



STATE OF FLORIDA

DIVISION OF EMERGENCY MANAGEMENT

Ron DeSantis
Governor

Kevin Guthrie
Director

November 7, 2022

Thomas McCool, Federal Coordinating Officer
FEMA DR-4673-FL
Joint Field Office
Brandon, Florida

RE: DR-4673-FL, Request for Expansion of Section 403 Emergency Protective Measures for Sheltering in Home for Recovery Continuation (SHRC) RFI Response

Dear Mr. McCool,

On November 4, 2022, the Florida Division of Emergency Management (FDEM or the Division) was presented with a Request for Information (RFI) for the DR-4673-FL Request for Expansion of Section 403 Emergency Protective Measures for Sheltering in Home for Recovery Continuation (SHRC) submitted by FDEM on October 28, 2022. The narrative response to all of the items recommended as part of the Request for Information is below.

1. *Please ensure an updated request includes a signature from the GAR or AGAR for DR-4673-FL*
Please see the last page of this letter for GAR signature.

2. *Please specify the "Gap" that SHRC is intended to fulfill. What is the desired outcome?*

It is the State's intent to help keep survivors in their homes and communities. In its initial stages, this program will specifically target ineligible survivors classified in the "No Relocation" category. The gap in this instance exists due to the fact these survivors have no other ability to effect habitability repairs to their homes, thus creating an environment that is not safe, healthy, or functional. While there may be various reasons for this classification, many survivors in Florida are sheltering in their damaged dwellings. For these survivors, SHRC can provide efficient, cost-effective, and uncomplicated repairs that will make an immediate positive impact on their health and safety.

These temporary repairs will be consistent with the Shelter Field Guide (FEMA and the American Red Cross, pg. 6) which requires:

- Functional and sanitary kitchen and bathroom;
- Sufficient lighting;
- Functional utilities;
- Entry and egress free of debris;
- Access and functional need support capacity; and
- Mitigated safety and fire hazards.

The desired outcome for each SHRC individual or household is to make temporary habitability repairs that enable the survivor to make their home a safe and functional place to live. SHRC is a survivor-centric approach to non-congregate sheltering that meets survivors where they are and facilitates their recovery. Temporary repairs on homes in order to make them safe, sanitary, and secure helps keep communities intact and can have an immediate, positive impact on the survivor's ability to maintain the ties they have to their jobs, schools, and support systems while repairs are conducted on their homes.

3. *How are other sheltering and assistance programs that are currently authorized not meeting the needs of survivors.*

The State is pursuing every available appropriate housing option for Floridians affected by Hurricane Ian. This includes congregate and non-congregate sheltering, FEMA IHP (Rental Assistance, Repair Assistance, Replacement Assistance, Other Needs Assistance) and SBA loans. The State reviewed all existing FEMA authorities and policies to maximize their potential, and overcome any unnecessary barriers to service delivery, for the benefit of survivors.

The sheltering and assistance programs currently authorized do not meet all survivors' needs. Specifically,

- Congregate sheltering is not sustainable long term and the locations of congregate shelters do not allow survivors to participate fully in their communities.
- Transitional Shelter Assistance (TSA) is not authorized for survivors who report living in their damaged dwellings. Survivors may not be able to access hotels within their community, which provide access to their work, schools, and healthcare networks.
- NCS-RV Trailers are not necessarily as weather-resistant as permanent structures. They are not as cost-effective a solution as immediate repairs and cannot be placed in all locations. NCS-RV is limited to a six-month time frame, whereas SHRC would allow survivors to stay in their homes for longer than six months while work is being performed.
- There are not enough available rental resources in many counties for all who need safe places to live.
- Direct Housing is not authorized in all designated counties and not all survivors with continued housing needs are eligible for Direct Housing.

4. *How will SHRC reduce the current need for congregate sheltering?*

Currently, there are local and state-run congregate shelters still operating in Lee, Charlotte, Collier, DeSoto, Sarasota, and Hardee counties with a cumulative population of 736. The intention of these counties and of the State is to assist eligible survivors in relocating back to their communities. SHRC can reduce the need for congregate shelters by:

- Eliminating the requirement for congregate shelters for those who can return home if temporary habitability repairs are made.
- For survivors who have been living in their damaged dwelling, SHRC can offer a solution to allow them to stay where they are safely and securely, so they do not have to go to a congregate shelter, if their current housing solution proves to be unsustainable.

5. *Specify the time duration of SHRC and how it falls under the authority of Section 403 of the Stafford Act as an immediate action to address health and safety needs.*

Consistent with other emergency protective measures and non-congregate shelter missions, this initiative shall not exceed six months from Federal disaster declaration, or March 29, 2023.

The Public Assistance 403 authority that provides for this program allows for:

Emergency protective measures conducted before, during, and after an incident are eligible if the measures:

- Eliminate or lessen immediate threats to lives, public health, or safety; OR
- Eliminate or lessen immediate threats of significant additional damage to improved public or private property in a cost-effective manner.

FEMA may require certification by Federal or SLTT government officials that a threat exists, including:

- Identification and evaluation of the threat; and
- Recommendations of the work necessary to cope with the threat. (FEMA PAPPG, pg. 6)

On September 29, 2022, the State of Florida requested the deployment of the U.S. Army Corps of Engineers Blue Roof Program. This emergency protective measure provides temporary roofing and the coordination of roofing activities of all other organizations (e.g., National Guard and voluntary organizations) performing portions of this roofing mission. The State of Florida is seeking an expansion of the execution of this same approved authority, for a limited, specific shelter in place mission, using verified volunteer labor, to include the purchasing of materials and equipment beyond tarps, plastic sheeting, and furring strips.

6. *What is the estimated per residence repair cost?*

Based upon similar Federally executed programs, it is estimated that home repairs would not exceed \$5,500 in building materials and approximately 200 volunteer hours per home.

7. *Will the labor of voluntary agencies be claimed as a donated resource?*

All volunteer labor will be claimed and tracked as donated resources. FDEM operates in close partnership with Volunteer Florida (the State Service Commission), the Florida Voluntary Organizations Active in Disaster (FLVOAD), and other partners including private business owners, universities, and community and faith-based service organizations who may be able to source volunteer labor for this program.

The State of Florida will limit provision of SHRC to individuals who:

- Are able to demonstrate that their damaged dwelling address is in a county that has been declared for FEMA Individual Assistance;
- Are able to demonstrate that their damaged dwelling address is their primary residence;
- Do not have homeowners' insurance; and
- Do not qualify for other kinds of long-term housing assistance.

8. *Define the population of individuals and households (HH) the State will limit provision of SHRC will assist that other currently approved recovery programs will not assist. Please specify how the State will identify the population of individuals / HH SHRC is intended to reach and provide estimates of approximately how many individuals and/or families SHRC will ensure in place sheltering as an option.*

Through the data sharing agreement with FEMA, the state will initially identify survivors deemed ineligible for FEMA IHP based upon a "No Relocation" classification. Based on the latest report received from FEMA on November 5, 2022, there are 3,040 individuals or households who are ineligible with this classification.

Prioritized populations for this program include persons who are 65 years of age or older, are medically vulnerable, have access and functional needs, and survivors who have not received other types of financial assistance from FEMA or for whom this financial assistance was not enough to make their home safe, sanitary, and habitable.

9. *Define the application process for HH to be considered for inclusion in the SHRC effort and specific criteria that will make a HH eligible for participation in SHRC*

FDEM, in partnership with Florida Digital Services, is developing a web-based Application Portal through Unite Us for households to register for a number of State-run assistance programs. This online application will be supported with a call center for households who have difficulty completing the application online, which will offer multi-language support and TTY capabilities. FDEM will review applications through the Unite Us portal to determine household eligibility and assign work orders. In addition to applying for this program directly with the Division via online application or call center, survivors may also be referred to this program as part of the ongoing immediate casework being provided by the State.

10. *If this is for survivors who are not eligible for other federal or State recovery programs, please elaborate on how SHRC will reduce the costs or achieve efficiencies in provision of assistance that are being provided under current recovery programs.*

Because SHRC prioritizes survivors with unmet housing needs despite the existing State and Federal recovery programs, it is incumbent upon the State, in order to maintain safe and habitable living conditions for its citizens, to deliver this form of assistance. This program contributes to stabilizing the criticality of livable housing stock in communities that have been significantly impacted by the disaster. SHRC reduces long term costs by bringing homes back to safe, habitable conditions, and keeping communities intact.

11. *What is the State's plan to address volunteer agency (VOLAG) lodging and other logistical support for volunteers coming from outside the impacted area and how will the associated costs to have them travel will be handled?*

The State plans to use voluntary organizations active in disaster (VOAD), community-based organizations, nonprofit social service providers, and employee volunteer programs from within the State of Florida. While there may be organizations that bring volunteers from outside the state, the State has no intention to provide for their travel or lodging.

12. *How will the State reconcile and collect the cost of work conducted on commercial residences?*

As this program is limited to uninsured homeowners' primary residences, commercial properties will not be included in the scope of services for temporary repairs.

13. *How will SHRC ensure that only authorized repair work is conducted?*

In order to ensure that only authorized repair work is conducted, prior to any work beginning the Division will obtain a scope of work, materials, and authorized repairs checklist for each property upon which work is conducted. The Division will use a work ordering system through Unite Us, as referenced in question 9, to coordinate with voluntary organizations to track work requests and completion.

14. *Describe the proposed concept of operations (CONOP) or implementation plan on how SHRC will be managed by the State.*

The State will work in partnership with FEMA to provide an approved Concept of Operations after FEMA's authorization. The CONOP will include:

- A Project Plan and Timeline including Kick-Off Meetings with county officials and VOAD members, Program Implementation and Monitoring, and Close Out
- Tracking System – A system that tracks:
 - Organizations performing work

- Volunteer labor
 - Number of volunteers
 - Total hours
 - Type of work
- Work Details
- Materials and Invoices (Date, material invoice number)
- Equipment Used on Home
 - Hourly rate (if applicable)
 - Costs of rented equipment (if applicable)
 - Fuel costs
- Repaired home addresses
- Date of repairs
- Homes assessed and deemed not eligible for this assistance
- Voluntary Organization Letter of Commitment/Memorandum of Understanding
- Survivor Home Repair Packet
 - Scope of Work
 - Right of Entry and Release of Liability Template
 - Materials Request Template
 - Close Out Report
 - Survivor Agreement and Sign Off for Work Completion

The State will:

- Obtain a signed agreement, within the timeframe established above, from each residential property owner for the type of work to be performed.
- Obtain, accelerate, and facilitate the issuance of all permits required to complete the eligible work and will arrange, accelerate, facilitate any and all inspections required by State or municipal law, and obtain clearance for temporary occupancy for each property.
- Ensure the owner recognizes and certifies their understanding that participation in SHRC will make a FEMA IHP applicant ineligible for further TSA assistance, if authorized, or subsequent lodging expense reimbursement once emergency temporary repairs are complete and the residence is cleared for occupancy.

15. *The State will need to develop an implementation Plan to address:*

- a. *A description of the administrative and logistical process for overarching management of SHRC.*

The Division will administer survivor application and intake, partner with the private sector and voluntary organizations to facilitate the logistics of temporary habitability repairs, and manage the ongoing performance of emergency work through the Unite Us platform.

- b. *The period of performance for the SHRC program overall and the estimated repair and rebuild for each home accepted into SHRC?*

The period of performance from date of authorization through March 29, 2023, when other Public Assistance and Non-congregate sheltering concludes.

Overall repairs and rebuilds are estimated to be no longer than 3-weeks per home with the following estimated detail:

- Full Muck and Gut: 2- 3 days
- Roofing: 3 days (just shingles) to 7 days (full roof)

- o Indoor Walls including dry out, insulation, and drywall: 10-14 days

c. *Whether the State will establish a requirement for a letter of commitment from all VOAD/VOLAG partners that will be accepted to participating in SHRC?*

Yes, the State will seek a letter of commitment from each VOAD partner engaged with SHRC.

d. *What are the qualifications for an organization to participate? (e.g., expertise in repair and rebuild, number of volunteers available, secure storage/warehousing space for materials)*

Trusted, verified nonprofit organizations with an existing relationship with the State of Florida, Volunteer Florida, and/or the FLVOAD will be enlisted. This may include National VOAD members, Florida VOAD members, local county social service providers focused on housing assistance and homelessness, or other community-based organizations with expertise in repair and rebuild.

e. *What is the vetting and acceptance process for organizations to participate in SHRC?*

Organizations must demonstrate that they have the capacity to conduct repairs and an existing relationship with the state by presenting an MOA. Organizations must demonstrate that they are properly licensed to conduct repairs where licensure is required.

f. *Does the State have pre-identified vendors in the area or beyond that can supply the quantity of materials needed within the time constraints of an emergency sheltering program? If not how will the State approach materials and needed equipment/supplies acquisition?*

The State will make every attempt to source building materials from local vendors and businesses in order to stimulate local economic recovery. When this is not possible, the State will expand to statewide and national resources, as appropriate.

g. *Will provision of materiel (equipment and supplies) be a State managed function, or will it be outsourced?*

The provision of materials will be State-managed.

h. *Will materials be available in pre-packaged lots to address a certain type of repair, or ordered on an ad hoc basis by each participating agency?*

This will be determined based on identified homes, needed repairs, location, and proximity and warehousing.

i. *How will SHRC MGMT. track of status of non-expandable equipment (e.g., hammers, ladders, wheelbarrows, drills, power washers, etc.) or will participating organization be required to provide their own equipment?*

SHRC management will work with participating organizations to determine additional needs beyond the equipment available to and provided by the participating organizations. The State will take responsibility for tracking non-expandable materials.

j. *What entity will conduct the Site Visit/Inspection, and obtain the required Rights of Entry (ROE)?*

The State will work in partnership with local municipalities and the participating organizations to obtain the necessary documentation and Rights of Entry from homeowners.

Sincerely,

Melissa Shirah
Alternate State Coordinating Officer
Governor's Authorized Representative