



Minnesota Department of Public Safety
Homeland Security and Emergency Management Division
445 Minnesota Street, Suite 223, Saint Paul, Minnesota 55101-6223



April 8, 2020

James K. Joseph, Regional Administrator
Federal Emergency Management Agency, Region V
536 South Clark Street, Floor 6
Chicago, IL 60605

Dear Administrator Joseph,

I request approval of reimbursement eligibility for non-congregate sheltering to help care for Minnesotans and control the spread of the coronavirus as we continue to battle the COVID-19 pandemic under FEMA-4531-DR-MN.

Specifically – in coordination with local emergency management, public health, and social services organizations, our alternate housing plan is to rent hotel, motel, and dormitory rooms or similar housing units for quarantine or isolation of:

- Homeless individuals who test positive for COVID-19 that do not require hospitalization, but need isolation or quarantine.
- Homeless individuals who have been exposed to COVID-19 (as documented by a local or state public official or medical health professional) that do not require hospitalization, but need isolation or quarantine.
- Individuals who test positive for COVID-19 that do not require hospitalization, but need isolation or quarantine and cannot return to their usual residence because of the risk of exposing other household members.
- Individuals who have been exposed to COVID-19 (as documented by a local or state public official or medical health professional) that do not require hospitalization, but need isolation or quarantine and cannot return to their usual residence because of the risk of exposing other household members.
- Individuals who are asymptomatic and at “high risk,” such as people over 65 or who have certain underlying health conditions (respiratory, compromised immunities, chronic disease) and require emergency non-congregate shelter as a social distancing measure.

This request includes the costs of supporting infrastructure (e.g., electricity, water, waste disposal) and wrap around services (e.g., laundry, food, cleaning, security).

Governor Walz declared a peacetime state of emergency on March 13, 2020, in response to COVID-19 in Minnesota. He has subsequently issued 32 more emergency executive orders to

mitigate the outbreak and help manage impacts on our citizens. The major actions he has ordered include activating the Minnesota National Guard, prohibiting large public gatherings, closing schools, closing bars and restaurants to sit down service, and other places of amusement. On March 27, Governor Walz issued a stay-at-home order. All these emergency executive orders remain in effect and the stay-at-home order is extended to May 4, 2020.

Minnesota's response to COVID-19 is straining our available resources, particularly public health. We appreciate the President approving Governor Walz' request to declare a major disaster declaration for this incident (FEMA-4531-DR). We await designation of Individual Assistance (IA) under the declaration, particularly for crisis counseling programs

We estimate the statewide homeless population in Minnesota is 10,292 people. Individuals experiencing homelessness are among the Minnesotans most vulnerable to the novel coronavirus, due to age, underlying health conditions, and lack of reliable health care. The 2018 Minnesota Homeless Study found 48% of homeless adults have a chronic physical health condition. A recent article warns that "people currently homeless across the United States have double vulnerability to the coronavirus" due to the higher likelihood of exposure from close sleeping arrangements in shelters, lack of access to hand washing facilities, and inability to isolate themselves. Key public health guidance to mitigate COVID-19 spread is for people with respiratory symptoms to self-quarantine at home, guidance that is impossible for people who are sleeping outside, staying on public transit, or staying in congregate shelter settings to follow.

Our request, as detailed below, meets the FEMA Public Assistance (PA) eligibility criteria for approval:

Non-Congregate Housing Done at the Direction of the State Public Health Official

The non-congregate housing plan is done at the direction of Governor Walz, the chief executive for the State of Minnesota, through the declaration of peacetime emergency and subsequent executive orders. He is being advised by leaders of the Minnesota Departments of Health, Human Services, and Public Safety, as well as the Minnesota Interagency Council on Homelessness.

Minnesota's Infectious Disease Director has issued orders that individuals confirmed or suspected of being infected with the coronavirus isolate or quarantine themselves away from healthy people.

Governor Walz, chartered a work group to develop and implement near and long term strategies including alternative sites for populations facing increased COVID-19 risks, including but not limited to the elderly, people with disabilities, those with underlying health conditions, and those experiencing homelessness. The work group is specifically focused on people are at risk and do not have the ability to social distance, isolate, or quarantine for various reasons The group has

developed strategies to meet these goals and is working with local emergency management public health, and social service teams to identify non-congregate sheltering sites.

Population Placed in Non-Congregate Sheltering

The population to be placed in non-congregate sheltering includes individuals who are under isolation orders or recommendations to quarantine, who do not have a place to reside or cannot return to their usual residence without exposing themselves or others to risk of infection.

Using criteria established by the Centers for Disease Control and Prevention (CDC), the State scoped this population for the non-congregate sheltering approach to limit the infection of highly vulnerable populations and slow the rate of community acquired cases.

Types of Non-Congregate Sheltering Units

The non-congregate sheltering plan includes securing hotel, motel, and dormitory rooms or similar housing units for quarantine and isolation, or other non-congregate sheltering settings. In accordance with CDC guidance, isolation is critical to minimize the risk of cross-contamination and community spread of the disease. The sites selected for this purpose meet the following requirements: (1) area for staff respite separate from COVID-19 impacted individuals; (2) designated area where staff can meet with COVID-19 impacted individuals to discuss symptoms and receive case management; (3) supply area; (4) HVAC with units mounted on an external wall and able to accommodate outdoor air dilution; and, (5) each COVID-19 impacted individual has a separate room with private bathroom.

Duration of Non-Congregate Sheltering

Given the fluidity of the COVID-19 pandemic in Minnesota, non-congregate sheltering for the state is requested for the duration of the Secretary of Health and Human Services' Public Health Emergency declaration for COVID-19 or when there is no longer a COVID-19 public health emergency in Minnesota, whichever comes first. Should the Secretary of Health and Human Services terminate the Public Health Emergency for COVID-19 declaration before Minnesota is able to reasonably mitigate and stop the spread of COVID-19, Minnesota will seek continued approval of non-congregate sheltering.

Request is Reasonably Necessary to Address Public Health Needs

As of April 8, 2020, Minnesota has 1,154 confirmed cases. Thirty-nine (39) Minnesotans have died. Predictive modeling of the spread of COVID-19 in Minnesota, without continued and enhanced mitigation, is dire. These measures will help limit the spread of COVID-19 and avoid the catastrophic impacts to Minnesota's health care system that other states have tragically experienced when they did not take the steps we are requesting in time. The request for non-congregate sheltering seeks to protect human life and minimize the hospital surge by reducing the possibility for transmission of COVID-19 individuals throughout our State.

Options Considered

Existing non-congregate sheltering capacity in Minnesota is insufficient to respond to the increased demands and requirements needed to control this high degree of infection and rates of transmission. Simply put, our shelters are full. Additionally, we estimate more than 1,650 of Minnesota's homeless are currently staying outdoors locations or in places not fit for habitation. Other potential congregate shelter options including arenas, convention centers, tent cities, etc., have been dismissed by senior health officials as ineffective and dangerous to public health. Congregate shelters for COVID-19 infected people will make conditions worse – much worse.

Taking No Action

If we take no action to establish non-congregate medical sheltering, vulnerable people without any good alternatives for housing will likely end up within the already strained hospital system. This means critical space would be occupied at a time when hospital surge capacity is essential to saving lives.

After a positive COVID-19 test, a hospital system would be faced with bad choices that could compromise mitigation efforts to stop the spread of COVID-19. Release the individual to a congregate shelter where the individual will likely transmit COVID-19 to others. Keep the individual in a critical bed space need for those more ill. Release the individual from the hospital with no shelter and no isolation capacity. Furthermore, there is a stay-at-home order in place, so releasing someone back to the streets puts them in violation of this lawful order. The cascading impact of a homeless person technically in violation of any laws, including anti-camping ordinances, places homeless individuals at higher risk of incarceration, and this has cascading negative impacts. The jail system presents the same risks as a congregate shelter: potential to spread COVID-19 to the incarcerated population creating an incident within an incident.

Environmental and Historic Preservation Laws

Minnesota will comply with all applicable environmental and historic preservation laws, regulations, and executive orders when establishing non-congregate housing units.

Coordination with Federal Entities

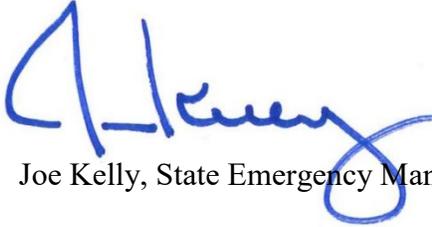
Minnesota acknowledges funding for non-congregate sheltering must meet the needs of the National Public Health Emergency and cannot be duplicated by another federal agency, including the U.S. Department of Health and Human Services or Centers for Disease Control and Prevention.

Closing

Thank you for your support as Minnesota fights COVID-19. I respectfully request you approve this request for reimbursement eligibility of non-congregate shelter.

If you have questions, please contact me directly or Brian Olson, Minnesota Preparedness and Recovery Bureau Director at brian.olson@state.mn.us and 651-201-7406 and 612-505-0557.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Kelly". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Joe Kelly, State Emergency Management Director/Governor's Authorized Representative