Taking Advantage of FEMA's 100% Coverage

Across the country, local governments continue to sweep encampments and propose ordinances that would criminalize people experiencing homelessness. These ordinances include panhandling prohibitions, encampment bans, and sit/lie restrictions. Criminalization is especially cruel amidst the still raging COVID-19 pandemic that has cost half a million American lives and conflicts with best practices from the Centers for Disease Control of Prevention. The criminalization of homelessness is ineffective, bad policy that wastes community dollars by furthering the cycle of victimization instead of increasing access to affordable housing.

But there are resources available. Since March 2020, FEMA has recognized that providing non-congregate shelter for people experiencing homelessness is a powerful public health response to combat the spread of COVID-19. In February 2021, FEMA expanded the available reimbursement for communities providing non-congregate housing.

People Experiencing Homelessness are MORE LIKELY to Contract COVID-19

- Homeless people are less able to appropriately distance themselves and often lack adequate access to necessary hygiene and sanitation facilities needed to reduce the spread of COVID-19.
- According to the CDC, “because many people who are homeless are older adults or have underlying medical conditions, they may also be at increased risk for severe illness.”
- People Experiencing Homelessness are HIGHLY LIKELY to Contract COVID-19 in a Shelter
- Example: In San Francisco, 144 residents in a single shelter were tested and five were found positive for COVID-19. Less than one week later, 92 of those residents tested positive for COVID-19, along with 10 shelter staff workers.
- Encampments allow people experiencing homelessness to “increase physical distance between themselves and others” in ways they cannot at a congregate shelter facility.

CDC Guidance is CLEAR—Do NOT Sweep Encampments Without Individual Housing

- Make sure ALL solutions prioritize continued linkage “to homeless services, housing, medical, mental health, syringe services, and substance use treatment, including provision of medication-assisted therapies.”
- “Clearing encampments can cause people to disperse throughout the community and break connections with service providers. This increases the potential for infectious disease spread.”
- Ensure people residing in encampments can access sanitation facilities, by ensuring the availability of functional and well-stocked restroom facilities that “remain open to people experiencing homelessness 24 hours per day.”

The Bottom Line

“If individual housing options are not available, allow people who are living unsheltered or in encampments to remain where they are.”
FEMA Made it Easier for Communities to Provide Individual Housing for ALL People Experiencing Homelessness

- FEMA is offering 100% reimbursement to transition people experiencing homelessness into non-congregate shelter instead of congregate shelter facilities rather than requiring a 25% match.
- FEMA has approved waivers of its 30-day renewal requirements, meaning FEMA will reimburse eligible activities until September 2021.
- FEMA will retroactively fund the cost of eligible activities from January 2020, so communities can (and should) start today!

Clarifying Common Misconceptions

- FEMA offered a non-exhaustive list of examples of populations that could benefit from non-congregate shelter. Communities can apply for FEMA to reimburse non-congregate shelter beyond these examples.
- Communities are not shackled by previous applications for reimbursement. Communities can apply for additional reimbursement.
- Community requests can be made in accordance with local public health orders absent a state-wide strategy.
- Communities can rely on FEMA reimbursement even if they have not spent all currently allocated COVID-19 funding.

Examples of States Relying on FEMA Funding to Provide Non-Congregate Shelter for People Experiencing Homelessness

- **Vermont**: FEMA awarded over $1.5 million for costs incurred for non-congregate sheltering.
  - “[Non-congregate sheltering] is necessary to keep people/family separated from one another, especially in indoor environments, and is primarily used for promoting physical distancing and reducing the risk of COVID-19 transmission.”
- **Connecticut**: FEMA awarded over $2 million for costs incurred by the Connecticut Department of Housing.
  - “With the Connecticut Department of Public Health (DPH) a determination was made that non-congregate sheltering in hotels for vulnerable populations was the best option to provide the necessary social distancing to prevent the rapid spread of COVID-19 among the homeless population.”

The Bottom Line

There is NO reason not to attempt to take advantage of available FEMA funding to provide non-congregate shelter for people experiencing homelessness.

For more information on applying for FEMA reimbursement for non-congregate shelter, watch NLIHC’s informative webinar here.