

FEMA REIMBURSEMENT PROCESS FOR SCHOOL DISTRICTS AND OPEN-ENROLLMENT CHARTER SCHOOLS

1. *How do I get my expenses incurred reimbursed by the Federal Emergency Management Agency (FEMA)?*

On March 13, 2020, the President issued a nationwide emergency declaration for Coronavirus Disease 2019 (COVID-19). The FEMA designation for this is DR-4485. This opens up funding through FEMA's Public Assistance (PA) program for reimbursement for emergency protective measures. FEMA has simplified the [process](#) to support eligible entities. You will need to take the following steps to start this process:

1. Participate in a virtual applicant briefing that will provide vital information on this process.
 - Applicant briefings started in the week of March 23, 2020 and are ongoing.
 - Visit this link for the schedule of applicant briefings: <https://tdem.texas.gov/covid-19/#1584998707036-c4e58f25-6498>
2. Submit a Request for Public Assistance (RPA) – You can complete this step prior to participating in the applicant briefing.
 - **If you DO have an existing FEMA account** (from a previous disaster) in the [FEMA Grants Portal](https://grantee.fema.gov/) (<https://grantee.fema.gov/>), please login, and you will be asked if you want to submit an RPA for DR-4485.
 - **If you DO NOT have an account in the FEMA Grants Portal**, please go to <https://grantee.fema.gov> to request an account. Under the Sign In button is a blue link that says "Register Your Organization and Request Public Assistance." You will need to provide the primary contact name, name of jurisdiction/potential applicant, phone number and email address. You will then receive an automated email invitation from the FEMA Grants Portal after your account is approved by TDEM.
 - Please watch this [video](#) for instructions on how to create an account for registering your organization and submitting an RPA.
 - If you have any issues, please call the Grants Portal Hotline at (866) 337-8448.

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2. *How do I know which expenses will be reimbursed?*

FEMA has launched a [website](#) that lists the eligible expenses for this disaster. However, these costs reflect FEMA's normal natural disaster-type expenses. This is an unprecedented event. We, therefore, anticipate changes to various funding streams within

FEMA and other federal agencies. We recommend that you track ALL costs related to COVID-19, including staff time, such as:

- Distance learning expenses, including purchasing electronic devices and communications infrastructure;
- Cleaning and sanitizing schools;
- Additional online learning and communication platform licenses;
- Communication and public information costs;
- Curriculum development;
- Supplies for paper distance learning packets and delivery costs (where online learning is not feasible); and
- Expenses to continue food assistance program services

Not all expenses will be covered by FEMA, but other funding streams may be created through the CARES Act and other future funding allocations. It is best to track and document costs now, then to do so months after the fact.

3. *When can I apply for funding?*

You can apply for funding as soon as TDEM and FEMA have approved your application in the FEMA Portal. You can use the FEMA [Job Aid](#) to start collecting the information FEMA will require for “Expedited Projects,” so it can be transferred to the portal once your RPA is approved. Once approved, you will receive 50% of what is claimed in your Expedited Project. The remaining will be released once all documentation is provided.

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FEMA is still developing guidance and processes related to how it will accept standard projects for COVID-19. Most applicants will not be assigned a FEMA point of contact (known as a Program Delivery Manager) and will have to submit their applications independently through Grants Portal for processes.

4. *How much of my incurred eligible expenses will FEMA cover?*

The federal cost share is 75%, and the share for a district or charter school is 25%.

5. *Do I need to document my expenses?*

Yes! Applicants must maintain records sufficient to detail the history of a procurement. While FEMA approval is not required for noncompetitive procurement under the emergency or exigency exception, you must document and provide justification for the use of the exigent or emergency exception. Additionally, you will be expected to follow your own procurement policy. Document everything you spend time and money on, including:

- Force account labor
- Force account equipment (regular time and overtime)
- Force account materials
- Rentals
- Contracts

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4/3/2020

- Procurement documentation
- Donated resources

6. What is the deadline for applying for FEMA reimbursement?

The deadline is April 24, 2020. Deadlines frequently are extended, but this is not guaranteed. It is easier to withdraw a Request for Public Assistance than submit a late Request for Public Assistance. We recommend you submit your RPA as soon as possible.

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7. Where else can I find information about the FEMA reimbursement process?

- Send an email to the Texas Division of Emergency Management (TDEM) at TDEMRecovery.RPA@tdem.texas.gov with questions
- FEMA COVID-19 Fact Sheet: <https://www.fema.gov/news-release/2020/03/23/coronavirus-covid-19-pandemic-public-assistance-simplified-application>
- TDEM's website: <https://tdem.texas.gov/covid-19/>

SCHOOL BOARD POLICY TO SUPPORT FEMA REIMBURSEMENT

Important Note: Some school districts and charter schools consider offering premium pay during disasters, while others do not. TEA does not have a position regarding this matter, but, if a school district or charter school wishes to offer premium pay during disasters, there are compliance issues that should be considered. See the following questions and answers for some guidance on this topic.

8. If a district has a DEA(LOCAL) policy that lacks a premium pay provision, will it qualify for FEMA reimbursement for overtime expenses incurred as a result of COVID-19?

FEMA requires that a premium pay (overtime) policy be in place before a disaster, per page 23 of the most recent version of its [Public Assistance Program and Policy Guide](#).

9. Would a district be eligible for FEMA reimbursement for premium/overtime expenses incurred post-policy adoption, if the policy was adopted after the disaster was declared?

No, not under current FEMA requirements. However, this requirement is potentially subject to change, based on the severity and geographic scope of the pandemic. As a result, TEA's guidance is that any district that wishes to provide premium pay to its employees should adopt the policy, if it has not already done so, as soon as possible. A policy adopted in this instance by board resolution should explicitly amend any existing pay and premium pay policies in effect to reflect the revised DEA(LOCAL) policy. Districts should ensure that any retroactive application of a revised DEA(LOCAL) policy applies

only to premium pay payments previously made during the current disaster and is not used to pay district employees retroactively for work performed during the disaster prior to amending the DEA(LOCAL) policy. Districts should consult with legal counsel regarding premium pay payment timing issues.

For additional reference, there may be other sources of federal reimbursement unrelated to FEMA that are not subject to the same constraint of requiring pre-disaster adoption of a premium pay policy.

10. If my district wants to adopt a DEA(LOCAL) policy that addresses premium pay, are there examples to model from?

Yes. TASB has created and has agreed to share with TEA and the education field a [template policy version](#) that addresses pay during closures and premium pay during disasters.

MISCELLANEOUS

1. Can a school district submit a State of Texas Assistance Request (STAR) request for personal protective equipment (PPE)?

NEW
4/3/2020

Yes, a school district can submit a STAR for PPE to the Texas Division of Emergency Management State Operations Center by working through their County Emergency Management Agency. If the county is unable to assist a district, the district can submit a request directly to the State Operations Center.

Currently the State Operations Center is working on a priority list where health care providers and hospitals would receive most PPE orders first and then move down the list to entities such as school districts.