



North Carolina Department of Public Safety

Emergency Management

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Guidance for reimbursement of non-congregate sheltering for COVID-19

Updated: April 30, 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, the State of North Carolina will be the Applicant, and the jurisdictions/agencies seeking reimbursement for the operations of non-congregate sheltering will be considered Sub-Applicants. Sub-Applicants that may be eligible for reimbursement are [Private Non Profits](#), COC (Continuum of Care), Homeless Shelters, Indian Tribal Governments, and Local Governments. Sub-Applicants must [register in FEMA Grants Portal](#), [submit an RPA](#) (Request for Public Assistance), and then submit a [Project Application](#).

The approved date for reimbursement of Non-Congregate Shelters operations begins April 6, 2020. Non-congregate sites that opened before April 6, 2020 may be eligible for the reimbursement, however additional information will need to be submitted for consideration. If there are any request for funding for non-congregate sheltering that happened prior to the April 6, 2020, it needs to be submitted in a new request for consideration for after the fact approval. Those requests should be sent to Brett Boykin-Roach, at Brett.Boykin-Roach@ncdps.gov.

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

- Test positive for COVID-19 who do not require hospitalization but need isolation (including those exiting from hospitals)
- Have been exposed to COVID-19 who do not require hospitalization but whom warrant quarantine
- Persons needing social distancing as a precautionary measure, as determined by public health officials, particularly for high-risk groups such as people over 65 or with certain

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underlying health 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, the specific needs of those sheltered, and determined necessary to protect public health and safety and in accordance with guidance provided by appropriate health officials. Wrap-around services include but are not limited to laundry, food/meals, cleaning, security, and care for those with disabilities or access and functional needs. Due to the current ambiguity of what is considered Wrap-around services, please keep documentation and records of all services you believe are pertinent. Support services such as case management, mental health counseling, and transportation 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 that the applicant or sub-applicants pursue a specific option or 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, Sub-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) 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 Sub-Applicants 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 do not require isolation). 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

Lack of sufficient supporting documentation may result in FEMA determining that some or all of the costs are ineligible.

Reporting

All counties or organizations operating non-congregate shelter must complete the report ([here](#)) for each operational site every Friday by COB.

All potential eligible expenses, including wrap-around services needs to be submitted every ten business days (April 17, 2020 and May 1, 2020), or at the end of the disaster. Questions about non-congregate sheltering should be sent to Brett Boykin-Roach at Brett.Boykin-Roach@ncdps.gov.