

## FEMA Eligibility Guidance

### Purpose/Background

On Jan. 21, 2021, the Biden administration issued a [memorandum to extend federal support](#) and to increase federal Category B funding under the Stafford Disaster Relief and Emergency Assistance Act of 1988. This presidential action, among other things, directs FEMA to provide Public Assistance reimbursement to public and non-profit schools.

[UPDATE June 29, 2022] Recently, FEMA released the [COVID-19 Pandemic Public Assistance Programmatic Deadlines guidance](#) that established a change in the federal cost share for eligible COVID-19 costs as well as various FEMA submission deadlines for eligible costs and closeout deadlines for obligated FEMA claims. The following is a summary of the full FEMA guidance and how it applies to public and non-profit schools.

### Changes To FEMA Cost Share

- Eligible costs incurred between Jan. 20, 2020, and July 1, 2022, will be federally reimbursed at 100% federal cost share.
- Eligible costs incurred on or after July 2, 2022, will be federally reimbursed at 90% federal cost share. FEMA has not yet set an end date for the 90% federal cost share period.

Note: The incident period for COVID-19 remains open at this time. The change in federal cost share does not impact the list of eligible costs for COVID-19, which remain in effect for both cost share periods. Refer to the “FEMA Eligible Costs” section for more details.

### Project Submission Deadlines

To submit costs to FEMA, you must first apply for a FEMA Request for Public Assistance (RPA) by July 1, 2022. You can [submit the RPA online](#) (a list of entities eligible for an RPA is in the “Determining Eligibility for FEMA Assistance” section below). Once your RPA is approved by FEMA, you can then submit eligible costs electronically in the [FEMA Grants Portal](#). You will not be able to submit any costs to FEMA for the COVID-19 disaster unless you have an approved RPA first.

The FEMA deadline to submit all eligible costs incurred between Jan. 20, 2020, and July 1, 2022, (aka for the 100% federal reimbursement period) is Dec. 31, 2022. However, the State of Vermont is requiring all applicants to finish preparing their FEMA applications for costs incurred between Jan. 20, 2020, and July 1, 2022, for state review by no later than Sept. 30, 2022.

### Contact Information:

If you have questions about this document or would like additional information, please contact Jill Briggs Campbell at [jill.briggscampbell@vermont.gov](mailto:jill.briggscampbell@vermont.gov).

Please notify [Darryl.Marshall@partner.vermont.gov](mailto:Darryl.Marshall@partner.vermont.gov) and [Amber.Lynn@partner.vermont.gov](mailto:Amber.Lynn@partner.vermont.gov) when your project is ready for review in the FEMA Grants Portal. You may put documents into the FEMA Grants Portal at any time, but please do not click “Submit” for the project application until it has been reviewed. Please list your entity’s name in the email notification.

- You may be allowed to request an extension to the FEMA deadline (Dec. 31, 2022) based on extenuating circumstances. Please refer to the FEMA guidance linked above for a list of allowable circumstances.
- Currently, there is no FEMA submission deadline for eligible costs incurred on or after 7/2/2022, to be federally reimbursed at 90%.

## Project Submission Rules

- To apply, you must have a minimum of \$3,300 in eligible costs already incurred and fully documented. Applications for estimated or anticipated costs will not be accepted.
- You must submit separate FEMA applications for costs incurred through July 1, 2022, and costs incurred on or after July 2, 2022. Applications may not contain costs that straddle July 1, 2022, – this is due to the cost share change from 100% to 90%.
  - If you cannot delineate costs (such as leases for equipment or facilities) before and after July 1, 2022, FEMA may prorate eligible costs based on the percentage of work performed or supplies used through July 1, 2022, to determine the cost share split.
- Only 60 days of stockpiled supplies (such as PPE, temperature scanning devices, COVID-19 tests, etc.) and their necessary storage costs are eligible. Stockpiled supplies and their storage will be eligible for a 100% federal reimbursement only if the items are used or distributed for use by July 1, 2022; if they are used or distributed for use on or after July 2, 2022, they will be eligible for a 90% federal reimbursement.
- Time of ordering, time of receipt, or delays in the installation and/or usage due to supply chain issues and labor shortages are not relevant for FEMA eligibility. Ultimately, what matters for FEMA eligibility and the cost share percentage is **only** the dates of use. If a set of plexiglass was scheduled to arrive in May 2022 and be installed in June 2022, but instead only arrived in August 2022 and installed in October 2022 (after the end of the 100% federal cost share period), the cost of the plexiglass would be funded at a 90% federal cost share.

## Project Closeout Deadlines

After receiving FEMA reimbursement, you must submit a Project Completion and Certification Report (PCCR) to FEMA that verifies that your scope of work has been completed and that all reimbursed costs were eligible. The State will generate this report and send it to you for electronic signature.

You must submit this closeout certification by a certain deadline (see below), based on the size of your project, for costs incurred from Jan. 20, 2020, to July 1, 2022, federally reimbursed at 100%.

- **For small projects (lesser than \$131,100):** you must complete a PCCR within 180 days of July 1, 2022, or 180 days from the date of obligation of your last small project, whichever is later. Small projects are closed out in aggregate, at the same time.
- **For large projects (equal to or more than \$131,100):** you must complete a PCCR for each large project within 180 days of July 1, 2022, or 180 days from its date of obligation, whichever is later. Large projects are closed out individually, at various times.

You may be allowed to request an extension to this closeout deadline based on extenuating circumstances. Please refer to the FEMA guidance linked above for a list of allowable circumstances.

Currently, there is no closeout deadline for eligible costs incurred on or after 7/2/2022, to be federally reimbursed at 90%.

## Determining Eligibility for FEMA Assistance

Note: there are no updates for FEMA eligibility in the July 13, 2022, FEMA guidance update.

To determine whether they are eligible to receive reimbursement from FEMA, an organization (listed below) should first complete the [FEMA Request for Public Assistance](#) (RPA).

To complete this simple, initial application only takes a few minutes and FEMA will usually respond with an eligibility determination within a few days to a few weeks. **You must complete your RPA by July 1, 2022 in order to qualify for FEMA funding for the COVID-19 disaster.**

### Eligible Entities

- Local Education Agencies (LEAs)
- Approved and recognized independent schools
- Non-profit childcare centers
- Non-profit religious schools
- Summer camps run by state and non-profits

### Who is Not Eligible

- For-profit schools
- For-profit summer camps
- For profit childcare centers

## FEMA Eligible Costs for COVID-19

- **Personal Protective Equipment (PPE)**
  - Face masks, face shields, gloves, and gowns
  - Eligible for students, staff, volunteers, and non-contracted school affiliates (including volunteers who are present on school campuses)
- **Cleaning and disinfection**
  - Must be in accordance with CDC or public health guidance<sup>1</sup>

- Only for costs in excess of regular/budgeted cleaning/disinfection costs for services or supplies (if there was no pandemic)
- Hand sanitizers
- **COVID-19 diagnostic testing**
  - Eligible for students, staff, volunteers, and non-contracted school affiliates (including volunteers who are present on school campuses)
  - Costs for testing kits, any shipping labels or supplies, and bar code scanners that are used only for testing
  - Contracts with testing companies to perform analysis of test kits
  - Contracts with shipping or courier services to deliver test kits to meet delivery window requirements or other shipping costs
  - Costs associated with staffing to conduct COVID-19 testing, either in excess of budget if there were no pandemic or hiring temporary staff to perform only testing-related work
- **Screening and temperature scanning**
  - Hand-held devices
  - Eligible for students, staff, volunteers, and non-contracted school affiliates (including volunteers who are present on school campuses)
- **Temporary physical barriers**
  - Purchase and installation costs (labor)
  - Temporary barriers, including portable barriers or those bolted to the ground/wall that will be removed after the pandemic, are eligible (you must include in the item description/narrative in the FEMA application that these barriers are temporary and that they will be dismantled after the pandemic even though they may be bolted now)
- **Storage/stockpile of supplies listed in this section**
  - Storage/stockpile is eligible for the items listed above, but with the following conditions: only 60 days of stockpiled supplies (such as PPE, temperature scanning devices, COVID tests etc.) and their necessary storage costs are eligible. Stockpiled supplies and their storage will be eligible for a 100% federal reimbursement only if the items are used or distributed for use by 7/1/2022; if used or distributed for use on or after 7/2/2022, they will be eligible for a 90% federal reimbursement.

[<sup>1</sup>CDC Guidelines on Cleaning and Disinfecting Your Facility; CDC Interim Guidance for General Population Disaster Shelters During the COVID-19 Pandemic](#)

**Not Eligible Costs:**

- Software programs to scan for whether students or staff have a temperature
- Permanent barrier installations
- HVAC/air filtration installation or maintenance
- Costs associated with COVID-19 contact tracing

- Costs associated with providing meals to students
- Remote learning/remote staff work costs (home internet access, cell phones, purchase of laptops/tablets, home office setup, etc.)

Additional information for interested applicants can be found on the AOE's [FEMA webpage](#). The Agency of Education and our partners in Vermont Emergency Management are able to provide support to schools, LEAs, and other eligible entities seeking FEMA reimbursement.