



# Private Non-Profit Organizations

How do we receive reimbursement or capture costs under the FEMA Public Assistance program?

# How can PNPs be Reimbursed?

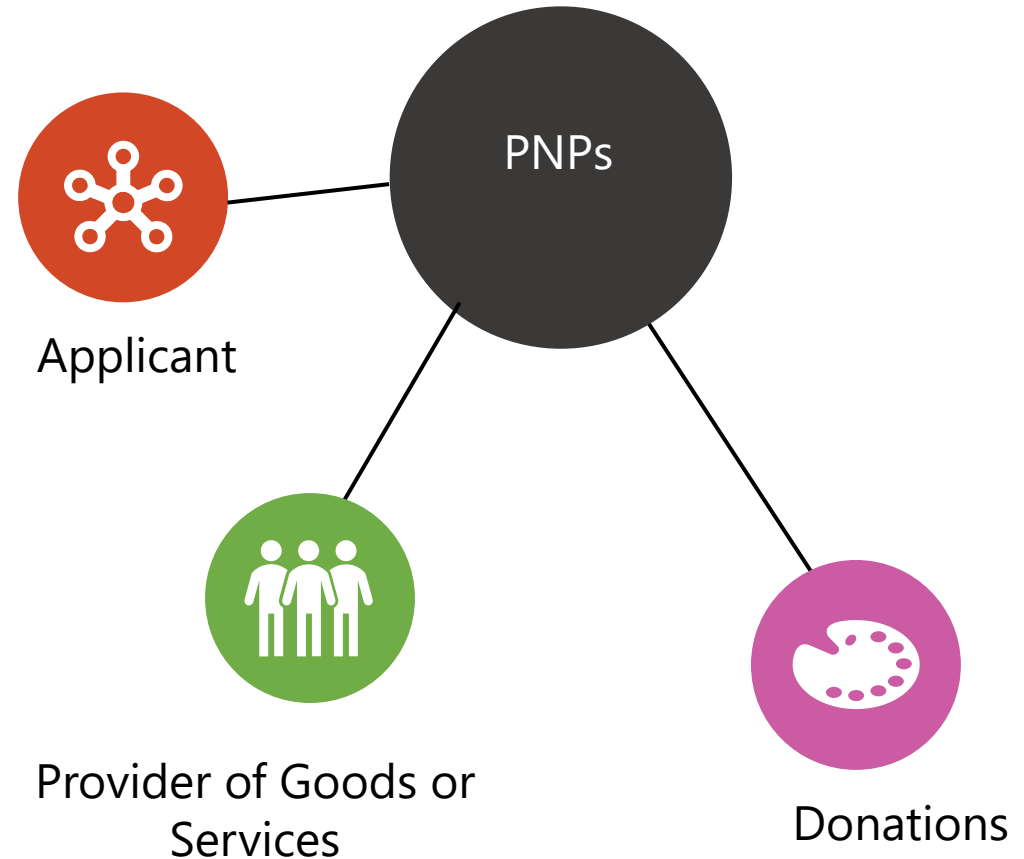
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## Private Non-Profits can be reimbursed:

- as the legally responsible entity (Applicant) for certain activities
- by a legally responsible entity (i.e., as a provider of goods or services)

## Additionally, Private Non-Profits can Donate Work to a Legally Responsible Entity

- By documenting activities, locations, names, and hours for people and equipment and providing that documentation to a legally responsible entity



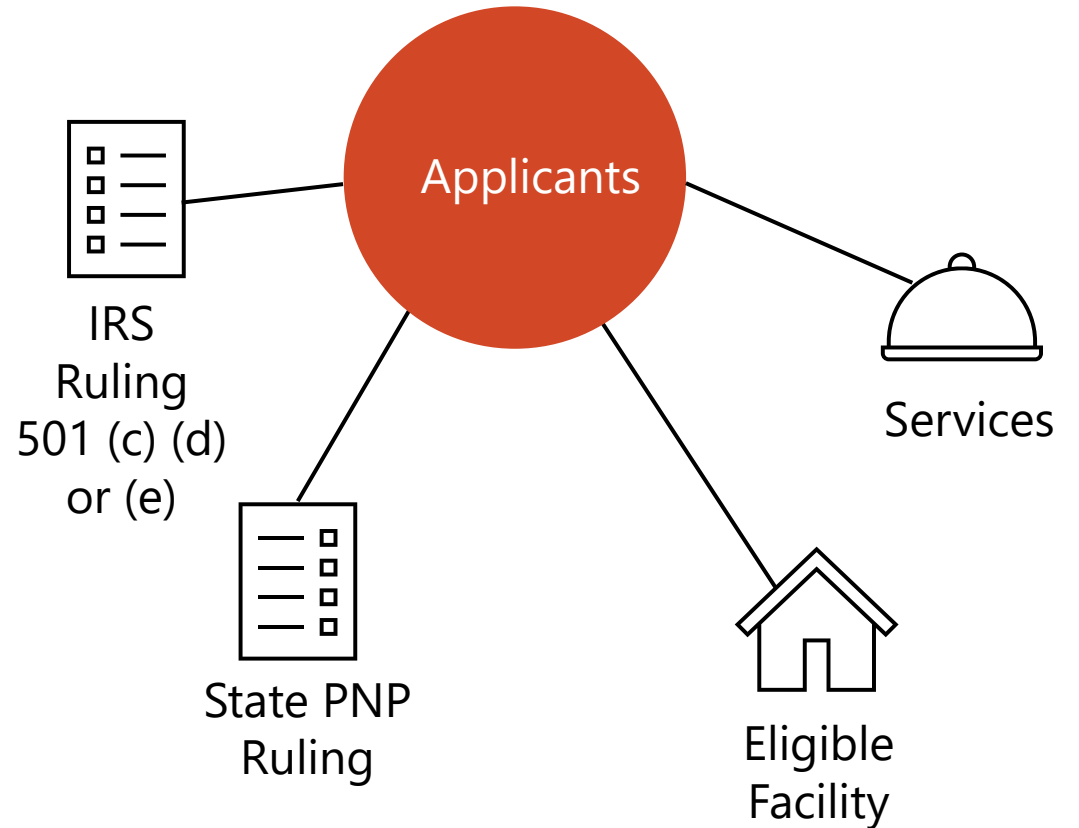
# Is the PNP an Eligible APPLICANT?

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Not ALL PNPs are Eligible Applicants

## Eligible Applicants

1. Must Show:
  - Ruling letter from IRS; or
  - Documented as a PNP from the State; and
2. Owns or Operates Eligible Facility
  - Critical Services
  - Essential Services (Non-Critical); and
3. Accessible to the Public, not Exclusive.
  1. Not self interest (HOAs, Condos, etc.)
  2. Not restricted (Gated, Security, etc.)
  3. Any fees are nominal, waived under circumstance, and reasonable.

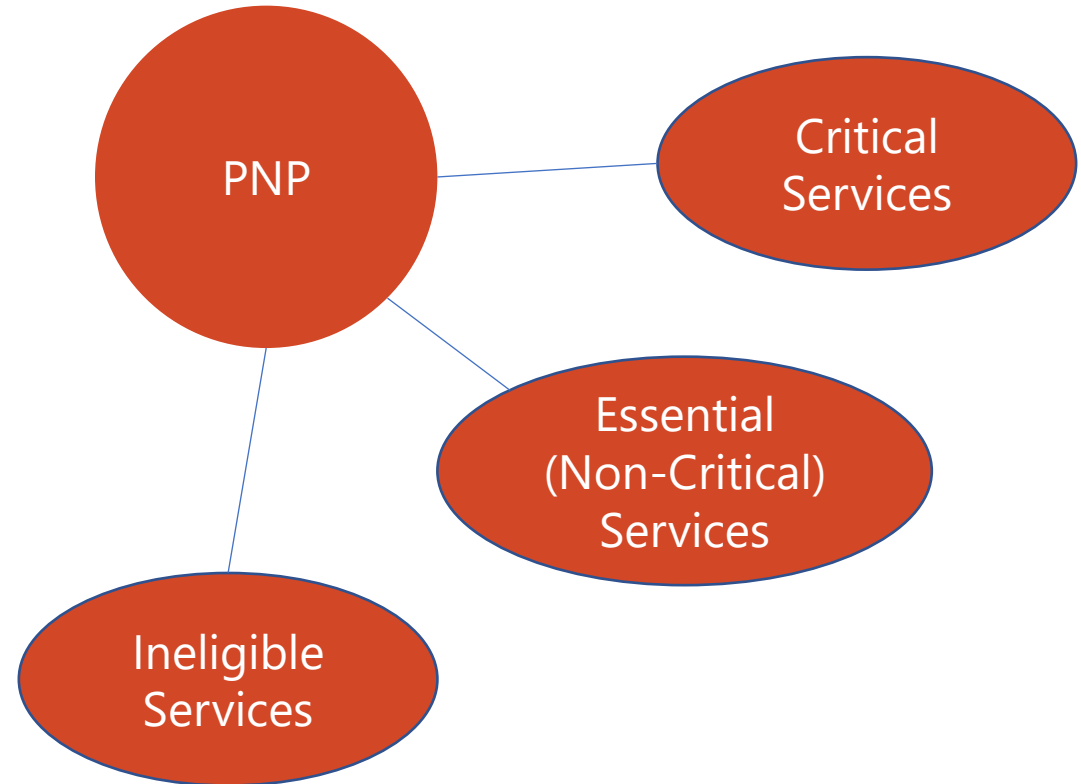


# ELIGIBLE APPLICANT – CRITICAL or ESSENTIAL SERVICES?

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## Critical vs. Essential Service PNPs

1. Critical PNPs that provide a critical service, which is defined as education, utility, emergency, or medical.
2. Essential PNPs are those who provide non-critical, but essential social services AND provides those services to the general public
3. Ineligible PNPs are any PNP that does not meet these criteria.



# Eligible PNP Services - CRITICAL

- **Critical Services PNPs**

- Education
  - Primary/Secondary Schools
  - Higher Education
    - Academic, Vocational, and Professional Trainings
- Utilities
  - Communications, Power Generation, Transmission, Distribution, Water, Sewer, etc.
- Emergency Facilities
  - Hospitals, Extended-Care, Outpatient, Rehabilitation
- Medical Services
  - Ambulance, Fire Protection, Rescue, Public Broadcasting

Table 1. PNP Eligible Critical Services

PNP ELIGIBLE CRITICAL SERVICES	
<p style="text-align: center;"><b>EDUCATION</b></p> <ul style="list-style-type: none"> <li>• Primary or secondary education as determined under State law and provided in a day or residential school, including parochial schools; OR</li> <li>• Higher-education institutions that meet all of the following criteria:                             <ul style="list-style-type: none"> <li>○ Admit students or persons having a high school diploma or equivalent;</li> <li>○ Are legally authorized to provide education beyond a secondary level;</li> <li>○ Award a bachelor's degree or 2-year degree that is acceptable as full credit toward a bachelor's degree or provides at least a 1-year training program to prepare students for gainful employment in a recognized occupation; and</li> <li>○ Are accredited by a nationally recognized agency or association (as determined by the Secretary of Education).</li> </ul> </li> <li>• Educational facilities that meet the above criteria are eligible without regard to religious character or use for religious instruction.</li> </ul>	<p style="text-align: center;"><b>EMERGENCY MEDICAL</b></p> <ul style="list-style-type: none"> <li>• Emergency medical care (diagnosis or treatment of mental or physical injury or disease) provided in:                             <ul style="list-style-type: none"> <li>○ Clinics</li> <li>○ Dialysis facilities</li> <li>○ Facilities that provide in-patient care for convalescent or chronic disease patients</li> <li>○ Hospices and nursing homes</li> <li>○ Hospitals and related facilities, including:                                     <ul style="list-style-type: none"> <li>➢ Central service facilities operated in connection with hospitals</li> <li>➢ Extended-care facilities</li> <li>➢ Facilities related to programs for home-health services</li> <li>➢ Laboratories</li> <li>➢ Self-care units</li> <li>➢ Storage, administration, and record areas</li> </ul> </li> <li>○ Long-term care facilities</li> <li>○ Outpatient facilities</li> <li>○ Rehabilitation centers</li> </ul> </li> </ul>
<p style="text-align: center;"><b>UTILITY</b></p> <ul style="list-style-type: none"> <li>• Communications transmission and switching, and distribution of telecommunications traffic</li> <li>• Electric power generation, transmission, and distribution.</li> <li>• Irrigation to provide water for drinking water supply, fire suppression, or electricity generation</li> <li>• Sewer and wastewater collection, transmission, and treatment</li> <li>• Water treatment, transmission, and distribution by a water company supplying municipal water</li> </ul>	<p style="text-align: center;"><b>EMERGENCY SERVICES</b></p> <ul style="list-style-type: none"> <li>• Ambulance</li> <li>• Fire protection</li> <li>• Rescue</li> <li>• Public broadcasting that monitor, receive, and distribute communication from the Emergency Alert System to the public</li> </ul>
<p>Administrative and support facilities essential to the provision of the PNP critical service are eligible facilities.</p>	

# Eligible PNP Services – ESSENTIAL (Non-Critical)

- **Essential Services PNPs**

- Museums
- Community Centers
- Education Enrichment (Hobby or at-home pursuits)
- Social Service Groups
- Food Banks
- Assisted Living
- Libraries
- Performing Arts
- Food Banks
- Homeless Shelters
- Houses of Worship
- Zoos, etc.

Table 2. PNP Eligible Noncritical, Essential Social Services

PNP ELIGIBLE NONCRITICAL, ESSENTIAL SOCIAL SERVICES	
<p>Community centers established and primarily used for the following services (or similar) to the general public:</p> <ul style="list-style-type: none"> <li>• Art services authorized by a SLTT government, including, but not limited to:               <ul style="list-style-type: none"> <li>• Arts administration</li> <li>• Art classes</li> <li>• Management of public arts festivals</li> <li>• Performing arts classes</li> </ul> </li> <li>• Community center activities that serve the public</li> <li>• Educational enrichment activities that are not vocational, academic, or professional training. Examples include hobby or at-home pursuits, such as:               <ul style="list-style-type: none"> <li>o Car care</li> <li>o Ceramics</li> <li>o Gardening</li> <li>o Personal financial and tax planning</li> <li>o Sewing</li> <li>o Stamp and coin collecting</li> </ul> </li> <li>• Multi-purpose arts programming</li> <li>• Senior citizen projects, rehabilitation programs, community clean-up projects, blood drives, local government meetings, and similar activities</li> <li>• Services and activities intended to serve a specific group of individuals (e.g., women, African Americans, or teenagers) provided the facility is otherwise available to the public on a non-discriminatory basis</li> <li>• Social activities to pursue items of mutual interest or concern, such as:               <ul style="list-style-type: none"> <li>o Community board meetings</li> <li>o Neighborhood barbecues</li> <li>o Various social functions of community groups</li> <li>o Youth and senior citizen group meetings</li> </ul> </li> <li>• Performing arts centers with a primary purpose of producing, facilitating, or presenting live performances, including:               <ul style="list-style-type: none"> <li>o Construction of production materials</li> <li>o Creation of artistic works or productions</li> <li>o Design</li> <li>o Professional training</li> <li>o Public education</li> <li>o Rehearsals</li> </ul> </li> </ul>	<p>Facilities that do not provide medical care, but provide:</p> <ul style="list-style-type: none"> <li>• Alcohol and drug treatment and other rehabilitation services</li> <li>• Assisted living</li> <li>• Custodial care, even if the service is not provided to the general public (including essential administration and support facilities)</li> <li>• Childcare</li> <li>• Center-based childcare, even if not provided to the public</li> <li>• Day care for individuals with disabilities or access and functional needs (for example, those with Alzheimer's disease, autism, muscular dystrophy)</li> <li>• Food assistance programs, including Food Banks and storage of food for Food Banks</li> <li>• Health and safety services, including animal control services</li> <li>• Homeless shelters</li> <li>• Houses of worship</li> <li>• Libraries</li> <li>• Low-income housing (as defined by Federal or SLTT law or regulation)</li> <li>• Museums:               <ul style="list-style-type: none"> <li>o Constructed, manufactured, or converted with a primary purpose of preserving and exhibiting a documented collection of artistic, historic, scientific, or other objects</li> <li>o Buildings, associated facilities, fixed facilities, and equipment primarily used for the preservation or exhibition of the collection, including:                   <ul style="list-style-type: none"> <li>➢ Permanent infrastructure, such as walkways and driveways of outdoor museum-type exhibition areas</li> <li>➢ Historic buildings, such as barns and other outbuildings, intended for the preservation and exhibition of historical artifacts within a defined area</li> <li>➢ Permanent facilities and equipment that are part of arboretums and botanical gardens</li> <li>➢ Infrastructure, such as utilities, and administrative facilities necessary for support</li> </ul> </li> <li>o The grounds at museums and historic sites are ineligible.</li> <li>o Open natural areas/features or entities that promote the preservation/conservation of such areas are ineligible.</li> </ul> </li> <li>• Residential and other services for families of domestic abuse</li> <li>• Residential services for individuals with disabilities</li> <li>• Senior citizen centers</li> <li>• Shelter workshops that create products using the skills of individuals with disabilities</li> <li>• Zoos</li> </ul>
<p>With exception of custodial care facilities and museums, administrative and support facilities essential to the provision of PNP noncritical service are ineligible facilities.</p>	

# NOT Eligible PNP Services

- **Ineligible Community Center Services**
  - Training individuals to pursue the same activities as full-time paying careers
    - Vocational
    - Academic
    - Professional Training
  - (facility) only used for a brief period of time
  - Political Education
  - Lobbying Groups not directly tied to health services
  - Cemeteries
  - Day cares that are not previously included
  - Job counseling, etc.

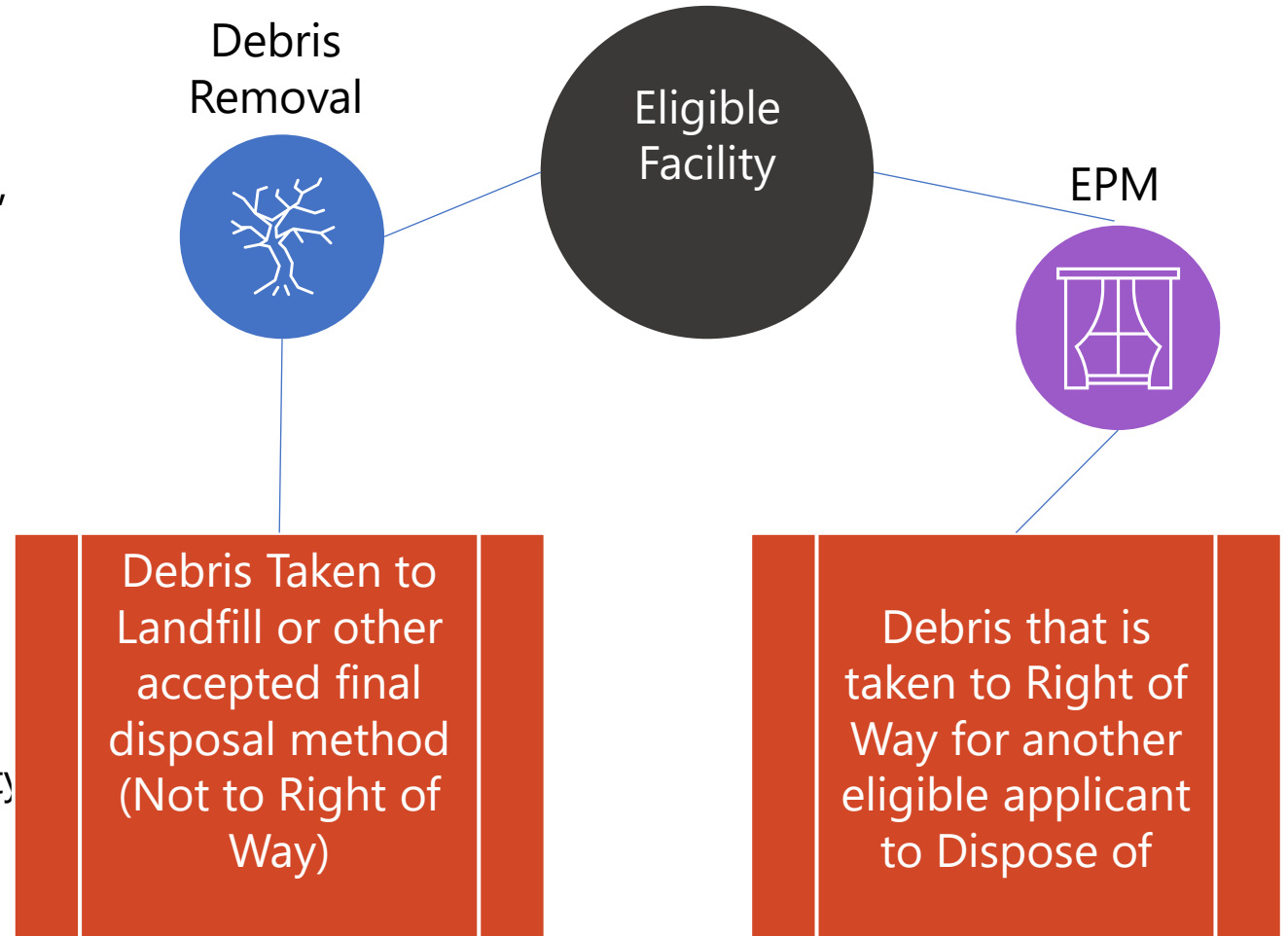
**Table 3. PNP Ineligible Services**

PNP INELIGIBLE SERVICES	
<p style="text-align: center; color: #800000; margin: 0;"><b>COMMUNITY CENTER SERVICES</b></p> <ul style="list-style-type: none"> <li>• Training individuals to pursue the same activities as full-time paying careers (for example, vocational, academic, or professional training)</li> <li>• Meetings or activities for only a brief period, or at irregular intervals</li> <li>• Other education or training including:               <ul style="list-style-type: none"> <li>○ Athletic, vocational, academic training, or similar activities</li> <li>○ Political education</li> </ul> </li> </ul>	<p style="text-align: center; color: #800000; margin: 0;"><b>OTHER COMMUNITY SERVICES</b></p> <ul style="list-style-type: none"> <li>• Advocacy or lobbying groups not directly providing health services</li> <li>• Cemeteries</li> <li>• Conferences</li> <li>• Day care services not included in previous table of eligible services</li> <li>• Flood control (e.g., levees, berms, dunes)</li> <li>• Land reclamation facilities</li> <li>• Irrigation solely for agricultural purposes<sup>97</sup></li> <li>• Job counseling</li> <li>• Property owner associations with facilities such as roads, bridges, and recreational facilities (except utilities or emergency facilities)</li> <li>• Public housing, other than low-income housing</li> <li>• Recreation</li> <li>• Parking not in direct support of eligible facility</li> </ul>

# Eligible PNPs – EMERGENCY WORK

Both **Critical** and **Essential** PNPs with Eligible Facilities may be reimbursed for:

1. Emergency Work specific to the eligible facility, such as:
  - A. Debris Removal (and Disposal)
    - i. Documented Debris from PNP's Property that is properly disposed
  - B. Emergency Protective Measures (EPM)
    - i. Sandbagging for Flood Control
    - ii. Boarding Windows
    - iii. Mitigating Immediate threats to the facility (such as a tree falling on roof)
    - iv. Generator Run Time\*
    - v. Evacuation of patients



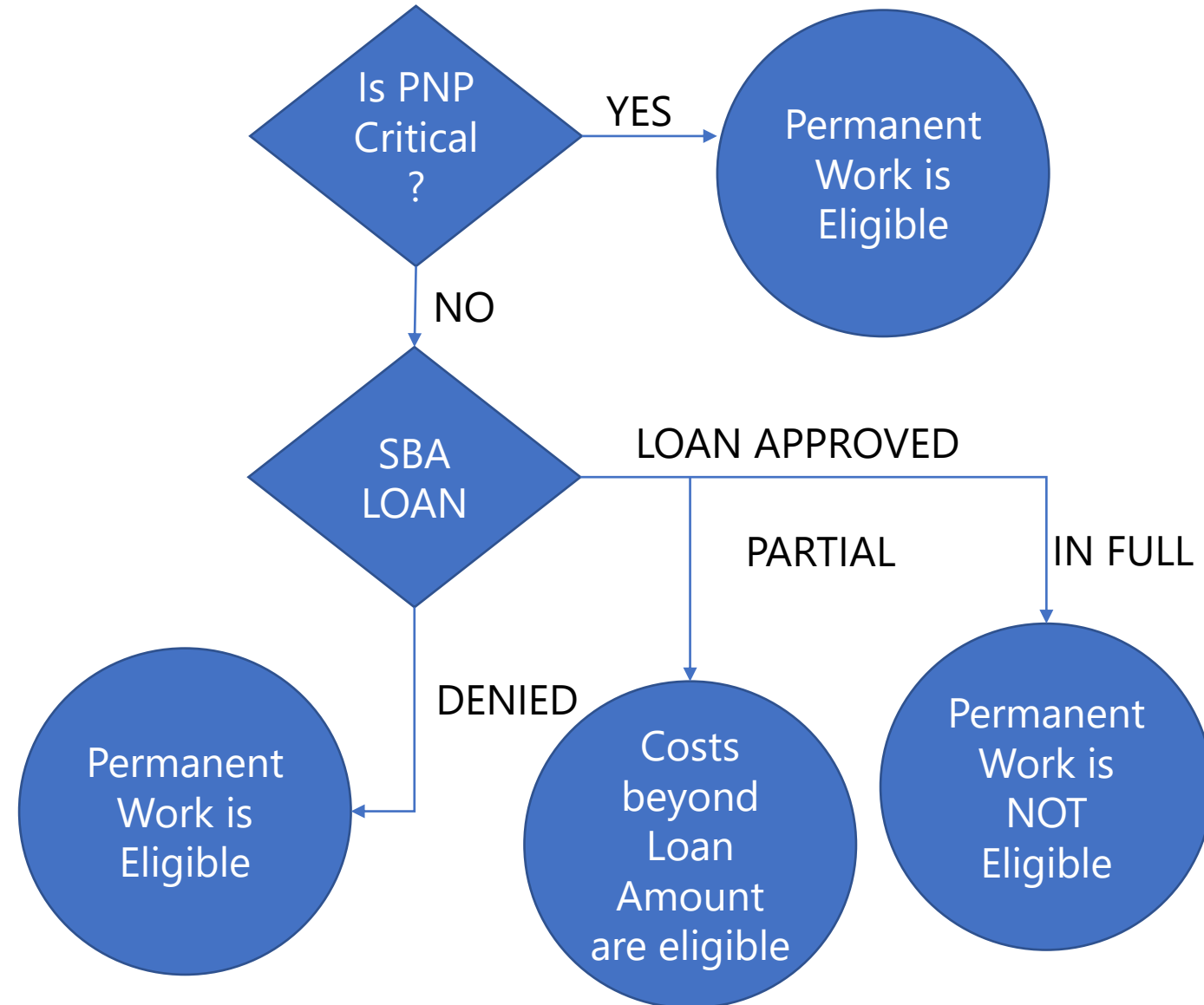
\* **Must be Documented, Limited, and Specifically Related to Saving Lives or Protect Public Health and Safety or Improved Property**



# Eligible PNPs – PERMANENT WORK

PERMANENT WORK is Limited to Event Related Damages on Eligible Facilities, and

1. Critical PNP Facility IS eligible for PA Assistance
2. Essential PNP Facility MUST FIRST:
  - A. Apply for Small Business Administration Loan.
    - i. Loan Approved In Full – Not Eligible
    - ii. Loan Partially Approved - PA Dollars limited to eligible costs not covered by SBA Loan.
    - iii. Loan Denied – Permanent Work is Eligible



# Eligible PNPs – INCREASED OPERATING EXPENSES

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PAPPG v4 pg 114 – *“Increased operating costs that are ineligible. event for a limited time, include but are not limited to:”*

- *Patient Care, except when Medical Care is Event Related;*
- *Administrative Activities;*
- *Provisions for Food (with exceptions);*
- *Costs related to staff that were retained to work additional hours, but did not perform eligible Emergency Work (e.g., staff working additional shifts due to other staff’s inability to get to work.)*
- *Obtaining electrical power from an alternate source;*
- *Obtaining water from an alternate source;*
- *School make-up days, including contracted costs for bus services for make-up days;*
- *Provisions of school bus services including fuel or mileage for transporting students from alternate locations or to alternate schools or temporary facilities; and*
- *Modification or construction of a new landfill to add landfill capacity*

*“For PNPs, operating costs are generally ineligible even if the services are emergency services, unless the PNP performs an emergency service at the request of and certified by the legally responsible government entity. In such case, FEMA provides PA funding through that government entity as the eligible Applicant.”*

# PNP AS A PROVIDER

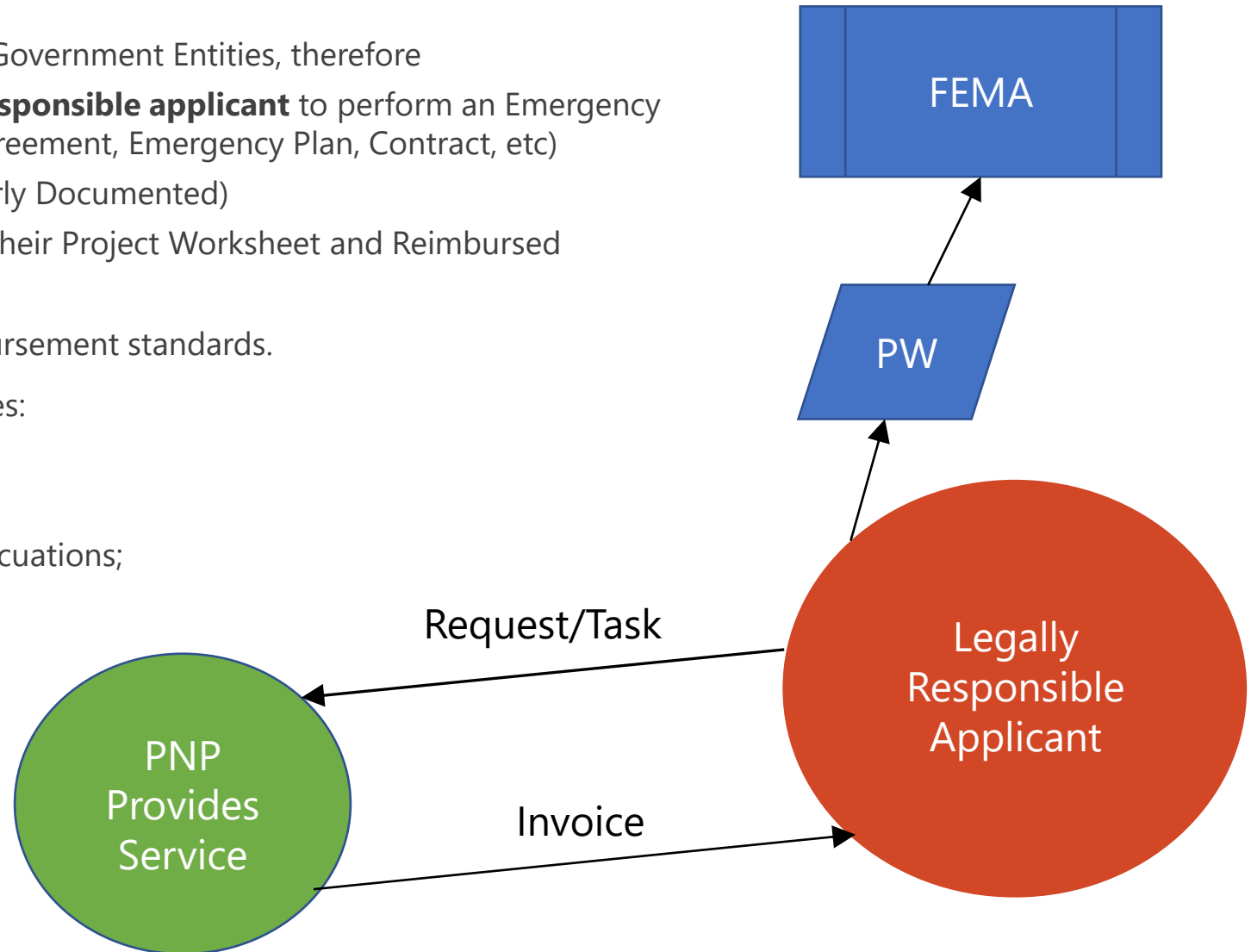
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- For work to be Eligible, the **Legally Responsible Entity** must either perform the work OR request the eligible work to an **entity** that can complete the task. Following is required for reimbursement:
- **Written Agreement** can be an Agreement, Contract, Task Order, or in form of a Memorandum of Understanding – such as a local emergency plan.
  - Request and Agreement must be written and agreed to by both entities. The written agreement can be after the request is made but should be complete as soon as practical.
- **Service Requested and Received** can be included in the written agreement. If an Applicant is requesting a service that is outside of the existing Agreement or Plan, then an additional agreement must be written and agreed upon.
- **Invoices** depending upon the service provided, the invoice and support documentation must include a level of detail that supports the Requesting entities reimbursement. Some examples are:
  - Time and Material – timesheets or activity logs detailing the work completed.
  - Unit Cost – documentation that captures all claimed costs (work orders, number of evacuees, proof of completion, etc)

# PNP AS A PROVIDER

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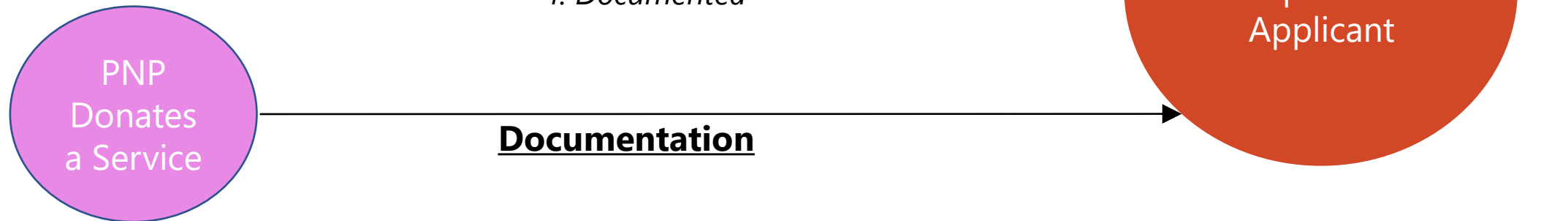
- Emergency Services are the Responsibility of Government Entities, therefore
  1. PNPs must be tasked by the **legally responsible applicant** to perform an Emergency Service (Pre- or Post-Event Written Agreement, Emergency Plan, Contract, etc)
  2. PNP invoices Eligible Applicant (Properly Documented)
  3. Eligible Applicant includes Invoice on their Project Worksheet and Reimbursed traditionally
- Invoice's must comply with traditional reimbursement standards.
- Some Examples of Eligible Emergency Services:
  - Fire and Rescue Activities;
  - Animal Control;
  - Emergency Ambulance Services for Evacuations;
  - Call Centers to track Event Damages;
  - Other Urgent Government Services



# PNP AS A DONOR OF RESOURCES

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- FEMA funds are subject to a **Cost Share** that typically starts at 75% federal and 25% non-federal. (44 CFR206.203(a))
- PNP's are responsible for the entire non-federal cost share (**Florida Statute 252.37 5(a)**)
- Applicants can offset the non-federal share for Emergency Work, Direct Federal Assistance, and to use the value of donated resources related to eligible work on a specific Permanent Work Project projects by documenting donated resources and placing a **value** of those donated resources. (**2 CFR 200.96**)
- These Donated Resources Must be:
  1. *From a third party*
  2. *Resource is used in the performance of eligible work.*
  3. *Necessary and Reasonable*
  4. *Documented*



# PNP AS A DONOR OF RESOURCES – What can I donate?

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<p><b>Volunteer Labor</b> – Valued at the same Straight Time hourly rate, with Fringe, as a similarly qualified person.</p>	<p><b>Equipment</b> – Valued at Applicant or FEMA Equipment Rates (lower of the two). Cannot exceed the fair market value – if donated with transfer of title.</p>
<p><b>Supplies or Materials</b> – Valued at the same commercial rate as available from vendors in the same area.</p>	<p><b>Buildings or Land</b> – Permanently donated is based off the fair market value at the time of the event. Ideally by an independent appraiser.</p>
<p><b>Space</b> – Temporary space is valued off the fair market rental value of comparable privately-owned space in the same locality as established by an independent appraisal.</p>	<p><b>Logistical Support</b> – Reasonable logistical support costs directly tied to eligible work, such as donations warehousing and management.</p>

# PNP AS A DONOR OF RESOURCES - Documentation Requirements

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<b><u>Volunteer Labor</u></b>	<b><u>Supplies or Materials</u></b>
<ul style="list-style-type: none"><li>• Sign-In Sheet</li><li>• Name</li><li>• Title and Function (professional services)</li><li>• Days/Hours Worked</li><li>• Location of Work Performed</li></ul>	<ul style="list-style-type: none"><li>• Quantity Used</li><li>• Who Donated</li><li>• Locations used; and</li><li>• Invoices or other documentation to validate the claimed value</li></ul>
<b><u>Donated Equipment</u></b>	
<ul style="list-style-type: none"><li>• Type of Equipment and Attachments Used (Year, Make, Model);</li><li>• Size/Capacity (Horsepower, Wattage, Volume);</li><li>• Locations, Days/Hours Worked</li></ul>	<ul style="list-style-type: none"><li>• Equipment Information</li><li>• Schedule of Rates, including rate components</li><li>• Operator Name</li><li>• Purchased Equipment Invoices/Receipts</li></ul>

# PA Resources & FDEM Contact Information

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- Public Assistance Program Information & Policy Guidance @ [www.fema.gov/assistance/public](http://www.fema.gov/assistance/public)
- PNP & "Public Assistance 101" brochures @ [www.floridapa.org/site/paInfo.cfm](http://www.floridapa.org/site/paInfo.cfm), under PA general Information
- IS-1026: Eligibility of Private Nonprofit Organizations (FEMA Independent Study Course) @ [www.training.fema.gov](http://www.training.fema.gov)

**Kevin Adkison**

**Interim State Public Assistance Officer**

**Cell: (850) 570-7073**

**[Kevin.Adkison@em.myflorida.com](mailto:Kevin.Adkison@em.myflorida.com)**

**Jose Morales**

**PA Programmatic Team Lead**

**Cell: (850) 815-5793**

**[Jose.Morales@em.myflorida.com](mailto:Jose.Morales@em.myflorida.com)**