# 214s and Timekeeping

## Who should complete an ICS 214 Activity Log (214)?

**Beginning January 1, 2021, you ONLY need to submit 214s if you’re working beyond your regular work hours (this includes both overtime (OT) and compensatory time (CT)). You will also need to complete a 214 for regular hours if the work you did qualifies for FEMA reimbursement.**

You should complete a daily online ICS 214 Activity Log if you are:

1. Involved in eligible emergency protective measures (as outlined by FEMA) and are working OT/CT hours. Please note if you are working OT/CT on a certain day, you need to complete a 214 for all your hours on that day (yes even for the regular hours)
2. Grant-funded or temporary employee (hired for COVID work) or your regular time can be classified as a management cost (see Management Costs section on Page 6), and your straight time is reimbursable by FEMA. In this case, please complete a 214 for all hours worked (regular and OT/CT).
3. A volunteer – for all hours worked (regular and OT/CT)
4. Non-CCSF employee under contract and have been requested to complete a 214 by the branch you report to.

**Please Note: You should also always complete a 214 if directed to do so by your department.**

Staff involved in these eligible activities are generally either assigned to:

* The COVID Command Center (working either at Moscone, remotely, or in the field) and spending time on COVID-19 emergency work.
* A departmental DOC or working in the field (such as sheltering site or food bank) AND spending time on COVID-19 emergency work.

If you are not assigned to the COVID Command Center and/or your DOC is focused on reopening and continuity of operations, you do not need to complete a 214 because those activities are not reimbursable by FEMA.

FEMA-eligible work for the COVID-19 pandemic (revised by FEMA and effective as of 9/15/2020) is included in Appendix A and also available [here](https://www.fema.gov/sites/default/files/2020-09/fema_policy_104-009-19_PA-eligibility-policy-covid.pdf).

**Timesheet coding**

If performing tasks related to COVID-19 emergency response and, thus, performing COVID-19 work that is reimbursable by FEMA, please code time to:

**Project code: 10033788 or departmental COVID project code (please see Appendix C for all COVID project codes)**

**Incident code: 201920000B**

**Project activity code: 0001 - Emergency Protective Measures**

## Is there COVID-19 related work that does not require a 214?

**If I am working on something COVID-related, that is not in one of the FEMA-reimbursable categories in Appendix A, do I need to complete a 214?**

If you are working on COVID-related activities that do not fall under any of the eligible categories listed above, you do not need to complete a 214. Simply operating in a COVID environment will be **considered an increased operating expense and will not be eligible**. Examples of such activities are:

* Workplace analysis to prepare for return to work
* Continuity of operations
* Coordinating equipment pick up for teleworking
* Providing virtual support for teleworking employees
* Sanitizing locations that are not in facilities where eligible emergency work is performed
* Working on or at congregate shelter sites

However, all COVID activity must be coded to one of the COVID projects on your timesheets, even if it does not need a 214. For activities that are not FEMA eligible please use Project activity code 0010.

## **Some special situations**

If you are assigned to a DOC, but still involved in COVID-19 FEMA-eligible emergency protective measures, please code your time to the appropriate Incident Activity Code (see detailed list in the Appendix B) and not your DOC Incident Activity Code. For example:

* **Disinfection and sanitation** that is beyond normal cleaning is only reimbursable by FEMA for facilities where eligible emergency work is performed. Please code these activities to Incident Activity Code **0806- Sanitizing & Disease Control**.
* **Collection, reconciliation, and submission of Cost Recovery documentation** by staff directly involved in these activities should be coded to Incident Activity Code **ACPF07 – Project Cost Estimatn & Documntn**.
* **Non-congregate sheltering** for eligible populations is reimbursable by FEMA. Staff working in non-congregate sheltering sites for eligible populations should code time to Incident Activity Code **0607 – Non-Congregate Sheltering**.
* **Vaccination costs\*** include any activities related to the planning, administration, storage, transportation, etc. of COVID vaccines should be coded to Incident Activity Code **0810 – Vaccination costs**.

**\***Please note: work related to Flu vaccinations are not eligible for FEMA reimbursement.

For all activities above, you must complete a 214 for all hours in a day, if you are working OT/CT on that day.

# Project Costing

Using FEMA-reimbursable categories to categorize costs will greatly improve the City’s ability to capture all reimbursable costs for our grant application submissions. Please see the [job aid](https://sfemployeeportalsupport.sfgov.org/support/solutions/articles/11000053443-financials-entering-fields-to-identify-financial-transactions-for-covid-19-cost-recovery), *Financials: Entering Fields to Identify Financial Transactions for COVID-19 Cost Recovery,* for instructions on how and where to enter these fields in an SF People & Pay timesheet.

All personnel costs related to the emergency response should be coded in a way that makes it is clear what the time was spent on and why it is reimbursable under FEMA and Cal OES requirements. To accomplish this, departments must enter the following in SF People & Pay for all COVID-19 emergency response time:[[1]](#footnote-1)

* Resource Type *(categorization)*
* Resource Category *(FEMA eligible costs category)*
* Resource Subcategory *(location)*

**IMPORTANT:** Departmental cost recovery and timekeeping staff must ensure that any employee coding time to Project Activity Code 0001 also completes these Project Costing fields.

## Resource Type

All time related to emergency response should be allocated to Source Type - *Labor*.

## Resource Category

All time related to emergency response should be allocated to a *Category*, which is how the City will sort time according to FEMA’s cost categories, which include the following:

|  |  |  |
| --- | --- | --- |
| Category Code | Category Description | FEMA Category B: Emergency Protective Measures |
| B1a | Mgmt EOC Costs | Operation of Emergency Operations Centers to direct and coordinate resources and response activities for COVID-19 declarations.  |
|  | Emergency Medical Care | All B2 codes are for medical care, in accordance with COVID-19 specific policy or subsequent updates.  |
| B2a | Emerg Non Def Med Treatmnt | Non-deferrable medical treatment of infected persons in a shelter or temporary medical facility. |
| B2b | Emerg Related Med Suppl-Srvc | Related medical facility services and supplies. |
| B2c | Emerg Temp Facility | Temporary medical facilities and/or enhanced medical/hospital capacity (for treatment when existing facilities are reasonably forecasted to become overloaded in the near term and cannot accommodate the patient load or to quarantine potentially infected persons). |
| B2d | Emerg Special Med Equip | Use of specialized medical equipment. |
| B2e | Emerg Waste Disposal | Medical waste disposal. |
| B2f | Emerg Medical Transport | Emergency medical transport. |
| B3b | Non-Congregate Shelter | Non-congregate medical sheltering, in accordance with COVID-19 specific policy or subsequent updates. |
| B5a | PPE Purchase & Storage | Purchase and distribution of Personal Protective Equipment (PPE) that is directly related to the performance of otherwise eligible emergency work, or is provided to healthcare workers, patients with confirmed or suspected COVID-19 infection, and first responders.* Funding for stockpiling a supply of eligible PPE is limited to a supply that is projected for up to 60 days from date of purchase.
* Funding for storing eligible PPE is limited to what is necessary to store projected 60-day PPE supply.
 |
| B5c | Food Purchase and Distribution | Purchase and distribution of food, in accordance with COVID-19 specific policy or subsequent updates. |
| B8 | Comm Health Safety Info | Communications to disseminate public information regarding health and safety measures and provide warnings about risks and hazards. |
| B11 | Casualty Management | Mass casualty management, including storage of human remains and mass mortuary services, as necessary to manage fatalities caused by COVID-19. |
| **IMPORTANT:** The activities below are only eligible for FEMA reimbursement when necessary to perform otherwise eligible emergency work listed above: |
| B1b | Training & Tech Assistance | Training and technical assistance specific to the declared event. |
| B1c | Disinfection and Supplies | Disinfection, in accordance with CDC guidance, in facilities where eligible emergency work is performed, including purchase and provision of necessary supplies and equipment, and in excess of current operating costs. |
| B2g | Temperature Scanning | Temperature scanning, including purchase and distribution of hand-held temperature measuring devices and associated supplies, in facilities where eligible emergency work is performed. |
| B5b | Purch & Distr of Face Masks | Purchase and distribution of face masks, including cloth facial coverings, provided to persons conducting eligible emergency work and/or in facilities where eligible emergency work is performed. |
| B6 | Transp Med Supp - People | Movement of equipment and supplies, including transportation and storage. |
| B7 | Security and Law Enforcement | Law enforcement and security. |
| B12 | Barriers & Plexiglass | Acquisition and installation of temporary physical barriers, such as plexiglass barriers, in facilities where eligible emergency work is conducted. |

With vaccination efforts underway, if your department is involved in vaccination work, please use the following Category Codes:

|  |  |  |
| --- | --- | --- |
| **Category Code** | **Category Description** | **FEMA Category B: Emergency Protective Measures** |
| B13a | Vaccine Strategy and Planning | Work and associated costs to support the distribution and administration of COVID-19 vaccines. |
| B13b | Vaccine Storage and Handling |
| B13c | Vaccine Transportation and Distribution |
| B13d | Vaccine Administration |
| B13e | Vaccine Facilities Costs |

## Resource Subcategory

Subcategory is used to map costs to specific locations for public health and sheltering. FEMA may ask for site specific information for sheltering, testing, and medical care sites, so this helps us track that. However, for those of us working onsite at CCC, from home, or another worksite that is not a sheltering, testing, vaccination or medical care site do not need to select a site and should just select N/A. Subcategory Codes include the following:

|  |  |  |
| --- | --- | --- |
| Subcategory Code1 | Subcategory Description | Use When Labor Is . . . |
| NA | Not Applicable | Not attributable to specific locations for public health or sheltering. Should be used by most employees or payroll staff. |
| ALL | All Sites | Spread across all sites, which includes medical shelters, non-congregate shelters, and emergency temporary facilities.2 |
| ALLMS | All Medical Shelters | Spread across the medical shelters.2 |
| ALNCS | All Non-Congregate Shelters | Spread across the non-congregate shelters.2  |
| ALETF | All Emergency Temporary Facilities | Spread across the emergency temporary facilities.2 |

Notes:

1 Subcategory codes may change based on where medical shelters, non-congregate shelters, and emergency temporary facilities exist.

2 Only certain departments should use this code. Do not use this code if your department is not responsible for facilities in this category or if you have not been assigned to facilities in this category.

If your department wants to track costs at the site-specific level, which is optional, please ensure your employees know which site code (Subcategory Code) corresponds to the site at which they are working.

|  |  |  |
| --- | --- | --- |
| Subcategory Code | Subcategory Description | Use When Labor Is . . . |
| Sites 1, 2, 3….. | Sites 1, 2, 3…. | To be allocated to a specific location where Emergency Protective Measures are being performed. If this is the case, select a site. (Due to the sensitive nature of some sites, sites are listed without addresses. Request address mapping from Cost Recovery if you believe your department should be allocating costs to locations.)2 |
| Sites A, B, C… | Sites A, B, C… |
| Sites 101, 102… | Sites 101, 102… |

# Additional FEMA Reimbursement Available for Appropriately Coded Management Costs

FEMA will reimburse the City up to 5 percent of our total FEMA claim for regular work hours spent on eligible management activities. By tracking management costs, the City can receive this **additional 5 percent on top of its existing FEMA claim**. To claim this, city departments need to appropriately track time spent on eligible management activities by having staff and managers appropriately code their timesheets. This section provides information about what activities are eligible and how to code them.

The Federal Emergency Management Agency (FEMA) defines Public Assistance (PA) management costs as including any of the following when associated with the PA portion of a major disaster or emergency:

* Indirect costs
* Direct administrative costs
* Other administrative expenses associated with a specific project

What work are San Francisco city departments involved in that are eligible activities for management costs? \*

* Collecting and reviewing documentation for submission to cost recovery (for eventual submission to FEMA)
* Developing systems / solutions to facilitate cost recovery information gathering for submission to FEMA (this includes time spent on developing dashboards and other reports that facilitate cost recovery’s project worksheet development)
* Meetings / presentations to discuss collection, review, and preparation of cost recovery documentation.

\*If you are involved in any direct/indirect activities related to FEMA claims and submission, it is most likely eligible as management costs. If you are unsure, please reach out to your cost recovery coordinator.

How do I code the time for eligible management activities?

* Time for departmental staff directly working on cost recovery document collection, review, or submission should be coded to **ACPF07.**
* Time for system support and other teams working on developing solutions to facilitate collection of information and reports to summarize the information should be coded to **ACLP05.**

Do I need to complete a 214 for any activities that qualify for management costs?

Yes, you need to complete an [online 214](https://sfgov.flexforms.com/) for any regular and/or OT/CT eligible work for management costs that will be submitted to FEMA for reimbursement. This means that you will need to complete 214s for every hour of management costs worked **(yes, even if it is less than 2 hours).**

When will cost recovery submit management costs to FEMA?

FEMA will process Category Z obligations based on obligated amounts at project closeout and/or at the end of the emergency.

What are FEMA’s documentation requirements?

The City must substantiate the eligibility of management cost claims. The Cost Recovery team will submit claims for management costs to FEMA based on the applicable Incident Activity Codes identified below. Actual cost documentation must include information necessary to demonstrate eligibility of costs and activities claimed as management costs and will include:

* payroll data
* 214s that include an explanation of the management cost activities performed for all hours reported

For more information on FEMA Public Assistance Management Costs please visit: <https://www.fema.gov/sites/default/files/2020-07/pa_fact_sheet_management_costs_interim_policy.pdf>

# APPENDIX A: FEMA Eligible Emergency Protective Measures

FEMA-eligible work for the COVID-19 pandemic (revised by FEMA and effective as of 9/15/2020) is defined below.

|  |  |
| --- | --- |
|   | Category B: Emergency Protective Measures |
|   | FEMA may provide assistance only for the following emergency protective measures in response to COVID-19 declared events: |
| 1 | Medical care, in accordance with COVID-19 specific policy or subsequent updates. |
| 2 | Purchase and distribution of food, in accordance with COVID-19 specific policy or subsequent updates. |
| 3 | Non-congregate medical sheltering, in accordance with COVID-19 specific policy or subsequent updates. |
| 4 | Operation of Emergency Operations Centers to direct and coordinate resources and response activities for COVID-19 declarations. |
| 5 | Communications to disseminate public information regarding health and safety measures and provide warnings about risks and hazards. |
| 6 | Mass casualty management, including storage of human remains and mass mortuary services, as necessary to manage fatalities caused by COVID-19. |
| 7 | Purchase and distribution of Personal Protective Equipment (PPE) that is directly related to the performance of otherwise eligible emergency work or is provided to healthcare workers, patients with confirmed or suspected COVID-19 infection, and first responders.* Funding for stockpiling a supply of eligible PPE is limited to a supply that is projected for up to 60 days from date of purchase.
* Funding for storing eligible PPE is limited to what is necessary to store projected 60-day PPE supply.
 |
| IMPORTANT: The activities below are only eligible for FEMA reimbursement when necessary to perform otherwise eligible emergency work listed above: |
| a | Purchase and distribution of face masks, including cloth facial coverings, provided to persons conducting eligible emergency work and/or in facilities where eligible emergency work is performed. |
| b | Temperature scanning, including purchase and distribution of hand-held temperature measuring devices and associated supplies, in facilities where eligible emergency work is performed. |
| c | Disinfection, in accordance with CDC guidance, in facilities where eligible emergency work is performed, including purchase and provision of necessary supplies and equipment, and in excess of current operating costs. |
| d | Acquisition and installation of temporary physical barriers, such as plexiglass barriers, in facilities where eligible emergency work is conducted. |
| e | Law enforcement and security. |
| f | Training and technical assistance specific to the declared event. |
| g | Reimbursement for force account overtime costs, costs related to hiring temporary employees, and contract labor costs associated with performance of eligible emergency protective measures. |
| h | Movement of equipment and supplies, including transportation and storage. |
| i | Other work and costs delineated within COVID-19 policies referenced (in the six eligible emergency protective measures listed in the first half of this table) |

# APPENDIX B: Incident Activity Codes and 214s Crosswalk

**Please use the guide below to determine which Incident Activity Code you should use and whether you need a 214 for that incident activity.**

| **Incident Activity Code** | **Description** | **Who should use this code?** | **214 required if working OT/CT[[2]](#footnote-2)?** |
| --- | --- | --- | --- |
| 0000 | DO NOT REPORT TO WORK | Those who have been asked not to report to work and are not teleworking | No |
| 0010 | OTHER INELIGIBLE COST | Those doing any work that is a result of COVID but is not FEMA-reimbursable | No |
| 0501 | EOC / COVID COMMAND CENTER | Those assigned to the COVID Command Center and who are working on eligible emergency protective measures (onsite at Moscone, remote, or in the field) | Yes |
| 0502 | SFO EOC | Those assigned to SFO EOC or working on its behalf | No\* |
| 0503 | DPW DOC | Those assigned to Public Works DOC or working on its behalf | No\* |
| 0504 | FIR DOC | Those assigned to Fire Department DOC or working on its behalf | No\* |
| 0505 | CON DOC | Those assigned to Controller's Office DOC or working on its behalf | No\* |
| 0506 | HSA DOC | N/A |   |
| 0507 | ADM DOC | Those assigned to ADM DOC or working on its behalf  | No\* |
| 0508 | DPH DOC | N/A |   |
| 0509 | DBI DOC | Those assigned to DBI DOC or working on its behalf  | No\* |
| 0510 | MTA DOC | Those assigned to MTA DOC or working on its behalf  | No\* |
| 0511 | PRT DOC | Those assigned to Port DOC or working on its behalf  | No\* |
| 0512 | PUC DOC | Those assigned to PUC DOC or working on its behalf  | No\* |
| 0513 | POL DOC | Those assigned to Police DOC or working on its behalf  | No\* |
| 0516 | SHF DOC | Those assigned to Sherriff DOC or working on its behalf  | No\* |
| 0517 | DHR DOC | Those assigned to DHR DOC or working on its behalf  | No\* |
| 0518 | DT DOC | Those assigned to DT DOC or working on its behalf  | No\* |
| 0519 | DEM DOC | Those assigned to DEM DOC or working on its behalf  | No\* |
| 0520 | REC DOC | Those assigned to REC DOC or working on its behalf  | No\* |
| 0521 | LIB DOC | Those assigned to Library DOC or working on its behalf  | No\* |
| 0522 | MYR-OEWD DOC | Those assigned to MYR-OEWD DOC or working on its behalf  | No\*  |
| 0523 | MYR DOC | Those assigned to MYR DOC or working on its behalf  | No\*  |
| 0524 | DCYF DOC | Those assigned to DCYF DOC or working on its behalf  | No\* |
| 0525 | JUV DOC | Those assigned to JUV DOC or working on its behalf  | No\* |
| 0601 | SHELTER OPERATIONS | Those involved in emergency response work at a congregate shelter | No |
| 0602 | MASS FEEDING | Those involved in any of the food distribution programs | Yes |
| 0607 | NON-CONGREGATE SHELTERING | Those involved in emergency work at a non-congregate sheltering site | Yes |
| 0703 | LOGISITICS STAGING AREAS | Those doing temporary warehousing and storage of critical commodities | Yes |
| 0706 | COMMODITY DELIVERY TO PUBLI | Those delivering sanitary or other non-food supplies to persons self-quarantining or other populations | Yes |
| 0707 | RESPONSE LOGISITCS & TRANSPORT | Those delivering critical commodities to COVID worksites, including hospitals, clinics, congregate & non-congregate shelters, staging areas, etc. | Yes |
| 0801 | MEDICAL SURGE/FIELD HOSPITALS | Those setting up medical surge capacity or alternate care sites | Yes |
| 0802 | EMS TRANSPORT | Those transporting any COVID or suspected COVID patients | Yes |
| 0803 | POINT OF DISTRIBN, PHARMACEU | Those doing mass distribution of medications from fixed sites | Yes |
| 0804 | ENVIRON HEALTH ASSESS/CONTROL | Those assessing or controlling environmental health related to COVID | Yes |
| 0805 | BEHAVIORAL/MENTAL CARE SERVICE | Those providing COVID-related behavioral health services  | No |
| 0806 | SANITIZING & DISEASE CONTROL | Those involved in COVID-related sanitizing, disinfecting, or disease control | Yes  |
| 0807 | MEDICAL SHELTERING | Those working at a COVID medical sheltering site | Yes |
| 0808 | INFECTIOUS DISEASE TESTING | Those working at a City COVID testing site | Yes |
| 0809 | CONTACT TRACING | Those involved in COVID contact tracing | No |
| 0810 | VACCINATION COSTS | Those involved in vaccination planning, coordination, and administration | Yes |
| 1102 | ANIMAL SHELTER OPERATIONS | Those providing animal sheltering services in direct support of COVID Congregate or Non-Congregate Sheltering | No |
| 1103 | BULK DISTR, PET FOOD/SUPPLIES | Those doing bulk distribution of pet food and supplies in direct support of COVID Congregate or Non-Congregate Sheltering | No |
| 1301 | LAW ENFORCEMENT | Those involved in security and law enforcement related to the COVID emergency. This includes enforcement of social distancing and other public health orders | Yes |
| 1501 | PUBLIC INFORMATION | Those involved in the distribution or sharing of COVID public information in the community. *Personnel assigned to the EOC/COVID Command Center’s Joint Information Center should use Incident Activity Code 0501.* | Yes |
| 1502 | CALL CENTER | Those doing activities related to call center setup for people who have traveled abroad or are experiencing possible COVID symptoms to call in for information | Yes  |
| 1701 | VOLUNTEER INTAKE & TRAINING | Those training or involved in intake of volunteers for COVID work | Yes |
| 1702 | DONATIONS MGMT, MONETARY | Those accepting, tracking, or managing COVID-related monetary donations  | Yes |
| 1703 | DONATIONS MGMT, IN-KIND | Those accepting, tracking, or managing COVID-related in-kind donations | Yes |
| ACLP05 | DATA COLLECTN & DISSEMINATN | Those collecting COVID-related damage data, invoices, estimates, or support documentation | Yes |
| ACPF07 | PROJCT COST ESTIMATN & DOCMNTN\*\* | Those estimating/quantifying project costs, collecting supporting documentation, or submitting to the Cost Recovery team for FEMA submission related to COVID | Yes\*\* |
| ACPF10 | PROJECT WORKSHEET WRITING | Those developing or supporting the development of FEMA project worksheets related to the COVID emergency | Yes |
| ACPF11 | PW REVIEW & FINAL APPROVAL | Those doing cost recovery review of COVID project worksheets | Yes |
| \* The role of DOCs has largely shifted to continuity of operations. If your work within your DOC is for other eligible activities, please select the Incident Activity Code for that activity. For example, use IAC 0806 for sanitization work. \*\* Time for departmental staff directly working on Cost Recovery document collection, review, or submission should be coded to ACPF07.  |

# APPENDIX C: COVID Departmental Project Codes

|  |  |
| --- | --- |
| **Project Code** | **Project Description** |
| 10033788 | 2019 COVID-19 |
| 10036565 | CoVid COM Unified Command & Fa |
| 10036576 | CoVid Congregate Shelters |
| 10036587 | CoVid DOP DEM Response |
| 10036586 | CoVid DOP HGH Response |
| 10036585 | CoVid DOP HL Response |
| 10036584 | CoVid FIN DPH Finance |
| 10036599 | CoVid HOM Response |
| 10036567 | CoVid JIC Info & Guidance |
| 10036566 | CoVid JIC Joint Information Co |
| 10036583 | CoVid LOG |
| 10036569 | CoVid OPS Alternate Care Site |
| 10036570 | CoVid OPS Community |
| 10036568 | CoVid OPS Contact Tracing & Ca |
| 10036578 | CoVid OPS Feeding |
| 10036574 | CoVid OPS Field Care Clinic |
| 10036572 | CoVid OPS Health Services |
| 10036595 | CoVid OPS I&Q |
| 10036571 | CoVid OPS Medical Services |
| 10036596 | CoVid OPS PSH |
| 10036575 | CoVid OPS SIP Hotels |
| 10036573 | CoVid OPS Testing |
| 10036577 | CoVid OPS Unsheltered |
| 10036579 | CoVid PLN Advance Planning |
| 10036580 | CoVid PLN Epi & Surveillance |
| 10036581 | CoVid PLN Plans |
| 10036582 | CoVid PPE & Scarce Resource Bu |
| 10037236 | CoVid OPS Vaccination |

1. The *Resource Type, Category,* and *Subcategory* fields are purely informational for reporting purposes and do not impact processing. They do not exist on the ledger and have no impact on budgets. [↑](#footnote-ref-1)
2. If you are working OT/CT related to COVID-19 emergency response work, and the work you are involved in is identified as needing a 214, you must complete a 214 for all hours worked (both regular and OT/CT) [↑](#footnote-ref-2)