

This document is intended to provide recommendations on actions associated with emergency non-congregate shelter activities which may assist in seeking reimbursement for eligible activities from state and federal sources. Nothing in this document should be construed as a promise or guarantee of funding, as each disaster and circumstance requiring emergency sheltering is reviewed on a case-by-case basis.

Non-Congregate Sheltering (NCS) is any emergency sheltering where people are given individual or family units, like hotel rooms or apartments, instead of staying in a large, shared shelter. NCS may be appropriate if congregate sheltering facilities are unavailable or cannot meet the emergency sheltering need and can reduce the risk of spreading illness or other issues that can arise in congregate spaces.

The jurisdiction which is legally responsible for conducting emergency sheltering is responsible for all costs which may be submitted for public assistance reimbursement. Eligibility for reimbursement will be determined if California Disaster Assistance Act or Stafford Act public assistance funding is approved and sufficient supporting documentation of cost incurred is provided.

Comprehensive documentation from start to finish of the actions taken, costs incurred, and decision making involved at the time of the event is critical to maximize the amount of reimbursement available to local government entities conducting emergency sheltering. Providing proper justification and documentation ensures that the state or federal government may approve reimbursement for activities that qualify. Notifying Cal OES as soon as possible after the decision to initiate emergency NCS allows subject matter experts to provide more specific guidance than this document.

### **Notification and Communication**

- **Notification**

- Notify the OA, Cal OES Regional Response ESC, Cal OES Recovery, and Cal OES Individual Assistance as soon as possible after electing to conduct NCS.
  - [RecoveryIA@caloes.ca.gov](mailto:RecoveryIA@caloes.ca.gov)
  - [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov)
- Identify a single point of contact within the jurisdictional organization for NCS communication.
- Develop a communication plan for survivors (email, phone, in-person, paper drop-off, etc.)
  - Cal OES and other jurisdictions who have conducted NCS can assist with more details.

- **FEMA or State Assistance via Reimbursement Programs**

- Both FEMA and Cal OES will require information-sharing agreements and regular reporting of shelter counts, costs, locations, services provided, etc.

- If a FEMA Major Disaster Declaration (MDD) is declared with Public Assistance (PA) or Individual Assistance (IA) approved, adhere to specific timelines for notifying FEMA via Cal OES.
  - If both PA and IA are approved, it can create duplication of benefits (DOB) issues across the various programs and assistance provided. These should be monitored closely to prevent DOB and maximize reimbursement.
  - Initial notification of intent to conduct NCS is required to FEMA and Cal OES within 5 days from MDD or from initiating NCS activities, whichever is later.
  - Additional reporting is required to FEMA every 30 days post-approval.

## Documentation

- **Event Details**
  - Specific start date and tentative/proposed end date.
  - Explanation for the necessity of NCS for the specific disaster/population.
- **Implementation**
  - Why NCS and not congregate sheltering?
    - Make sure to identify any entities already conducting NCS or congregate sheltering because of the event, including jurisdictional departments, private non-profits (PNP), non-governmental organizations/volunteer organizations active in disaster (NGO/VOAD), etc. If possible, include any pre-disaster Memoranda of Understanding/Memoranda of Agreement (MOU/MOA) with delineated responsibilities upon activation.
  - Identification of the contractor, PNP, or jurisdictional agency responsible for shelter intake and management.
    - There may be one or many, but the jurisdiction should identify a single entity responsible for management and coordination of all efforts.
  - Criteria for selecting NCS locations.
  - Names and addresses of past, current, and proposed future NCS facilities, including rates.
  - Justification for the locations chosen and their distribution throughout the jurisdiction.
    - Are the rooms distributed throughout the Operational Area (OA)? This should be a survivor-centered approach. If too far away from the affected area, distance may cause an issue with medical, school, and/or work transportation.
  - Procurement process and adherence to procurement requirements, including any local SOE waivers.

- **Population Served**

- Populations eligible for NCS (e.g., disaster affected, including homeowners, renters, pre-disaster unhoused, etc.)
  - Origin of these populations is key (e.g., home address, geographic areas, zip codes, cities, evacuation zones, etc.)
  - How are the impacted disaster areas which will receive NCS being determined? (Particularly if both NCS and congregate sheltering are being used.)
- Tracking of individuals/family units.
  - Household point of contact (POC) name.
  - How many rooms per household?
  - Are household pets included in the room and rate?
  - Room allocation per household and linkages to other households (multi-generational family)
  - If multiple rooms are granted under a single household POC, provide justification and description of the need.
  - Conduct a recurring status check on the household to ensure they are still in the program. (Costs associated with rooms that cannot be confirmed as occupied may not be eligible for reimbursement.)
  - Check-in/out procedures for NCS households.
  - Duration of stay and services provided/received tracked by providing entity and activity/service.

- **Survivor Agreement**

- Terms for staying in NCS, including communication with the jurisdiction or managing entity and adherence to program rules.
- Survivor information to collect at intake:
  - Household POC name
  - Preferred language
  - Identification numbers (FEMA IA, local registration, etc.)
  - Contact details
  - Damaged address
  - Household count by age
  - Members with disabilities or access and functional needs
  - Homeowner or renter status
  - Insurance details, including the hazard type
  - Confirmation that household POC will register with FEMA within 7 days of an IA declaration and will fully cooperate with FEMA requests and inspections

- **Duration and Transition**

- What conditions are required to terminate NCS locally?
- Plans for transitioning to other programs once the threat has passed or the emergency is over (e.g., local housing commission, home repair support, etc.)
- Notification exit letter templates (e.g., 14 days/30 days/end of program)
- Board of Supervisors, City Council, or Chief Administrative Official letter/document detailing where the funding is coming from, how long NCS will take place, and/or how it will transition to other programs.

### Costs and Services Provided

- **Contracts and Agreements**
  - Documentation of contracts or room agreements with each NCS provider.
  - Activity logs for force account labor and/or volunteer labor (ICS 214 or similar) and time sheets/sign-in sheets (from internal staff, contractors, private non-profits, and/or volunteers.)
  - Logs for force account equipment or rental equipment, including lease agreements.
- **Wrap Around Services to be Tracked (may not be reimbursable):**
  - These items should be tracked and segregated into distinct costs to maximize reimbursement possibilities:
    - Security
    - Meals (if provided by jurisdiction or PNP)
    - Childcare
    - Case Management
    - Shelter Management (responsible for intake, status checks, and verifying room occupancy)
    - Transportation

### Transition Planning

- **Transitioning Out of NCS**
  - Develop a plan for ending or transitioning out of NCS upon initiation of sheltering operations.
  - Identify conditions for ending NCS (e.g., end of threat, end of evacuation orders, completion of home inspection, etc.)
  - Explore options for individuals without homes to return to (e.g., FEMA IA Transitional Housing, state/local housing programs).
  - Engage with PNPs, other state/federal Agencies, or elected officials for additional options.
    - If pre-event MOU/MOA is not in place, identify the active shelter providers as soon as possible and work closely to determine if post-event agreements need to be executed to confirm the work was done at the jurisdiction's request or direction.

**Supplemental Supporting Documents for Reimbursement**

- **Tracking Items**
  - Examples of spreadsheets, sign-in sheets, burn rate trackers, overnight populations, etc.
  - List of documents such as contracts, MOU/MOA, lease agreements, activity logs (ICS 214 or similar), SOE forms.
  - Form letter for notifying FEMA/Cal OES with required fields/information.
- **Population Tracking**
  - Total number of survivors.
  - Tracking of vulnerable populations (AFN, undocumented, etc.)
  - Reasons for entering and exiting the NCS program.

To obtain additional information about NCS Best Practices contact:

[RecoveryIA@caloes.ca.gov](mailto:RecoveryIA@caloes.ca.gov)

[DisasterRecovery@CalOES.ca.gov](mailto:DisasterRecovery@CalOES.ca.gov)