

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

### Eligibility for FEMA Reimbursement and Project Roomkey

- 1. Question:** 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 May 31, 2020.

- 2. Question:** What is the official Incident Period begin 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 May 31, 2020 (per the [approval extension](#) unless the public health needs should sooner terminate. The State must obtain FEMA’s approval for any time extension beyond May 31, 2020 and will do so should there still be a need for non-congregate sheltering to control the spread of COVID-19.

- 3. Question:** 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 [extension](#) on April 29, 2020, through

May 31, 2020. It is extremely important that the tracking and eligibility requirements are in alignment with the guidance outlined in these approval letters.

4. **Question:** 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 May 31, 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 Housing 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.

5. **Question:** 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 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/COVID Response Resources and Guidance 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.

6. **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.

7. **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](#).

8. **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.

**9. 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).

**10. 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.

**11. Question:** Are there any updates on FEMA approval to grant an extension on FEMA reimbursement for Project Roomkey beyond April 30, 2020?

**Answer:** On April 29, 2020, FEMA granted the State an extension to our original approval of NCS for Project Roomkey through May 31, 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 May 31, 2020, and will keep communities apprised of any status changes.

### Occupancy Agreements

**12. 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](#).

**13. 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.**

**14. 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.

**15. Question:** 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 27 to 46 of the Occupancy Agreement template updated on April 3, 2020.

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

**Answer:** It is unclear what the purchasing order would look like but at a minimum it would need to have the required FEMA language. It is recommended that counties and tribes use the State's Occupancy Agreement template to secure hotel/motel rooms for Project Roomkey.

**17.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 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.

**18.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.

**19. 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. 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.

#### Documentation and Tracking

**20. Question:** 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 for 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 Project Roomkey program, in the unit (hotel/motel/trailer), services provided and their costs. 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 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/COVID Response Resources and Guidance 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.

**21. 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.

**22. 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).

**23. 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/COVID Response Resources and Guidance page](#) (please review the materials under Project Roomkey Guidance and Funding Considerations).

**24. 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.

#### Process to Request FEMA Reimbursement

**25. 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).

**26. 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 the [FEMA video tutorial on completing a Streamlined Project Application](#) though FEMA’s Grants Portal. For additional information Click here [FEMA’s Non-Congregate Sheltering Policy](#) or email any questions to [DisasterRecovery@caloes.ca.gov](mailto:DisasterRecovery@caloes.ca.gov).

**27. 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.

**28. 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

## Other

**29. 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).

**30. 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.

**31. 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](#).

**32. 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.

**33. 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.

**34. 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.