

## Project Roomkey Federal Emergency Management Agency (FEMA) Reimbursement Frequently Asked Questions

Updated: June 8, 2020

### Eligibility for FEMA Reimbursement and Project Roomkey

1. **Question:** *Updated* Are activities and services provided by local agencies through Project Roomkey eligible for FEMA reimbursement?

**Answer:** Yes. The State of California, on behalf of local governments, sought and received approval from FEMA for emergency non-congregate shelter (NCS). This means that costs associated with providing NCS through occupancy agreements and necessary wrap-around supports for individuals experiencing homelessness who are: COVID-19 positive; exposed to COVID-19 as verified by a health provider; or asymptomatic but “[high risk](#),” such as over 65 years old or with a underlying health condition, may be eligible for FEMA reimbursement at up to 75 percent. Counties and tribes should carefully review the [State](#) and [local](#) government approval letter for eligibility criteria, allowable activities, wrap-around supports, and ineligible costs. The initial approval was [extended](#) through [June 30, 2020](#).

2. **Question:** *Updated* Are there any updates on FEMA approval to grant an extension on FEMA reimbursement for Project Roomkey?

**Answer:** FEMA granted the State an additional extension to our original approval of NCS for Project Roomkey through [June 30, 2020](#). The specifics of the extension can be reviewed in the [Project Roomkey: FEMA Approval Extension Letter](#). The State will continue to seek extension approvals as appropriate should there still be a need for NCS beyond [June 30, 2020](#) and will keep communities apprised of any status changes.

3. **Question:** *Updated* What is the official Incident Period start date for which NCS under Project Roomkey became eligible for FEMA reimbursement?

**Answer:** Reimbursement for non-congregate sheltering costs began March 19, 2020, as specified in the [approval letter](#), and will continue through [June 30, 2020](#) (per the [extension approval](#)) unless the public health needs should

sooner terminate. The State must obtain FEMA's approval for any time extension beyond [June 30, 2020](#) and will do so should there still be a need for non-congregate sheltering to control the spread of COVID-19.

4. **Question:** *Updated* Does each county/tribe need to make a formal request for their county/tribe to be approved for Project Roomkey costs associated with NCS as long as they are consistent with the State and local approval?

**Answer:** No, it is not necessary for counties or tribes to request and be approved for NCS separately or individually. FEMA has provided pre-approval for NCS to the [State](#) and [local](#) governments in letters dated March 27, 2020, and April 2, 2020, respectively, and recently approved an additional [extension](#) on [June 1, 2020](#), through [June 30, 2020](#). It is extremely important that the tracking and eligibility requirements are in alignment with the guidance outlined in these approval letters.

5. **Question:** *Updated* Is there a timeline by which an individual is able to remain in a Project Roomkey site and for the local government to be eligible for NCS FEMA reimbursement? For example, if an individual moves into a Project Roomkey site because they are COVID-19 positive and then later cleared, are the costs associated with their extended stay eligible for reimbursement for a limited period of time or until there is no longer a need for NCS? Who determines when there is no longer a need for NCS?

**Answer:** State guidance relevant to recommended practices associated with Project Roomkey does not limit the length of stay for an individual that moves into a NCS site (hotel, motel or trailer). [Approval](#) for NCS that is reimbursable by FEMA is granted through [June 30, 2020](#), per the [Project Roomkey: FEMA Approval Extension Letter](#), and is applicable to individuals who meet one of the three categories specified. Once an individual has been cleared and no longer meets any of the three categories for NCS, Cal OES recommends that entities move the costs associated with sheltering the individual for the remainder of their stay to another eligible funding source, such as State funding made available and announced under [Executive Order N-32-20](#) as the costs associated with the latter part of their stay (once they have been cleared) may not be eligible for FEMA reimbursement. Communities are strongly encouraged to review relevant funding streams to confirm eligible uses; communities receiving the [funds distributed](#) by the Homeless Coordinating and Financing Council (HCFC), including those referenced in the link above, who are interested in utilizing HCFC funds for this purpose must notify HCFC at [hcfc@bcsh.ca.gov](mailto:hcfc@bcsh.ca.gov).

Please also refer to question 11 in the [FEMA COVID-19 Non-Congregate Sheltering FAQs](#) for more information.

6. **Question:** *Updated* What wrap-around services are consistent with Project Roomkey and eligible for FEMA reimbursement? What documentation is required to track for eligible reimbursements?

**Answer:** The following wrap-around supports are consistent with Project Roomkey and eligible for FEMA reimbursement as they are essential with maintaining emergency non-congregate sheltering operations:

- Furnishings, supplies, and equipment needed to maintain a sanitary shelter environment for clients and staff.
- The costs associated with leasing and operations of hotels, motels, trailers, and other alternative isolation emergency housing options.
- Transportation to/from Project Roomkey sites and medical care facilities may be reimbursable if it aligns with the emergency response to COVID-19 as specified in the FEMA [approval letter](#).

The required documentation [for Project Roomkey participation](#) includes, but may not be limited to, tracking the location where wrap-around services are provided as well as maintaining documentation on the total time enrolled in Project Roomkey (in the unit: hotel/motel/trailer), services provided and their costs. Please also refer to the [Public Assistance Program and Policy Guide v3.1](#) (pages 65 thru 70) for an answer to the type of documentation that is needed.

Additionally, [template materials](#) and a [training](#) on recommended [documentation practices](#) including a [self-certification](#) for those who are high risk of complications is available on the [Project Roomkey/Housing and Homelessness COVID Response page](#) (please review the materials under Project Roomkey Guidance and Funding Considerations). We strongly recommend communities maintain these enrollment/screening documents consistently as well as input a robust level of data into the Homeless Management Information System (HMIS) NCS [workflow](#) in order to track each program record on an individual/daily level.

7. **Question:** If our county/tribe contracted with a local ambulance service company to transport our individuals experiencing homelessness to hotels/motels would this expenditure be reimbursable by FEMA?

**Answer:** [Public Assistance Program and Policy Guide v3.1](#) (aka “PAPPG”) suggests eligibility for reimbursement of transportation costs to a shelter during a pandemic event. See the citation below:

**PAPPG V3.1 (pg. 73) Chapter 2 VI (b) 11** (Infectious Disease Event): *“FEMA may provide assistance for the rescue, evacuation, and movement of persons; movement of supplies; and care, shelter, and other essential needs of affected human populations.”*

Although the citation above infers eligibility for the “*movement of persons*” during an “*Infectious Disease Event*,” there is no mention of transportation types (e.g. ambulance, etc.). Nonetheless, this citation is in the context of infectious disease, and those who have met the criteria to receive admittance into Project Roomkey should avoid public or other means of transportation where transmission is more likely.

The PAPPG is a reference tool for guidance, thus open to interpretation. Prudent advice would strongly suggest tracking those contracted ambulance wrap-around costs and include them in the FEMA Public Assistance reimbursement claim as a wrap-around expense. Ultimately FEMA makes all eligibility determinations. Should FEMA deny those costs, applicants have two opportunities to appeal a negative determination. To learn more about the appeal process, refer to 44 CFR § 206.206.

- 8. Question:** What is the necessary Private Nonprofit Organizations (PNP) status (e.g. 501(c)3, another definition) to be eligible for reimbursement? What if they are Joint Power Authorities?

**Answer:** To be eligible for Public Assistance, a PNP applicant must show that it has: A ruling letter from the Internal Revenue Service granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954; or documentation from the State substantiating that the non-revenue producing organization or entity is a nonprofit entity organized or doing business under State law. The organization must also own or operate an eligible facility. For PNPs, an eligible facility is one that provides an eligible service, which includes education, utilities, emergency, medical, custodial care, and other essential social services.

Eligible emergency protective measures taken to respond to the COVID-19 emergency at the direction or guidance of public health officials may be eligible for reimbursement under Category B of FEMA’s Public Assistance program. In some cases, a government entity may be legally responsible to provide services and enter into an agreement with a PNP to provide those services (e.g., sheltering or food distribution). In these cases, Public Assistance funding is provided to the legally responsible government entity, which then pays the PNP for the cost of providing those services under the agreement.

In limited circumstances, essential components of a facility are urgently needed to save lives or protect health and safety, such as an emergency room of a PNP hospital. In these cases, PNPs that own or operate an eligible facility and perform eligible work, such as providing emergency, medical or custodial care services for which they are

legally responsible in response to the COVID-19 incident, may be eligible for reimbursement of costs as a Public Assistance applicant.” Please refer to the [FEMA COVID-19 Fact Sheet On PNPs](#).

**9. Question:** *New* Are Joint Power Authorities (JPA) eligible for FEMA reimbursement?

**Answer:** Generally, JPAs are NOT eligible, especially in the context of Project Roomkey. An eligible JPA would have to possess authority to provide that service to the community; which is the same authority found in a political subdivision, i.e. city, county, tribe, state.

**10. Question:** *New* If a Private Nonprofit Organization (PNP) awarded emergency response money by the Joint Power Authority (JPA) applies for FEMA reimbursement, who receives the reimbursement, the JPA or the PNP?

**Answer:** Neither would be eligible to receive FEMA reimbursement. For more information please refer to the [FEMA COVID-19 Fact Sheet On PNPs](#) and the [Public Assistance Program and Policy Guide v3.1](#) (starting on page 9). Additional questions should be directed to [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**11. Question:** *New* Are Homeless Continuums of Care (CoC) eligible to receive FEMA reimbursement?

**Answer:** FEMA Public Assistance Program eligibility for CoCs are to be considered on a case-by-case basis, as partnership with their respective “lead agency” (Cities, Counties, Joint Power Authorities, and Private Nonprofits) may be a contributing factor in FEMA’s determination of eligibility.

**12. Question:** Our County Mental Health Branch places clients who would otherwise be homeless in Room and Board housing with funding provided by the Mental Health Services Act (MHSA). If these clients were determined to be COVID-19 positive would they qualify for Project Roomkey sheltering and be eligible for FEMA reimbursement?

**Answer:** If these individuals do fall into one of the three categories listed in the FEMA [approval letter](#), they would be eligible for FEMA reimbursement for non-congregate shelter. To use State funding for people experiencing homelessness they would need to meet the definition of homeless associated with the funding stream used.

**13. Question:** *New* Would costs associated with providing NCS in hotels/motels be eligible for reimbursement if the individual does not meet any of the conditions of eligibility identified in the FEMA approval letter, but are highly vulnerable because of a serious mental health condition that impacts their ability to adhere to necessary

precautions (i.e. social distancing guidelines, good hand hygiene, etc.) to prevent the spread of COVID-19? If these individuals are placed in NCS, will costs associated with their occupancy meet eligibility for FEMA reimbursement?

**Answer:** Individuals who do not meet the FEMA eligibility criteria for NCS are not eligible for FEMA reimbursement per the March 27, 2020, FEMA [Non-Congregate Sheltering approval letter](#) . Other non-congregate options and funding should be considered for this population.

If all other options and funding have been exhausted, these costs may be included in your reimbursement claim to FEMA for their consideration. To increase the prospect of reimbursement funding please include public health official justification. Absent that, provide a brief narrative specific to that particular client's underlying condition. In either scenario, having a public health official's justification or the brief narrative from a non-public health official, it would be wise to document the Applicant's failed attempt to find another program that also would serve to reduce the public threat of spreading COVID-19. Please also review the [DHCS COVID-19 FAQ: Behavioral Health Services for People Experiencing Homelessness](#).

**14. Question:** How does FEMA Public Assistance funding interact with other housing funding provided by the State? Can State funding be utilized as the 25% match for the FEMA funding?

**Answer:** Local and State funds, including funds awarded by the CDSS and the Homeless Coordinating and Financing Council (HCFC), used to provide NCS for emergency response and consistent with the [approval letter](#) are eligible for FEMA reimbursement. Questions regarding eligible uses of [Homeless Emergency Assistance Program](#) (HEAP), [Homeless and Housing and Assistance and Prevention Program](#) (HHAP) and [COVID-19 emergency homeless response funding](#) awarded by HCFC should be directed to [HCFC@bcsh.ca.gov](mailto:HCFC@bcsh.ca.gov).

**15. Question:** Can you clarify the Project Roomkey age eligibility requirement for individuals who do not have any other underlying health conditions?

**Answer:** The FEMA approval reflects eligible reimbursement for individuals who are "high risk" such as people over the age of 65 or who have certain underlying health conditions (respiratory, compromised immunities, chronic disease). The age of the individual is self-certified when they present themselves to the intake staff at a non-congregate shelter, and FEMA will only provide reimbursement for individuals who meet the criteria specified

in the [approval letter](#). Please also refer to the [FEMA COVID-19 Non-Congregate Sheltering FAQs](#) for additional information.

**16. Question:** *New* For families in which only the head of household meets the criteria for FEMA reimbursement eligibility, but the other household members (particularly minor children) do not; are costs for services for these other household members eligible for FEMA reimbursement?

**Answer:** If a member of the family met the FEMA reimbursement criteria as specified in the [approval letter](#), we would expect to submit the costs for services to FEMA for the entire household during the period in which the individual met the FEMA criteria. This is assuming that the family members were sharing occupancy in a single room and, particularly, are related to the minor children.

#### Occupancy Agreements

**17. Question:** *New* Does FEMA require an agency/entity (e.g. city, county, local organization) to enter into a lease with a hotel/motel (by way of an Occupancy Agreement that includes the FEMA language) to be eligible for FEMA reimbursement? Or can the agency/entity forgo use of the Occupancy Agreement when securing rooms (i.e. a single room or a small block of rooms) and use the invoice to claim FEMA reimbursement?

**Answer:** FEMA did not provide a requirement in their [Public Assistance Program and Policy Guide v3.1](#) nor in the NCS [State, local](#) government or [extension approval](#) letters stipulating that the applicant/local entity MUST enter into a lease agreement with the hotel/motel. If the applicant chooses not to utilize an occupancy agreement in favor of renting the rooms individually as needed, that should be acceptable. Renting hotel/motel rooms in this manner would then preclude the need for the FEMA-required/recommended contractual language.

When submitting documentation to support the FEMA reimbursement claim, be sure to include documentation (summary of costs and invoices) for any wrap-around services that can be tied directly to rooms that were used to shelter individuals who met the criteria of eligibility as set forth in the FEMA March 27, 2020, [Non-Congregate Sheltering approval letter](#). Without the documentation of wrap-around services it may come into question how the individual was isolated as a public health protection measure.

**18. Question:** If counties or tribes are unable to secure an Occupancy Agreement with any of the motels we are currently using for the COVID-19 crisis homeless placements (or any other local motels we are reaching out to), and we continue paying by credit card or check, will these expenses be FEMA-reimbursable?

**Answer:** The costs associated with providing NCS in response to the COVID-19 crisis are reimbursable by FEMA as long as they meet the requirements specified in the [approval letter](#). Please also refer to the [FEMA Procurement Memo dated March 17, 2020](#) and the [FEMA Procurement Under Grants: Under Exigent or Emergency Circumstances Fact Sheet](#).

**19. Question:** Our county/tribe has provided individuals emergency sheltering in hotels/motels in response to the COVID-19 crisis using our existing motel voucher program; however, we would like to convert into an Occupancy Agreement arrangement that would be eligible for FEMA reimbursement. Can you provide us with the guidance to do so?

**Answer:** The costs associated with providing NCS in response to the COVID-19 crisis are reimbursable by FEMA as long as individuals meet the requirements specified in the [approval letter](#). The required documentation for FEMA reimbursement include the contract, invoices and justification for the need, along with what public health official (e.g. Public Health Department) it was directed by.

The State has provided an Occupancy Agreement template that was updated April 3, 2020, which includes required FEMA reimbursement language. The State can provide support by answering questions related to the occupancy agreement and negotiate agreements with property owners. Please contact [housing@dss.ca.gov](mailto:housing@dss.ca.gov) to request support.

**Any prior occupancy agreements must be amended to include the FEMA reimbursement language. It is extremely important that the tracking and eligibility requirements are in alignment with FEMA guidance.**

**20. Question:** If a county or tribe does not include FEMA language in their occupancy agreement for NCS are they still eligible for reimbursement?

**Answer:** If an occupancy agreement was signed prior to FEMA NCS approval, the county or tribe must document the conditions and authority by which it was directed (e.g. Public Health Department). The agreement must be amended to add the FEMA reimbursement language. It is extremely important that the tracking and eligibility requirements are in alignment with the guidance in the [approval letter](#) to be eligible for FEMA reimbursement.

**21. Question:** *Updated* What parts of the State's Occupancy Agreement template language must be included for FEMA reimbursement should our county/tribe choose to use our own Occupancy Agreement?

**Answer:** The federal provisions for FEMA reimbursement are outlined in sections [25](#) to 46 of the Occupancy Agreement template updated on April 3, 2020.

**22. Question:** *New* Will the costs of vacant rooms at Project Roomkey leased hotels be covered by State funds and eligible for FEMA reimbursement?

**Answer:** The costs for those vacant rooms should be submitted for FEMA reimbursement, provided they were leased as part of a block of rooms to be made available for individuals who meet the criteria specified in the FEMA Non-Congregate Shelter [approval letter](#). There is no guarantee of reimbursement, however, counties and tribes should always proceed with any emergency protective measures irrespective of FEMA reimbursement. Furthermore, counties and tribes should explore other possible funding streams (e.g. Cares Act, etc.) should FEMA deny funding for unoccupied rooms.

Lastly, a well-prepared hotel Occupancy Agreement can lessen exposure to denied FEMA funding with language similar to the highlighted sentence below, which is an excerpt from the State's Hotel Occupancy Agreement template (April 3, 2020):

The *hotel name* (up to Rooms) located at , , CA as outlined in red on the attached Exhibit "A" aerial site plan, consisting of one (1) page, dated , said Exhibit "A", hereby being incorporated into this occupancy agreement, and including all parking spaces contiguous to the subject hotel building, and unlimited use of the building's common facilities. **The County/Tribe shall occupy a fluctuating number of rooms, up to \_\_\_\_\_, and pay for rooms based on the actual daily occupancy.** The County/Tribe shall have exclusive access to and use of the occupied premises set forth in this occupancy agreement twenty-four (24) hours per day, seven (7) days per week with no exceptions.

**23. Question:** *Updated* Can the county/tribe acquire hotel rooms as a purchase order, or must it use the Occupancy Agreement?

**Answer:** A purchase order seems like the incorrect vehicle to rent a room. Purchase orders are better suited for acquisition of goods such as face masks, hand sanitizer, etc. FEMA provided no requirement in their [Public Assistance Program and Policy Guide v3.1](#), nor in the [FEMA Non-Congregate Sheltering approval letter](#) stipulating

the applicant/local entity MUST enter into a lease agreement with the hotel/motel. If the applicant chooses not to utilize an occupancy agreement, in favor of renting the rooms individually as needed, this should suffice. Renting rooms in this manner would then preclude the need for the FEMA-required/recommended contractual language. When submitting documentation to support the FEMA reimbursement claim, be sure to include documentation (summary of costs and invoices) for any wrap-around services that can be tied directly to rooms that were used to shelter individuals who met the criteria of eligibility as set forth in the FEMA March 27, 2020, [Non-Congregate Sheltering approval letter](#). Without the documentation of wrap-around services it may come into question how the individual was isolated as a public health protection measure.

**24. Question:** Can our community's allocation of the \$100 million in COVID-19 emergency homelessness response funding be used on Project Roomkey eligible activities and are we eligible to request reimbursement for these expenses even though we haven't executed an Occupancy Agreement for the COVID-19 response yet?

**Answer:** Questions regarding eligible uses of Homeless Emergency Assistance Program (HEAP), Homeless and Housing and Assistance and Prevention Program (HHAP) and COVID-19 emergency homelessness response funding awarded by the Homeless Coordinating and Financing Council (HCFC) should be directed to [HCFC@bcsh.ca.gov](mailto:HCFC@bcsh.ca.gov). Local and State funds, including funds awarded by HCFC and CDSS, used to provide NCS for emergency response and consistent with the [approval letter](#) may be eligible to use for the 25% non-federal cost-share.

**25. Question:** We moved some individuals and families into individual hotel rooms prior to negotiating an occupancy agreement in order to meet the urgent public health need. Are these hotel/motel costs eligible for FEMA reimbursement, provided the individuals meet FEMA reimbursement eligibility requirements? If so, what documentation is required for FEMA reimbursement of hotel/motel expenses?

**Answer:** Yes, these costs are reimbursable by FEMA as long as the NCS provided for the individuals and families meet the requirements as specified in the [approval letter](#). The required documentation for FEMA reimbursement is the contract, invoices, the screening criteria and determination of eligibility for each individual (including medical or other supporting documentation of COVID status/high risk), documentation on total time enrolled in the Project Roomkey unit (hotel/motel/trailer), wrap-around services provided and their costs, and justification for the need, along with what public health official it was directed by.

**26. Question:** Are the trailer park space rental, sewage and electricity costs associated with the use of trailers for Project Roomkey eligible for FEMA Reimbursement? Would these associated costs be considered wrap-around supports that would be covered under the FEMA reimbursement language in the Occupancy Agreement?

**Answer:** Yes, these associated costs are typical with usage of trailers and should be tracked as wrap-around supports. It is important that tracking be maintained to identify trailers that are occupied by individuals as specified in the FEMA [approval letter](#), the timeframe individuals are housed, and the justification of occupancy. Additionally, it is critical that unoccupied trailers are accounted for in the tracking to ensure accurate reporting for FEMA reimbursement. The CDSS will require communities that received trailers through Cal OES to track this information in order for the State to seek eligible reimbursements for the purchase of the trailers. Please contact [housing@dss.ca.gov](mailto:housing@dss.ca.gov) for further information regarding the tracking requirements associated with trailer use.

**27. Question:** **New** Are the costs of unoccupied trailers and their associated wrap-around supports (trailer space rental, sewage, electricity) eligible for FEMA reimbursement?

**Answer:** Possibly. Ultimately FEMA makes all eligibility determinations and a definitive answer in advance of FEMA's review of a county's submitted claim is simply not possible. However, eligible emergency protective measures taken to respond to the COVID-19 emergency at the direction or guidance of public health officials may be eligible for FEMA reimbursement. Also, since trailers were secured as an emergency protective measure to help mitigate the spread of COVID-19 through non-congregate sheltering, entities should submit requests for reimbursement for the wrap-around costs associated with the unoccupied trailers. Should a trailer or trailers remain unoccupied for a length of time, paring down the wrap-around as much as possible would illustrate to FEMA that the county is operating in good faith by being vigilant stewards of taxpayer dollars. Please refer to the [Coronavirus \(COVID-19\) Pandemic: Eligible Emergency Protective Measures Fact Sheet](#) and the [FEMA COVID-19 Non-Congregate Sheltering FAQs](#) for additional information.

#### Documentation and Tracking

**28. Question:** **New** With regard to the NCS-eligible populations described in the FEMA letter, can you provide a more detailed definition of the 2nd and 3rd bullets listed under the eligible populations?

- For "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," what type of documentation is required for this population?

- For "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", what type of documentation is required for this population? Is documentation of a medical diagnosis required?

**Answer:** Medical records may serve as documentation if it is available for individuals identified as high risk. When medical records are not available or are pending, a self-certification form is strongly recommended. Please also refer to the [Public Assistance Program and Policy Guide v3.1](#) (pages 65 thru 70) for an answer to the type of documentation that is needed. Note: Any collection or handling of information with regard to the health status of individuals must be in compliance with applicable privacy laws, including the Health Insurance Portability and Accountability Act of 1996. FEMA will not be collecting any health information.

**29. Question:** *Updated* What specific information does FEMA require for reimbursement of costs associated with each individual who is sheltered in NCS under Project Roomkey?

**Answer:** The State, in partnership with the Department of Housing and Urban Development (HUD) developed a recommended list of elements to be included in the Homeless Management Information System (HMIS) for tracking of non-congregate shelter. HMIS is a recommended engine for collecting critical data that will be necessary for requesting FEMA reimbursement of NCS costs related to Project Roomkey, as specified in the [approval letter](#). The required documentation includes, but may not be limited to, the determination of eligibility for each individual (including medical or other supporting documentation of COVID status/high risk) as well as documentation on total time enrolled in the Project Roomkey program, in the unit (hotel/motel/trailer), services provided and their costs, [and an exit plan associated with the individuals](#). Medical records may serve as documentation if it is available for individuals identified as high risk. When medical records are not available or are pending, a self-certification form is strongly recommended. Please also refer to the [Public Assistance Program and Policy Guide v3.1](#) (pages 65 thru 70) for an answer to the type of documentation that is needed. Note: Any collection or handling of information with regard to the health status of individuals must be in compliance with applicable privacy laws, including the Health Insurance Portability and Accountability Act of 1996. FEMA will not be collecting any health information.

Additionally, [template materials](#) and a [training](#) on recommended [documentation practices](#) including a [self-certification](#) is available on the [Project Roomkey/Housing and Homelessness COVID Response page](#) (please review the materials under Project Roomkey Guidance and Funding Considerations). We strongly recommend

communities maintain these enrollment/screening documents consistently as well as input a robust level of data into the Homeless Management Information System (HMIS) NCS [workflow](#) in order to track each program record on an individual/daily level.

**30. Question:** I understand that eligible services need to be tracked at the client level to determine eligibility. Some services, such as security, are not provided on an individual level. Can these services be pro-rated to the individuals staying at the hotel? For example, if we have secured 100 beds at a hotel, 50 of which are occupied by FEMA-eligible individuals/families, and 50 of which are occupied by other homeless individuals who are not eligible for FEMA reimbursement, can these costs be pro-rated and 50% of the service expenses submitted for reimbursement through FEMA (assuming all beds were full each night)?

**Answer:** Yes, these services can be pro-rated. The proration would depend on the security agreement.

**31. Question:** **New** What medical signature is required for FEMA reimbursement regarding COVID-19? Is it a medical doctor (MD) or can it be a much broader medical/healthcare professional?

**Answer:** Per the FEMA NCS [approval letter](#) dated March 27, 2020: “As documented by a state or local public health official, or medical health professional.” FEMA has not provided any clear guidance on the level of medical/public healthcare expertise required.

**32. Question:** **New** In order to meet the requirement for FEMA reimbursement, what documentation can be used as evidence that a medical health professional determined that an individual tested positive for COVID-19 or was exposed and requires emergency non-congregate sheltering?

**Answer:** Medical records may serve as documentation if it is available for individuals identified as high risk. When medical records are not available or are pending, a self-certification form is strongly recommended. Please also refer to the [Public Assistance Program and Policy Guide v3.1](#) (pages 65 thru 70) for an answer to the type of documentation that is needed. Note: Any collection or handling of information with regard to the health status of individuals must be in compliance with applicable privacy laws, including the Health Insurance Portability and Accountability Act of 1996. FEMA will not be collecting any health information.

**33. Question:** We understand that communities will get reimbursed for 50% of their 75% FEMA reimbursable costs within 30 days of submission to FEMA. Is this timeline generally accurate?

**Answer:** This timeframe is possible as it is done under an Expedited Project Worksheet, which will provide 50% of an estimated amount provided by the receiving entity. It is important to know that FEMA approves 50% of 75% of estimated costs. In order to get the other half of the FEMA reimbursement funding, 100% of documentation must be submitted which can take entities time to provide, which then impacts the timeline for full FEMA reimbursement. Staff from Cal OES is working with various entities that have applied and may be interested in this. For additional information please email [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**34. Question:** Should all intake screenings to determine eligibility for Project Roomkey be conducted by medical/public healthcare professionals (e.g. EMT, Registered Nurse, Licensed Practical Nurse, etc.)? If so, what are the minimum qualifications required of a medical/public healthcare professional to conduct/verify screenings?

**Answer:** FEMA has not provided any clear guidance on the level of medical/public healthcare expertise required for conducting/verifying intake screenings. Cal OES feels that it is prudent to task the screening/verification process to a person that, at a minimum, has taken the [Project Roomkey Screening and Documentation Training](#). Additional resources to ensure best practices for documentation and screening for FEMA reimbursement is available on the [Project Roomkey/Housing and Homelessness COVID Response page](#) (please review the materials under Project Roomkey Guidance and Funding Considerations).

**35. Question:** Many healthcare professionals are over the age of 65 and considered high risk to COVID-19 and would opt to screen individuals through telehealth practices (i.e. over the phone, and with video/audio capabilities via other electronic devices). Are screenings conducted by healthcare professionals via telehealth practices eligible for FEMA reimbursement? Would telehealth screenings conducted over the phone with audio only (i.e. without video capability) be acceptable?

**Answer:** Based on the review of the [Public Assistance Program and Policy Guide v3.1](#) and [FEMA COVID-19 Non-Congregate Sheltering FAQs](#) conducted by Cal OES, there is nothing that would preclude FEMA from funding the reimbursement of screening activities if the only available/qualified screener falls into a category of high risk. Cal OES works very closely with our federal partners and historically, a written justification and thorough documentation of an extenuating circumstance has proven advantageous when championing for FEMA funding.

**36. Question:** *New* Most healthcare professionals across the state have switched from conducting in-person appointments and assessments to conducting appointments almost exclusively via telehealth. Are all healthcare professionals approved to conduct screenings for Project Roomkey purposes via telehealth?

**Answer:** Yes, and when requesting FEMA reimbursement, merely draft a justification for the need to enact telehealth and upload that as a document in the FEMA Grants Portal for that project.

**37. Question:** *New* Extenuating circumstances seem to apply to all telehealth screenings for reasons related to the COVID-19 pandemic. Additionally, documentation of extenuating circumstances for every screening conducted via telehealth would pose a significant administrative burden. Is documentation of extenuating circumstances required for every telehealth screening for Project Roomkey? Could one piece of documentation of extenuating circumstances apply for all telehealth screenings?

**Answer:** A successful FEMA claim, one that maximizes federal reimbursement funding, is commensurate to the quality and volume of documentation that supports both project costs & programmatic eligibility. Documentation of extenuating circumstances must include a short narrative that justifies the need across your community/city/county for healthcare professionals to conduct telehealth screenings during the COVID-19 pandemic to help establish eligibility and/or prioritization for placement in non-congregate sheltering under Project Roomkey.

**38. Question:** *New* Should healthcare professionals verify a prior screening conducted by a non-healthcare professional (who took the [Project Roomkey Screening and Documentation Training](#)) for documentation purposes for all FEMA-reimbursable populations?

**Answer:** To avoid the perception of inflating costs through redundancy (screening occupants twice) it is recommended the Applicant documents the need for an additional screening conducted by a healthcare professional after the initial screening had been conducted by a non-healthcare professional. One extenuating circumstance that could result in a FEMA funded second screening would be a validation or “spot-checking” conducted by a healthcare professional to ensure compliance with FEMA-approved, non-congregate sheltering criteria as set forth by the FEMA Region IX March 27, 2020, non-congregate sheltering [approval letter](#).

**39. Question:** *New* Please provide guidance on tracking employee time for Project Roomkey activities in order to claim FEMA reimbursement.

**Answer:** Eligible entities are encouraged to track ALL employee labor, both straight time and overtime. Although this is a “Category B only” eligible disaster, only overtime force account labor is eligible for FEMA reimbursement for regular budgeted employees. Nonetheless, FEMA will need to see that the employee has satisfied the weekly regular time commitment before accruing overtime. There may be an exception to claim both straight and overtime costs when employee(s) labor/wages are funded by a grant or other funding sources (e.g. state revenue) wherein their funding stream could not be used for anything other than what that grant/funding source was intended for. In a circumstance where an employee is redirected to work on Project Roomkey, which is outside the scope of work designated by the grant or other funding source that typically covers labor/wages for the employee(s), then the employees costs may be eligible to be claimed to FEMA at both straight time and overtime. Straight time costs can be submitted to FEMA for reimbursement, but it becomes more difficult to have them approved. It would be necessary to provide a narrative and any other supporting documentation that can make the case for reimbursement.

Entities should maintain a labor summary spreadsheet that includes, but is not limited to, tracking employees name, job title, description of work performed, location/site, project period, dates & hours worked (regular and overtime), total hours worked, hourly rate of pay, benefit rate, and total costs.

### Process to Request FEMA Reimbursement

**40. Question:** Please advise how organizations and entities can begin to request grants or reimbursement monies from FEMA for emergency COVID-19 relief?

**Answer:** A [Request for Public Assistance](#) must be submitted via the Grants Portal on the FEMA website. Project Roomkey leads should work with their local Emergency Operations Center (EOC) to request reimbursements. The local EOCs will work with Cal OES to complete the necessary steps. You may refer to the [Public Assistance Applicant Quick Guide](#) for additional information and guidance.

Note: The Cal OES 89 form is required. The Cal OES 130 form may not be required if the organization/entity has a current Cal OES 130 form on file (within the last three years), and all Authorized Agents are still valid. If the Cal OES 130 form needs updating, you will need to submit a new Cal OES 130 form. Both forms do not have to be sent immediately, but Cal OES must have them in place before you can get reimbursed. The Cal OES 89 form and the Cal OES 130 form must be submitted to [PAGrantsPayments@caloes.ca.gov](mailto:PAGrantsPayments@caloes.ca.gov). Additional information and

resources, including the California COVID-19 (EM-3428) FEMA Eligibility Fact Sheet, can be requested and provided by Cal OES by emailing [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**41. Question:** Can you provide information about Expedited Project Funding and the process?

**Answer:** The California Governor's Office of Emergency Services outreaches to applicants to gather information for potential expedited funding for Category B Emergency Protective Measures related to COVID-19. Organizations who are responding to the COVID-19 crisis with Category B work such as EOC activities, law enforcement, sheltering, including Project Roomkey, and other potential eligible costs should refer to the [Coronavirus \(COVID-19\) Pandemic: Eligible Emergency Protective Measures Fact Sheet](#).

If an organization chooses to apply for expedited assistance before the standard recovery assistance process, they must complete a **Streamlined Project Application**. Applicants must include costs incurred to date for eligible items, and foreseen costs to the best of their ability for an estimated project total. Shelter costs must be kept separate from EOC costs.

**Please Note:** FEMA will no longer accept Streamlined Project Applications in PDF format via upload; all project applications will need to be submitted using the new online Streamlined Project Application within the FEMA Grants Portal. The Streamlined Project Application is an expedited project worksheet alternative to the typical Public Assistance procedure for recovery. Applicants are welcome to decline this option and proceed with the normal grant process once requests for Public Assistance are approved. Please refer to <https://www.youtube.com/watch?v=DROIambXBWY> for a video tutorial on completing a Streamlined Project Application through the FEMA Grants Portal. For additional information click here for [FEMA's Non-Congregate Sheltering Policy](#) or email any questions to [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**42. Question:** Can each eligible agency or entity (e.g. county, city, local organization) request a 50% FEMA reimbursement Expedited Project Worksheet on the costs for Project Roomkey only once or can multiple advance requests be submitted over time?

**Answer:** Only one Expedited Project Worksheet should be requested for Project Roomkey costs. This is not an advance, but a streamlined awarded project worksheet approved at 50% of the applicant's estimated costs. When

an applicant's documented project costs exceeds the initial Expedited Project Worksheet's approved dollar amount, the applicant can request through Cal OES, a version to be prepared to capture additional project costs.

**43. Question:** What is the scope of the 50% funded FEMA Expedited Project Worksheet reimbursement grant that an eligible agency or entity can request? Specifically (1) can the request include planned hotel/motel occupancy agreements and operating costs or only already-executed agreements; and (2) can the agency or entity request the full 3-months of the occupancy agreement and operating costs for each hotel/motel?

**Answer:** The eligible agency or entity can include both costs for planned Project Roomkey sites and associated costs, and costs for already-executed agreements and their associated costs. The Expedited Project Worksheet cannot include costs associated with non-congregate sheltering beyond the last approved date of the most recent FEMA-approved time extension request.

A typical scope of work for a Project Roomkey Expedited Project Worksheet would include, but not limited to:

- Contract/occupancy agreement for hotels, trailers, or other non-congregate temporary housing.
- Wrap-around services, e.g.:
  - Services for client supportive services
  - Onsite supervision and security
  - Three meals per day to participants in a hotel/motel sheltering
  - Healthcare services
  - Transportation to non-congregate sheltering sites

**44. Question:** **New** What happens when an eligible agency or entity (e.g. city, county, local organization) receives 50% FEMA reimbursement through the Expedited Project Worksheet process and then their backup documentation is found to be insufficient?

**Answer:** If the claim cannot be supported, Cal OES/FEMA will reduce the claim by what is not accounted for. This will happen at closeout of the project.

## Other

**45. Question:** *New* Some motel property owners are requesting that entities purchase an increased insurance plan when they plan to house individuals who are COVID-19 positive in proposed Project Roomkey sites. Are the increased insurance plan costs eligible for FEMA reimbursement?

**Answer:** FEMA has a firm position on “Increased Operating Costs.” However, on page 42 of the [Public Assistance Program and Policy Guide v3.1](#) under certain circumstances, FEMA COULD find eligibility for the increased operational expenses. The following excerpts from the [Public Assistance Program and Policy Guide v3.1](#) further supports this:

### **Increased Operating Costs**

Increased costs of operating a facility or providing a service are generally not eligible, even when directly related to the incident. However, short-term increased costs that are directly related to accomplishing specific emergency health and safety tasks as part of emergency protective measures may be eligible, as discussed in Chapter 2:VI.B.2.

### Chapter 2:VI.B.2

#### **2. Expenses Related to Operating a Facility or Providing a Service**

The Applicant may incur additional costs related to operating a facility as a result of the incident because of an increased demand for the services the facility provides. These additional costs are only eligible if:

- The services are specifically related to eligible emergency actions to save lives or protect public health and safety or improved property;
- The costs are for a limited period of time based on the exigency of the circumstances; and
- The Applicant tracks and documents the additional costs.

It is critical the Applicant provide adequate documentation and, if needed, a written justification to accompany any claimed costs that may appear “borderline-eligible” to FEMA.

**46. Question:** I understand that other local efforts related to protecting individuals experiencing homelessness from COVID 19, including congregate sheltering with expanded capacity to provide social distancing may be eligible for

FEMA reimbursement expense under Category B. Can you point me to guidance outlining the required documentation for eligibility of congregate shelters that were stood up in response to the current COVID-19 crisis?

**Answer:** To be clear, congregate sheltering is not consistent with the goals or recommended practices relevant to Project Roomkey. Guidance regarding congregate and non-congregate sheltering can be found in the [Public Assistance Program and Policy Guide v3.1](#) (pages 65 thru 70). For information on labor, materials, and equipment, this can be found on pages 23, 29, & 63 in the [Public Assistance Program and Policy Guide v3.1](#).

FEMA has released a fact sheet that provides further guidance, [Coronavirus \(COVID-19\) Pandemic: Eligible Emergency Protective Measures](#). Please note that reimbursement for congregate sheltering is not part of the Project Roomkey reimbursement approval from FEMA as specified in the [approval letter](#). Additional questions related to FEMA reimbursement for congregate sheltering should be directed to [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**47. Question:** *New* Does the FEMA reimbursement approval under Category B for congregate sheltering cover costs spent on new sites or can reimbursement be provided for new costs for old sites?

**Answer:** FEMA makes all eligibility determinations, and the notion of congregate sheltering seems counterintuitive for an infectious biological event. To increase the probability of FEMA reimbursement funding, Cal OES suggests the Applicant uploads a narrative/explanation into the FEMA Grants Portal as to how the congregate shelter aids in reducing the spread of COVID-19, thus meeting the eligibility requirements for a Category B (Emergency Protective Measures) Scope of Work. Be sure to include as many details as possible (e.g. shelter size, number of beds, plans for social distancing, target demographic, etc.).

**48. Question:** It is our understanding that trailers purchased for this emergency response are eligible for FEMA reimbursement based on the depreciation value. How can we estimate the depreciation value?

**Answer:** If a county or tribe purchases a trailer as part of the emergency response, it would be considered a new asset. FEMA will only pay the difference between new and fair market value at conclusion of the mission for new assets purchased. The best way to figure out the potential cost to the county or tribe for these trailers is to determine the lesser of two numbers for FEMA reimbursement:

How much the seller of the trailer would pay to buy the trailer back from the purchaser after a specified period of use? For example, if the trailer is used for 6 months of sheltering the depreciated value can be

calculated as follows: Original price minus the quoted resell value would equal the worst-case reimbursement from FEMA. Example: \$20,000 (new) - \$10,000 (resell value) = \$10,000 reimbursement.

How much would the trailer be worth at salvage value? This could be achieved by calling a few junk yards to understand what the value of the new trailers would be if destroyed. Example: \$20,000 (new) - \$2,000 (salvage value) = \$18,000 reimbursement.

**49. Question:** Can counties and tribes provide immediate isolation via hotel/motel housing for individuals who are homeless who migrate to our communities?

**Answer:** Yes, FEMA has provided pre-approval to the State and local governments to begin immediate efforts of moving individuals experiencing homelessness within their communities into NCS via hotels/motels if they meet the requirements as specified in the [approval letter](#).

**50. Question:** Are monies from Emergency Solutions Grants (ESG) and Community Development Block Grants (CDBG) that are used to address COVID-19 under Project Roomkey eligible for FEMA reimbursement?

**Answer:** If an eligible entity is using monies from other federal programs (e.g. ESG, CDBG, etc.) FEMA will yield to those other federal funding sources. FEMA is legally prohibited from duplicating benefits from other sources as stated in the [Public Assistance Program and Policy Guide v3.1](#) (see page 39, Duplication of Benefits). However, monies from other federal programs could be used to offset the non-federal cost share. For example, a State agency would receive 75% reimbursement for FEMA-eligible costs, which results in a 25% non-federal cost share that is the responsibility of the State. The other federal funds may be used to offset the non-federal cost share; however, the terms and conditions of the grants for those federal funds should first be reviewed before determining if they can be used for covering the cost-share.

**51. Question:** Are administrative costs associated with data tracking in the Homeless Management Information System (HMIS) eligible for FEMA reimbursement?

**Answer:** The HMIS is a local technology product that would be reimbursable under the FEMA Public Assistance Program and it may be eligible under two possible categories:

1. It could fit as a direct project cost for the purpose of facilitating the primary objective – Project Roomkey; and those costs would be included in the Category B Project Worksheet (the reimbursement grant for emergency protective measures), or
2. It could be considered as a Direct/Indirect Project Cost, thus ending up as a cost component in the Category Z Project Worksheet to be included with the applicant’s other administrative costs.

It really depends on the exact use of the HMIS. These details will be worked out as the Project Worksheets are being prepared, and Cal OES will provide guidance to applicants at that time.

**52. Question:** *New* We are using a single hotel room to conduct Project Roomkey administrative activities. Can we request FEMA reimbursement for use of this single room as part of our administrative activities?

**Answer:** Use of a single room for project-related administrative activities may be eligible for FEMA reimbursement as part of your project costs/administrative expenses. These details will be worked out as the Project Worksheets are being prepared, and Cal OES will provide guidance to Applicants at that time. Additional questions should be directed to [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**53. Question:** Does FEMA reimbursement cover the restoration costs to any damaged hotel/motel rooms in order to return them to their original condition?

**Answer:** Currently, FEMA will not reimburse any restoration costs due to damages and it is expected that communities would use systems already in place as part of their greater homeless system (e.g. risk mitigation funds). In the event all funding sources were evaluated and there is a gap in what you can provide, the use of other funds should be discussed by contacting [housing@dss.ca.gov](mailto:housing@dss.ca.gov) to request support.

**54. Question:** *New* Is FEMA reimbursement provided for the costs associated with disinfecting and the final clean-up of hotel/motel rooms at the conclusion of the stay? Does the disinfecting and final clean-up costs need to be included as part of the room rate in the Occupancy Agreement? Or should these disinfecting/clean-up costs be tracked and submitted for reimbursement outside of the Occupancy Agreement?

**Answer:** Disinfecting/clean-up costs are considered “wrap-around costs” and should be tracked and submitted for reimbursement outside of the Occupancy Agreement, should these costs not be included in the initial Occupancy Agreement.

**55. Question: *New*** Our city owns sites that needed to be refurbished (ground leveling, fence installation, etc.) in order to safely place trailers onsite for non-congregate sheltering. Are the costs associated with site setup reimbursable under the FEMA Public Assistance Program?

**Answer:** If the city can document there were no “turn-key” sites available to place the trailer(s) upon, it is recommended these costs be submitted with a brief narrative supporting the extenuating circumstance that necessitated the need for site preparation. Please Note: Ground disturbing activities may require permitting and may require review from the FEMA Office of Environmental Planning and Historic Preservation.

**56. Question: *New*** Do the terms and conditions of funding provided for Temporary Assistance for Needy Families (TANF) allow for use of these funds towards our non-federal cost share?

**Answer:** Federal TANF cannot be used as a match per number 20 of the most recent version of the CDSS [TANF award guidelines](#) that states, “These funds may not be used to meet the matching or cost-sharing requirements of other Federal grant programs unless expressly authorized by Federal law.” Please also refer to [Title 2 Code of Federal Regulations \(CFR\) 200.306\(b\)](#) for cost sharing or matching requirements. In the end, non-Maintenance of Effort (non-MOE) or other funds not otherwise used for federal matching would be the way to go for a potential FEMA match.