

FEMA Eligibility Guidance

Purpose/Background

On January 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 provide for the safe opening and operation of eligible schools, child-care facilities..."

[Recently FEMA](#) has extended the "eligibility period" for public and non-profit schools. The following costs are now eligible for FEMA reimbursement at 100% cost share if incurred between January 20, 2020, and **July 1, 2022**. Essentially, these costs are retroactively eligible since the beginning of the COVID-19 disaster period through July 1, 2022.

Two important deadlines have also been established in the latest FEMA guidance. The first is that all [Requests for Public Assistance](#) must be submitted by July 1, 2022. Applicants who do not submit an RPA before July 1, 2022, will not be able to apply for FEMA funding for the COVID-19 disaster. Any SU/SD that received CRF funding in 2020 has already completed this required step.

In addition, FEMA has defined a deadline of December 31, 2022, to submit applications for reimbursement of expenses. In preparation for this deadline, the Vermont Agency of Administration requires all FEMA-eligible organizations in Vermont to prepare their FEMA-PA grant applications for State review by no later than **September 30, 2022**. This requires that you fill out all application materials in FEMA's online Grants Portal, as well as upload all supporting documentation, prior to September 30, 2022. However, please do not click "Submit to FEMA." When you have filled out the application and uploaded all materials, please alert your Vermont Emergency Management Public Assistance Recovery Team point of contact who will review your materials and provide instructions on final submission to FEMA.

If the FEMA incident period for COVID-19 is extended beyond July 1, 2022, a cost share structure of 90% federal share may be implemented by FEMA. FEMA has not yet announced whether the incident period will be extended beyond July 1, 2022, and the AOE will provide updated information as it becomes available.

Additional information for interested applicants can be found on the AOE's [FEMA webpage](#) and on the [Vermont Emergency Management 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.

Contact Information:

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

General Considerations

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 is only the dates of use, which are January 20, 2020, to July 1, 2022. Only the dates of actual use will determine the eligibility of the cost.

Please note that the minimum submission threshold for a FEMA application is \$3,300. If you have less than \$3,300 in total incurred expenses, you will not be eligible for FEMA assistance.

Determining Eligibility for FEMA Assistance

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.

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

Eligible Costs Incurred Between January 20, 2020 and July 1, 2022

- **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 guidance¹
 - 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** (based on projected needs)
 - Rental of a storage facility after January 20, 2020
 - Items purchased and stockpiled before January 20, 2020, and used between January 20, 2020, and July 1, 2022
 - Please note that you must have a minimum of \$3,300 in eligible costs, *incurred and fully documented*, for a FEMA application. Grant applications for estimated or anticipated costs will not be accepted.

[¹CDC 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 contact tracing
- Costs associated with providing meals to students are not eligible (regardless of current source of funding)
- Remote learning/remote staff work costs (home internet access, cell phones, purchase of laptops/tablets, home office setup, etc.)
- Any costs incurred prior to January 20, 2020; unless it is stockpiling of eligible materials (see section above)
- Any items purchased and stockpiled and forecasted to be used after July 1, 2022