



**FEMA**

June 28, 2022

MEMORANDUM FOR: FEMA Regional Administrators  
Regions I – X

ATTENTION: Regional Recovery Division Directors

FROM: Melissa K. Forbes  
Assistant Administrator  
Recovery Directorate

SUBJECT: Emergency Non-Congregate Sheltering

A handwritten signature in black ink, appearing to read "Melissa K. Forbes".

FEMA Policy 104-009-18, [Emergency Non-Congregate Sheltering During the COVID-19 Public Health Emergency \(Interim\) Version 3](#), is in effect through July 1, 2022. On July 2, 2022, FEMA will transition to a modified approach to sheltering for all open Public Assistance (PA) and Fire Management Assistance Grant (FMAG) declarations. This decision is based on Centers for Disease Control and Prevention (CDC) indicators of COVID-19 community levels, the significant percentage of the U.S. population vaccinated against COVID-19, and partners such as the Red Cross returning to a strategy of congregate sheltering as the first level of sheltering.

On July 2, 2022, FEMA will utilize established policy on sheltering in the [Public Assistance Program and Policy Guide](#) (PAPPG) Version 4, with the additional flexibilities described below. As per the PAPPG, to be eligible for PA funding, non-congregate sheltering (NCS) must be approved by FEMA's Assistant Administrator for Recovery in advance of the sheltering action. Such approval is generally limited to 30 days. FEMA will implement the PAPPG policy with the following flexibilities:

- FEMA will waive the requirement in the PAPPG for Recipients/Applicants to obtain pre-approval before conducting NCS activities in traditional settings, i.e., hotels/motels, dormitories, retreat camps.
  - This waiver does not apply to non-traditional NCS setting such as the use of Recreational Vehicles (RVs) to provide NCS. The use of non-traditional methods to provide NCS (including RVs) requires pre-approval by FEMA's Assistant Administrator for Recovery; see additional information on RVs below.
- Applicants are required to notify FEMA Headquarters and the appropriate Regional Administrator, through the Recipient, within five days of initiating NCS operations for a declared incident (if sheltering is conducted prior to a federal declaration, then the notification requirement applies as 5-days post declaration).

- For NCS conducted for more than 30 days, the Applicant must submit a time extension request, through the Recipient, to the appropriate FEMA Regional Administrator.
  - Time extensions are granted in 30-day increments.
  - Time extension requests should be submitted at least seven days before the expiration date of the currently approved period of performance.
- Regional Administrators may provide time extensions up to 6 months from the declaration date.
- Time extensions beyond 6 months must be approved by FEMA's Assistant Administrator for Recovery.
- If an applicant needs to establish NCS in non-traditional facilities, such as use of RVs, the applicant must request this specifically and such requests must be approved by FEMA's Assistant Administrator for Recovery. NCS provided in any setting other than a hotels/motels, dormitories, and retreat camps are subject to additional incident-specific requirements and guidance.
- For NCS conducted for more than 30 days, Recipients and Applicants will be required to use data regarding the individuals and households sheltered. This will ensure that only individuals and households with a demonstrated need for continued emergency sheltering remain in NCS facilities. FEMA will use the criteria below to determine eligibility of NCS work and costs beyond the first 30 days:
  - Each household must:
    - Be in an area declared for Individual Assistance (IA);
    - Be registered with IA for disaster assistance;
    - Have not requested to withdraw its IA registration;
    - Be able to document pre-disaster status as an owner or renter of the primary residence; and
    - Have their primary residence determined not to be habitable.
  - The Applicant may determine a household's habitability status using IA information, Home Assessment information, or a habitability assessment process developed by the Applicant. The Applicant must submit the habitability determination method with the time extension request. Additionally, the Applicant should maintain information about the basic habitability of each individual and household in NCS during the period for which the Applicant is requesting a time extension.
- When conducting NCS, FEMA expects Applicants to develop and maintain a reporting system that captures the following data elements for individuals and households to ensure the eligibility of the work and costs:
  - FEMA IA Registration ID (if available)
  - Head of household: First and last Name and phone number (mobile or other)
  - Number of individuals in the household

- Damaged dwelling: Street Address, City, State, Zip Code
- Pre-incident residence habitability status

Applicants should inform individuals and households that information collected may be shared with FEMA. FEMA PA staff will not collect the data on behalf of the Recipient or Applicant. Recipients are expected to ensure Applicants are prepared to provide the information to substantiate eligibility based on the above criteria and submit the defined data elements to FEMA on a weekly basis, if requested.

When providing NCS, as a condition of assistance, Recipients and Applicants must comply with all statutes, regulations, and Executive Orders, including those that require non-discrimination and equitable delivery of FEMA funding to underserved communities. These include, but are not limited to, the Stafford Act Section 308 (42 U.S.C. 5151), the Americans with Disabilities Act, the Architectural Barriers Act, Title VI of the Civil Rights Act, and Title 44 of the Code of Federal Regulations Part 7. FEMA monitors compliance with these laws when granting assistance. Failure to adhere to these laws may result in the termination of or refusal to grant or to continue Federal financial assistance.

If you have any questions, please contact [Ana Montero](#), Director, Public Assistance Division.