




FEMA

June 13, 2022

MEMORANDUM FOR: Regional Administrators
FEMA Regions I – X

ATTENTION: Regional Recovery Division Directors

FROM: Melissa K. Forbes
Assistant Administrator
Recovery Directorate 

SUBJECT: Air Disinfection Eligibility Under FEMA’s *Coronavirus (COVID-19) Pandemic: Safe Opening and Operation Work Eligible for Public Assistance (Interim) Policy*

On April 5, 2021, FEMA issued the [Coronavirus \(COVID-19\) Pandemic: Safe Opening and Operation Work Eligible for Public Assistance \(Interim\), Version 2](#) (O&O Policy) establishing parameters for eligible safe opening and operation work under COVID-19 declarations. The O&O Policy allows Public Assistance (PA) funding for, among other things, “cleaning and disinfection, including the purchase and provision of necessary supplies and equipment in excess of the Applicant’s regularly budgeted costs.” In implementing this policy, based on the information regarding the spread of COVID-19 that continues to be disseminated by the Centers for Disease Control and Prevention (CDC), FEMA is clarifying that air disinfection may be eligible in limited circumstances in accordance with the O&O Policy under the category of cleaning and disinfecting. This clarification applies to the effective dates in the O&O Policy.

In response to COVID-19, some applicants have sought reimbursement for different forms of ventilation and air disinfection, including Ultraviolet Germicidal Irradiation (UVGI). UVGI is the use of UV energy to kill viral, bacterial, and fungal organisms. CDC guidance does not recommend UV technology for surface disinfection.¹ However, it does convey that ventilation interventions, including opening windows, using fans, adding high-efficiency particulate air (HEPA) fan/filter systems, and adding upper-room UVGI can help reduce the number of infectious viral particles (including SARS-CoV-2) in the air. In addition to being in accordance with CDC guidance, FEMA’s statute, regulation, and policy requires that COVID-19 work must lessen or eliminate an immediate threat to life, safety, or public health to be eligible.

CDC and the U.S. Environmental Protection Agency (EPA) guidance indicate that ventilation/air disinfection alone does not eliminate the immediate threat of COVID-19. EPA states that by itself, a UVGI system is not enough to protect people from COVID-19.² CDC states that UVGI does not replace the need for cleaning or disinfecting surfaces where infectious SARS-CoV-2 droplets may be present, and recommends a layered

¹ [Cleaning and Disinfecting Your Facility | CDC](#)

² <https://www.epa.gov/coronavirus/what-upper-room-ultraviolet-germicidal-irradiation-uvgi-what-hvac-uvgi-can-either-be>.

approach, which combines multiple prevention strategies such as use of masks, ventilation improvements, physical distancing, cleaning and disinfection, hand hygiene, and vaccination.³

Therefore, to meet PA statutory, regulatory, and policy requirements, including the requirement to lessen or eliminate an immediate threat, FEMA may only fund air disinfection (including HEPA filters), in cases where applicants implemented a layered approach. Such approaches may include the following types of preventive measures:

- Use of masks in a consistent and correct manner;
- Physical distancing of at least 6 feet;
- Frequently cleaning and disinfecting surfaces;
- Hand hygiene with regular hand washing with soap and water or using alcohol-based hand sanitizer; or
- Vaccination.

FEMA may approve UVGI specifically as an air disinfection method, if it was installed based on CDC recommendations,⁴ which are generally limited to:

- Indoor spaces with insufficient or no mechanical HVAC systems or where adequate natural ventilation cannot be maintained year-round.
- Areas with an increased likelihood of sick people (for example, school nurse’s office, hospital waiting room).
- Crowded spaces, particularly when the health status of occupants is unknown (for example, courtrooms, lobbies, homeless shelter sleeping areas).
- Spaces where people must take off masks to eat or drink (for example, school/institutional cafeterias, restaurants, break rooms).
- Areas where it is difficult to stay at least 6 feet apart from others.

If you have any questions, please have your staff contact Ana Montero, Director, Public Assistance Division at Ana.Montero@fema.dhs.gov .

³ [Ventilation in Buildings | CDC: Upper-Room Ultraviolet Germicidal Irradiation \(UVGI\) | CDC.](#)

⁴ [Upper-Room Ultraviolet Germicidal Irradiation \(UVGI\) | CDC.](#)