



U.S. Department of Homeland Security
536 S. Clark St. 6th Floor
Chicago, IL 60605

FEMA

March 30, 2020

Mr. Jared Moskowitz, Director
Florida Division of Emergency Management
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

Reference: Pinellas County Request for Non-Congregate Sheltering
FEMA-4486-DR-FL

Dear Mr. Moskowitz:

This is in response to Pinellas County's (County) request submitted on March 27, 2020, requesting FEMA approval for emergency non-congregate sheltering activities under the Public Assistance (PA) program. Specifically, the letter from the County Health Director requests approval for hotel space to effectively and safely provide isolation and quarantine to alleviate demand and congestion on hospital resources while ensuring isolation of potentially contagious homeless residents. Your target population are cases for homeless individuals and families awaiting Coronavirus Disease 2019 (COVID-19) test results or having tested positive for COVID-19 that require sheltering immediately upon discharge and are not able to return to a community shelter location without posing significant risk of COVID-19 spread. Upon discharge, individuals and families will be transported safely to the site, a room will be available, and supplies provided as a separate quarantine room. Case managers and Department of Health (DOH) personnel will make frequent contact by phone to work with and mitigate individual/family concerns until DOH authorizes discharge.

In accordance with section 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, eligible emergency protective measures taken to respond to the referenced COVID-19 emergency, at the direction or guidance of state, local, tribal, and territorial public health officials, may be reimbursed under Category B of FEMA's PA program if necessary to save lives, protect improved property, or public health and safety, and/or lessen or avert the threat of catastrophes.

Based on my review of your request and supporting documentation and information provided, I am providing approval of your request for pre-approval for emergency, non-congregate sheltering, which will be implemented by the County pursuant to the Director of the Florida Department of Health of Pinellas County letter dated March 25, 2020. Your approval is contingent on these actions being prudent and necessary as documented in the State of Florida

Department of Health's Declaration of Public Health Emergency dated March 1, 2020 and subsequent Public Health Advisory dated March 25, 2020 for COVID-19 as a result of Executive Order 20-83. Based on coordination with the local public health official in Pinellas County, the local public official is in support of this recommendation as it relates to section 6 of the State of Florida Department of Health Declaration of Public Health emergency dated March 1, 2020.

My approval of the County's request for PA approval for costs related to non-congregate sheltering is subject to and conditioned by the following:

FEMA approves non-congregate sheltering for the individuals identified in the request from the County specifically for individuals that meet one or more of 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 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.

My approval is limited to emergency, non-congregate sheltering costs that are reasonable and necessary to address the public health needs resulting from FEMA-4486-DR-FL.

My approval is limited to costs that are reasonable and necessary for providing non-congregate sheltering to eligible individuals. In this regard, please note that FEMA does not mandate that the State pursue a specific option or options for temporary facilities to be used for non-congregate sheltering, but FEMA will only approve PA funding for cost-effective and practical options.

FEMA may provide funding for eligible costs for the establishment of non-congregate sheltering as outlined above in 30-day increments or less if a re-assessment determines there is no longer a public health need, but not to exceed the duration of the Order of the State Public Health Officer. The County must provide a re-assessment from the State Public Health Officer or County Health Department at each 30-day interval that includes certification that a threat to lives, public health, or safety exists, and that measures to eliminate or lessen that threat are required.

To be reimbursed for contract costs, the County 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, and the County should include a termination for convenience clause in its contracts for sheltering and related services, such as food, security services, and care for those with disabilities or access and functional needs.

FEMA will not approve PA funding that duplicates funding by another federal agency, including the U.S. Department of Health and Human Services or Centers for Disease Control and Prevention.

The County must comply with, and enable FEMA to comply with, applicable environmental and historic preservation laws, regulations, and executive orders or funding may be jeopardized.

The County will need to maintain tracking mechanisms to provide sufficient data and documentation to establish the eligibility of costs for which it is requesting PA funding (including the need for non-congregate sheltering of each individual, costs and length of stay to include they are no longer determined to be infected and therefore do not require quarantine). As with any activity, lack of sufficient support documentation may result in FEMA determining that some or all of the costs are ineligible.

Sincerely,



Gracia B. Szczech
Regional Administrator