

Purchase & Distribution of Food Eligible for Public Assistance

Policy Summary

The April 11, 2020 [FEMA policy for Purchase and Distribution of Food Eligible for Public Assistance](#) (FP 104-010-03) policy defines the framework, policy details, and requirements for determining eligible work and costs for the purchase and distribution of food in response to the COVID-19 Public Health Emergency to ensure consistent and appropriate implementation across all COVID-19 emergency and major disaster declarations. Except where specifically stated otherwise in this policy, assistance is subject to PA Program requirements as defined in Version 3.1 of the [Public Assistance Program and Policy Guide](#) (PAPPG).

Eligibility

The policy states that legally responsible State, local, tribal and territorial (SLTT) governments may enter into formal agreements or contracts with private organizations, including private nonprofit (PNP) organizations such as food banks, to purchase and distribute food when necessary as an emergency protective measure in response to the COVID-19 Public Health Emergency. This policy is applicable if a “stay at home” order has been applied in your community, there has been a marked increase or atypical demand for assistance in access to food, and there has been a disruption to the typical food supply chain within your jurisdiction.

Eligible work includes activities associated with the purchase and distribution of food in

response to the COVID-19 pandemic such as:

- Purchasing, packaging, and/or preparing food, including food commodities, fresh foods, shelf-stable food products, and prepared meals;
- Delivering food, including hot and cold meals if necessary, to distribution points and/or individuals, when conditions constitute a level of severity that food is not easily accessible for purchase; and
- Leasing distribution and storage space, vehicles, and necessary equipment.

Individuals eligible for this program may include those who test positive for or have been exposed to COVID-19, high-risk individuals as identified by the CDC, and other populations based on the direction or guidance of the appropriate public health official.

Cost Recovery

All claimed costs must be necessary and reasonable in order to respond to the COVID-19 Public Health Emergency and are subject to standard program eligibility and other Federal requirements, including the prevailing cost-share for the respective declaration.

In these cases, PA funding is provided to the legally responsible government entity, which would then reimburse the private organization for the cost of providing those services under the agreement or contract.

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Program Considerations

There are suggested considerations when applying/developing this program for your community.

- Applicants must demonstrate a “marked increase or atypical demand for feeding resources; or disruption to the typical food supply chain within a given jurisdiction.”
- Not all are eligible to participate in a community feeding program. As stated within the policy an individual may have contracted, been exposed, or be “at risk” to receive assistance.
 - *Screening individuals prior to providing assistance can identify eligibility requirements.*
- Individuals must not qualify for or receive other state and federal food assistance programs such as, CalFresh/SNAP, EBT, or WIC. This would be a duplication of benefits.
 - *Screening individuals prior to providing assistance can identify eligibility requirements.*
- Expenses must be “reasonable.”
 - *For example, the state has used per diem allowances for total meal expenses per day, according to FY 2020 U.S. General Services Administration (GSA) per diem rates for California localities as guidance for the budgeted cost per meal for similar programs.*
- Must be allowable applicant including public entities, tribal governments, and private-non-profit (PNP) organizations.

Avoid Duplication of the Emergency Feeding Program

The Emergency Feeding Program is for Seniors 65+ who have self-attested the need to have prepared meals delivered to their home as they are unable to prepare meals on their own. These individuals are not able to participate in existing Meal Assistance programs. Any support under the Purchase and Distribution of Food Eligible for Public Assistance program should focus on households not being served by the Emergency Feeding Program.