

MEMORANDUM

TO: Superintendents, Independent School Heads, Business Managers
FROM: Daniel French
SUBJECT: FEMA Decision Regarding Coronavirus Relief Funds
DATE: September 28, 2020

Guidance Rescinded

This guidance was issued/updated September 28, 2020 and is rescinded as of May 11, 2021. It is no longer in effect. Please see [COVID-19 Guidance for Vermont Schools](#) for current guidance related to the COVID-19 pandemic emergency.

Purpose

This memo conveys updated guidance the Agency of Education (AOE) has received from the Agency of Administration (AOA) and Vermont Emergency Management (VEM) concerning FEMA eligibility and the requirement to apply for FEMA to receive Coronavirus Relief Funds (CRF).

FEMA has issued new guidance that effectively precludes schools from being eligible for FEMA funding. As of Sept. 25, 2020, the AOA and VEM are removing the FEMA “presumptive eligibility” for all school costs. This will allow schools to receive CRF funding without applying to FEMA for any potentially FEMA-eligible costs.

The AOE thanks the field for its cooperation in completing the FEMA Eligible Cost Survey and Request for Public Assistance. The CRF Application Team will continue to review CRF applications and applicants will be contacted as grant award agreements are finalized.

Background

On Sept. 1, 2020 FEMA issued new guidance limiting FEMA reimbursement to only those entities performing eligible emergency response work, such as healthcare providers performing life-saving activities for COVID-19-positive patients. This guidance became effective for costs incurred on or after Sept. 15, 2020, and it was the understanding of the State of Vermont that costs incurred by schools between March 1 – Sept. 14, 2020, would remain eligible for FEMA.

However, further communications between the Director of VEM and FEMA regional and national offices during the week of Sept. 14 - 18, 2020, made clear that, regardless of the Sept. 15,

2020, effective date, FEMA intends to deny virtually all school-related costs previously believed to be FEMA-eligible. VEM, the AOA and their partners at Guidehouse, believe that FEMA is likely to deny all costs from supervisory unions, school districts and independent schools.

Next Steps

SU/SDs or Independent Schools are not required to apply for FEMA, but please be aware of the following:

- If you have completed a FEMA Request for Public Assistance, please do not withdraw the Request for Public Assistance. Keep it as is in the online FEMA grants portal – no additional action items are required from you in the FEMA grants portal.

Some independent schools or SU/SDs may choose to pursue a FEMA application. If so, they should be prepared for a lengthy appeal process, and should be aware that at this time FEMA is likely to deny all costs from supervisory unions, school districts and independent schools.

- If you choose to apply for FEMA, please be aware that you cannot apply to another funding source for the same expenses. If those FEMA costs are currently included in your CRF application, this would require removing those costs from your CRF application.
- If you wish to pursue an application with FEMA you may visit the [Vermont Emergency Management website](#) or contact Jill Briggs Campbell (jill.briggscampbell@vermont.gov) or Rylie Zhang (Rylie.zhang@partner.vermont.gov).