

The U.S. Department of Education & FEMA Public Assistance Guidance for Schools and Institutions of Higher Education

Frequently Asked Questions (FAQs) How Schools and Institutions of Higher Education Can Utilize FEMA's Public Assistance Program to Recover from Disasters

The U.S. Department of Education's Office of Safe and Supportive Students' Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center worked with the Federal Emergency Management Agency's (FEMA) Public Assistance (PA) Division to develop this Frequently Asked Questions document. These FAQs are meant to assist state education agencies, local educational agencies, schools, and institutions of higher education interested in applying for PA funding to help with recovery efforts following Presidential disaster declarations. FEMA's PA Program provides supplemental grants to state, local, tribal, and territorial governments, and certain types of private non-profit (PNP) organizations so communities can quickly respond to and recover from major disasters or emergencies. After an event like a hurricane, tornado, earthquake or wildfire, communities need help to cover their costs for debris removal, life-saving emergency protective measures, and restoring public infrastructure.

The FAQs are commonly asked questions organized into the following categories:

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If you have additional questions about applying for funding under FEMA's PA program, please request technical assistance from the REMS TA Center by either emailing info@remstacenter.org or calling (855) 781-REMS (7367). FEMA PA can also provide assistance by calling their Hotline at (866) 337-8448.

Application Process and Timeline

Can prospective applicants seek federal funds right away, or must we check with our state first to determine whether the state has assistance available?

- All prospective applicants should contact their state, tribal, or territorial emergency management office to gather information specific to that event and understand the process for PA.

How do we apply for FEMA's Public Assistance program? Where can we find the relevant form?

- All prospective applicants must complete the [Request for Public Assistance - FEMA Form FF-104-FY-21-131](#). More information about how to apply for PA and access the FEMA Grants Portal is available on [FEMA.gov](#).
- A private non-profit entity must provide information to support eligibility and should be prepared to provide the following information when completing a Request for Public Assistance (RPA) form:
 - A current ruling letter from the Internal Revenue Service (IRS) granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954 OR documentation from the state substantiating it is a non-revenue producing, non-profit entity organized or doing business under state law; and
 - If the organization is not required to obtain 501(c)(3) status or tax-exempt status under applicable state law, it must provide articles of association, bylaws, or other documents indicating that it is an organized entity, and a certification that it is compliant with Internal Revenue Code section 501(c)(3) and state law requirements.
 - If the applicant owns the facility, proof of ownership OR if the applicant leases the facility, proof of legal responsibility to repair the incident-related damage; and
 - A list of services provided by the facility, when those services are provided, and to whom.

Once complete, where do we submit the RPA form?

- Prospective applicants can submit the RPA form and any other required information either electronically through FEMA's [Grants Portal](#) or they can contact their state, tribal, or territorial emergency management office to assist with this process. The state, tribal, or territorial emergency management office can submit the request to FEMA on the prospective applicant's behalf.

Submitting the RPA form is time-sensitive. It must be submitted within 30 days of the declaration.

How do we find our state, tribal, or territorial emergency management office?

- FEMA recommends using the [disasterassistance.gov](#) site to find the relevant emergency management office for resources and county contacts.

What is the deadline for applying for PA funding? What must be completed by that deadline?

- The deadline for applying for Public Assistance (submission of the RPA form) is 30 days from the date of the declared disaster. Note that the RPA must be **uploaded to FEMA's [Grants Portal](#)** by the

deadline. For questions about PA deadlines, check with the state, tribal, or territorial emergency management agency.

If we have already submitted the RPA, what are the next steps?

- FEMA will begin reviewing applicant eligibility after receiving the RPA. If you are determined to be an eligible applicant, FEMA will assign a Program Delivery Manager (PDMG) who will contact you after the RPA is approved.

Does FEMA provide live support to guide applicants through the entire grant process?

- Yes, FEMA and state, tribal, or territorial representatives will be assigned to applicants to assist with the entire process until all items identified on the list of impacts are addressed and grants have been submitted.

When do we meet with FEMA to go over all of our damages and impacts and determine eligibility?

- FEMA and state, tribal, or territorial representatives will contact you to set up a [Recovery Scoping Meeting \(RSM\)](#) to review the list of damages and impacts shortly after the RPA has been approved.

After the RPA has been approved, how many days do we have to complete our project application(s)?

- The length of time needed to complete the project application(s) varies depending on the complexity of the projects and the number of projects. More information about the Public Assistance process is available on [FEMA.gov](#).

Does FEMA visit our site to assess the damage?

- FEMA can set up site inspections based on the disaster's list of impacts and damage, or you can provide the damage information. FEMA's [YouTube](#) channel contains resources applicants can use to learn more about site inspections and other PA relevant process information. Information is also available on [FEMA.gov](#).

Is there a typical timeframe to receive PA funding from FEMA?

- The timeframe to receive PA funding varies depending on several factors, such as: how much of the work has already been completed, the dollar value of the project, and the complexity of the project. Expedited funding is only available with large emergency work projects for debris removal and emergency protective measures. You can also request projects be prioritized. Both requests should be directed to your state, tribal, or territorial representative and are considered on a case-by-case basis.

When assistance is offered, is it dollar for dollar or a percentage of the damage incurred? Or is it a loan?

- FEMA PA is a grant program. The reimbursements are not a loan and do not require repayment. FEMA will pay the "federal share" of not less than 75% of the eligible cost to return all eligible damaged facilities to pre-disaster condition.

In the past, PA funds went directly to the state, and not to the applicants. Is this still the case?

- Yes. PA funding goes to the state, tribe, or territory (the recipient) and they distribute the funds to the eligible applicants (the subrecipients).

Applicant and Facility Eligibility

Is PA funding available for pre-schools as well as K-12 schools?

- If a school provides elementary education, as defined under state law, then it is an educational institution under FEMA rules and can apply for a PA grant as an educational institution. If a pre-school does not provide elementary education as defined under state law, it may still be able to apply for a PA grant as a childcare facility or as another eligible facility under FEMA's rules.

Would PA funding be available for a privately-owned preschool that serves ages 0-5 (and after-care for children up to age 11)?

- Public Assistance funding is eligible for center-based childcare provided by a private nonprofit facility that the State or Tribal Department of Children and Family Services, Department of Human Services, or similar agency, recognizes as a licensed childcare facility.

Are for-profit day care centers eligible for PA funding?

- No. Unfortunately, these organizations are not eligible. Check with your state, tribal, or territorial emergency management agency for other grant and loan opportunities including the Small Business Administration.

Are for-profit private schools eligible for PA funding?

- No. Unfortunately, these organizations are not eligible for PA funding, with very rare exceptions (e.g., funding for removal of storm debris that poses a danger to public roads). Check with your state, tribal, or territorial emergency management agency for other grant and loan opportunities.

Are private, non-profit, religious schools eligible for PA funding?

- Yes. Private, non-profit, accredited religious schools are eligible for PA funding without regard to religious character or use for religious instruction.

Are institutions of higher education eligible for PA funding?

- To be eligible for PA funding, an institution of higher education must meet the following criteria:
 - Admit students or persons having a high school diploma or equivalent;
 - Be legally authorized to provide education beyond a secondary level;
 - Award a bachelor's degree or a 2-year degree that is acceptable as full credit toward a bachelor's degree or provide at least a 1-year training program to prepare students for gainful employment in a recognized occupation; and
 - Be accredited by a nationally recognized agency or association (as determined by the Secretary of Education).
- If unsure, contact your state, tribal, or territorial emergency management agency.

Are higher education research labs eligible for PA funding?

- They may be eligible and should apply for PA funding.

For planning purposes, is there a way for a private non-profit institution of higher education to determine its eligibility for the PA Program outside of a declared disaster?

- FEMA only determines an applicant's eligibility for PA during an active disaster. The *PA Program and Policy Guide (PAPPG)* provides the criteria FEMA uses to evaluate eligibility. Generally, private non-profit institutions of higher education are eligible. The criteria can be found in the [PAPPG Chapter 3: Applicant Coordination and Eligibility](#).

Is PA funding only available after an education facility has been impacted by a disaster?

- Yes, PA funding is only available to eligible applicants after they have been impacted by a presidentially declared disaster.

To be eligible for funding, must a facility be compliant with the ADA and with Section 504 of the Rehabilitation Act prior to the disaster? Is there a requirement for compliance after reimbursement?

- FEMA provides PA funding regardless of whether the facility was compliant prior to the incident, as long as the applicant was not cited for a violation. If the applicant was notified of being in violation of a requirement prior to the incident and did not bring the facility into compliance, then accessibility requirements related to the violation are ineligible. FEMA reimburses costs, including those necessary to upgrade to current codes and standards.
- FEMA has issued a minimum codes and standards policy. If a facility is in a hazard zone, the repairs must be done in accordance with any applicable codes or standards that are based on international building codes. Please see examples in the [PAPPG](#). Additional guidance information can be found on the [Public Assistance Resource Library | FEMA.gov](#)

If a school has two campus locations, is it necessary to submit two RPA forms, or is it possible to submit one?

- One RPA form is all that is required for each organization. FEMA will work with the recipient and applicant to develop projects for all various facilities based on a single RPA.

Does a private non-profit school submit its PA application to the state, tribe, or territory in which the private school is located?

- Yes, or you can submit it electronically through FEMA's [Grants Portal](#).

Leased Properties and Donated Spaces

If our property is leased, are we eligible for PA funding?

- Yes, provided that you are legally responsible for the damaged facility. For leased facilities, FEMA will determine eligibility for funding in accordance with the terms of the lease agreement. Some lease agreements reserve responsibility to the lessor, while others assign it to the lessee. Any loss of equipment or materials will be determined based on who purchased and owns them.

If we as a lessee have legal responsibility for maintenance of the building and grounds, should we submit a PA application, or should the owner of the building submit it?

- The eligible applicant is determined by how the lease designates legal responsibility for the damaged facility, provided that all other eligibility requirements are met. An RPA should be submitted electronically through FEMA's [Grants Portal](#) or to the state, tribal, or territorial emergency management agency for eligibility review.

We are a K-12 school that operates in a donated space. We have damage to equipment and supplies. Does the FEMA PA program cover these types of expenses?

- If the school is a public school, then the repairs may be covered, provided that all other eligibility criteria are met. If it is a private non-profit school, then the applicant needs to own or operate a facility that provides eligible services.

Eligible Expenses

Can FEMA reimburse work that has already been completed, or is there a pre-approval requirement? For expenses that have already been incurred, are photos and invoices sufficient to receive FEMA assistance, or are quotes or other more detailed records of the damage necessary?

- FEMA PA provides grant funding for emergency protective measures and debris removal (emergency work), and permanent restoration of damaged facilities, including cost-effective hazard mitigation to protect the facilities from future damage (permanent work). At a minimum, work must meet each of the following three general criteria to be eligible:
 1. Be required as a result of the declared incident;
 2. Be located within the designated area; and
 3. Be the legal responsibility of an eligible applicant.
- FEMA is required to consult with federal, state, tribal, and territorial government agencies before the applicant begins work. Not meeting federal compliance requirements can result in loss of potential grant funding. Applicants that completed work should provide FEMA with as much information as possible, including a detailed damage description, a scope of work and invoices.

Does the PA Program help with individual student support?

- No. Unfortunately, the PA Program does not provide assistance for individual student support. Families and parents affected by disasters can go to [DisasterAssistance.gov](#) to register with FEMA

and find out how FEMA's Individual Assistance can support their disaster recovery.

Does FEMA cover the expenses for vendors to assess damage to schools?

- FEMA will reimburse certain types of damage assessments and site evaluations depending upon the reason for the inspection and the entity performing the work.

Insurance Claims

Does PA funding cover insurance deductibles?

- Although PA funding does not specifically cover the insurance deductible, the assistance generally covers them indirectly. FEMA reduces the total eligible damage amount less the insurance proceeds and typically provides reimbursement for the remainder. This may, in effect, provide a portion of reimbursement for the deductible. However, if the facility was previously damaged and received PA funding, FEMA will review for compliance any "obtain and maintain" insurance requirement placed on the facility. This can impact the eligible federal funding amount.

How can we know what our insurance does and does not cover, so that we can apply for the PA Program?

- The applicant should contact their insurance provider and file a claim. Once the insurance company completes the assessment, it will notify the applicant of any approved insurance contribution. Simultaneously, however, the applicant should also submit an RPA to FEMA. FEMA may write a project for funding and award it prior to the applicant being aware of or in receipt of insurance funding. When this occurs, FEMA will deduct funding from the project based on anticipated insurance proceeds. The final PA grant amount will be adjusted once the insurance proceeds are finalized, and documentation is provided to FEMA. **Insurance funding and PA funding cannot be used to cover the same costs.**

Will FEMA pay the deductible for insurance claims submitted by public school districts?

- FEMA does not provide funding specifically to cover an insurance deductible. PA funding can be used to cover the costs not reimbursed by insurance coverage, including resilience measures. Refer to FEMA's [Public Assistance Policy on Insurance, FP 206-086-1](#).

Do schools have to wait to receive PA funding until insurance awards are determined?

- No. FEMA can provide PA funding to recipients for eligible applicants, including schools, based on anticipated insurance proceeds. This is calculated by a FEMA insurance specialist after a review of the full insurance policy. Once the final insurance award is received, submit it to your state, tribal, or territorial representative(s), who will work with FEMA to adjust eligible funding accordingly.

Employees and Human Resources

Does FEMA help with loss of pay for employees (e.g. if the school was closed and employees were not able to work, but were still paid wages for those days)?

- FEMA's PA grant does not provide reimbursement for employee loss of pay.

Can the PA Program cover wages for public school employees who worked during the event because of the emergency (e.g. employees who worked in shelters or emergency evacuations, or employees involved in cleanup)?

- There are a few labor reimbursement eligibility rules that apply to disaster-related work by the applicant's employees, most of which result in some level of reimbursement. This only applies to staff performing debris removal or emergency protective measures at the request of the eligible applicant. Any work performed by students, parents, or community members are considered donated resources which can offset the non-federal cost share of projects. All donated labor, equipment, and materials should be provided to the PDMG. This information should not include any individual's personally identifiable information (PII). More information is available in the [PAPPG](#).

Does FEMA have specific forms for tracking employee time and eligible work?

- No specific forms are required. FEMA will review records including timecards, payroll, and benefit information for each employee engaged in disaster-related work, along with a description of the eligible work performed. A FEMA representative will assist the applicant with these labor considerations as well as any questions throughout the process.

Can PA funding be used to pay for feeding employees during disaster-related work?

- Provision of meals (including beverages and meal supplies) for employees and volunteers engaged in eligible emergency work is eligible as long as the individuals are not receiving per diem and one of the following circumstances apply:
 - Meals are required based on a labor policy or written agreement that meets FEMA PA requirements;
 - Conditions constitute a level of severity that requires employees to work abnormal, extended work hours without a reasonable amount of time to provide for their own meals; or
 - Food or water is not reasonably available for employees to purchase.
- FEMA only reimburses the cost of meals that are brought to the work location and purchased in a cost-effective and reasonable manner, such as bulk meals. FEMA does not reimburse costs related to group outings at restaurants or individual meals.

Can PA funding be used to reimburse costs and expenses incurred while a school served as a shelter (including employee costs, food, etc.)? If not, is there another program available to cover these costs?

- The PA Program reimburses the entity legally responsible for the work. Generally, a school would not have primary legal responsibility of opening a shelter. FEMA understands that educational facilities incur costs related to shelters and encourages using its established mutual aid agreement or formalize in writing any verbal agreement with state/county/local governments. The entity with legal responsibility for providing a service under a Memorandum of Understanding is potentially eligible for FEMA PA reimbursement.

Facilities Damage

Can PA funding cover the cost of debris removal if a school district or institution of higher education removes its own debris?

- Yes, if the debris is located on maintained school property. PA can be used to cover the costs of labor, equipment, and materials for debris removal if the underlying work is eligible.

Can PA funding be used for damage to university administrative buildings, or is assistance only available for academic buildings?

- If the applicant is an accredited institution of higher education and is a governmental sponsored institution, then all facilities are eligible.
- If the applicant is an accredited institution of higher education, recognized by the U.S. Department of Education, and a PNP entity, then all non-recreational facilities are eligible. This includes facilities dedicated to administrative and supporting services if they are essential to providing critical educational services.

Does FEMA provide reimbursement for damaged playground equipment?

- If the applicant is an accredited education institution and is a government sponsored institution, then all facilities including recreation are eligible.
- If the applicant is an accredited education institution recognized by the U.S. Department of Education or a PNP entity, then some facilities may not be eligible including those used for athletic (recreation), vocational, academic training, or political education. Further information on PNP entity eligibility can be found in the [PAPPG](#).

Is funding available to repair a damaged fence or a leaky roof?

- Yes, these costs may be eligible under the PA Program if the damage was a direct result of the disaster and not a result of deferred maintenance or negligence.

Does the PA Program cover expenses to remove trees damaged by the disaster?

- If the trees were damaged by the disaster, their removal may be eligible for PA funding.

Is PA funding available to remove large trees that pose a danger to the facility or potential injury risk to students?

- The PA Program may provide funding for the removal of trees, provided that they pose a threat to life, health and safety, and meet applicable eligibility requirements discussed in the [PAPPG](#).

Can PA funding be used to replace damaged textbooks for students?

- Eligible applicants may receive reimbursement for damaged textbooks from their inventory. Textbooks that have been purchased and are owned by students are not eligible.

Would university vehicles (e.g., 12-passenger vans) be included for replacement?

- Applicant-owned equipment, including vehicles, damaged by a declared event may be eligible for repair or replacement. Appropriate consideration will be given to all available offsets such as insurance and salvage value. If a replacement vehicle is determined eligible, the replacement will be limited to a similar vehicle of type, age, and condition.

Can PA funding be used to cover the cost of damage to school furniture and the ceiling due to roof leaks caused by a hurricane?

- Yes, damage caused by a declared event may be considered eligible for FEMA assistance, less coverage available by insurance.

Miscellaneous

Where can the Public Assistance Program and Policy Guide be accessed?

This document is often referenced as the *PAPPG*. The *PAPPG* and other useful resources can be accessed on FEMA.gov at the [Public Assistance Resource Library | FEMA.gov](#).

Can you explain the pre-disaster "function" of a facility?

- When a facility was being used for purposes other than those for which it was designed, restoration will only be eligible to the extent necessary to restore to the use immediately prior to the disaster. For example, if an applicant designed and constructed an administrative building, but later altered it in accordance with applicable construction codes or standards to use as a school, the pre-disaster function would be as a school.

Would a PNP entity become subject to additional regulation if they receive FEMA funding for rebuilding? If so, what are examples of this?

- All applicants are subject to reporting and regulatory requirements associated with the FEMA grant, including (but not limited to) those found in the 44 C.F.R. Part 200 and 2 C.F.R. Part 206. The PNP entity should consult with its servicing attorney to determine other regulatory responsibilities that it may be subject to.

Is training available to learn how to apply for PA reimbursements?

- The state, tribal, or territorial emergency management agency may have training available. If you are determined to be an eligible applicant, a FEMA representative will be able to assist you with the grant procedures.

Appendix A: Key Resources

1. *PA Program and Policy Guide (PAPPG)*

The *PAPPG* is a comprehensive, consolidated program and policy document for the PA Program. The *PAPPG* provides an overview of all PA Program policies and the process for applying and receiving PA funds.

2. Public Assistance Resources

The [Public Assistance Resource Library | FEMA.gov](#) contains general program and disaster-specific guidance that focuses on restoring public infrastructure for communities affected by major disasters or emergencies. You can search for a document by its title or filter the collection by topic or document type.

3. Procurement Guidance for FEMA Grants

Knowing the federal procurement rules when purchasing goods and services under a FEMA grant program will help increase your chance of securing and keeping the funding you need. Find the guidance you need to ensure your grant application and management of an awarded grant is successful at [Contracting with Federal Funds for Goods and Services Before, During and After Disasters | FEMA.gov](#).

4. Public Assistance Policy on Insurance, FP 206-086-1

This policy guide interprets statutes and regulations related to insurance requirements under FEMA's PA Program.