

Coronavirus (COVID-19) Pandemic

Emergency Medical Care: R8 Takeaways from FEMA Policy FP 104-010-04

(This is not an all-inclusive list of changes and information)

ELIGIBLE MEDICAL CARE WORK AND COSTS

- Both emergency and inpatient care may be eligible:
 - For primary medical care facilities, the costs associated with treating COVID-19 patients may be eligible.
 - For temporary or expanded medical facilities, the costs associated with treating both COVID-19 and non-COVID-19 patients may be eligible.
- Administrative costs at Primary Medical Care Facilities is viewed as ineligible increased operating costs whereas those same costs may be eligible at Temporary or Expanded Medical Care Facilities.
- Lease, purchase, or construction costs, as reasonable and necessary, of a temporary facility as well as reasonable alterations to expand an existing facility necessary to provide medical care services may be eligible.
 - Expanding a primary medical care facility to respond to COVID-19 must be feasible and cost effective.
 - In most cases, permanent renovations are not eligible unless the Applicant can demonstrate that the work can be completed in time to address COVID-19 capacity needs AND is the most effective option.
 - Mobilization and demobilization, wraparound services, and facility maintenance related to a temporary or expanded facility may be eligible.
- The following remain eligible for both primary and temporary or expanded medical care facilities:
 - Labor costs in accordance with PAPPG Page 23-26 (PDF Pages 34-37) that are not included in patient bill and/or otherwise covered by another funding source;
 - Purchase or lease of PPE, specialized or durable medical equipment, and consumable medical supplies; and,
 - Medical waste disposal.
- Ongoing and projected needs regarding continuing operations should be based on regular assessments. Assessments should include adjustments to projected needs based on guidance from public health officials, caseload trends, and/or other predictive modeling or methodologies; lead times and associated costs for scaling up or down based on projected needs; and any other supporting information.

COST SHARE & PROCUREMENT

- Federal assistance provided by other federal departments and agencies cannot be used to cover the non-federal cost share unless the other federal award has specific statutory authority allowing it to be utilized to meet cost-share requirements, or is otherwise allowable under the other federal source of funding.
- Contracts must include an actionable termination for convenience clause that will be implemented if any part of the scope of the contract is ultimately not needed, or the needs are less than projected, as determined by the legally responsible entity.

DUPLICATION OF BENEFITS

- FEMA cannot duplicate assistance provided by HHS or other federal department and agencies. Costs may only be eligible when they are not covered by another funding source like patient payments, insurance payments, and other federal grant programs.
- At no time will FEMA request or accept any Personally Identifiable Information related to the medical care of individual COVID-19 patients.
- FEMA will reconcile final funding based on any funding provided by another agency or covered by insurance or any other source for the same purpose. FEMA will coordinate with HHS to share information about funding from each agency to assist in preventing duplication of benefits.

POTENTIAL ELIGIBILITY OF COVID-19 MEDICAL CARE COSTS*

Allowable Unallowable	Primary Medical Facility	Temporary/Expanded Medical Facility
Emergency Care of COVID-19 Patients (Confirmed or Suspected)	✓	✓
Inpatient Care of COVID-19 Patients (Confirmed or Suspected)	✓	✓
Emergency Care of Non-COVID-19 Patients	✗	✓
Inpatient Care of Non-COVID Patients	✗	✓
Administrative costs	✗	✓
Specialized Medical Equipment**	✓	✓
PPE, Durable Medical Equipment, and Consumable Medical Supplies**	✓	✓
Facility Lease, Purchase, Construction, or Alterations**	✗	✓
Medical waste disposal	✓	✓
Straight-Time for Budgeted Employees	✗	✗
Straight-Time for Unbudgeted, Temporary or Contracted Employees	✓	✓
Overtime for Budgeted, Unbudgeted, Temporary or Contracted Employees	✓	✓
Travel, Lodging and Per Diem for Out-of-Area Contracted Employees***	✓	✓
Wraparound Services	✗	✓
Facility Maintenance	✗	✓
Mobilization and Demobilization (Setting-Up/Closing-Down)	✗	✓
Reasonable and Necessary Based on Actual or Projected Need****	✓	✓
Covered by Another Funding Source*****	✗	✗

*This chart is meant to be read within the context of FP 104-010-04. It is intended to provide a quick reference as to what medical care costs may be eligible under PA. Eligibility will be reviewed based on actual costs and in accordance with FP 104-010-04.

**Subject to: 2 CFR § 200.313(e) disposition of equipment; 2 CFR § 200.314(a) disposition of supplies; 2 CFR § 200.314(a) disposition of real property, and/or; 2 CFR § 200.329 reporting on real property.

***FEMA determines the eligible costs based on the contractual agreement subject to cost reasonableness.

****Eligibility of uncovered medical care costs will be determined by ongoing and/or projected needs. Assessments should include adjustments to projected needs based on guidance from public health officials, caseload trends, and/or other predictive modeling or methodologies; lead times and associated costs for scaling up or down based on projected needs; and any other supporting information.

*****FEMA cannot duplicate assistance. Costs may only be eligible when they are not covered by another funding source like patient payments, insurance payments and other federal grant programs. Please refer to the policy for examples of other federal programs that may have more specific statutory authority to cover such medical care costs.