

## MEMORANDUM

**To: Pastors, Parish and School Business Managers**  
**From: Office of Risk Management**  
**Re: FEMA Public Assistance Reimbursement Update June 2021**  
**Date: July 1, 2021**

On June 4, 2020, we informed parishes of RCAB's participation in FEMA's COVID-19 Public Assistance program. **As of July 1, 2021**, FEMA accepted our first round of submissions and determined eligibility of expenses.

Unfortunately, of the **\$518,650.49** we submitted in the initial round, only **\$151,622.93** was deemed eligible for reimbursement in their initial determination. A major reason for that difference is that livestreaming services and supplies were determined ineligible, as were unemployment and union fees. We will be appealing this decision and will keep you abreast of any updates. Our consultants believe we have a strong case to argue for the eligibility of these expenses.

**We do not have a timeline as to when we can expect reimbursement from FEMA for the first round of expenses deemed eligible**, nor do we have a timeline for the appeals process; we are working with our consulting group and will provide an update as soon as possible. As indicated early on, when dealing with government reimbursements, it's a very tedious and lengthy process. Once the first round is reimbursed, we will submit the second round of 2020 expenses.

### **Background Information**

The FEMA assistance program provides funding to eligible applicants for costs related to emergency protective measures conducted as a result of the COVID-19 pandemic. Emergency protective measures are activities conducted to address immediate threats to life, public health, and safety, such as training staff, disinfecting public facilities, and purchasing and distributing personal protective equipment. The state set the incident period for this project as March 27, 2020- September 14, 2020.

Expenses were submitted to us by individual parishes and schools in two rounds: the first were for expenses incurred through June 30, 2020, with a due date of July 17, 2020. We received submissions from 96 parishes and schools for this period. The second submission period, for expenses incurred through September 14, 2020, concluded with submissions from 91 schools and parishes, with a submission deadline of September 18, 2020. Following a review by our consulting group, the initial application was submitted to the FEMA Grants Portal on November 6, 2020.

We've been advised by our consulting firm that projects are generally moving slowly due to the implementation of new policy directives as a result of the changeover between presidential administrations. On Feb. 2, President Biden announced a presidential action that **eliminates the previous 25% cost share that applicants were responsible for in COVID-19 reimbursements**. FEMA will pay 100% of costs that have already been approved. This may include funding for the provision of personal protective equipment, disinfecting services and supplies. These costs will also be reimbursed at **100% federal share**.

New directives this year expanded eligibility to include expenses from **January 21, 2021- September 30, 2021**. As we did previously, we will begin accepting expenses in rounds, which will be submitted as addendums to the initial project. There is **no** current indication that expenses from the interim period (**September 15, 2020-January 20, 2021**) will be reimbursed, but we are encouraging parishes to track COVID-related expenses from that period on their own in case this changes. The first round of submissions will cover expenses from **January 21, 2021- March 31, 2021**. Per new directives, these will be reimbursed at **100% federal share**.

If you have expenses to submit, please send all documentation to: [covidexpenses@rcab.org](mailto:covidexpenses@rcab.org). Please send invoices as well as **proof of payment** in the form of a bank statement or canceled checks. To prevent delays and ensure relevant expenses are covered, please **clearly indicate how expenses are related to COVID**. Please note that we still do not know at this time if equipment and costs related to livestreaming Masses or audio equipment for outdoor Masses will be eligible following the appeals process. During the initial determination, these expenses were not deemed eligible by FEMA, though we will be making a case for their necessity. We will solicit expenses for **April 1-June 30** shortly.

If you have any questions, please call Madeline at 617-866-9942 or email [covidexpenses@rcab.org](mailto:covidexpenses@rcab.org).