Activations Page under Disaster Documentation**  
(some also on <https://www.themartinetgroup.com> under "Freebies")

**International Association of Emergency Managers (IAEM) Disaster Cost Recovery and Finance Caucus COVID-19 Pandemic Webinar Series FEMA Public Assistance Program Information and Handouts as of May 2020**

- Compilation of key documents that have been release for COVID-19 Cost Recovery

**PNP Eligible Noncritical, Essential Social Service (PDF)**

Process for getting funding from FEMA

- [Email](#) the State of California Recovery Division and tell them that you want to file a Request for Public Assistance. They will help you.
- Normally, must file RPA within 30 days from the end of the disaster event. (COVID 19 is still open because the event is still active)

[State COVID-19 Recovery page](#)

[State Private Nonprofit Organizations Assistance Program](#) (general)

[FEMA Public Assistance Program and Policy Guide 2018 v3.1](#)

[Value of a Volunteer Hour](#). Scroll down and click on California. Currently \$29.95

[FEMA Mass Care/Emergency Assistance Pandemic Planning Considerations June 2020](#)

**How is Reimbursement Possible?**

- PNPs who are feeding people or providing other disaster services *on their own* – will not receive FEMA funding.
- If PNP has a written agreement with a city or county to provide the food or service, they get paid by the city/county for the ADDITIONAL meals needed for the emergency. (see section on Contract Language)
  - Detailed record keeping is required to show how many people you've fed, food cost, increased increment for utilities, supplies, feeding containers, volunteer hours, etc. (for example)
- If PNP had an OWNED building that had damage (typically after an earthquake or flood) – Apply directly to FEMA to Request Public Assistance (RPA)
  - Must also apply to the Small Business Administration for funding. If the SBA gives you a loan that covers the cost of repairing the damages, you are not eligible for FEMA funding. If the loan is denied or is for less than the total, you can apply to FEMA for the balance.

Note: FEMA reimbursement is 75% of the total of eligible damages.



## Questions & Answers

### **1. Are additional operating costs reimbursable and how to track them vs normal operation?**

Additional operating costs are NOT reimbursable. If the operating costs exist because you are open and providing services to support the response, you can build the additional costs into the unit price of the service you are providing.

### **2. Is there any chance that lost revenue could be reimbursable?**

No, it's never been reimbursed.

### **3. Would paid administrative leave be eligible for reimbursement?**

Not likely.

### **4. Documentation of service provision (e.g., food distribution)**

If you are making deliveries, use ICS 214 (modified) form to write the time you drove to an address, the address itself, why food was delivered to this address (medically fragile, can't drive, etc). Need to show every address and mileage to/from.

For fixed sites (like food distribution) use an ICS 211B to document staff and volunteer hours, and the assignments of each person. Individuals in Leadership roles might also want to use an ICS 214 (modified) for additional activity details.

### **5. What information should we gather from those receiving food and necessities so we can be reimbursed?**

Individuals and families self-certify that they have a need but we need more explanation/clarification of who fits into the categories and how to track. *CADRE is working on getting clarification from the Health Officer.*

J Guevarra. Data intake from the nonprofit. How to document the population. How do you know who needs to get food from you? People show up at food distribution through advertising. Some do intake to answer questions. I've been impacted by COVID, I fall within these groups. Pre-COVID, there was a method for determining eligibility. Should still be using the normal criteria. Reasonable effort to determine eligibility and self-certify that they fall into the category.

### **6. What exactly should we be tracking for volunteers, besides hours?**

Same as for paid staff. Use CADRE Form ICS 211B or similar. Complete Name, Time In, Time Out, their assignment, any overtime. At the top of the form, write the location and purpose of this volunteer activity (i.e. food distribution, testing, food packaging, making masks etc.)

Time spent on COVID Activities for certain employees is 100% reimbursable and for straight time through the CARES Act, with proper documentation.

Doing training for COVID is also reimbursable for straight time through FEMA.

### **7. Should the FEMA contract language as identified in the FEMA Procurement Under Grants Public Assistance Policy be added to existing contracts executed prior to COVID19?**

Yes



**8. How do you define regular work activities for employees vs response related activities?**

Any individual activities that have to do with COVID should be documented on the ICS 214 form. If the person is sitting in an Emergency Operations Center, working at a distribution site, shelter, etc. all day, also keep an ICS211B sign in sheet.

If part of the day is normal job duties and part of the day is COVID activities, you only have to document the COVID related time. Must have actual hours. FEMA will not allow apportionment, for example, 25% of my time was for COVID.

**9. How can we be reimbursed for PPE through FEMA? Link to the application/application process would be appreciated.**

Info on Request for Public Assistance listed at the top of the document. More info in webinar recording on 4/17/20 Understanding FEMA COVID-19 on CADRE website under Programs/Events – Workshops

**10. To the extent that information has not been tracked according to the requirements of FEMA, what is the best practices to get reimbursement?**

Without proper documentation, reimbursement may occur, but when the organization is audited, FEMA may ask for the money back. To the best of your ability, go back through all the existing documentation and properly document what was done.

**11. What documents other than timecards and bank statements would we need to have ready?**

For employees, you'll need timecards that specifically list the hours applied to COVID19 work as well as an ICS 211B (if they were working at a fixed location with only one assignment) or an ICS 214 (listing various activities performed during the day.) This is your backup information to show that the hours claimed are accurate. You will also need to document the employee benefit rates.

For purchases, you need to document the transaction from beginning to end. Order receipt, delivery receipt, credit card statement showing the charge and a copy of the check showing the payment to the credit card. And if the price of the item is higher than normal, take screen shots showing that this was the going rate and not an excessive expense.

For contracts with nonprofits, you'll want a copy of the agreement, and ensure that the organization is tracking volunteer hours and all other activities/purchases or quantities outlined in the contract.

**12. Impact of PPP loan**

Not part of this webinar. Check with your accountant or CPA who should have this information should there be another round of PPP funding.

**13. Would Workers Comp come in to play if someone contracted COVID?**

Talk to State Worker's Comp.

**14. Should a city assign a staff person to PNP work sites to ensure volunteer hours are being documented?**

Sounds like a good idea. Straight time for the staff person could be reimbursable through CARES Act. Overtime is reimbursable through FEMA.



**15. Who needs to have an MOU with city/county?**

Agreements, similar to the sample template Agreement shared, should be in place between a nonprofit and the city/county requesting the services. Agreement can be to provide services under contract or to provide services as a donation.

**16. How do we document donations organizations receive from FEMA?**

**We were given PPE**

Fill out the Donations Receipt form provided in this webinar

**17. Is a Zoom license a reimbursable expense?**

Additional operating costs are not allowed unless you can roll the cost into the unit price of a service you are providing.

**18. Mental Health issuing PPE to staff. Is that reimbursable? Is mental health counseling covered?**

Counseling not covered by FEMA, maybe CARES? As we get farther into the event, things may change.

Doesn't hurt to document activities.

PPE is reimbursable.

**19. Should we file a Request for Public Assistance?**

If you have to take protective measures to open your facility (sneeze guards, sanitizer, directional signage) would require an RPA.

Look at your lease, if you don't own the building, make sure you find out whose responsibility it is to take the emergency protective measures.

**MOU Template and Agreement – 32 pages long.** Last two pages - Page 31 and 32 are instructions.

**MOUs can be created after the fact. Get them in place ASAP.**

Highlighted text needs to be edited. Only use the pieces that are needed for your particular service.

Some key points are summarized below.

Must have an agreement if you are donating services or if you are contracting services.

- Do not self-deploy. Tell the City/County and get their approval to respond through a contract or through donated services.
- **PNPs can do good for the community and do good for the City with agreements in place and proper documentation.**
- **Must have an agreement in place for donated goods/services** if you want the City to get credit to offset their costs.
- City can use the value of donated labor and supplies to help them with their local cost share. Example; Providing Meals @ \$7.50ea x 200 x 90 = \$135,000. If it's all properly tracked, the City can use the donation against their local cost share.
- Must have an agreement in place for donated goods/services if you want the City to get credit to offset their costs.
- Or invoice the city/county (under a contract) and they request reimbursement from FEMA. Agreement needs to be with the entity that has legal responsibility to provide the service.
- MOU – Template and instructions has sample language for a variety of different types of agreements - donations Management, Disaster Feeding, Shelter, Pet Rescue, etc.
  - Just pick what you need.
  - Sample of the language you need to make sure



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- What NOT to say in an agreement.
  - “This is not a binding agreement.” – FEMA will likely not pay.
  - “We will reimburse you when we get reimbursed by FEMA” – Contingent agreements are not allowed. No payment.

Pre-event MOU – **Best Effort** - Need to add wording to say you will “do your best to provide” – in case your building is damaged, and you cannot actually assist.

**City and Provider duties and expectations** – Know what types of FEMA documentation is required

**Pre-use inspection** – if you are renting/leasing an additional building for use during the event, inspect it for damage, document and take pictures before you begin use. If the facility gets damaged during use, you can be reimbursed for restoring it – painting, patching walls, cleaning. Be sure to inspect immediately after you stop use, document and take pictures again to show what needs restoration. FEMA would reimburse the repairs (with a filed RPA) or can have who pays to restore stipulated in an agreement.

**Documentation.** Need details in the MOU about documentation. FEMA has record retention requirements

**Record Retention** - 3 years from the date of closeout of the last City project. Not from the end of your contract. So if it takes 5 more years for the City’s last project to close, you would need to maintain the records of your activities for 8 years.

**Cost allocation** – Some costs might be paid by the provider or the city. PNP has a kitchen and volunteers but no food. (i.e. City agrees to provide the food if PNP prepares it. Agreement would reflect this.)

**MOU Attachments:**

1. Labor and benefits – need to give FEMA your HR documents showing what people are paid.
2. Rental or lease agreements.
3. Daily operations expense. Must be done daily or weekly.
  - Sign in sheet. Paid employees or volunteers should sign in and sign out.
  - Daily worker activity log.
  - Need some record of what people did during their shift. As specific as possible.
4. PNP’s articles of Incorporation. FEMA doesn’t recognize PNPs that are not legally established (official 501(c)) and the IRS Determination letter.
5. Is insurance required for what you do?
6. In kind services and donations acceptance form.
7. *Sign in sheet for meals.* EOC needs to have people sign for every meal.
8. Warehouse needs for donations management. Will be different for Congregate care sheltering or Pet Care and Rescue.
9. List of items authorized for donation and those prohibited donation items. Expired food, agricultural concern of invasive species.

**Donations (Materials, Equipment)**

Confirm that the donation can actually be used. It’s not food that has expired.



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In Puerto Rico, 10,000 microwave meals were donated but they had no power so no ability to microwave them... not useful.

**Tracking donations.** (see form) It's important to have some form of documentation to show where the donation came from and its value. If an individual goes to the store and purchases items to donate, their donated value is higher than if the items were donated by an organization (the store itself) who can buy at wholesale. Also important to track where the donation is being stored and how it is used.

There have been instances where someone offered to assist at a disaster site, and were allowed to, only to later receive an invoice charging for the service. Must confirm it's a donation and get it in writing.

**Equipment** – is it donated to USE or donated to KEEP?

**Cash – Large, legacy donations.** Example. Damage to an Art Museum. If someone donates money to the City and states that it is to restore the building, FEMA will reduce reimbursement by that much. If the City receives a donation is to restore or replace the art collection itself, the City FEMA will not deduct the donation from the City's reimbursement.

**Cash – Small donations.** Example: During the disaster, individuals dropped off \$25 gift cards for food. At the end of the disaster, the City had \$75,000 worth of gift cards for food. Must use them for a bonified government purpose. Could give them to a food bank or purchase food/supplies for a bonified government event. No way to return them because you have no receipts. No one specified what the use of the cards should be. All donations need to be documented and clearly identify the intended purpose.

### **FEMA Rules on Donations**

Reference Version Public Assistance Policy and Program Guide version 3.1 2018

*Do not reference Version 4 which came out in 2020. It was not in effect when COVID-19 began.*

Public Assistance donated resources memo 6/18/18

Houston estimated their 25% share was \$100 million. Asked FEMA if they could have an Exemption and say that the value of donated goods, services, labor and cash applied against the cost of permanent work. FEMA changed their policy so that these donations may be used on any category of work.

### **Volunteer Labor**

Volunteer labor, properly documented, can be used to assist cities to offset their 25% portion of disaster costs. Every volunteer hour packing grocery boxes, delivering food, preparing meals, answering phones, distributing supplies, etc. has a value of \$29.95. Use the ICS 211B sign in sheet and ICS 214 log to properly document hours. (Personal vehicles used for purposes of supporting COVID response, mileage is also a donated resource and has a value).

Joplin, MO, May 2010 Volunteer hours totaled. Used volunteers to track the volunteers. Used Americorps. Got a credit of \$17.7 million. Wiped out their local cost share.

If people are making masks as individuals, they don't count. If individuals are sewing masks, their hours don't count because they aren't a bonified nonprofit. If the individuals give the masks to a bonified



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nonprofit, the masks are given a value. Nonprofit gives away the masks and it becomes a donated resource that the City can count as part of their cost share.

Cities/Counties have pre-registered Disaster Volunteers (CERT, Medical Reserve Corps, Ham Radio) Spontaneous Volunteers – Have no prior affiliation and just come out to help during disasters. Specialists (Building Inspectors, Engineers, Architects) – Some are volunteers, and some are paid mutual aid.

Cities/Counties must have a mechanism to cover volunteers for workers' compensation. Could register them as Volunteer Disaster Service Workers with the State or could create a government ordinance that makes volunteers unpaid staff. Will need to notify Workers Comp and there will be an increase in your Workers Comp payments.

PNPs must have insurance for volunteers. Cities could assign their volunteers to work for a PNP.

### **For all Volunteers**

Provide "Just In Time" training to help prevent injuries and keep everyone safe. Involve the appropriate Human Resources department to look at any other HR issues. (background checks needed, for example.

Identify what jobs you anticipate needing to assign and what the qualifications for that task should be.

Identify what transportation, feeding, tools and work supplies will be needed.

Logistical support for Volunteer Organizations coming from out of the area. They bring many resources but may need support (housing, feeding) Examples are the Southern Baptists and Team Rubicon.

Incoming building inspectors would also need some support. Transportation, supplies.

### **Forms**

ICS 211B Staff and Volunteer Check In Form. Make sure it lists the individual's assignment, total straight time hours and overtime hours for each person. Also the location and the Overall activity being performed (like food distribution, packing, etc.) Use this form when staff/volunteers are working in one place all day and doing the same thing. Individual should also use an ICS 214 if activities vary during the day.

ICS 214 Modified. Important to be able to identify activities performed by an individual or team. If doing food deliveries, log each address you deliver to.

Special Disaster Operations Report. If you have a contract with the City, fill out this form every day. Excel spreadsheet that will providing running totals of all your activity. Suggestion. Print the form on a large envelope (9x12 or 10x13). Every daily report, invoice, bills and receipt for the day goes in there. Different special operations can be consolidated into one report.

### **Supplies**

PPE – gloves and mask given to staff every day.



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Document: Name, and what items were issued (mask, gloves, sanitizer, etc.) Document where all that stuff went. Sometimes the documentation is more difficult than the actual cost. Have to project what the total cost of the supplies is vs what it costs to document it all.

**Existing Inventory**

Track every time you take existing inventory off the shelf (PPE, sanitizer, cans of food, etc.) Have to show how you use it incrementally. Try to find original invoices to show what the cost of those items were so you can maximize reimbursement.

**Lost Revenue** – Not reimbursable

**Mass Feeding** – thing to think about. Mass Care/Emergency Assistance Pandemic Planning

Considerations – June 2020 Does not talk about reimbursement

Will you donate the services or set up a contract? There is a lot of documentation. If the documentation the PNP maintains is not adequate for FEMA, the PNP will get paid but the City will not be reimbursed.

**Funding Differences**

CARES Act. Both San Jose and the County just had \$\$ show up into their bank accounts. Have to document where that money went or they'll ask for it back.

FEMA money requires you to prove you are entitled to reimbursement with up front documentation.