What should we do if we want to change how a FEMA PA project is completed?

Copyright Vermont League of Cities and Towns
Current as of: 11/12/2026

If your municipality wants to complete a FEMA Public Assistance project differently than what is written in the project worksheet, **you should contact VEM right away.** FEMA must approve any modification to the scope of work written in the project worksheet. This includes changes to materials, methods, or hazard mitigation components. Scope changes must be approved in writing through a revised project worksheet. Completing work differently than approved - if the project still functions as intended - can put the project funding at risk.

During the final inspection, if the completed work does not match FEMA's approved scope, the Department of Public Safety may:

- **Request a FEMA scope chang**e - FEMA may update the project worksheet to match the work actually done and require the municipality to repay part of the funding..
- **Find the project ineligible** - The State and FEMA may determine the project is not eligible for Public Assistance funding and require the municipality to repay all the funds.
- **Investigate for misconduct** - If a municipality used federal funds improperly, the State may investigate and apply penalties.

Misconduct is treated seriously under federal law. Improper use of FEMA funds can lead to repayment, State or Federal debarment, civil penalties, or criminal charges. Early communication with the State is the best way to avoid these outcomes. Best practice is to put your scope change question in writing and wait until you receive an approval response in writing too.

Copyright Vermont League of Cities and Towns
Current as of: 11/12/2026