



Q&A

EVERYTHING YOU NEED TO KNOW ABOUT FEMA GRANTS AND PREVENTING INSPECTOR GENERAL FINDINGS

April 2020

BDO

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QUESTION DETAIL		ANSWER
1.	Can a healthcare provider qualify for an SBA loan if they accepted the HHS funds?	Yes, getting HHS does not stop the provider from obtaining the SBA loans. You must make sure you track the uses of the HHS grants and the SBA loans to make sure you are in compliance with the terms and conditions for the utilization of each.
2.	Are indirect (overhead) costs eligible under the CARES Act funding from US Treasury?	Visit BDO's recent article on how the CARES Act affects nonprofits at https://www.bdo.com/blogs/nonprofit-standard/april-2020/how-cares-act-helps-nonprofits
3.	Does your firm anticipate forgiveness of the Medicare Advanced Payment Program?	Loan forgiveness is not a feature of the Medicare Advanced payments as the program stands today. The AHA is working with congress to try to change some of the repayment clauses so monitor CMS guidelines for this program as more information is released.
4.	Is the estimate of lost revenue (as guided by terms and conditons) interpreted the same by the Accounting Firms? Meaning if the trend shows a decline of \$100M, and the Hospital received \$75M, the entire \$75M will be supported as lost revneue?	Yes, lost revenue is a reason for eligibility of the HHS funds. This can be determined by looking at prior year period to the COVID-19 period to determine the decrease in revenue. You can also look at the budgeted revenue for Feb-April and compare to actual to determine the lost revenue. If you received 75m and lost 100m, this covers the requirement. You do need to ensure you utilize the funds in accordance with the terms and conditions so that there is no take back of the fund due to non-compliance.
5.	What is minimum documentation requirements for force account labor? Is what we need to prove the same as what it what it is for a typical FEMA disaster, or more lax?	For labor costs, you will be required to provide supporting documentation to include employee name, title, time sheets, work performed, location, date, and hours worked, separating overtime and regular time. It will be the same as previous disasters. It will definitely not be more lax. More likely more stringent on documentation than previous.
6.	Can the US Treasury funding be considered towards the local share for FEMA PA program?	It cannot. All the Federal funding from the CARES Act will be considered a duplication of benefits.
7.	If we have applied for the PA grant for tornado disaster relief (our buildings were completely devastated), can we also apply for a FEMA PA for COVID?	Yes. You will need a new Request for Public Assistance (RPA) under the COVID-19 declaration and your COVID-19 expenses will be tied to the COVID declaration. Your tornado project worksheets will be tied to the tornado.
8.	is there a deadline date for application for FEMA for NJ?	There is currently not a deadline for New Jersey.
9.	Are private, not for profit institutions allowed to apply for these FEMA, if so, based on the CARES Act funding source as well, what type of expenses should be pointed to FEMA that don't apply for CARES Act Instituional piece could be looked to this FEMA funding?	See the FEMA eligible expense fact sheet at: https://www.fema.gov/news-release/2020/03/19/coronavirus-covid-19-pandemic-eligible-emergency-protective-measures

QUESTION DETAIL		ANSWER
10.	What is the best way to stay up to date on the eligibility changes that are occurring?	Sign up for news alerts from your state emergency management department, as eligibility rules could differ with each state declaration.
11.	If a hospital received provider relief payments for certain COVID-19 related expenses or foregone revenue AND also received FEMA funds through the state specifically for the set up of a temp hospital in the Garage/parking lot is there an issue? In this case the expenses are clearly identifiable to each respective source of funding.	There could be a duplication of benefits issue
12.	if we have received a loan from the CARES act can we still get a FEMA grant as well?	Yes. The forgiven part of the PPP would be considered a duplication of payment
13.	Our science center has been shut down due to stay at home orders. As we prepare to reopen, we need to take measures related to COVID. Can we submit for these expenses once we've incurred them? Likely time frame over next 2-3 months.	If you meet all 4 eligibility rules, you can apply to the state as an eligible private nonprofit for a prescreen.
14.	Would charitable contributions specifically designated support Covid 19 be considered a funding source that would be considered for FEMA purposes?	It would be considered a donated resource that could be used to offset the 25/25% cost share.
15.	Good afternoon. We are a private non-profit, but a historic house museum, not operating a school or day care facility - i.e. and eligible facility? May we apply for funding to purchase emergency protective equipment? We plan to purchase masks, gloves, hand sanitizer, possibly hand washing stations, etc. Thank you	If you meet all 4 eligibility rules, you can apply to the state as an eligible private nonprofit for a prescreen.
16.	Does "EOC Operations" refer to the emergency/pandemic command center? We have several hospitals and we set up a command center to help coordinate preparedness and response.	Yes.

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