

# NON-CONGREGATE SHELTERING CHECKLIST

## ATTACHMENT A

Coronavirus 2019 (COVID-19)

This document serves to provide some limited clarification of FEMA's guidance for non-congregate shelters and suggestions for filling out the *NON-CONGREGATE SHELTERING CHECKLIST*. This document is not exhaustive and cannot substitute for the best judgment of your organization. These suggestions and the checklist are merely tools to assist you through this process and do not guarantee that FDEM or FEMA will approve your organization's request for non-congregate sheltering or the eligibility of non-congregate sheltering for reimbursement by the FEMA Public Assistance program under Section 403 of the Stafford Act if submitted as a Category B Emergency Protective Measure project. Please work with your public health officials and the State, including FDEM, to follow the process outlined by FEMA for seeking approval for non-congregate shelters from FEMA Region IV.

The following definitions for non-congregate and congregate shelters come from FEMA guidance and are intended for reference only:

**Non-Congregate Shelters** are private or public facilities (e.g. - hotels, dorms, etc.) that, by design, provide a short-term lodging function and an increased degree of privacy over congregate (i.e. - communal) shelters. Non-congregate sheltering provides alternatives for incidents when congregate sheltering is unavailable, overwhelmed, or longer-term temporary sheltering is required.

A **congregate shelter** is any private or public facility that provides contingency congregate (i.e. - communal) refuge to evacuees, but day-to-day serves a non-refuge function (e.g. - convention centers, civic centers, stadiums, etc.).

1. The non-congregate sheltering must be at the direction of and documented through an official order signed by a state, local, tribal, or territorial public health official.

**Additional Information:** FDEM is working with DOH and the Surgeon General to create direction for non-congregate sheltering and will work with public health officials for proper documentation. Public health officials should consider the needs of the community and exercise their best judgement to save lives, to protect property and public health, and to ensure public safety.

2. Any approval is limited to that which is reasonable and necessary to address the public health needs of the event and should not extend beyond the duration of the Public Health Emergency.

**Additional Information:** The FEMA incident period started 1/20/2020 and the HHS public emergency started 1/27/2020; the Public Health Emergency is, as of March 25, 2020, 2 months long and ongoing.

3. We shall follow FEMA's Procurement Under Grants Conducted Under Exigent or Emergency Circumstances guidance and include a termination for convenience clause in our contracts.

**Additional Information:** FEMA establishes that local governments, "may proceed with new and existing noncompetitively procured contracts in order to protect property and public health and safety, or to lessen or avert the threats created by emergency situations...." In line with this guidance, we will follow all applicable local and state procurement requirements as we move forward with non-congregate sheltering and include a termination for convenience clause in relevant contracts.

4. Prior to approval, we shall provide an analysis of the implementation options that were considered and a justification for the option selected.

**Additional Information:** It may help to frame in terms of effectiveness (avoids COVID-19 spread), feasibility (easy to identify and utilize now? close to medical facilities?), capacity (sufficient for forecast population? maintains availability of congregate facilities for other uses such as hurricane response?), cost (under GSA rate? other quotes/options?).

5. The funding for non-congregate sheltering to meet the needs of the Public Health Emergency cannot be duplicated by another federal agency, including the U.S. Department of Health and Human Services or Centers for Disease Control and Prevention.

**Additional Information:** At this time, no other funding has been identified.

6. Applicable Environmental and Historic Preservation laws, regulations, and executive orders apply and must be adhered to as a condition of assistance.

**Additional Information:** FDEM is working with FEMA on clarification of EHP application to non-congregate shelters (programmatic waiver, cat ex, stat ex), especially if there is no ground-breaking. It might help to write a brief narrative of existing conditions, minimal impact, etc.