October 7, 2020

Ms. Alicia Tate-Nadeau, Director
Illinois Emergency Management Agency
2200 S. Dirksen Parkway
Springfield, Illinois 62703

Dear Ms. Tate-Nadeau:

This is in response to your letter dated October 6, 2020, requesting an extension to the State of Illinois' approval for emergency non-congregate sheltering (NCS) activities under the Public Assistance (PA) program. 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 Coronavirus Disease 2019 (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.
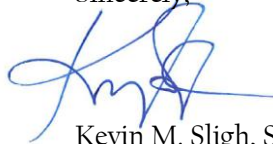
Based on my review of your request and supporting documentation, I am providing a conditional approval of your extension request. This approval is subject to and conditioned by all of the same factors outlined in my initial letter and remains effective for the lesser of 30 days or the expiration date of your governing public health decree. The State and local jurisdictions engaging in shelter missions and planning to seek FEMA reimbursement must follow FEMA's guidance on Procurement Under Grants Conducted Under Exigent or Emergency Circumstances. As noted in this guidance, applicants must comply with the cost principles set forth in the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards ("Uniform Requirements"), 2 C.F.R. Part 200, including ensuring that costs are reasonable. As defined in the Uniform Requirements, "a cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost." 2 C.F.R. § 200.404.

With regard to wrap-around services for NCS, I note that agency guidance is clear that "support services such as case management, mental health counseling, and others are not eligible." *Coronavirus (COVID-19) Pandemic: Non-Congregate Sheltering Frequently Asked Questions* (Mar. 31, 2020).

In addition, I am including the recently released document entitled *Federal Funding Priority Order for Non-Congregate Shelter During COVID-19.* This document provides information to recipients on how to use different Federal resources for the highest and best use for the operation of NCS. In accordance with this guidance, State and local jurisdictions needing NCS for persons experiencing homelessness who have not tested positive for COVID-19, who are not exhibiting symptoms or who have not been exposed to COVID-19, or who are not at high risk for poor outcomes, should use U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – CARES Act or Emergency Solutions Grant – CARES Act funds for NCS. If you have not already done so, you and local jurisdictions should reach out to HUD to start the grant application process in order to effectively transition NCS for persons experiencing homelessness to HUD funding.

Lastly, any future extension requests 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. At this time in the response, FEMA expects that all non-COVID-19 homeless individuals have been transferred to an appropriate HUD funded homeless program and that the state will only be seeking reimbursement for individuals meeting the non-congregate sheltering criteria already established by the guidelines regardless if they are homeless or not. For more information on the implementation of the non-congregate sheltering, please contact my Recovery Director, Fred Kaehler at Fredric.Kaehler@fema.dhs.gov or at 312.718.6459.

Sincerely,

Kevin M. Sligh, Sr.
Acting Regional Administrator