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We had meetings with HQ, OCC, and JFO staff on this issue last week and all are in agreement that the independent school districts do not have the legal responsibility to conduct hurricane evacuation sheltering services and therefore cannot apply directly to FEMA for reimbursement for such activities. Instead, any eligible costs incurred by the independent school district should be reimbursed through a mutual aid agreement with the county serving as the requesting entity and the independent school district as the providing entity. These mutual aid agreements may be entered post-incident based on a verbal agreement between the requesting and providing entities. However, before funding the requesting entity should document the agreement in writing. The agreement should also be consistent with past practices for mutual aid between the entities.

I hope this is helpful. If you or your team would like to discuss further just let us know.

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FEMA-3395-EM-FL