



Transitional Sheltering Assistance Policy *(Interim)* **FEMA Policy #104-009-20**

BACKGROUND

Transitional Sheltering Assistance (TSA) is a short-term, non-congregate sheltering form of assistance for displaced disaster survivors taking refuge in emergency shelter locations. The intent of TSA is to provide sheltering using facilities, including but not limited to, hotels and motels for survivors as they transition from emergency shelters to temporary or permanent housing solutions.

Based on lessons learned from previous TSA activations and the coronavirus (COVID-19) pandemic, and in alignment with FEMA's Strategic Plan to reduce complexity and simplify disaster recovery, the Recovery Directorate issues this Interim Policy for TSA to be applied under emergency or major disaster declarations that include Individual Assistance (IA).

PURPOSE

This document serves as FEMA's Interim Policy on TSA in accordance with Chapter 2, Section IX, of FEMA Policy 104-009-03, *Individual Assistance Program and Policy Guide*, published in March 2019. This interim policy is effective for disasters declared on or after August 22, 2020.

PRINCIPLES

- A. TSA will provide temporary non-congregate sheltering to alleviate immediate threats to life resulting from a Presidentially declared disaster that includes Individual Assistance.
- B. FEMA will provide standardized timelines and milestones, including end dates, to help manage expectations, and emphasize the short-term nature of this temporary sheltering solution.
- C. FEMA will activate TSA based on a state, tribal, or territorial government's (STT's) demonstrated need for non-congregate sheltering.
- D. FEMA will coordinate with whole community partners to meet the human services needs of survivors in TSA, using all available state, local, tribal, and/or territorial (SLTT) and federal assistance for disaster survivors.
- E. FEMA will clearly communicate information about this assistance to survivors in a simple and effective manner.
- F. FEMA will promote STT understanding of the scope, benefits, limitations, and costs of assistance.
- G. FEMA will use standard criteria from the Individuals and Households Program (IHP) to determine household eligibility and definitive guidance to reduce complexity and prevent inconsistency in the delivery of TSA.



- H. FEMA will coordinate with SLTTs and other whole community partners to plan for the needs of people with disabilities and others with access and functional needs.

REQUIREMENTS

A. AUTHORIZING TSA

FEMA may authorize TSA when the following conditions exist:

1. Congregate shelters are overcrowded or insufficient in number and location to meet the sheltering demand; or
2. Areas of designated communities are inaccessible, and it is projected the condition of inaccessibility may exceed 30 days.

FEMA authorizes TSA when an STT requests assistance supporting the emergency needs of survivors in the area of the Presidentially declared disaster for IA. The STT must submit the request through the Federal Coordinating Officer (FCO) and Regional Administrator (RA) to the Individual Assistance Division Director (IADD) at FEMA Headquarters (HQ). When the request package is submitted to the IADD for final review and approval, a signed letter with the FCO's recommendation and the RA's concurrence, must be included. FEMA's IADD may approve the request, deny the request, or ask for additional information prior to a final decision.

The STT request package must include, as substantiated by data-informed analysis, that the congregate shelter population count has stabilized and/or address:

1. STT activation request letter signed by the Governor/Tribal Chief Executive (TCE) or the Governor's/TCE's Authorized Representative (GAR/TAR);
2. A signed, fully executed and accepted Resource Request Form (RRF) received from field-based FEMA staff, and containing all necessary elements as noted in the TSA RRF template;
3. Specific length of time the STT is requesting TSA be made available, to include justification for the requested duration with the understanding that the TSA minimum activation is 30 days and the maximum period of assistance cannot exceed 180 days from the date of declaration;
4. Identification of the IA designated counties for which the STT is requesting TSA; FEMA, in coordination with the STT government, will conduct an analysis to identify the locations of participating hotels, motels, or other facilities to be utilized for TSA.
5. Acknowledgement of the STT cost share for TSA;
6. An assessment of utility outages in identified counties along with estimated restoration dates; and
7. Justification that the conditions for TSA exist. The following factors that are applicable to the current disaster must be addressed:
 - a. The current shelter capacity does not meet the sheltering needs of the displaced population; and/or
 - b. Congregate shelter support resources are inadequate to sustain existing shelter needs (e.g., shelter operators and other partners project that they will be unable to sustain congregate shelter operations for 30 days); and/or



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- c. Areas of designated communities are inaccessible and are projected to remain inaccessible for greater than 30 days; and/or
- d. Facilities serving as congregate shelter(s) need to return to their pre-disaster use (e.g., schools to provide education); and/or
- e. Available rental resources, as determined by FEMA in coordination with the STT, are not sufficient to meet the needs of the displaced population within the affected areas.

B. PERIOD OF ASSISTANCE

Based on the documented need supported by the data and analysis in the request package, the IADD may approve TSA for not less than 30 days and up to 180 days from the date of the emergency or major disaster declaration.

C. CONDITIONS OF INITIAL REGISTRANT ELIGIBILITY

TSA is authorized for FEMA disaster assistance registrants who have a documented need. TSA is intended to be a short-term sheltering option, serving as a bridge to temporary or permanent housing. The initial period of TSA eligibility is 30 days, subject to the following registrant eligibility criteria.

To be considered for TSA eligibility, registrants must:

1. Register with FEMA within 60 days from date of declaration; and
2. Be a U.S. citizen, non-citizen national, or qualified alien; and
3. Complete a valid registration with FEMA for federal disaster assistance; and
4. Pass identity verification; and
5. Pass occupancy verification; and
6. Have a primary residence located in an area designated for TSA; and
7. Be the head of household and/or not be linked with another valid registration for FEMA assistance; and
8. Have a current sheltering location of mass shelter (including churches/houses of worship), hotel/motel, car, or place of employment; and
9. At least one of the following must be present:
 - a. Indicate the home is physically inaccessible; or
 - b. Report home damage that displaced the registrant and was caused by the event occurring within the incident period; or
 - c. Have a completed home assessment on file indicating the home is not safe to occupy, the utilities are out, or the home is inaccessible.

D. CONTINUED REGISTRANT ELIGIBILITY

FEMA will conduct periodic reviews of registrants' continued TSA eligibility, generally in 14-day intervals. Registrants who meet the conditions of continued eligibility may remain in TSA. There may be eligibility intervals that are longer to accommodate holidays, to align reviews across multiple TSA activations, or due to other exigent circumstances.



This guidance delegates authority from the IADD to the FCO to waive continued eligibility for an individual registrant.

Registrants are no longer eligible to remain in TSA if any of the following uniform criteria apply:

1. The registrant has completed a FEMA registration, but does not meet the conditions for referral to FEMA Housing Assistance; or
2. The registrant voluntarily withdrew from consideration for disaster assistance; or
3. The registrant's pre-disaster primary residence is safe to occupy based on FEMA's home assessment; or
4. The registrant will continue to occupy the damaged dwelling while repairs are being made, based on information provided during the home assessment and/or recorded through casework or calls to the FEMA Helpline; or
5. The registrant has insurance providing Additional Living Expense or Loss of Use coverage verified by the home assessment; or
6. The registrant is identified as insured after registration and has not been made eligible for temporary housing assistance; or
7. The registrant does not respond to FEMA outreach efforts after at least three contact attempts; or
8. The registrant is included with another household already receiving FEMA IHP assistance; or
9. The registrant chooses not to accept Direct Temporary Housing assistance when offered; or
10. The registrant has been licensed into a FEMA Temporary Housing Unit (THU); or
11. The registrant no longer needs TSA because emergency temporary repairs have been completed; or
12. The registrant does not comply with the TSA Terms and Conditions; or
13. The registrant has received FEMA Temporary Housing Assistance and adequate rental resources are available; or
14. The registrant has obtained alternate temporary or long-term housing, based on information recorded through casework or calls to the FEMA Helpline.

Each eligibility review interval will include all initial and uniform continued eligibility criteria, as listed in Sections C and D. Additional eligibility factors will be implemented at each eligibility review interval. See Appendix A with Intervals 1 through 3.

As determined by FEMA HQ, in consultation with TSA field-deployed coordination staff, additional eligibility factors from Appendix A may be adjusted due to disaster-specific exigent circumstances either by request of the STT or by FEMA leadership. FEMA HQ will notify STTs and registrants in a timely manner about any adjustments to additional eligibility factors using a combination of written documentation and a registrant's preferred communication mechanism.

When a registrant becomes ineligible for TSA, they will be provided notice that they have seven days remaining in TSA. Notification will be in the form of a phone call, text, and/or email,



depending on the registrant's identified communication preference documented in the registrant's FEMA application.

Registrants are required to sign a Terms & Conditions document at their initial check-in to a TSA hotel. This document notes that in some instances an expedited check out will be required, such as:

1. When a registrant is licensed into a THU, they will be provided three additional nights in TSA to coordinate their move;
2. When a registrant identifies repairs have been made to the damaged dwelling, or they have obtained alternate housing, they will be provided three additional nights in TSA to coordinate their move;
3. In instances of fraud, registrants may be notified of immediate termination of TSA eligibility; or
4. When there is a credible belief that a registrant is a threat to themselves or others, registrants may be notified of immediate termination of TSA eligibility.

E. MODIFICATION OF TSA IMPLEMENTATION

At the written request of the STT, when accompanied by sufficient justification, including a recommendation from the FCO and/or RA (see Section A of this policy), the IADD may authorize:

1. The addition of counties not initially designated for TSA; and/or
2. An increase in the applicable General Services Administration (GSA) lodging rate of up to 300%.
 - a. The applicable rate can subsequently be decreased to the GSA lodging rate.
 - b. Such requests must include information or specific data justifying the requested increase or decrease to the GSA lodging rate.
 - c. Any adjustment to the established lodging rate will be applied during the next eligibility review.

F. EXTENDING TSA

If the IADD authorizes TSA for fewer than the maximum 180-day period of assistance, the RA has the authority to extend TSA up to the maximum 180-day period from the date of the declaration. In coordination with the FCO, the STT can submit a written request to extend TSA to the RA.

The request must:

1. Be received a minimum of 30 days prior to the end of the approved TSA period of assistance; and
2. Include the dates for the previously approved TSA period(s) of assistance associated with the event; and
3. Specify exigent circumstances justifying an extension (e.g., continued lack of rental resources, inability to access impacted areas, demonstrated need for a direct housing mission); and



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4. Include the end date for the requested extension; and
5. Submit an exit strategy describing the actions and/or components that will assist registrants' transition to temporary or permanent housing solutions, including state or local housing and community development organizations.

G. ENDING TSA

TSA will end when:

1. The STT does not request an extension prior to the end of the authorized TSA period of assistance;
2. The RA denies an extension request beyond the authorized TSA period of assistance; or
3. The period of assistance reaches 180 days from the date of declaration.

Keith Turi
Assistant Administrator, Recovery Directorate

August 23, 2020

Date



ADDITIONAL INFORMATION

REVIEW CYCLE

FEMA Policy 104-009-20, *Transitional Sheltering Assistance Policy (Interim)*, will be reviewed, reissued, revised and/or rescinded within one year of the issue date.

AUTHORITIES and REFERENCES

Authorities

- A. Section 403, 42 U.S.C. 5107b, Essential Assistance, of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended.
- B. Section 408, 42 U.S.C. 5174, Federal Assistance to Individuals and Households, of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended.
- C. Section 502, 42 U.S.C. 5192, Federal Emergency Assistance, of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended.

Policies do not have the force and effect of law, except as authorized by law or as incorporated into a contract.

References

- A. FEMA Policy 104-009-3, *Individual Assistance Program and Policy Guide*, March 2019.

MONITORING AND EVALUATION

Following the review of this policy, FEMA will consider changes necessary to FEMA Policy 104-009-3, *Individual Assistance Program and Policy Guide*.

QUESTIONS

Direct questions to Zachary Usher, Branch Chief, Mass Care/Emergency Assistance, Voluntary Agency Coordination, Community Services, at Zachary.Usher@fema.dhs.gov.



APPENDIX A: TSA ELIGIBILITY REVIEW MATRIX

In addition to all initial and uniform continued eligibility criteria, these additional factors will be implemented at each eligibility review interval, with Interval 1 generally beginning after the first 14 days that the registrant receives TSA, as follows:

Eligibility Review Intervals	Ineligible Reason	Explanation
1		
	Housed	Registrant reports being back in damaged dwelling or alternate housing; new rental unit, Pre-disaster HUD; housing paid by other entities; DHAP, etc.
	No Habitability Repairs Required	FEMA home assessment indicates no disaster caused damage preventing the registrant from moving back to their primary dwelling.
2		
	Utilities Restored or Home Accessible (ERU-ERIA) only	Utilities confirmed as restored and/or the home is now accessible.
	Appeal = Home is Safe to Occupy	A home assessment appeal indicates the home is now habitable.
	Ineligible >30 days	Registrant was notified of TSA eligibility and has not checked into a hotel in 30 days or more from notification.
	Not in Hotel	Confirmed registrant is not currently checked into a hotel.
	Inaccessible	The registrant indicates the dwelling is inaccessible at the time of registration and has not updated their accessibility or received a home assessment.
3		
	Leased/Licensed into FEMA Direct Housing	FEMA leased a registrant into a direct housing option.
	Refused HUD Housing Assistance	The registrant was referred to HUD housing and the registrant refused HUD housing assistance.

Eligibility review criteria are cumulative and will continue throughout the duration of the approved TSA assistance period.

As determined by FEMA HQ, in consultation with TSA field-deployed coordination staff, additional eligibility factors from Appendix A may be adjusted as a result of disaster specific exigent circumstances.