

Alternate Housing FAQ

May 29, 2020

Does my county alternate housing plan require additional approval prior to implementation?

No. In an effort to proactively mitigate the impacts of the COVID-19 pandemic, all Illinois counties and accredited municipalities were requested to develop an alternate housing plan. The plans were to provide quarantine or isolation capacity for a minimum of 25 persons in their respective jurisdictions. On April 5, 2020, FEMA issued additional correspondence approving the use of non-congregate sheltering by sub-state jurisdictions. Therefore, no additional approval of a county's alternate housing plan is necessary.

That having been said, state and local government have identified several changes necessary to the planning basis for county alternate housing plans. A series of workshops, revised guidance and a new planning template are being distributed to the counties.

Will all expenses associated with alternate housing be reimbursed by FEMA?

- FEMA issued a guidance document titled “Public Assistance: Non-Congregate Sheltering Delegation of Authority” on March 19, 2020. This guidance outlined the six criteria by which FEMA will evaluate expenses associated with non-congregate housing for reimbursement. While there is no guarantee all costs incurred for alternate housing will be reimbursable by FEMA, the criteria below should assist local governments in controlling costs. Additionally, local governments should carefully document how costs incurred were aligned with the criteria below.
- 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.
- 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.
- Applicants must follow FEMA’s *Procurement Under Grants Conducted Under Exigent or Emergency Circumstances* guidance and include a termination for convenience clause in their contracts.
- Prior to approval, the applicant must provide an analysis of the implementation options that were considered and a justification for the option selected.
- 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. County officials should reach out to the coalition of state agencies (IDHS, DCEO, IDPH, IDoA, and IEMA) to determine what support programs may exist.
- Applicable Environmental and Historic Preservation laws, regulations, and executive orders apply and must be adhered to as a condition of assistance.
- Finally, FEMA has specified that any future requests for reimbursement must include, at a minimum, the number of individuals being sheltered by each local provider, average length of stay, underlying need/condition requiring emergency NCS, types of wrap-around services being provided, and average cost per individual. In addition, in preparation for a potential transition of NCS of homeless individuals to HUD, be prepared to provide the information separately for that population.

Can Alternate Housing Sites be used for healthcare workers and first responders?

Yes. On April 12, 2020, the Illinois Department of Public Health issued the “COVID-19 Isolation and Quarantine Direction and Order”. This order helped to establish the first of the FEMA criteria required for reimbursement as outlined above. Second, this order expanded the categories of persons eligible for use of alternate housing to include,

- *“...those who test positive for COVID-19 who do not require hospitalization but need isolation (including those exiting from hospitals);*
- *those who have been exposed to COVID-19 and do not require hospitalization; and*
- *asymptomatic high-risk individuals needing social distancing as a precautionary measure, such as homeless or disadvantaged individuals in communities with multiple instances of community spread of COVID-19, healthcare workers serving patients or caring for persons who have tested positive for COVID-19, first responders having regular contact and personal interactions with members of the public in communities with multiple instances of community spread of COVID-19, and/or people over 65 or with certain underlying health conditions (e.g. respiratory, compromised immunities, chronic disease).”*

Counties and local governments wishing to house first responders and medical workers should carefully document the need as outlined in the FEMA reimbursement criteria above. The state also recommends that the local health department utilize the ‘*intake screening tool*’ and ‘*voluntary quarantine form*’ distributed as interim guidance for all persons utilizing alternate housing.

What outreach is necessary for establishment and maintenance of an Alternate Housing Site?

As counties or accredited municipalities consider implementation of their alternate housing plans, initial conversations should be coordinated with the IEMA and IDPH regional representatives, the county EMA and health department, as well as the municipal officials in which the site is planned. There is potential for an alternate housing site to place an increased demand on the police and EMS resources nearby. Roles, responsibilities and jurisdictional authorities should be established early on.

What type of assistance can the State provide in the Alternate Housing effort?

The State is working to form a coalition of applicable state agencies, community action groups and continuums of care. These entities may have existing facilities and funding avenues to assist a county in identifying non-congregate sheltering solutions. IEMA is also consolidating guidance at <http://AltHousing.Iema.Illinois.gov>, developing webinars and a revised alternate housing template. Regional coordinators can assist in reviewing plans which may range from rental properties, cabins, empty dormitories, RVs or government owned facilities. When evaluating potential early sites for alternate housing, a list of hotels was compiled by the State. Many of these were reviewed for the feasibility of housing COVID-positive individuals. The State has an additional list of hotels that were not assessed but may be reasonable for housing first responders and healthcare workers. These lists can be provided to counties upon request. Additionally, several different funding efforts and resources have emerged since the start of this pandemic. The Inter-Agency Working Group on Homelessness, Illinois Department of Human Services, DCEO, and the provisions of the CARES Act may provide significant resources to facilitate implementation of the county plans.

Additional questions can be directed to Alternate.Housing@Illinois.gov