# FREQUENTLY ASKED QUESTIONS FEMA RESOURCES DURING COVID-19



During the coronavirus pandemic, FEMA has focused on its usual areas of expertise: operational coordination and providing funding assistance for emergency protective measures. The agency has labelled its actions surrounding COVID-19 as a "Whole of America Response."

NATIONAL LOW INCOME HOUSING COALITION

On the operational side, FEMA has focused on assisting state and local governments in acquiring personal protective equipment (PPE) and increasing the capacity of hospitals and COVID-19 testing. The agency has been working in tandem with the Army Corp of Engineers, as well as activated National Guard units.

FEMA is also focusing on implementing the assistance measures approved through the President's National Emergency Declaration and Major Disaster Declarations. This involves accepting applications for reimbursement from state, local, and tribal governments, as well as designated nonprofits for disaster response work.

# WHAT FEMA RESOURCES ARE AVAILABLE TO ADDRESS HOUSING AND HOMELESSNESS IN STATES COVERED BY THE NATIONAL EMERGENCY DECLARATION?

FEMA has authorized its Public Assistance (PA) program – Category B: Emergency Protective Measures for all states, territories, and tribal governments covered by the national Emergency Declaration. This program authorizes FEMA to reimburse eligible costs related to COVID-19 response, including some <u>costs related to</u> <u>shelter needs</u>. Emergency protective measures are "activities taken to eliminate or reduce an immediate threat to life, public health or safety, or significant damage to improved public or private property in a cost-effective manner."

The PA Program is the only avenue available for FEMA funding to address housing needs related to COVID-19. Reimbursements under Category B will be provided with a 75% reimbursement from FEMA. This means that the state will pay 100% of the costs and be reimbursed for 75% of it.

# WHAT FEMA RESOURCES ARE AVAILABLE TO ADDRESS HOUSING AND HOMELESSNESS IN STATES COVERED BY A MAJOR DISASTER DECLARATION?

For areas under Major Disaster Declarations, the entire range of Public Assistance Programs is available. The types of grants available are broken up into several broad categories:

- Category A: Debris Removal
- Category B: Emergency Protective Measures
- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Buildings and Equipment
- Category F: Utilities
- Category G: Parks, Recreational, Other

For "typical disasters" these programs provide reimbursement for removing debris from public areas, getting water and electricity back online, and a host of other repair projects. Given the lack of structural damage and debris caused by a pandemic, most of these categories are unlikely to address housing and homelessness

needs. The category that can be utilized the most to assist individuals experiencing homelessness is Category B: Emergency Protective Measures.

#### WHAT CAN PUBLIC ASSISTANCE PROGRAM - CATEGORY B: EMERGENCY PROTECTIVE MEASURES BE USED FOR?

Activities eligible for reimbursement under Public Assistance - Category: B Emergency Protective Measures include:

- Transporting and pre-positioning equipment and other resources for response
- Emergency Operations Center (EOC)-related costs
- Supplies and Commodities
- Medical Care and Transport
- Evacuation and sheltering, including that provided by another state or tribal government.
- Childcare
- Security, such as barricades, fencing, or law enforcement
- Dissemination of information to the public to provide warning and guidance about health and safety hazards using various strategies such as flyers, public service announcements or newspaper campaigns.
- Mass mortuary services

For housing assistance – the eligible activity most likely to be utilized during the COVID-19 pandemic is "Evacuation and Sheltering." FEMA has designated "medical sheltering" as a part of this eligible activity.

The term "medical sheltering" is meant to address the specific needs directly resulting from this Public Health Emergency. For purposes of eligibility under the COVID-19 declarations, FEMA will consider non-congregate sheltering for health and medical-related needs, such as isolation and quarantine. All such non-congregate sheltering must be approved by the FEMA Regional Administrator in order for such costs to be reimbursed. This approval should come before non-congregate sheltering begins – although limited circumstances exist allowing FEMA to approve the sheltering after the fact. A positive model of non-congregate sheltering at a state level can be found in <u>California</u> and <u>North Carolina</u>.

FEMA limits the target population for non-congregate sheltering narrowly. FEMA will only cover costs associated with individuals that have been exposed or have tested positive for COVID-19 that do not require hospitalization but need isolation, as well as high-risk individuals that need social distancing as a precautionary measure. The need for non-congregate sheltering must be established by an official order or other directions from state and local health officials.

The CDC or state/local/tribal/territorial public health officials must require the non-congregate sheltering through an official order or must otherwise be done at the direction of health officials. The target population should be determined by a public health official's direction or using procedures established by health-related state or local entities. Requests from health officials should specify the populations to be sheltered. FEMA is able to approve state-wide requests, provided the plan meets FEMA guidance and is approved before sheltering.

For more information on non-congregate sheltering and FEMA during the COVID-19 pandemic please refer to FEMA's <u>fact sheet</u> on the subject. Please note that this non-congregate sheltering eligibility only covers individuals that are actively without a place to go – not individuals that may be at risk of losing their homes in the future.

#### WHO IS ELIGIBLE FOR THIS FUNDING?

State, territorial, tribal, local government entities and certain private non-profit (PNP) organizations are eligible to apply for the FEMA Public Assistance Grant Program (PA) and access these assistance funds. Only certain Private Non-Profit Organizations (PNP's) are eligible for Category B Public Assistance. To be eligible, the nonprofit in question must have an IRS-granted tax exemption or documentation from the state showing that they are a non-revenue producing, nonprofit entity organized under state law. They must own or operate a facility that provides "eligible services." These eligible services are broken into two parts 1) Eligible Critical Services and 2) Eligible Non- Critical, Essential Social Type Services. For more information on eligibility for nonprofits, please refer to FEMA's fact sheet on the subject.

NLIHC recommends that nonprofit service providers reach out to state and local governments to include their needs in the jurisdictions' applications for FEMA assistance instead of applying on their own.

#### ARE FEMA AND THE NATIONAL GUARD DEPLOYING HOUSING SOLUTIONS LIKE RVS FOR HOMELESS INDIVIDUALS?

FEMA has been authorized to cover expenses for National Guard units currently deployed to assist in COVID-19 response. National Guard units are currently assisting hospitals and local governments to increase medical capacity in hard-hit areas and improving emergency response capabilities.

The national guard is not currently setting up any housing for homeless individuals. While some jurisdictions have been utilizing RVs as overflow for homeless individuals, that service is not being provided by the National Guard. Instead those overflow units are being procured and deploy by state and lo cal officials and are potentially being reimbursed by FEMA.

# DOES FEMA HAVE RECOMMENDATIONS FOR ADDRESSING THE NEEDS OF INDIVIDUALS EXPERIENCING HOMELESSNESS?

FEMA does not have any recommendations on addressing the needs of individuals experiencing homelessness at this time. FEMA does not typically focus on the needs of individuals experiencing homelessness and it unlikely that the agency will issue recommendations in the future. FEMA does not have an active role in directing state and local response to COVID-19 – they are merely providing logistical and technical support, and reimbursement for eligible expenses. FEMA's rumor control page has additional facts regarding FEMA's role.

Other agencies, such as HUD and the U.S. Interagency Council on Homelessness have issued guidelines and best practices for addressing homeless individuals in encampment, shelter, and unsheltered situations. A review of these documents is available on the NLIHC COVID-19 website.

#### WILL FEMA BE SENDING FINANCIAL ASSISTANCE TO INDIVIDUALS?

In the context of a pandemic, it is unlikely that direct assistance programs for individuals will be authorized.

# HOW CAN I MAKE SURE MY STATE IS ACCESSING FEMA FUNDS?

Nonprofits should consult with their state and local governments and FEMA regional offices to ascertain what funds are being provided to their state. Typically, the Emergency Management office of a locality, state, territory, or tribe will be in frequent contact with FEMA personnel and will be able to provide information regarding FEMA response in the area. It is recommended that nonprofits without direct FEMA experience reach out to these emergency managers to ensure that the needs of individuals experiencing homelessness are being considered as the state applies for public assistance funding.

DISASTER HOUSING RECOVERY COALITION, C/O NATIONAL LOW INCOME HOUSING COALITION 1000 Vermont Avenue, NW | Suite 500 | Washington, DC 20005 | 202-662-1530 | www.nlihc.org