



**FEMA**

April 2, 2020

Mr. Mark S. Ghilarducci, Director  
Governor's Office of Emergency Services  
3650 Schriever Avenue  
Mather, CA 95655

Re: Request for Approval of Non-Congregate Sheltering by Local Governments  
FEMA-4482-DR-CA (COVID-19)

Dear Mr. Ghilarducci:

This is in response to your letter dated April 1, 2020, clarifying that the California Governor's Office of Emergency Services' (Cal OES) letter dated March 25, 2020, was intended to request that FEMA approve Public Assistance (PA) funding for costs related to emergency, non-congregate sheltering (Emergency NCS) implemented and managed by the State of California (State) and local governments.

Based on your letter clarifying Cal OES' request and describing Cal OES' coordination with local governments to ensure that Emergency NCS is implemented and managed in a consistent manner, including requiring the use of uniform registration forms and reporting procedures, I am retroactively approving the implementation of Emergency NCS by local governments as of March 19, 2020.

My approval of the implementation of Emergency NCS by local governments is subject to the same terms and conditions outlined in the State Emergency NCS Approval Letter and Cal OES must clearly communicate the applicability of these terms and conditions to the local jurisdictions that have implemented or intend to implement an Emergency NCS program. To this end, I encourage you to provide these jurisdictions with a copy of the State Emergency NCS Approval Letter to minimize confusion at the local level about the requirements and limitations applicable to FEMA's approval of PA funding for their claimed costs. For your convenience, a copy of the State Emergency NCS Approval Letter is enclosed.

Please emphasize to the local governments the importance of maintaining tracking mechanisms to provide sufficient data and documentation to establish the eligibility of their claimed Emergency NCS costs (including the need for non-congregate sheltering of each individual, length of stay, and costs). As with any activity, lack of sufficient support documentation may result in FEMA determining that some or all of a local jurisdiction's claimed costs are ineligible.

Finally, on or before April 15, 2020, please provide FEMA with a list of those local jurisdictions that have implemented, or advised the State that it intends to soon implement Emergency NCS and provide FEMA with an updated list on the 15<sup>th</sup> and 30<sup>th</sup> of each month.

If you have any additional questions regarding this matter, please contact Robert Pesapane, Recovery Division Director, at (510) 627-7250.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. J. Fenton'.

Robert J. Fenton  
Regional Administrator  
FEMA Region IX

cc: James Cho, Regional Response Division Director, FEMA Region IX  
Robert Pesapane, Regional Recovery Division Director, FEMA Region IX  
J.P. Henderson, Regional Counsel, FEMA Region IX