



# GOVERNOR'S OFFICE OF HOMELAND SECURITY & EMERGENCY PREPAREDNESS

Prepare

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# Houses of Worship

## New FEMA Policy





# FEMA POLICY



- The policy applies to Houses of Worship that were previously ineligible due to the religious and/or secular nature of the facility





# FEMA POLICY- PURPOSE



- Changed to make private non-profit houses of worship eligible to apply for potential funding to help with certain disaster-related costs under FEMA's Public Assistance and Hazard Mitigation grant programs







# FEMA POLICY



- Retroactive to disasters declared on or after August 23, 2017 OR
- Any unresolved RPA or PW pending with FEMA as of August 23, 2017, including those on 1<sup>st</sup> or 2<sup>nd</sup> appeal





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# APPLICABLE REGULATIONS

- For Private nonprofit (PNP) organizations to be eligible for FEMA funds, the PNP must own or operate facilities that are open to general public and provide certain essential and critical services otherwise performed by a government agency.
- For Nonprofits, it is important that you have policies and procedures that are in compliance with 2 CFR § 200.317 – 326.
- PNP Applicants must use their own procurement standards and applicable Louisiana procurement procedures, however, they must also conform to FEMA's. If there is a conflict, the most restrictive rule applies.





# APPLICABLE REGULATIONS

- For Post 12/26/2014 Declarations follow 2 CFR § 200.317.326 Procurement Regulations for ALL entities; and 2 CFR § 200.400-475 (Cost Principles)
- In addition, the applicant must ensure that every contract includes any clauses required by Federal statutes and executive orders and their implementing regulations.







# ELIGIBILITY REQUIREMENTS

- Must have a current IRS ruling granting tax exempt 501 (c), (d), or (e) status OR
- Documentation from the State re: non-profit status





# ELIGIBILITY REQUIREMENTS

- Provide critical services such as education, utilities, medical or emergency services OR
- Provide non-critical, essential social services to the general public







# Critical vs. Non-Critical Facilities

- Critical Facilities

- Education
- Utility
- Medical
- Emergency Services

[PAPPG V3.1 April 2018](#)

- Non-Critical Facilities

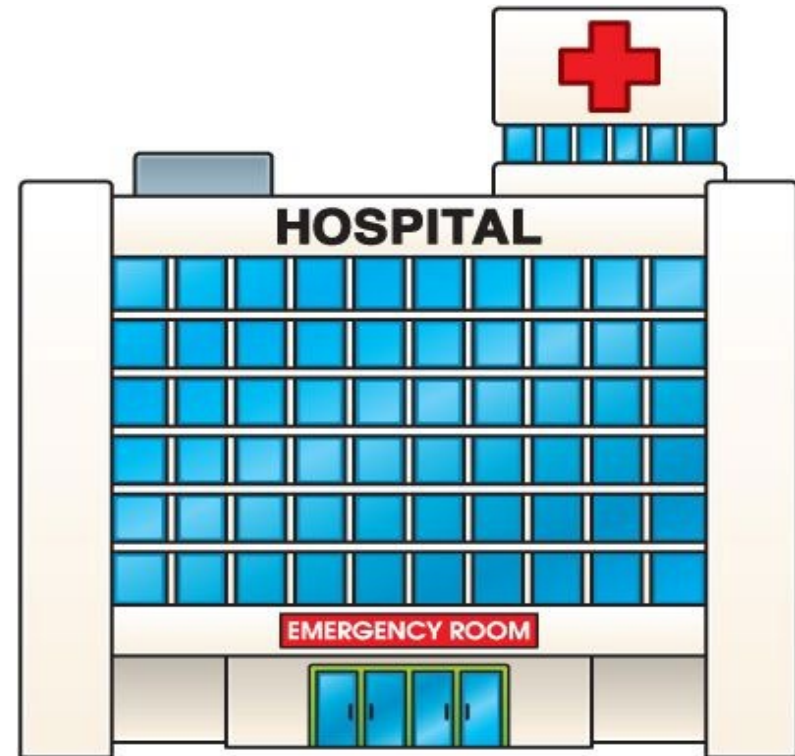
- Example: Portion of facility used for religious purposes only;
- See FEMA's Public Assistance Program and Policy Guide V3.1 pp.12-14 for a clear definition of critical vs. non-critical **and** eligible vs. ineligible





# CRITICAL FACILITIES

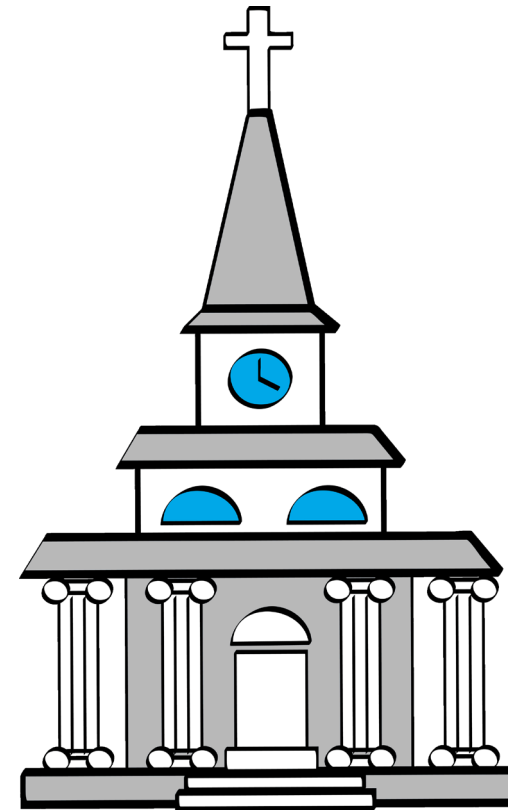
- FEMA assistance can be provided for disaster related required emergency protective measures and permanent work
- Applying to Small Business Association (SBA) is not required for critical facilities.





# NON-CRITICAL FACILITIES

- FEMA can provide assistance for **emergency protective measures** WITHOUT applying to SBA simultaneously
- FEMA can provide assistance for **permanent work** ONLY IF denied SBA loan or if loan is insufficient to cover eligible permanent repair and replacement work
- FEMA assistance is limited to costs that SBA's disaster loan will not cover.
- FEMA will determine if SBA denial is sufficient to satisfy the requirement.







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# Eligible and Ineligible Costs

- Sheltering is still NOT ELIGIBLE for any PNP. You must be on your parish's list of approved shelters and request reimbursement through them as it is their "legal responsibility".
- Eligible Costs may include:
  - Permanent Repairs and/or replacement of damaged structures
  - Replacement of lost or damaged contents
  - Emergency Protective Measures taken to prevent further loss of life or damage to improved property (ex. mold remediation, sandbagging around your buildings, temporary roof repair to your facility, etc.)





# Donated Resources

- Donated labor for both Emergency Work and Permanent Work may be eligible to offset the non-federal cost share (normally 25%). However, their time must be tracked as if they were an employee of the organization. (Sign in and Sign out times)
- Donated Equipment used in work may be eligible but it also must be tracked in a similar fashion





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## Applying for FEMA assistance

- Submit an RPA through [WWW.LOUISIANAPA.COM](http://WWW.LOUISIANAPA.COM)

**LouisianaPA.com**

Home Open Grants IR Info Resources Training Webinars

**Louisiana Public Assistance \*\*Test Site\*\***

LouisianaPA.com manages the Public Assistance (PA) grant in Louisiana. The system manages the PA process from application through closeout.

**Returning User Login:**

Email:

Password:

Remember Me

[Forgot Login/ Register for Access](#)

Louisiana Severe Storms and Flooding is now open for applications [APPLY NOW](#)

**About**

This site is for the online application and management of the Public Assistance (PA) grant. Public Assistance (PA) is a Federal grant program to aid State and local governments in returning a disaster area to pre-disaster conditions. A minimum of 75% of eligible costs is provided to primarily address the repair and restoration of public facilities, infrastructure, or services which have been damaged or destroyed. Eligible applicants include local and Tribal governments as well as certain Private Non-Profit organizations.

**News Releases**

**Nov 17, 2016 - New System Updated**  
Process Services will update the system with a newly released software patch on Friday night November 18, 2016. We are verified that the software changes will make LouisianaPA.com an even better system.

**Sep 30, 2016 - EM 4277 RPA Deadline**  
The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) wants to inform everyone that the 90th Extended Deadline to submit Requests for Public Assistance (RPA) for the August Flooding (2016-18-4277) is now October 13th, 2016.

**Sep 14, 2016 - Notice from the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties**  
The U.S. Department of Homeland Security controls its requests of Federal financial assistance that are engaged in emergency management

**Contact**

**Address:**  
Louisiana GOHSEP  
1300 West Street  
Baton Rouge, LA 70802

**Phone:**  
225-346-4185

**Fax:**  
225-267-2413

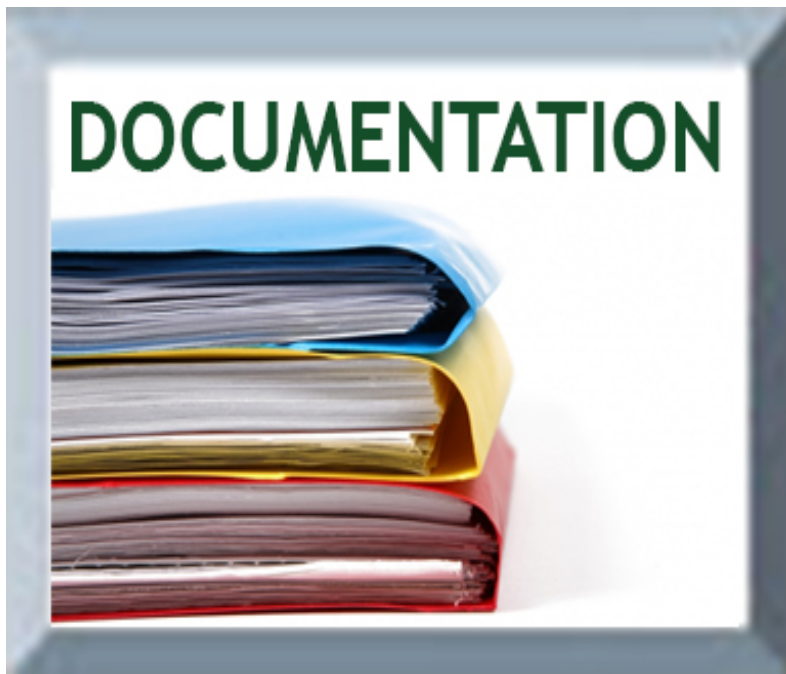
**Email:**  
ls.pa@go.gov

**U.S. DEPARTMENT OF HOMELAND SECURITY**





# REQUIRED DOCUMENTATION



- Insurance policies, declaration pages, claims, payments received
- Proof of legal responsibility for facility
- Articles of Incorporation, charter, bylaws, as applicable
- Evidence in good standing with LA Secretary of State





# INSURANCE POLICIES

- If a facility is located within a floodplain, at a minimum, flood insurance is required. If no proof of flood insurance is provided, a penalty is assessed on the facility and may impact the amount of funding provided.
- The entity is required to fully pursue their insurance carrier for the maximum proceeds available.





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## PROOF OF LEGAL RESPONSIBILITY

- The entity is required to provide documentation to prove legal responsibility. Such documentation may consist of:
  - Deeds
  - Mortgage Agreements
  - Contractual Agreements, etc.
- ❖ The entity will also need to be able to provide maintenance records showing normal repairs to the facility.







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# The PA Process

- ✓ GOHSEP performs Applicant Briefing
- ✓ Perspective Subrecipient submits an application for Public Assistance to GOHSEP
- ✓ GOHSEP reviews and forwards the application to FEMA for consideration
- ✓ FEMA reviews and determines eligibility. FEMA notifies GOHSEP of its decision. If eligible, FEMA assigns a Program Delivery Manager (PDMG)





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## PA Process (Cont.)

- ✓ FEMA and GOHSEP schedule exploratory call
- ✓ FEMA and GOHSEP schedule recovery scoping meeting
- ✓ Subrecipient prepares damage inventory list and submit in Grants Portal (FEMA Management System)
- ✓ FEMA, GOHSEP and Subrecipient work collaboratively to formulate project





## PA Process (Cont.)

- ✓ FEMA processes grant
- ✓ FEMA provides funding to GOHSEP
- ✓ GOHSEP provides funding to the Subrecipient as invoices are provided
- ✓ Once the project is complete, Subrecipient submits reconciliation of final cost and request closeout







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# Questions??



Contact YOUR  
State Applicant Liaison (SAL)

OR

[gohseplegal@la.gov](mailto:gohseplegal@la.gov)

[PNP@la.gov](mailto:PNP@la.gov)

[RPA.Help@la.gov](mailto:RPA.Help@la.gov)

