

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



FEMA

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 March 24, 2020, and supplemental information provided via email on March 30, 2020 requesting FEMA approval for emergency non-congregate sheltering activities under Public Assistance (PA) program. Specifically, your letter requests approval for temporary sheltering of the following target populations:

- Persons testing positive for COVID-19 and who are experiencing mild symptoms;
- Asymptomatic individuals who had direct contact with someone who tests positive for COVID-19;
- Asymptomatic individuals who had direct contact with a currently asymptomatic individual described in the second bullet; and
- Asymptomatic individuals who share a household with someone who tests positive for COVID-19, but who have not had contact with that person and who cannot return to the household without risking exposure to COVID-19.

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, which were implemented 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, I am providing a conditional approval of your request for emergency, non-congregate sheltering, which will be implemented by the State of Illinois pursuant to the Director of Illinois Department of Public Health "COVID-19 Isolation and Quarantine Direction and Order" signed March 24, 2020.

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

FEMA will reimburse costs associated with the sheltering of individuals 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 people over 65 or with certain underlying health conditions (respiratory, compromised immunities, chronic disease). Sheltering specific populations in non-congregate shelters should be determined by a public health official's direction or in accordance with the direction or guidance of health officials by the appropriate state or local entities.

My approval does not include the reimbursement of costs for the sheltering of asymptomatic individuals that are not among the populations specifically identified in the previous paragraph, without additional state or local public health official's direction or guidance.

FEMA may provide funding for eligible costs for the establishment of non-congregate sheltering as outlined above in 30 days increments until there is no longer a public health need per your State Public Health Officer. The State will need to provide a re-assessment at each 30-day interval that includes State Public Health Official certification that a threat to lives, public health, or safety still exists, and that continuing non-congregate sheltering eliminates or lessens the threat.

Additionally, Illinois must follow FEMA's Procurement Under Grants Conducted Under Exigent or Emergency Circumstances guidance and include a termination for convenience clause in its contracts for sheltering and related wrap around 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. Illinois should track populations separately such as homeless, health care workers and first responders in case of future appropriations that may duplicate funding by another federal agency.

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

Illinois 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, length of stay, and costs). As with any activity, lack of sufficient support documentation may result in FEMA determining that some or all of the costs are ineligible.

Sincerely,



James K. Joseph
Regional Administrator