



**FEMA**

April 29, 2020

Mr. Ryan Buras  
Deputy Director, Recovery  
Governor's Authorized Representative  
California Office of Emergency Services  
3650 Schriever Avenue  
Mather, California 95655

Re: Request for a Time Extension for Approval of Non-Congregate Sheltering  
FEMA-4482-DR-CA (COVID-19)

Dear Mr. Buras:

This is in response to your letter dated April 20, 2020, requesting that FEMA approve Public Assistance (PA) funding for costs related to emergency, non-congregate sheltering (NCS) for an additional 90 days.

In the Region's letters to you dated March 27, 2020 and April 2, 2020, FEMA approved costs associated with non-congregate sheltering (NCS) from March 19, 2020 through April 30, 2020. Based on my review of your request and supporting information, including the re-assessment of continued need provided by the State Public Health Officer, I am approving your request to extend the period of time for FEMA reimbursement of costs related to Emergency NCS, for the period beginning May 1 through May 31, 2020.

In the Region's March 27, 2020 letter, time extension approvals were conditioned upon the re-assessment of the continuing need for Emergency NCS from a State public health official and a detailed justification of the continuing need. Please note that FEMA will need the following information to be included in any future extension requests:

- Number of individuals being sheltered by each local provider;
- Average length of stay;
- Underlying need/condition requiring Emergency NCS;
- Types of wrap-around services being provided;
- Average cost per individual; and
- Non-Congregate transition plan to other federal funding sources such as Department of Housing and Urban Development (HUD) funding for homeless individuals or other resources under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

This approval for the time extension and all costs associated with Emergency NCS remain subject to the same conditions and limitations set forth in the Region's March 27, 2020 and April

2, 2020 letters to you on this subject. Moreover, I want to emphasize, as previously stated in the March 27, 2020 letter to the state and consistent with FEMA's national guidance on reimbursable expenses related to Emergency NCS, the approval does not include all populations included in the State's March 25, 2020 request. Specifically, it does not include asymptomatic individuals whose living situation may make them unable to adhere to social distancing guidance, unless they also meet one of the following criteria:

- Individuals who test positive for COVID-19 that do not require hospitalization, but need isolation or quarantine (including those exiting from hospitals);
- Individuals who have been exposed to COVID-19 (as documented by a state or local public health official, or medical health professional) that do not require hospitalization, but need isolation or quarantine; and
- Individuals who are asymptomatic, but are at "high risk", such as people over 65 or who have certain underlying health conditions (respiratory, compromised immunities, chronic disease), and who require Emergency NCS as a social distancing measure.

Finally, I would like to reinforce the importance of the State of California and local providers maintaining effective tracking mechanisms to provide sufficient data and documentation to establish the eligibility of Emergency NCS costs (including, wrap-around services) for which it is requesting PA funding. As with any activity, lack of sufficient support documentation may result in FEMA determining that some or all of the costs claimed by the State and/or local providers are ineligible.

If you have any additional questions regarding this matter, please contact Robert Troy, Deputy Federal Coordinating Officer for COVID-19 Recovery, at (510) 849-7226.

Sincerely,



Robert M. Pesapane  
Acting Deputy Regional Administrator  
FEMA Region IX

cc: J.P. Henderson, Regional Counsel, FEMA Region IX  
Robert Troy, COVID-19 Event Recovery Deputy FCO, FEMA Region IX  
James Cho, Regional Response Director, FEMA Region IX