



Public Assistance: COVID-19

Private Nonprofit/Food Assistance Questions & Answers

Why did your organization serve during the COVID-19 Public Health Emergency?

Be specific to your reason your organization served during the COVID-19 Public Health Emergency (e.g., to meet high demand for foods by elderly, unemployed, homeless and shut-ins, requested to do so by County EMA or local resources were not available to meet needs during the COVID-19 Public Health Emergency). An answer such as “it was the right thing to do or we saw the need,” while commendable, does not meet the eligibility conditions for FEMA reimbursement.

Did your organization provide similar services prior to the Public Health Emergency?

The reimbursement application should include information on the types of services provided by your organization prior to the Public Health Emergency. E.g. Our organization has operated a Food Bank/Pantry for six years serving ABC community.

Who owns the Facility where the program or services are being provided?

When submitting your Request for Public Assistance provide specific information on who owns or operates all the facility(ies) where programs or services are being provided. The Applicant could demonstrate it owns or operates a facility by providing a lease or deed for the facility. The Applicant must also demonstrate that the facility, pre-disaster, is used primarily for eligible services if it is a shared space used part of the time for other ineligible purposes.

For example, if the Facility is a church that houses a food bank provide specific information how the food bank operates and is managed and supporting documentation such as a lease agreement. Describe the relationship between the church and the non-profit food bank/pantry. Explain what portion of the facility and resources were used for programs or services related COVID-19.

Is your agency or organization a 501(C)3 non-profit?

Provide supporting documentation such as the IRS determination letter as to the non-profit status when submitting your Request for Public Assistance.

Does the organization or agency have an MOU or agreement with a local or county municipal agency to provide Emergency Feeding programs or services? If so, who is the agency?

Food Pantries are not eligible for reimbursement of costs associated with the purchase and distribution of food because they do not have legal responsibility. If they wish to seek reimbursement for costs associated with the purchase and distribution of food, they should coordinate with their local municipality, county or state to set up an agreement where the municipality, county or state will pay them as if they were contracted for the work. If a Non-profit has an MOU or Agreement to provide Emergency Feeding services with a local, county or state government agency they should not submit for reimbursement directly from FEMA. The local, county or state agency may submit for reimbursement for Emergency Feeding programs or services.

Food Pantries can be eligible Applicants and may request reimbursement for other eligible costs outside of the purchase and distribution of food.

FEMA recommends that such an agreement includes, at a minimum, the following provisions:

1. A scope of work identifying the work that the Food Bank/Pantry will perform on behalf of the Governmental Entity. This is important, because the purchase and distribution of food is only eligible when it meets the conditions identified in FEMA Policy No. 104-010-03 Coronavirus (COVID-19) Pandemic: Purchase and Distribution of Food Eligible for Public Assistance (Apr. 11, 2020).
2. The terms under which the Governmental Entity will pay the Food Bank/Food Pantry for the food distribution services, meaning the Food Bank/Food Pantry-provided goods and services the Governmental Entity will pay for.
3. The length of the agreement should be identified, establishing when the agreement will begin and end.
4. A termination for convenience clause, allowing either party to end the agreement at any time with or without notice.
5. It is also the case that the Governmental Entity would be eligible for an initial 30-day period for the purchase and distribution of food. The Governmental Entity would be able to request that FEMA approve an extension of this 30-day period.

If an organization, local, county or state government agency donated financial or food resources to the PNP, can the PNP apply for reimbursement on behalf of the organization or agency that provided assistance?

No, the organization, local, county or state agency who made the donation has the sole discretion to seek reimbursement. It is important to note that eligibility and approval of reimbursement is the sole discretion of FEMA.

Are you receiving funding from other State or Federal Agencies for response to the COVID-19 Pandemic?

If so, you must provide additional information in your Project Application indicating what agency is providing the funding, how much funding is being provided, and to what costs they were applied to. FEMA may reject portions of your Project Application for reimbursement if financial assistance contains duplicative funding from another source received by the Applicant for the same project, program or services. If the organization receives assistance from USDA or even another statewide Food Bank/Pantry the ability to seek reimbursement may be limited.

Are there any other resources available for a PNP to consider for reimbursement or financial assistance? Is FEMA reimbursement the best approach to receive financial assistance?

It may be beneficial for a PNP to pursue other resources for financial or resource assistance for programs or services provided during the COVID-19 Public Health Emergency that are not tied to the requirements and restrictions of the FEMA PA Reimbursement Process. Resources include organizations such as the United Way Community Response Fund, USDA, Feeding America and local and state foundations:

<https://www.unitedwaysofmaine.org/covid/>

<https://www.usda.gov/coronavirus>

<https://www.feedingamerica.org>

<https://www.fullplates.org>

Why was a resource such as a freezer, refrigerator or Facility (warehouse, storage site) purchased or leased which the agency is requesting reimbursement?

Explain the impact of the COVID-19 Public Health Emergency which required additional resources to be acquired. E.g., *due to limited cold storage available in the community a freezer was acquired to protect foods; due to limited space at our primary distribution facility, a storage unit was rented to maintain readily available resources during a period of higher than normal demands for food items.* As a reminder, food pantries are not eligible for reimbursement of costs associated with the purchase and distribution of food, but governmental entities may be eligible for this reimbursement.

What types of supporting documentation are required by FEMA when submitting for reimbursement?

- Force Account Labor
- Force Account Equipment
- Force Account Materials
- Donated Resources
- Rented Equipment

- Contracts
- Supporting Documentation - excerpt from FEMA's Public Assistance Program and Policy Guide (PAPPG)

When a Request for Public Assistance is submitted how long will it take to hear back regarding eligibility?

While Requests for Public Assistance are reviewed as quickly as possible the high volume of requests may be impacting FEMA determinations. Currently, in the New England Region there are nearly 1,000 applications that have been submitted.

Note: Specific responses as mentioned above do not guarantee FEMA approval for reimbursement. FEMA will carefully review each application to ensure eligibility consistent with the Presidential Disaster Declaration Public Assistance Program policies and guidelines. Final determination on organizational eligibility and reimbursement is at FEMA's discretion.