



COUNTY OF MENDOCINO

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Prevention, Recovery, Resiliency, and Mitigation Division

The Prevention, Recovery, Resiliency, and Mitigation Division (PRRM) has been working diligently with Public Health regarding the response and potential outcome of the FEMA letter dated October 16, 2023, titled Emergency Non-Congregate Sheltering – FEMA-4482-DR-CA (COVID-19) pertaining to **Project Roomkey**.

As defined by the California Department of Social Services (CDSS), the purpose of Project Roomkey and Rehousing Strategy was to provide non-congregate shelter (NCS) options, such as hotels and motels, for people experiencing homelessness, to protect human life, and to minimize strain on health care system capacity. The California Governor's Office of Emergency Services (CalOES) responded to an initial letter dated March 27, 2023, with questions regarding eligibility, terminology, and FEMA's methodology in their initial pre-approval of the NCS project during the COVID-19 Pandemic. This October 16, 2023 letter is providing the clarification to these questions, over three years after the initiation of the program. The letter affects any hotel stays for clients between the dates of June 11, 2021 through May 11, 2023. FEMA's clarified guidelines now state that the length of stay for eligible populations during this time period is to be no more than "up to 20 days," defines "high-risk", and removes "asymptomatic" "low-risk" as an eligible population. Clients who utilized NCS between the start of the program through June 10, 2021 do not apply to these stricter guidelines, however, the amount of clients with hotel stays during the restricted guideline period who now are *no longer eligible* for reimbursement through the program, is substantial.

The County's Public Health team found an alternative funding source for a portion of the "no longer eligible" through an already utilized grant program Emergency Solutions Grant – COVID-19 (ESG-CV). The program was part of an appropriation of funds through the CARES Act and was at its final days before close-out. The Public Health team worked swiftly to submit the eligible expenses to the ESG-CV grant.

Total original FEMA submission	\$1,556,899.78
Portion of original FEMA submission that will qualify under the new FEMA policy	\$127,549.95
Portion of original FEMA submission that will no longer qualify for reimbursement under the new FEMA policy	\$1,429,349.83

Portion of original FEMA submission that will no longer qualify for FEMA reimbursement under the new policy but has been submitted to ESG-CV grant as an alternative source of funding	\$876,906.30
Portion of original FEMA submission that no longer qualifies for FEMA reimbursement under the new FEMA policy and does NOT have another source of funding	\$552,443.53

County staff and CalOES are working collaboratively on creating a united message with other counties affected by this new FEMA policy. There will be two chances to appeal the denials once issued by FEMA. The County has been reassured by CalOES that no county is alone in this.