
Supervisory Unions and Independent Schools FEMA Webinar FAQ

Purpose

The purpose of this FAQ is to respond to questions regarding FEMA that were generated from a webinar held on Wednesday, Aug. 26, 2020. The [slide deck](#) for that presentation is available on the AOE website. Questions regarding FEMA eligibility or FEMA and CRF, should be directed to Rylie Zhang at rylie.zhang@partner.vermont.gov or Jill Briggs Campbell at jill.briggscampbell@vermont.gov.

FEMA Eligible Costs

Q1. Is there a situation where hiring a nurse for COVID-19 reasons is not eligible for FEMA funding? You said the expense "may be" eligible?

A temporary nurse hired specifically and only for COVID-19 response is highly likely to be FEMA eligible and should be included in your FEMA application and cost estimates. However, as with all costs, FEMA makes the final eligibility determination.

Q2. Would nurse substitutes be eligible?

If by substitute, you mean the original nurse position was backfilled – if the nurse you replaced is performing COVID-19 response activities, the overtime costs for the backfill employee is eligible as long as the employee that he/she is replacing is performing eligible emergency work. These costs should be included in your FEMA application and cost estimates. As with all costs, FEMA makes the final eligibility determination.

Q3. Is temporary custodial staff eligible?

If the temporary custodial staff is hired specifically and only for COVID-19 response activities, such as additional cleaning and sanitation of school grounds, the cost is highly likely to be FEMA eligible and should be included in your FEMA application and cost estimates. However, as with all costs, FEMA makes the final eligibility determination.

Q4. Is overtime for existing custodial staff eligible?

If overtime for the existing custodial staff was for COVID-19 response activities, such as additional cleaning and sanitation of school grounds, the cost is highly likely to be FEMA eligible and should be included in your FEMA application and cost estimates. However, as with all costs, FEMA makes the final eligibility determination.

Q5. Can Personal Protective Equipment (PPE) for students be considered?

Most of the FEMA decisions have been around teachers and staff, so this one is difficult to say, but should be included in your FEMA application and cost estimates. As with all costs, FEMA makes the final eligibility determination.

Q6. What are meal wraparound costs?

Wraparound costs are meal-related costs, such as meal preparation (labor), meal delivery, meal packaging and meal sanitation, in excess of the original meal-related costs prior to the COVID-19 pandemic.

Q7. What about labor costs for meal delivery?

Also considered a meal wraparound cost (see Q6).

Q8. Is software for staff/parents/students to prescreen for COVID-19 before they come on campus eligible?

This may be eligible as we are hoping to make the case that using such software can directly reduce the presence of the virus on campus and the threat to public health. Although software is generally not FEMA eligible, software to support symptom tracking should be included in your FEMA application and cost estimates. However, as with all costs, FEMA makes the final eligibility determination.

Q9. Is the maintenance fee for the prescreening software also possibly eligible?

If the prescreen software is eligible, the maintenance cost of it may still be ineligible. In the best case scenario, the maintenance cost for prescreening software would only be reimbursable for the actual days the software was used for COVID-19-response, not for the lifetime of the software. This portion of the cost should be included in your FEMA application and cost estimates. As with all costs, FEMA makes the final eligibility determination.

Q10. Is the purchase of thermometers to do student temperature checks prior to entering school a FEMA eligible cost?

A: This may be eligible as we are hoping to make the case that thermo testing can directly reduce the presence of the virus on campus and the threat to public health, these costs should be included in your FEMA application and cost estimates. However, as with all costs, FEMA makes the final eligibility determination.

Q11. Do these costs have to follow federal procurement procedures?

Private non-profit organizations (this definition includes all SU/SDs and non-profit independent schools) should always comply with their own documented procurement procedures, applicable state/local/tribal/territorial government laws and regulations, and applicable Federal laws and regulations.

Q12. Are reassigned employees eligible for FEMA?

If you assign an employee to perform COVID-19 response activities that is not part of the employee's normal job, FEMA provides funding based on the reassigned employee's normal pay rate, not the pay level appropriate to the work, because your incurred cost is the employee's normal pay rate. These costs should be included in your FEMA application and cost estimates.

FEMA and Coronavirus Relief Fund (CRF) grants

Q13. Would the temporary meals and meal wrap around costs, etc. be covered under the CRF Summer Food Service Program (SFSP) grant? Just want to be sure we are not double counting the same expenses being requested within AOE agencies.

If you have only applied for the CRF SFSP, you are not required to apply for FEMA (although you may still choose to). If you have applied for both SFSP and the CRF LEA grant, please do include the SFSP costs in your survey response and in your subsequent FEMA application.

Q14. What costs should be listed on the CRF application due on Sept. 2, 2020?

The CRF application due on Sept. 2, 2020, should include all (100%) CRF-eligible costs, including those that are also potentially FEMA eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits.

Q15. How can we apply for CRF without knowing whether or not a cost is FEMA-eligible? What do we do if we find it is not FEMA eligible? How do we apply for CRF?

The CRF application due on Sept. 2, 2020, should include all CRF-eligible costs, including those that are also potentially FEMA-eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits.

Q16. Will the application include expenses incurred after June 30, 2020?

The FEMA application can include costs incurred from Jan. 20, 2020, to the end of the incident period (which is currently open and undetermined by FEMA). You can apply for multiple projects based on time periods or types of costs that you choose.

However, to simplify accounting with FY20 and CRF grant programs in mind, we strongly recommend that you apply to costs incurred from Jan. 1, 2020, to June 30, 2020, in one project; June 30 to Dec. 31, 2020, in one project; and costs beyond that in one project.

Q17. Do you anticipate two phases of FEMA – before June 30, 2020, and after June 30, 2020? Many of our FEMA eligible costs, including the hiring of a nurse and procurement of masks for students have been incurred after July 1, 2020.

The June 30, 2020, cut off in the survey is not a FEMA deadline, but rather a State (Agency of Administration) timeline to gather costs in a way that is easiest for you (aligning with FY20 accounting). You can put all actual costs from the past and all estimated costs in the future in the same single FEMA application. You can also submit multiple FEMA applications – perhaps one for all actual costs (completed work) and another for all estimated costs (work to be completed).

However, to simplify accounting with FY20 and CRF grant programs in mind, we strongly recommend that you apply to costs incurred from Jan. 20, 2020, to June 30, 2020, in one project; June 30, 2020, to Dec. 31, 2020, in one project; and costs beyond that in one project.

Q18. Our organization (an independent schools system) has four schools. Can we do a cost survey as an agency or do you need a cost survey per school? What about the Request for Public Assistance (RPA)?

A: The survey and the RPA should be completed by each school, as each school is the CRF grant applicant and will also be a FEMA applicant using the following determination. To determine who shall be the FEMA applicant and therefore fill out the FEMA RPA, the applicant should be the entity that satisfies all three of the following conditions:

1. Holds a unique DUNS number;
 - LEA – Supervisory District
 - LEA – Supervisory Union
 - All their Member School Districts
 - Independent School (public non-profit)
2. Is the usual applicant to the CFP – Consolidated Federal Program;
 - LEA – Supervisory District
 - LEA – Supervisory Union
 - Independent School (public non-profit)
3. Is at the level at which the budget is improved and implemented.
 - Federal Grant Purposes (CFP)

- LEA – Supervisory District
- LEA – Supervisory Union
- Independent School (public non-profit)

Therefore, the applicant may be a SU, a SD, an individual school district, or an independent school (public non-profit) that satisfies all three criteria listed. The applicant will need to fill out the RPA, and only one RPA per applicant is required.

Q19. How long does it take for FEMA funding?

A FEMA project < \$131,000 is a small project – and from recent examples, it has taken a 2-3 weeks to reach a funding decision. A FEMA project > \$131,000 is a large project, which could take slightly longer to adjudicate. Projects > \$1M need to enter a separate congressional review queue, which can add 2-3 weeks to the funding decision. Please be aware that FEMA is entering a period of high request volume, so these timeframes may change.

Q20. Should we submit for the full cost or 75% of cost?

Please submit the full 100% cost to FEMA, not 75% of your costs. FEMA will obligate up to 75% if your project is approved, but FEMA will calculate the 75% based on your 100% cost total. The remaining 25% non-federal share will come out of the CRF and be distributed via subgrant from the Department of Public Safety.

Q21. If CRF application is not delayed, should we be asking for 100% of costs on both applications?

Yes. The CRF application due on Sept. 2, 2020, should include all CRF-eligible costs, including those that are also potentially FEMA eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits.

Q22. In a Supervisory Union (SU) there are multiple school districts but only one Consolidated Federal Programs application filed with the SU's DUNS - so who "pays" the bill and files the RPA is not clear.

To determine who shall be the FEMA applicant and therefore fill out the FEMA Request for Public Assistance form (RPA), the applicant should be the entity that satisfies all three of the following conditions:

1. Holds a unique DUNS number;
 - LEA – Supervisory District
 - LEA – Supervisory Union
 - All their Member School Districts
 - Independent School (public non-profit)

2. Is the usual applicant to the CFP – Consolidated Federal Program;
 - LEA – Supervisory District
 - LEA – Supervisory Union
 - Independent School (public non-profit)
3. Is at the level at which the budget is improved and implemented.
 - Federal Grant Purposes (CFP)
 - LEA – Supervisory District
 - LEA – Supervisory Union
 - Independent School (public non-profit)

Therefore, the applicant may be a SU, a SD, an individual school district, or an Independent School that satisfies all three criteria listed. The applicant will need to fill out the RPA, and only one RPA per applicant is required.

Q23. How are CRF and FEMA interacting? What is the timing and relationship? How should applicants apply to CRF now?

Most FEMA-eligible expenses are eligible for CRF funding. However, FEMA funding is more restrictive than CRF in terms of eligibility. As such, it is State policy and best practice that applicants use FEMA funding to cover any FEMA-eligible costs first. CRF funding may only be used to cover CRF-eligible expenses that are not eligible for FEMA funding. The CRF application due on Sept. 2, 2020, should include all CRF-eligible costs, including those that are also potentially FEMA eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits.

Q24. So, we should apply for the same things through CRF that we are for FEMA, in case the FEMA funding doesn't cover it?

A: The CRF application due on Sept. 2, 2020, should include all CRF-eligible costs, including those that are also potentially FEMA eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits. If FEMA denies those costs, and they are CRF eligible, they will be covered by CRF.

Q25. Our cost through June 30, 2020 is minor compared to the cost after June 30, 2020. I do not know how valuable your survey will be.

There will be a subsequent survey to capture the costs after June 30, 2020.

Q26. It seems like costs will be double counted between the two applications: FEMA and CRF. Will that be a problem?

A: No. The CRF application due on Sept. 2, 2020, should include all CRF-eligible costs, including those that are also potentially FEMA eligible and will be applied to FEMA. As part of its reconciliation process, the Agency of Education will ensure that costs which are ultimately reimbursed by FEMA will be deducted from CRF funding to ensure non-duplication of benefits.

Q27. What's the distinction between LEA and CRF grants, or are they one and the same?

A: There are four Coronavirus Relief Fund grant programs administered by AOE: the Indoor Air Quality grant (handled by Efficiency Vermont), the Summer Food Service Program Grant (applications closed on August 18), the LEA grant (for Vermont's public schools) and the Approved Independent Schools grant (eligible schools must have at least one publicly enrolled student as of March 27, 2020).