

Disaster Status and Incident Command Structure in response to COVID-19

1. Current Emergency Declaration in place – DHSEM
 - a. Send emergency or disaster declarations to 2020_COVID-19@ak-prepared.com
 - b. Send requests for resources as described below
2. FEMA supporting DHSEM – document all expenses based on DHSEM guidance
3. If/when Major Disaster declared – FEMA Region X will take lead
 - a. Document all expenses based on FEMA guidance, below
 - b. Follow directions for public assistance as described below
 - c. FEMA Region 10 Alaska Area Office
222 West 8th Avenue, Suite #A13
Anchorage, AK 99513
907-271-4300

It is important that requests for assistance, especially for critical supplies, get routed through the proper channels as soon as possible. The most efficient way to identify critical gaps and get results:

- Consistent with the principle of locally executed, state managed, and federally supported response, requests for assistance at the local and county levels should first be routed to their respective state.
- Any needs that cannot be met by the state or tribe should then be sent to the respective FEMA regional office.

Requests for resources are the priority right now; requests for reimbursement will occur later in the recovery phase. The State will roll out information on how communities can submit disaster reimbursement requests in the disaster process. Communities should track their disaster costs like they would for any disaster, such as flood or earthquake, setting up separate cost accounting for disaster response. Note that only costs for the response beyond normal operations.

Once a major disaster is declared, how quickly will it take to access funds? The State is currently accessing State disaster funds. Local communities should use their funds and seek reimbursement under the provisions of the State disaster. Disaster funds to local communities are provided on a reimbursement basis.

FEMA Eligible Assistance

Steps for Municipalities to Apply for FEMA Relief Funds

Resource requests are processed through the Alaska Department of Homeland Security and Emergency Management (DHSEM) which is coordinating response efforts with the Alaska Department of Health and Social Services (DHSS).

- 1) Local medical facilities and community leaders conduct inventory assessment and determine resource needs. Resources include medical supplies, staffing, shelters, temporary morgues, etc.
- 2) City Council/Borough Assembly declare disaster emergency. This step is not required for the state level but will facilitate access to federal resources once the disaster is elevated in severity (which is expected as a Major Disaster Declaration).
- 3) Need for resources - City or borough officials completes [FEMA Form 213 RR](#) to request resources. Multiple resources may be requested on a single form if they are being delivered to the same location.

- a. City or borough officials sends Form 213 RR to DHSEM at 2020_COVID-19@ak-prepared.com
- b. DHSEM coordinates with DHSS to determine priority of resource request.
- c. If needed, DHSEM will elevate resource request to the FEMA.
- d. DHSEM will inform city or borough of timeline for resource delivery.

Requests for Resources

PPE and other procurement needs

- Utilize local or regular sources and place orders with normal suppliers even if on backorder
- If that sourcing is exhausted, complete these ICS 213 Resource Request forms
 - Submit to 2020_COVID-19@ak-prepared.com
- JIA has some PPE supplies available, and more on order, for members

Human Resources

- If a community exhausted their local resources, mutual aid, and all available normal resources, then they would go to the next level of government for assistance.
- If in a Borough or Unified Municipality, then to them.
- If in the Unorganized Borough, then directly to the State Emergency Operations Center.
 - Phone for SEOC is 907-428-7100. Email for the COVID-19 response is 2020_COVID-19@ak-prepared.com

- 4) **Need for reimbursement** – will be coordinated by DHSEM until a major disaster declared
 - a. Public Assistance – direct request to FEMA – won’t be available until major disaster declaration – see below for guidance
 - b. Use FEMA Form 214 for activities – “Resources Assigned” = staff; “Activity Log” = time [https://training.fema.gov/emiweb/is/icsresource/assets/ics%20forms/ics%20form%20214,%20activity%20log%20\(v3\).pdf](https://training.fema.gov/emiweb/is/icsresource/assets/ics%20forms/ics%20form%20214,%20activity%20log%20(v3).pdf)

FEMA Public Assistance Process (upon declaration of major disaster)

While communities that regularly experience natural disasters like hurricanes, tornadoes, and earthquakes are familiar with FEMA’s Public Assistance process, the President’s recent [declaration of a nationwide emergency under the Stafford Act](#) encompasses every state, including tens of thousands of eligible applicants (if not more) for disaster assistance, many of which are navigating unfamiliar territory. Recognizing the logistical and bureaucratic challenges this unprecedented response effort will bring, FEMA is actively working to develop a simplified application and funding process. In this alert, we provide an overview of the Public Assistance process for COVID-19 – for new and experienced applicants.

What is the Public Assistance program?

The Public Assistance program (sometimes referred to as the “PA” program) is a program under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121, et seq. that authorizes

the President to provide federal financial assistance as outlined therein. Funding authority is largely delegated to FEMA, and is made through grants administered by state “recipients.”

Who is eligible for Public Assistance?

State, territorial, tribal, and local governments and certain private non-profits may apply as eligible “subrecipients.” “Local governments” include, e.g., counties, municipalities, school districts, and local public authorities. Eligible private non-profits (PNPs) include critical service providers like schools, colleges, utilities, clinics, laboratories, hospitals, long term care facilities, and emergency services providers. PNPs may also be non-critical service providers like community centers, assisted living centers, child care facilities, food assistance programs, houses of worship, and senior centers, among others.

What is eligible for reimbursement with Public Assistance grants?

Under the President’s national emergency declaration, Public Assistance is available for “emergency protective measures,” which is also referred to as “Category B” work. This includes work such as disinfection of eligible public facilities, emergency medical transport, medical sheltering, movement of supplies and persons, purchase of personal protective equipment, and government force account overtime cost, among others. FEMA published a [Fact Sheet](#) providing guidance as to what emergency protective measures may be considered eligible and a separate [Fact Sheet](#) on eligible sheltering costs.

How does an eligible entity apply for a Public Assistance grant?

Eligible entities can apply for Public Assistance by completing a Request for Public Assistance through FEMA’s web-based platform, [Grants Portal](#). First time applicants must contact their local or state emergency management department to get access to the portal.

How does the funding flow once a grant is approved?

FEMA Public Assistance dollars flow through the recipient to the eligible state agencies and instrumentalities, local governments, and PNPs in its jurisdiction (the “subrecipients”) pursuant to a subgrant agreement. An applicant’s eligible work and costs are organized into “projects,” which are captured in a “Project Worksheet” or “PW” – the form FEMA uses to document and approve reimbursements.

What will the process be like for COVID-19 and how will it differ from previous FEMA-eligible disasters?

Because the COVID-19 emergency declaration limits reimbursement to Category B emergency protective measures and does not involve the repair or replacement of buildings or infrastructure, [FEMA is working to simplify the process](#) to the greatest extent possible. FEMA intends to keep many steps in the reimbursement process the same, including the initial application process, development of scopes of work and cost estimates, compliance reviews, and eligibility reviews. However, due to the enormous breadth of the disaster, FEMA has taken the extraordinary step of reducing documentation requirements. For the COVID-19 pandemic, FEMA’s program will be administered as follows:

1. Attend virtual applicant briefing.
2. Log on or create account in PA Grants Portal. Experienced applicants will be able to access the COVID-19 emergency (or disaster for jurisdictions where a Major Disaster has been declared) in

the Grants Portal using their current accounts. New users will need to contact their local or state emergency management departments to obtain access.

3. Submit Request for Public Assistance (RPA). An RPA is a relatively simple form that begins the Public Assistance process. It includes information about the applicant's location, authorized agent, and type of organization. Applicants must submit an RPA within 30 days of the emergency or disaster declaration. For the nationwide emergency declaration, this is 30 days from March 13, 2020. Later-declared Major Disasters will have different deadlines, including the one declared in New York on March 20, 2020.
4. Submit COVID-19 PW (Project Worksheet). It remains to be seen how FEMA will streamline the project formulation process, but it is "developing a simplified online form applicants can complete, and on which they may explain work activities, answer basic questions, provide limited supporting documentation, and provide a cost estimate." At this point, we know that the form will ensure the U.S. Department of Health and Human Services and Centers for Disease Control and Prevention are not duplicating the funding and that it will require minimal documentation to support eligibility based on the project's risk of providing ineligible funding and emergency need:
5. Expedited Projects: Limited documentation but funded at 50 percent.
6. Small Projects (greater than or equal to \$3,300; maximum \$131,100): Limited documentation and self-certified as to basic eligibility requirements.
7. Large Projects (greater than \$131,100): Limited documentation but full FEMA review based on amount of funding provided.
8. FEMA and recipient review documents. FEMA's statement that only "limited documentation" is required is an ambiguous standard at this time. We would recommend that where possible, applicants (or for-profit entities acting pursuant to agreements with applicants) keep records of (a) purchases and other costs incurred for medical supplies and equipment, (b) daily summaries of the emergency work performed by employees, and (c) for each major procurement, maintain a procurement file demonstrating steps taken in selecting the contractor, and also specifying the efforts taken by the applicant to control costs. FEMA has to be able to show to auditors that it sought, even in this emergency environment, to assure work and costs were eligible and reasonable. FEMA will "follow up with limited requests for additional information if necessary."
9. Sign final grant.
10. Receive funding. As noted above, all funding flows from FEMA through the recipient to the subrecipient. FEMA has said this process is designed to get funding to local officials more quickly and that funding is immediately available where expedited assistance is needed.

We understand that simplified application processes will be implemented within two to three weeks, and the Grants Portal will have direct application capability in six to eight weeks.

MUNICIPALITIES ARE STRONGLY ENCOURAGED TO TRACK ALL HOURS AND WAGES FOR PERSONNEL CONDUCTING WORK ON COVID-19 RESPONSE. USE FEMA FORM 214 TO TRACK HOURS.

Under the COVID-19 Emergency Declaration described above, FEMA may provide assistance for emergency protective measures including, but not limited to, the following, 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).

Management, control and reduction of immediate threats to public health and safety:

- Emergency Operation Center costs
- Training specific to the declared event
- Disinfection of eligible public facilities
- Technical assistance to state, tribal, territorial or local governments on emergency management and control of immediate threats to public health and safety

Emergency medical care:

- Non-deferrable medical treatment of infected persons in a shelter or temporary medical facility
- Related medical facility services and supplies
- Temporary medical facilities and/or enhanced medical/hospital capacity (for treatment when existing facilities are reasonably forecasted to become overloaded in the near term and cannot accommodate the patient load or to quarantine potentially infected persons)
- Use of specialized medical equipment
- Medical waste disposal
- Emergency medical transport

Medical sheltering (e.g. when existing facilities are reasonably forecasted to become overloaded in the near future and cannot accommodate needs)

- All sheltering must be conducted in accordance with standards and/or guidance approved by HHS/CDC and must be implemented in a manner that incorporates social distancing measures
- Non-congregate medical sheltering is subject to prior approval by FEMA and is limited to that which is reasonable and necessary to address the public health needs of the event, is pursuant to the direction of appropriate public health officials and does not extend beyond the duration of the Public Health Emergency

Household pet sheltering and containment actions related to household pets in accordance with CDC guidelines

- Purchase and distribution of food, water, ice, medicine, and other consumable supplies, to include personal protective equipment and hazardous material suits
- Movement of supplies and persons
- Security and law enforcement
- Communications of general health and safety information to the public
- Search and rescue to locate and recover members of the population requiring assistance
- Reimbursement for state, tribe, territory and/or local government force account overtime costs