



**‘GOFERR’ INFORMATION/GUIDELINES:  
COVID-RELATED SCHOOL EXPENSE REIMBURSEMENT THROUGH MUNICIPAL  
ALLOCATION UNDER GOFERR’s MRF**

Provided to NHMA September 15, 2020

NHMA BACKGROUND;

On September 15, FEMA announced that funding for personal protective equipment (PPE), cleaning materials, and additional supplies would no longer be provided to state and local governmental entities unless “qualifying emergency work” requirements are met. At the same time, FEMA reclassified items deemed ‘PPE’ as falling under the “increased operating costs” category when those items were purchased for non-emergency circumstances. Increased operating costs are not eligible for FEMA reimbursement.

Following the FEMA announcement, New Hampshire school officials, who were planning to seek reimbursement for COVID-related expenses through FEMA, were advised by the Department of Education they “...should work with their municipal partners to request reimbursement for (school) district expenses from GOFERR...” That guidance seemed to suggest that school districts would now share in the Municipal Relief Fund (MRF) allocation.

Since New Hampshire school districts in almost all cases are separate legal entities not previously able to share in the MRF, NHMA contacted the Governor’s Office for Emergency Relief and Recovery (GOFERR). We received the following information in response from GOFERR. Although we agree that submitting reimbursement for school-related expenses is completely voluntary, NHMA also feels it is appropriate to caution municipalities. The subgrantee agreement is signed by your town or city, meaning that compliance with federal and state guidelines for use of the CARES Act funding is the municipality’s responsibility. If rules or federal guidelines/guidance change, it will continue to be the municipality’s responsibility to comply.

GOFERR REPOSE: INFORMATION/GUIDELINES:

*With the time frames for Municipal reimbursement running, we understand that there is limited time for the local officials to sort these issues out, so we are trying to respond as promptly as possible. To respond to your concerns as numbered below:*

- 1. It will be up to the Municipalities to determine with their school district(s) what requests for reimbursement of expenses of the school district(s) the Municipality is willing to submit to GOFERR. As long as these costs have been incurred by the school district in the appropriate Municipal reimbursement time period, and the Municipality indicates to GOFERR that it has agreed to reimburse the school district for these costs if approved by GOFERR, and it is for allowable COVID related expenses, we do not have any other requirements. We (GOFERR) do not see that this needs another sub-grantee notice.*
- 2. We (GOFERR) will not be able to issue the reimbursement directly to the School District. The Grant agreement is only with the Municipality and is under their vendor number. It will be up to the Municipality to work out the arrangement between its School District and the Municipality for what the Municipality will submit and how the Municipality will transmit any reimbursement paid by GOFERR to the school district.*
- 3. GOFERR is not advising the Municipalities that they must, or should, do this. That is a policy and legal determination for each local government. We (GOFERR) are only saying that if they do, we will consider the expenses to be an obligation of the Municipality that has agreed to make a reimbursement to its school district. It will be up to the Municipality to work out the arrangement between its School District and the Municipality for what the Municipality will submit and how the Municipality will transmit any reimbursement paid by GOFERR to the school district.*
- 4. There is no separate reimbursement period for school district expense.*