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**Vermont Emergency Management**

45 State Drive  
Waterbury, VT 05671-1300  
<http://vem.vermont.gov>

Toll free: 800-347-0488  
Phone: 802-244-8721  
Fax 802-241-5556

September 9, 2021

Paul F. Ford  
Acting Regional Administrator  
Federal Emergency Management  
Agency Region 1  
99 High Street  
Boston, MA 02110

RE: Time Extension (#17) Report for Continued Approval for Reimbursement of Non-Congregate Medical Sheltering (NCMS), DR-4532

Dear Regional Administrator Ford:

In response to the COVID-19 pandemic, the Governor of Vermont activated the State Emergency Operations Center (SEOC) on March 11, 2020.

Subsequent to March 13, 2020, Nationwide Emergency Declaration for Coronavirus Disease 2019 (COVID-19) and the recognition that non-congregate sheltering may be necessary to save lives and protect health and safety during this Public Health Emergency, and 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 COVID-19 emergency at the direction of state public health officials may be reimbursed under Category B of FEMA's Public Assistance (PA) program. These include costs for NCMS which must be approved by the FEMA Regional Administrator prior to implementation. Through this report, I am submitting the supportive documentation necessary to validate the continued need for NCMS operations for the state and local jurisdictions to protect these vulnerable populations.

Since July 1, Vermont has narrowed the eligibility criteria to significantly scale down the number of people covered under this program.

**Background and Justification for Continuing Need:**

As of April 6, 2020, when Vermont was first approved for non-congregate sheltering, we had reported 522 people infected with COVID-19 and 22 fatalities as a result. As of September 8, 2021, 29,436 people have tested positive for COVID-19, resulting in 282 deaths. Thirty-two (32) patients are currently hospitalized, with seven (7) in ICU, and with two (2) patients currently hospitalized and under investigation for COVID-19. There have been 454,407 people tested and 1,943,359 total tests conducted. There have been 25,994 people that have recovered.

The Vermont Department of Public Safety, through Vermont Emergency Management (VEM) has utilized state partners including, but not limited to the Department of Health, Agency of Human Services and Department of Buildings and General Services to identify solutions to protect the most vulnerable populations from the outbreak's effects. These population groups include first responders

and healthcare workers who need to quarantine safely without exposing their families, homeless families in congregate shelters, with at least one member who tested positive for COVID and will require isolation, homeless individuals, whether or not in a congregate setting, who require quarantine or isolation, Vermonters who live in group or congregate settings who need to isolate or quarantine or who do not have a suitable home environment to do so. In developing solutions to protect these groups, the state partners determined that Non-Congregate Medical Sheltering (NCMS) was necessary in this Public Health Emergency to save lives, to protect public health, and to ensure public safety, as well as to lessen or avert the threat of a healthcare catastrophe.

### **Official Order for Non-Congregate Medical Sheltering:**

- Attached to this report are the official orders signed by the Governor dated April 3, 2020 (Addendum 8); April 10 (Addendum 9); and May 15, 2020 respectively (Addendum 14); and most recently the Governor's Amended and Restated Executive Order No. 01-20, dated June 15, 2020, directing the continued implementation of this NCMS operation at the state and local level; and
- Addenda 1, 3, 5, 6, 8, UPDATED 8, 9, 10, 11, 12, 14 and 16 to the Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020] extending the non-congregate sheltering to July 15, 2020, September 15, 2020 October 15, 2020, November 15, 2020, December 15, 2020, January 15, 2021, February 15, 2021, March 15, 2021, April 15, 2021, May 15, 2021, June 15, 2021 and July 15, 2021 respectively.
- The Governor's current Executive Order: EXECUTIVE ORDER NO. 06-21 [COVID-19 Post-Emergency Recovery Activities] (dated June 15, 2021) which extends until further notice with respect to non-congregate housing for specific populations.

The data contained in this report follows FEMA's monthly report format to support the State of Vermont's need for an extension to the period presented in the Governor's Amended and Restated Executive Order No. 01-20 [Extension of State of Emergency Declared March 13, 2020; Other COVID-19 Related Directives and Clarifications] and the Governor's current Executive Order: EXECUTIVE ORDER NO. 06-21 [COVID-19 Post-Emergency Recovery Activities] (dated June 15, 2021).

### **Re-Assessment of Continuing Need:**

As provided in our original request we explored options such as college dorms, rental properties and hotels and found that our only viable, cost effective option was motel vouchers, or leasing of space at hotels.

It is our assessment at this time that there is continued need for non-congregate housing arrangements, particularly associated with homeless individuals.

The State of Vermont had planned for the worst-case scenario, however, only measures that are reasonable and necessary to address the continued public health needs of the COVID-19 event will be implemented at the state and local level during this additional 30-day increment. The State of Vermont is providing this report as justification for continued FEMA approval for all eligible costs that have been incurred since January 20, 2020 and all eligible costs that will be incurred through October 15, 2021 or the end of the Incident Period, whichever comes first.

Initially, the state partners looked at all available NCMS options, including hotels, college dormitories, shuttered healthcare facilities, and other facilities with similar layouts, staff near the affected areas, and

able to accommodate the needed ancillary services, such as meal service and cleaning. No single option was feasible and cost effective statewide. VEM through its state partners developed a list of available hotels and dormitories, only to be activated as needed and able to be deactivated easily as need subsided. As we assess the continuing need for NCMS, the state partners are now looking at all available possibilities to find the most cost-effective approaches as hotels and motels and homeless shelters begin to re-open to normal business activities. We have reassessed and continue to utilize the current plan in place for additional time. The estimated cost is \$99.77 per person per day and \$3,002,290.37 monthly (based on 30-day month). Our analysis has determined that the most cost-effective approach under the circumstances of limited supply is to effectively scale the operation in real-time based on need. It is our goal to limit this operation to only that which is reasonable and necessary to meet the needs as they arise.

#### Analysis of Shelters:

The State performed an analysis of the current shelter system in Vermont to specifically identify whether or not shelters were able to meet social distancing CDC guidance for congregate housing, including placing beds at least 6 feet apart, assessing residents for risk of COVID, and isolating individuals who would be identified as a risk.

The State also identified shelter sites that were in jeopardy of closing due to staffing shortages, or shelters that were unable to meet guidance. Following analysis, the State developed a plan to address the vulnerable populations. The plan is as follows:

- 1) Previously, shelters would cease accepting new clients; or have closed
  - a. Some shelters now have reduced capacity to the appropriate levels to maintain a lower than regular census to meet guidelines.
- 2) Clients that normally reside in shelters would transition to hotels and motels utilizing the Agency of Human Services Department for Children and Families “motel voucher” emergency housing program;
- 3) Some Shelters would close until the event ceases;
- 4) If a homeless Vermonter experiences symptom, the individual would be tested.
  - a. While awaiting test results, the individual would be housed in an identified isolation site (see below);
  - b. If the test results are negative, or if the client is no longer symptomatic, the individual will transition to the motel voucher program referenced above.

#### Newly Homeless:

Vermont uses Vermont 2-1-1 during business hours and the Department for Children and Families’ Economic Services Division Benefits Service Center during non-business hours to refer individuals who are homeless to housing sites. Individuals not currently housed at available shelters were provided a referral to the alternate hotel sites through the voucher program.

From the onset of this incident, to-date, over 2,600 per night beds have been made available, though recently this has been reduced to approximately 1,003 per bed nights.

Through the course of this event, and still ongoing, the state of Vermont continues to explore many options to address housing Vermont’s vulnerable populations. We continue to assess that the best available course of action is to utilize existing programs in place, namely the “motel voucher” emergency housing program.

As indicated above, Isolation sites are used for individuals who have tested positive, are presumptive for COVID, are symptomatic, or have otherwise been advised by a health care provider to quarantine and be tested. These individuals have no suitable home environment to isolation or quarantine and are

unable to isolate at their current shelter or motel. These sites have individual rooms with bathrooms and include onsite services to appropriately accommodate self-isolation/quarantine in a motel. In addition, these sites have services on-site to appropriately accommodate individuals unable to self-isolate in a hotel.

Larger scale “COVID Recovery Sites” were established and were used to accommodate individuals who were tested and confirmed for COVID. These congregate housing sites were used to accommodate individuals who were homeless, or in the care and custody of the state, and confirmed COVID positive. This component is no longer active.

Expenditures relating to the above captioned include housing needs, transportation needs, security and feeding.

The breakdown of Vermont’s current housing and associated services for AHS clients is as follows:

- 917-person capacity under the General Assistance (GA) Voucher Program;
  - 52 persons in Non-Congregate Housing;
  - 34 persons in leased Isolation/Quarantine/Recovery.
- Total:1,003

### **Estimated Cost Summary:**

Costing is based on 1,003 beds and 30-day-month; a conservative estimate of transportation costs; and only select staffing. =Factors include: Nursing staff, Mental Health staff, and support staff costs; Security staff costs; Lease costs; Meal costs; and Supplies/Materials costs. Transportation costs are based on the length of leases and maximum usage. This yields a total daily cost of \$100,076.35 or daily average cost per bed of \$99.77.

### **Report package:**

**An extension to the current period of performance for NCMS is supported with the data contained in this report package, through October 15, 2021.**

Pursuant to the Public Assistance Program and Policy Guide (PAPPG), Chapter 2: VI.B.10.b *Sheltering*, the state finds that non-congregate sheltering is the best available option for meeting the urgent public health needs of COVID-19 and to protect health and safety in the community. The Department of Public Safety (DPS), through Vermont Emergency Management (VEM) is ensuring that: Applicants follow FEMA’s *Procurement Under Grants Conducted Under Exigent or Emergency Circumstances* guidance and include a termination for convenience clause in their contracts; all applicable environmental and historic preservation laws, regulations, and executive orders that apply are adhered to; and there will be no duplication of benefits with another federal agency.

### **Conclusion:**

The State of Vermont actively chose non-congregate sheltering to address the immediate public health and safety needs of individuals impacted by COVID-19 (specifically including: first responders and healthcare workers who need to quarantine safely without exposing their families, homeless families in congregate shelters, with at least one member who tested positive for COVID and will require isolation, homeless individuals, whether or not in a congregate setting, who require quarantine or isolation, and Vermonters who live in group settings who do not have a suitable home environment to do so. The State

of Vermont has conducted assessments to review best available options, resulting in this report to continue reliance primarily on the motel voucher program at this time for the affected population as the best way forward to preserve the health and safety of the community.

We confirm our review of the Regional Administrator's Memo re: *Non-Congregate Sheltering Delegation of Authority* and accept all criteria. Specifically, the Vermont Department of Public Safety confirms that funding to support non-congregate sheltering has not been received from any other federal agency. The Vermont Department of Public Safety, through Vermont Emergency Management, will follow FEMA's *Procurement Under Grants Conducted Under Exigent or Emergency Circumstances* guidance; and include a termination for convenience clause in contracts.

If you should have any questions regarding this report, please contact me at 802-585-4719 or [ben.rose@vermont.gov](mailto:ben.rose@vermont.gov). Thank you for your consideration of the supportive documentation contained in this report for continued approval of expenses under Public Assistance, Category B - Emergency Protective Measures.

Sincerely,

*Ben Rose*

Ben Rose, Recovery and Mitigation Section Chief  
Vermont Emergency Management

Cc:

Robert Irby, FEMA R1 Recovery Supervisory Emergency Management Specialist

Dan Laurich, FEMA R1 Public Assistance Branch Chief

Mary Rensch, FEMA R1 Executive Assistant

Attachments:

Vermont Governor Philip B. Scott - *Addendum 8 to Executive Order 01-20 [Non-Congregate Sheltering in Vermont; Extension of Certain Deadlines Relating to Closures of DMV and Bars and Restaurants]*

Vermont Governor Philip B. Scott - *Addendum 9 to Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020; Other COVID-19 Related Directives and Clarifications]*

Vermont Governor Philip B. Scott - *Addendum 14 to Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020; Be Smart/Stay Safe]*

Vermont Governor Philip B. Scott's Amended and Restated Executive Order No. 01-20 (dated June 15, 2020)

Vermont Governor Philip B. Scott - *Addendum 1 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020] (dated July 15, 2020)*

Vermont Governor Philip B. Scott - *Addendum 3 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020] (dated August 14, 2020)*

Vermont Governor Philip B. Scott - *Addendum 5 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020] (dated September 11, 2020)*

Vermont Governor Philip B. Scott - Addendum 6 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020] (dated October 15, 2020)

Vermont Governor Philip B. Scott - Addendum 8 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020; Stay Safe/Stay Working/Stay in School] (dated November 13, 2020)

Vermont Governor Philip B. Scott - UPDATED Addendum 8 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020; Stay Safe/Stay Working/Stay in School] (dated November 20, 2020)

Vermont Governor Philip B. Scott - Addendum 9 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated December 15, 2020)

Vermont Governor Philip B. Scott - Addendum 10 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated January 15, 2021)

Vermont Governor Philip B. Scott - Addendum 11 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated February 15, 2021)

Vermont Governor Philip B. Scott - Addendum 12 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated March 15, 2021)

Vermont Governor Philip B. Scott - Addendum 14 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated April 15, 2021)

Vermont Governor Philip B. Scott - Addendum 16 to Amended and Restated Executive Order 01-20 [Extension of State of Emergency Declared March 13, 2020]; (dated May 14, 2021)

The Governor's current Executive Order: EXECUTIVE ORDER NO. 06-21 [COVID-19 Post-Emergency Recovery Activities] (dated June 15, 2021).

121620 - *Update to Non-Congregate Sheltering Delegation of Authority Waiver Memo*

NCS Reporting Spreadsheet by the Vermont Agency of Human Services (AHS), *NCS\_Reporting\_Sept-Oct\_2021*

Note: FEMA is no longer issuing approval letters as they are now considered reports, not time extension requests. VEM received an e-mail confirmation of receipt from FEMA on August 9, 2021 for the September monthly report.