Take time now to understand federal grant management regulations, so you can focus on providing help in the future to those who need it most.

OPERATIONS

FEMA Disaster Relief Grants: Know the Program Requirements

By Jason Venner
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On March 13, President Trump declared a nationwide emergency and increased federal support for the ongoing COVID-19 pandemic response. Under this declaration, the Federal Emergency Management Agency (FEMA) is directed to assist state, local, tribal, and territorial governments, as well as other eligible entities, with the health and safety actions they take on behalf of the American public. FEMA will also administer most of the $45 billion that the Department of Homeland Security is receiving for its Disaster Relief Fund as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

With FEMA and the country focused on the pandemic response, coping with the agency’s complex and multistep disaster relief grant program after an unexpected natural disaster could be challenging. We know, because we have been there. We helped our clients successfully navigate these challenges during other emergencies, like Superstorm Sandy, by:

Get started
Connect with a CLA representative to help you navigate the complexities of FEMA’s disaster relief program.
• creating and implementing policies and procedures to help clients meet grant requirements; and
• monitoring expenditures for reconstruction projects to prevent and detect any unethical or illegal conduct.

With our national presence and capability to work remotely, CLA is here to help you comply with federal grant management regulations so you can secure federal funds when needed.

Know your options
Following a presidential disaster declaration, FEMA is authorized to provide public assistance funding for disaster relief to state, local, and tribal governments, and other eligible entities. Grants can be authorized, among other things, for:
• Assistance for debris removal;
• Assistance essential to meet immediate threat to life and property resulting from a major disaster; and
• Assistance for the repair, restoration, and replacement of damaged facilities, which includes certain hazard mitigation measures.

The FEMA COVID-19 Emergency Protective Measures Fact Sheet includes a list of eligible emergency medical care activities.

Public assistance is administered through a coordinated effort between (a) FEMA, (b) state or territorial governments (typically as the grant recipient), and (c) local or tribal governments, or other eligible entities (typically as sub-recipients). Entities at all three levels must work together to provide quick and effective assistance.

Note that we are writing this on the heels of the federal government reviewing a framework for identifying regional risks as part of its COVID-19 emergency plan. Nonetheless, we expect that the information discussed below will remain applicable even if such a framework is established.

Know your requirements
While public assistance grants utilize federal funds, they come with strict compliance rules and administrative requirements. FEMA and grantee officials
review applications based on specific eligibility rules that outline the types of damage that can be reimbursed. In the application instructions, FEMA has identified steps that recipients must take to document eligibility.

States and local governments have several additional responsibilities following receipt of grants from FEMA, including:

- Disbursing funds;
- Providing technical advice and assistance;
- Providing support for damage assessment operations; and
- Monitoring the sub-recipient’s activities for compliance with federal statutes and regulations.

Sub-recipients have their own set of responsibilities, which include:

- Identifying damage;
- Providing data for developing scopes of work and estimates of project costs;
- Managing the projects; and
- Documenting claimed costs.

Procurement requirements under these grants are complex and, as with all federal grant programs, contracts are subject to federal procurement regulations. Grant recipients should review their procurement policies and procedures so they can meet federal requirements. Particularly when using sole-source procurements to meet different types of needs, grant recipients need to confirm that the situation meets one of the circumstances that allow for noncompetitive procurement. FEMA allows for noncompetitive procurements when a public exigency or emergency requires urgent or immediate action that cannot be met with a lengthy, competitive solicitation award process. Here is information on these two scenarios:

- Exigency — there is a need to avoid, prevent, or alleviate serious harm or injury — financial or otherwise — and use of competitive procurement proposals would prevent the urgent action required to address the situation.
- Emergency — a threat to life, public health or safety, or improved property requires immediate action to alleviate the threat.
Complying with these requirements not only helps you manage grants, but also prepares you for a potential audit from the Department of Homeland Security’s Office of Inspector General or state and local audit offices. These audits focus on whether procedures and processes are in place to manage the grant dollars, associated contracting, insurance, records, and other key activities that support FEMA-funded projects. Noncompliance with federal standards could result in questions about costs — or worse, a request to pay back some of the grant.

For more information on disaster recovery relief management, see Five Steps to Proactive Disaster Recovery Grant Management for Governments.

Watch out for scams

Bad actors are increasing their attacks to take advantage of fear and suffering during the COVID-19 pandemic. The more COVID-19 is in the news, the more scammers might attempt to use people’s anxiety as a way to scam them. This includes offers of government aid. For example, only scammers will reach out to you and ask for payment for sensitive information to secure government aid for disasters.

How can we help?

From start to finish, our team is here to support you as you navigate these uncertain times. Our COVID-19 resource center provides clear information that can help you sift through all the noise. You can also subscribe to our email communications to get the latest news. Both are great ways to stay connected to the CLA family during this crisis. Furthermore, our experienced professionals can help you navigate the complexities of disaster recovery funding and work with you to provide effective strategies for implementing grant management policies and procedures, and other risk management services. That way, you can focus on quickly and effectively helping those in need.

Contact us

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