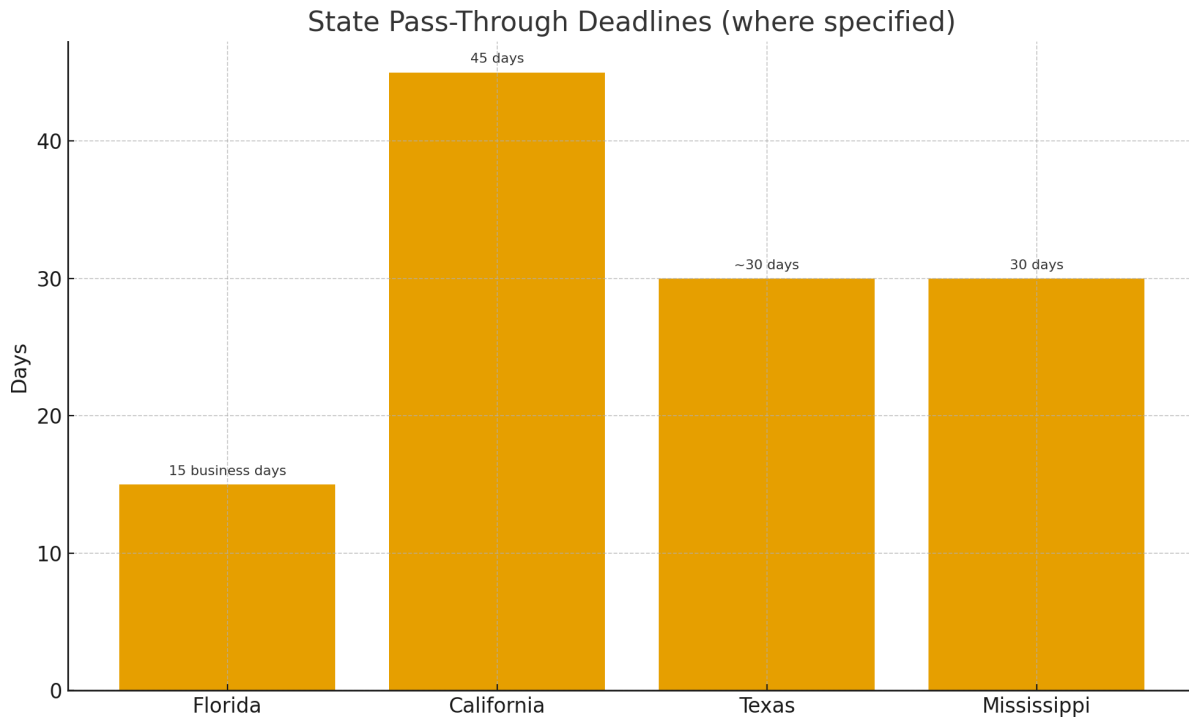# FEMA Public Assistance (PA) – Executive Summary (Pass-Through Rules)

Quick comparison of state/territory pass-through timelines, payment models, and systems. Federal anchors apply across all: 2 CFR 200.305 (cash management), 44 CFR 206.205 (PA payment), Stafford Act §705(c).

State Pass-Through Deadlines (where specified)

State/Territory	Recipient	Pass-through Timeline	Payment Model / System	Key Citation(s)
Florida	FDEM	15 business days	Mix; FloridaPA.org	Fla. Stat. §252.37; FAC 27P; 2 CFR 200.305
Puerto Rico	COR3	Validation-based Via DRFFM no fixed days	Heavy Central Validation before payout	COR3 Manual; PROMESA; 2 CFR 200.305
Texas	TDEM	~30 days (doc-dependent)	Reimbursement; GMS	TAC Title 37 Ch.7; 2 CFR 200.305
Montana	DES	As soon as practicable	Reimbursement; SIGMA	MCA Title 10 Ch.3; 2 CFR 200.305
California	Cal OES	45 days	Mixed; Cal OES Grants Portal	Cal. Gov't Code §8686; 2 CFR 200.305
Louisiana	GOHSEP	As soon as practicable	Reimbursement; LAPA	La. R.S. Title 29; 2 CFR 200.305
Mississippi	MEMA	30 days	Reimbursement; MEMA Portal	Miss. Code §33-15-307; 2 CFR 200.305

FEMA Public Assistance (PA) Funds Flow – Florida

Recipient: Florida Division of Emergency Management (FDEM)
Pass-through: Must transfer FEMA funds to Subrecipients within **15 business days** of receipt.
Statute: Fla. Stat. §252.37; Fla. Admin. Code 27P.
System: FloridaPA.org.

Model: Mix of advances (small projects) and reimbursement (large projects).
Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).

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│        FEMA obligates project         │
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│  Obligation posted to SmartLink       │
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│  Recipient draws funds (per state     │
│  rules)                               │
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│  Treasury disburses to Recipient bank │
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│        Recipient pays Subrecipient    │
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│  Subrecipient pays contractors/vendors│
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│  Reporting & Closeout (SF-425,        │
│  oversight)                           │
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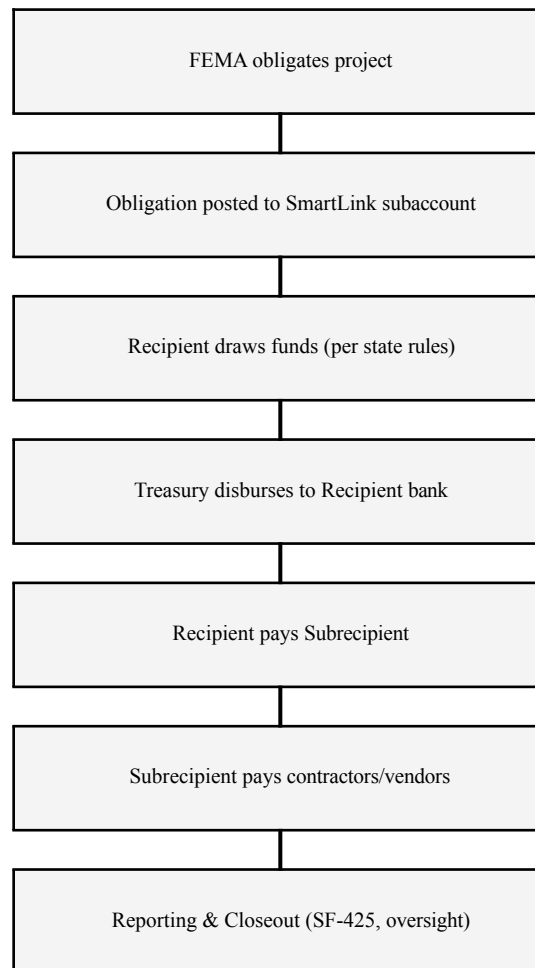
FEMA Public Assistance (PA) Funds Flow – Puerto Rico

Recipient: COR3 (Central Office for Recovery, Reconstruction & Resiliency)
Pass-through: Disburses only after validation via DRFFM system.
Oversight: PROMESA fiscal control; centralized disbursement.
Statute: COR3 Federal Funds Management Manual; PROMESA §101.
System: DRFFM + Puerto Rico Treasury.
Model: Reimbursement-heavy, central validation before payout.
Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).

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│         Treasury disburses to Recipient bank  │
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│             Recipient pays Subrecipient       │
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│        Subrecipient pays contractors/vendors  │
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│      Reporting & Closeout (SF-425, oversight) │
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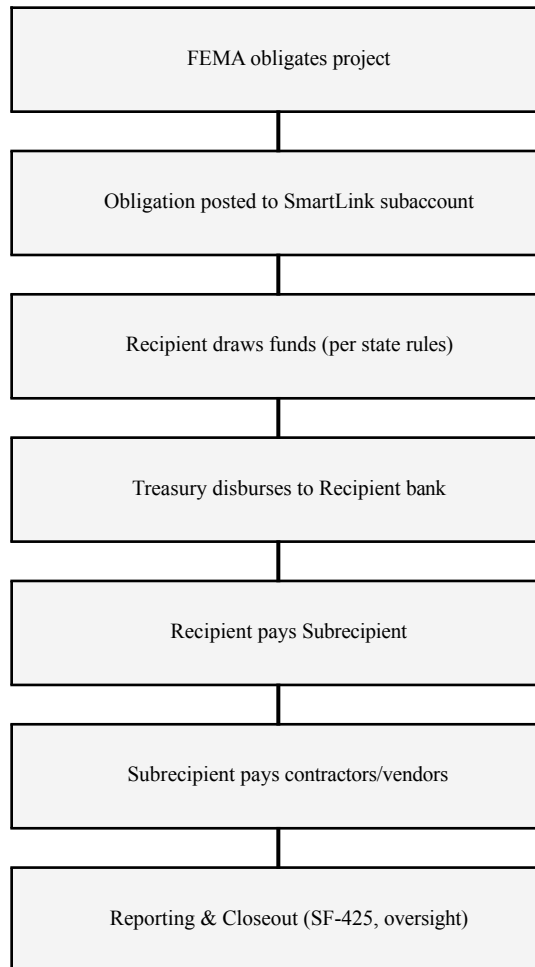
FEMA Public Assistance (PA) Funds Flow – Texas

Recipient: Texas Division of Emergency Management (TDEM)

Pass-through: Within ~30 days when documentation complete.

Statute: Texas Admin. Code, Title 37, Part 1, Ch. 7, Subch. E.

System: Texas GMS portal

Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).

Model: Reimbursement-based; advances rare.

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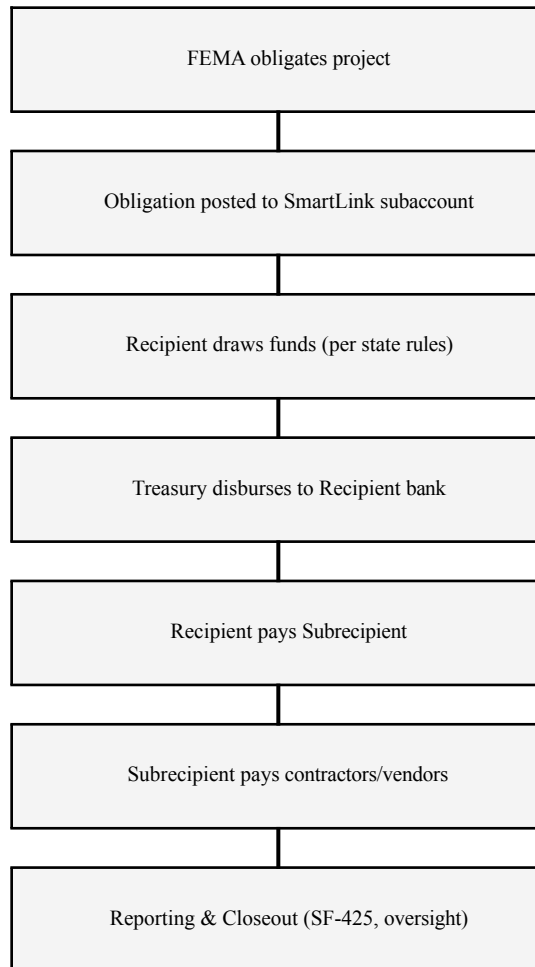
FEMA Public Assistance (PA) Funds Flow – Montana

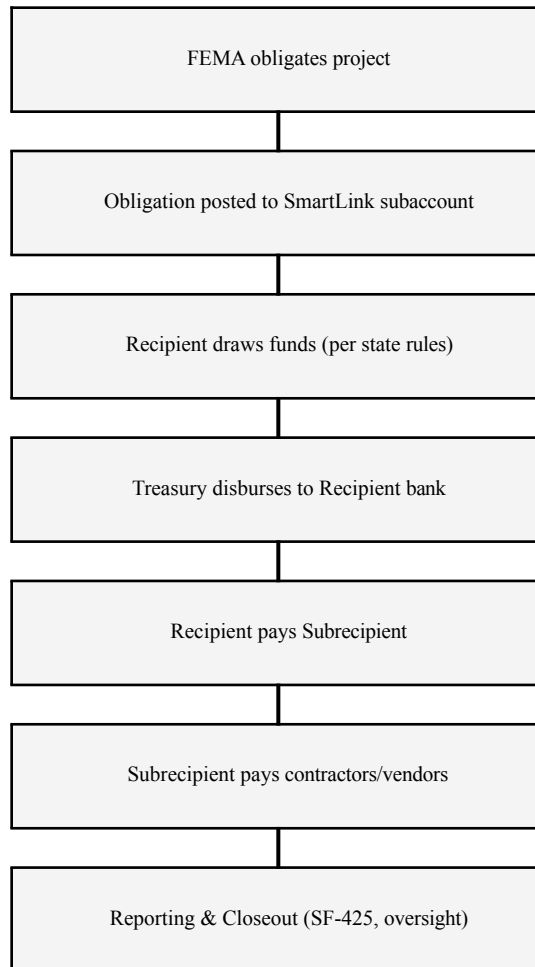**Recipient:** Montana Disaster & Emergency Services (DES)

Pass-through: Follows "as soon as practicable" federal rule.

Statute: Montana Code Annotated, Title 10, Ch. 3.

System: SIGMA (Montana's Grants & Loans portal).

Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).

Model: Primarily reimbursement, some advances for small jurisdictions.

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│     Subrecipient pays contractors/vendors     │
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│    Reporting & Closeout (SF-425, oversight)   │
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FEMA Public Assistance (PA) Funds Flow – California

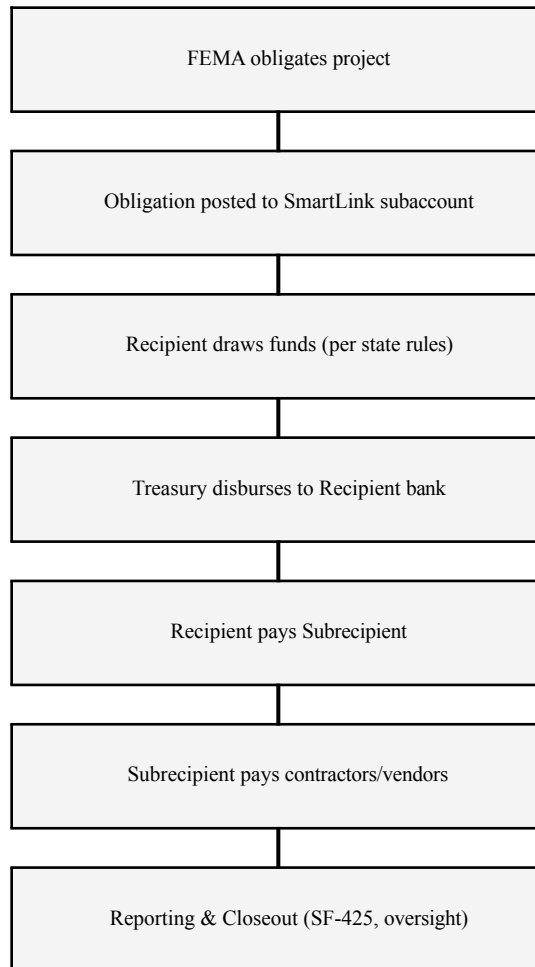**Recipient:** California Office of Emergency Services (Cal OES)
Pass-through: Within **45 days** of receipt of FEMA funds.
Statute: Cal. Gov't Code §8686; Cal OES Grant Guidelines.
System: CalOES Grants Portal05; 44 CFR 206.205; Stafford Act §705(c).
Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).
Model: Mix of advance and reimbursement; layered reviews.

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│   Reporting & Closeout (SF-425, oversight)│
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FEMA Public Assistance (PA) Funds Flow – Louisiana

Recipient: Governor's Office of Homeland Security & Emergency Preparedness (GOHSEP)
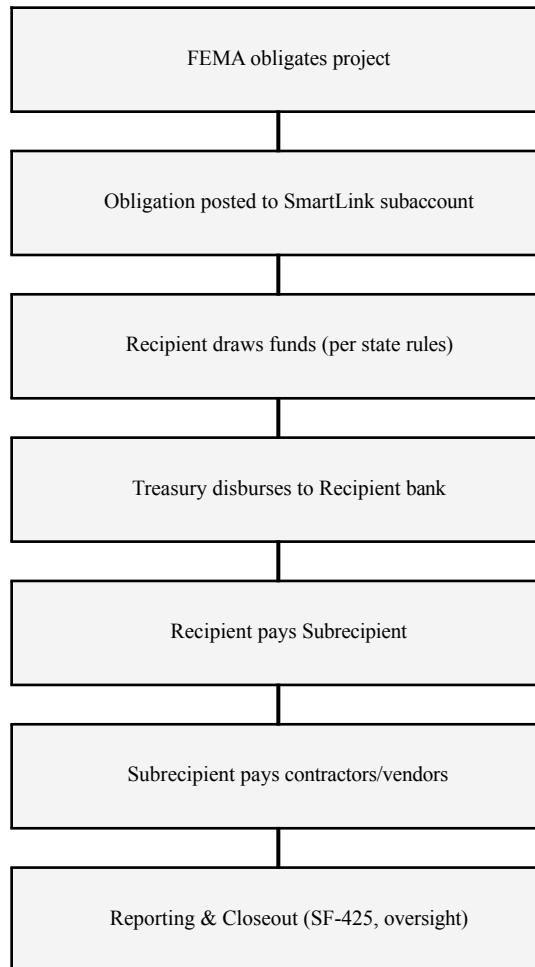
Pass-through: "As soon as practicable," documentation required.

Statute: Louisiana Revised Statutes, Title 29 (Homeland Security & Emergency Preparedness).

System: LAPA portal

Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).

Model: Reimbursement; advances rare.

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FEMA Public Assistance (PA) Funds Flow – Mississippi

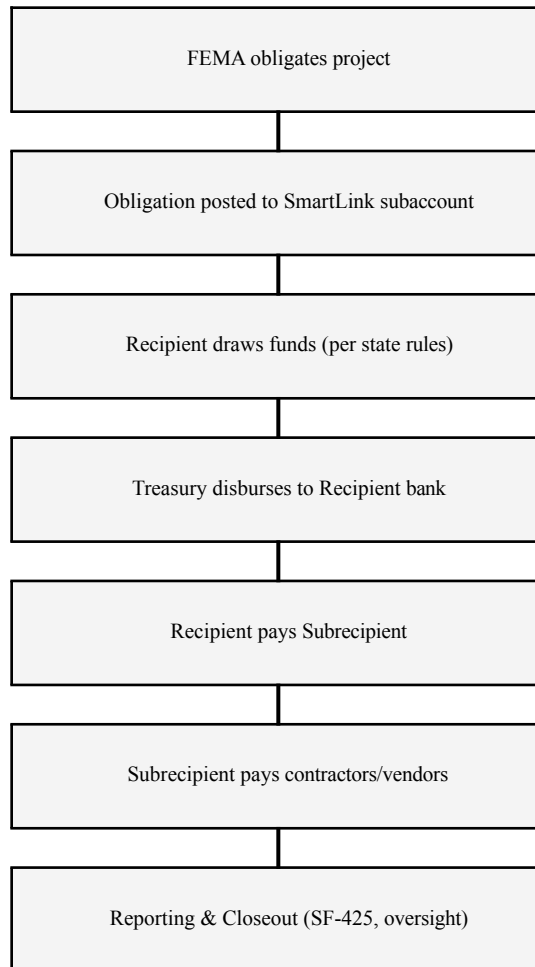**Recipient:** Mississippi Emergency Management Agency (MEMA)

Pass-through: Generally **30 days**, reimbursement model.

Statute: Miss. Code §33-15-307; MEMA PA guidance.

System: MEMA PA Portal 200.305; 44 CFR 206.205; Stafford Act §705(c).
Federal Anchors: 2 CFR

Model: Reimbursement with 3-day disbursement rule applied to Subrecipients.

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Federal Anchors: 2 CFR 200.305; 44 CFR 206.205; Stafford Act §705(c).