

May 1, 2020

Mr. Ryan Buras Governor's Authorized Representative California Office of Emergency Services 3650 Schriever Avenue Mather, California 95655

Re: Time Extension for Reimbursement of Emergency Feeding Program Costs

FEMA-4482-DR-CA (COVID-19)

Dear Mr. Buras:

This is in response to your letter dated April 30, 2020, requesting that FEMA approve Public Assistance (PA) funding for costs associated with the purchase and distribution of food and prepared meals to certain defined groups of individuals requiring emergency feeding program services as a result of COVID-19. Included with your request is a detailed plan outlining how local governments will implement, manage and administer the *Great Plates Delivered* program¹ with support and technical assistance provided by the California Governor's Office of Emergency Services (Cal OES) and the California Department of Aging (CDA).

In my letter to you dated April 10, 2020, I approved the reimbursement of reasonable and necessary costs associated with emergency feeding program services through May 10, 2020 (Initial EFP Approval Letter). My Initial EFP Approval Letter stated that any time extension requests must include a re-assessment and detailed justification of the continuing need for emergency feeding program services due to COVID-19 based on the direction of a State public health official.

Based on my review of your request and supporting information, including the confirmation by the State Public Health Officer of a continuing need, I am approving your request to extend the period of time for FEMA reimbursement of costs related to emergency feeding program services through June 10, 2020. I note that your request is for a 90-day time period; however, FEMA's authority for COVID-19 emergency feeding programs is limited to 30-day intervals.

My approval of this time extension and all costs associated with emergency feeding program services remains subject to the same conditions and limitations set forth in my Initial EFP Approval Letter except to the extent modified or superseded by the conditions and limitations set forth below.

https://covid19.ca.gov/restaurants-deliver-home-meals-for-seniors/.

For purposes of clarification, only the following groups of individuals are eligible recipients of emergency feeding program services:

- o Individuals aged 65 years and older;
- o Individuals who live in nursing homes or long-term care facilities (and who do not pay for and receive services in these facilities that include meals);
- o Individuals of any age who are "higher risk" due to serious underlying medical conditions, such as asthma, chronic lung disease, compromised immunities, chronic disease)² and do not have the resources or ability to prepare or obtain meals as a result of COVID-19 (emphasis added), and are not receiving assistance from existing programs such as the U.S. Department of Agriculture (USDA) Food and Nutrition Services (FNS) Supplemental Nutrition Assistance Program (SNAP); and
- o Individuals who are COVID-19 positive, or have been exposed to COVID-19 (as documented by a State, Tribal, or local public health official, or medical health professional) that do not require hospitalization, but need isolation or quarantine (including those exiting from hospitals).³

My approval of the reimbursement of costs incurred by local providers for emergency food program services is limited to those selected by Cal OES and CDA to implement, manage and administer the *Great Plates Delivered* program as described in Cal OES' *Emergency Feeding Program Framework* dated April 29, 2020 (EFP Framework), and who do so in accordance with the operational considerations and requirements (including data collection) set forth in the EFP Framework.

Cal OES, on behalf of the State of California and participating local governments, must obtain FEMA's approval for any time extensions. As outlined in my Initial EFP Approval Letter, extension requests must include a re-assessment and detailed justification for the continuing COVID-19-related need for continuing the *Great Plates Delivered* program from a State public health official. Additionally, subject to applicable privacy laws, extension requests Cal OES must include the information specified in <u>Attachment A</u>. If the EFP Framework has been modified during the previous 30-day time period, please include the updated copy with your extension request.

Finally, I would like to reinforce the importance of the State of California and local providers maintaining effective tracking mechanisms to provide sufficient data and documentation to establish the eligibility of emergency feeding program costs for which PA funding will be requested. As with any activity, lack of sufficient support documentation may result in FEMA determining that some or all of the costs claimed by the State and/or local providers are ineligible.

https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html.

³ Excluding individuals in emergency non-congregate shelters as a result of COVID-19 and receive wrap-around services, including meals.

If you have any additional questions regarding this matter, please contact Robert Pesapane, Recovery Division Director, at (510) 627-7250.

Sincerely,

Robert J. Fenton Regional Administrator FEMA Region IX

cc: Robert Troy, COVID-19 Event Recovery Deputy FCO, FEMA Region IX Robert Pesapane, Regional Recovery Division Director, FEMA Region IX J.P. Henderson, Regional Counsel, FEMA Region IX

ATTACHMENT A

Required information/data to support requests for extension of the *Great Plates Delivered* program (broken down by local provider):

- Number of individuals that were receiving meal support (at peak);
- Number of individuals that are receiving meal support and number of meals that have been provided per individual;
- Number of individuals that are 65 years or older that are receiving meal support and average length of time that they have been receiving meal support;
- Number of individuals who live in nursing homes or long-term care facilities that are receiving meal support and average length of time that they have been receiving meal support;
- Number of individuals who are otherwise at high risk (as defined by the CDC) for COVID-19, such as those undergoing cancer treatment or dialysis and people with severe obesity or kidney disease, that are receiving meal support and average length of time that they have been receiving meal support;
- Number of individuals that are COVID-19 positive, or have been exposed to COVID-19 and receiving meal support;
- Average cost per eligible recipient of meal support; and
- Documentation of the lack of other State or local resources to fill the need including, but not limited to food banks, private nonprofit organizations, State funding sources, and additional federal resources, including ones that may be available under the multiple Congressional Supplemental Funding Bills known as the CARES Act, or any other additional resources available at the time of your request.⁴

⁴ To assist the State and local jurisdictions identify potential food systems resources and programs, included with this letter is a copy of FEMA Region IX's *COVID-19: Food System Recovery Resources*.