



North Carolina Department of Public Safety

Emergency Management

Roy Cooper, Governor
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Guidance for Reimbursement of Non-Congregate Sheltering for COVID-19

Updated: August 7, 2020

Subsequent to President Trump's March 13, 2020, Nationwide Emergency Declaration for Coronavirus 2019 (COVID-19), the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) recognizes that non-congregate sheltering may be necessary in this Public Health Emergency to protect public health and save lives. North Carolina State Health Director, Dr. Elizabeth Tilson has directed the state, counties and any other jurisdictions to take appropriate measures to mitigate and respond to COVID-19 disease pandemic. These measures should include plans for non-congregate sheltering, which will provide temporary housing solutions to protect human life and minimize hospital surge. FEMA has approved a state-wide waiver for non-congregate sheltering. This approval extends for 30 days from the date of issuance (April 6, 2020) and will be re-assessed by FEMA every 30 days for as long as there is a public health need.

For reimbursement under Public Assistance Emergency Protective Measures, there are two options: (1) The jurisdictions/agencies can seek direct reimbursement from FEMA for the operations of non-congregate sheltering; Or (2) Through the State-Centric model, the jurisdictions/agencies can seek expedited reimbursement from NCEM, who will then seek reimbursement from FEMA. For both options, applicants that may be eligible for reimbursement include [Private Non-Profits](#), COC (Continuum of Care), Homeless Shelters, Indian Tribal Governments, and Local Governments. Jurisdictions/agencies submitting for reimbursement directly from FEMA must [register in FEMA Grants Portal](#), [submit a Request for Public Assistance](#) (RPA), and then submit a [Project Application](#).

Jurisdictions/agencies using the State-Centric model will not need to submit the same information to FEMA, but will need to [report](#) weekly and provide supporting documentation and proof of payment with invoices to NCEM, who will provide expedited reimbursement. Jurisdiction/agencies using the State-Centric model will remain responsible for setting up and managing their non-congregate sheltering program, including coordinating comprehensive wrap-around services (e.g., food, care for those with disabilities and or access and functional needs, medicine, cleaning/disinfecting, transportation, security, and laundry).

The State-Centric model will help counties and local organizations for whom waiting for FEMA reimbursement has been a barrier, to continue offering or begin offering non-congregate sheltering for their community or region. For more information on the State-Centric model please review the "State-Centric Non-Congregate Sheltering for COVID-19 FAQs" document.

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FEMA approves non-congregate sheltering for individuals that meet the following criteria:

- First Responders and healthcare workers and do not require hospitalization but need to avoid direct contact with their families due to exposure to COVID-19;
- Test positive for COVID-19 and do not require hospitalization but need isolation (including those discharged from hospitals);
- Have been exposed to COVID-19 and do not require hospitalization but should be quarantined;
- Are at high risk for COVID-19 and need to undertake social distancing as a precautionary measure, as determined by public health officials. For high risk groups such as people over 65 or with certain underlying healthy conditions (respiratory, compromised immunities, chronic disease), this may include those whose living situation makes them unable to adhere to social distancing guidance.

FEMA will not reimburse for the sheltering of non-symptomatic individuals that are not among the foregoing categories. Wrap-around services will be reviewed for eligibility based on the type of shelter and the specific needs of those sheltered. Wrap-around services must be determined necessary to protect public health and safety in accordance with guidance provided by appropriate health officials. Wrap-around services include but are not limited to food, care for those with disabilities and or access and functional needs, medicine, cleaning/disinfecting, transportation, security, and laundry. Due to the current ambiguity of what are considered wrap-around services, please keep documentation and records of all services you believe are pertinent. Support services such as case management, and mental health counseling are not eligible at this time. However, it is important to still track these costs, in case there is a change.

FEMA does not mandate specific options for temporary facilities to be used for non-congregate sheltering. Options for non-congregate settings include but are not limited to hotels, motels, trailers, dormitories or other locations that meet the State Health Director's directive and are cost effective and practical. To be considered for reimbursement, Applicants must comply with the Federal procurement standards found at [2 C.F.R. §§ 200.317 – 200.326. FEMA's Procurement Under Grants Conducted Under Exigent or Emergency Circumstances Fact Sheet](#) (March 16, 2020), which provides additional guidance to include the requirement for a termination for convenience clause in its contracts for sheltering and related wrap-around services, such as food, security services, and care for those with disabilities or access and functional needs.

FEMA will not approve Public Assistance reimbursement that duplicates funding by another federal agency, including but not limited to the U.S. Department of Health and Human Services or Centers for Disease Control and Prevention. Eligible counties and organizations will need to maintain records to provide sufficient data and documentation to establish the eligibility of costs for which it is requesting Public Assistance reimbursement. Appropriate lengths of stay should be based on guidance from public health officials or CDC (e.g., when it is appropriate for someone to no longer be considered infected and therefore not require isolation anymore), or as the individual is able to move to alternative safe and stable sheltering solutions.

Documentation to establish eligibility **includes but is not limited to** the following information:

- Specific need for each individual sheltered (e.g., what eligibility category the individual falls into)
- Length of stay for each individual sheltered
- Age of each individual sheltered
- If applicable, number of meals provided for each individual sheltered
- If applicable, number of individuals with access or functional needs sheltered
- If applicable, number of household pets sheltered
- If applicable, number of assistance and service animals sheltered
- If applicable, type of shelter provided for animals as stand-alone, co-located, co-habitational
- Description of services provided to sheltered individuals
- Vendor contracts
- Invoices with proof of payment

If you are following the State-Centric model this information must be submitted with every invoice for verification to Brett Boykin-Roach at Brett.Boykin-Roach@ncdps.gov. Lack of sufficient supporting documentation may result in NCEM or FEMA determining that some or all of the costs are ineligible.

A report must be submitted every Friday by close of business. This information is sent to FEMA weekly. Please click [here](#) to access the report.