



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

ASSISTANT SECRETARY FOR  
COMMUNITY PLANNING AND DEVELOPMENT

**MAY 12, 2006**

MEMORANDUM FOR: All Regional Directors  
All Field Office Directors  
All CPD Directors  
All HOME Coordinators

FROM: Pamela H. Patenaude, Assistant Secretary, D

SUBJECT: FEMA Reimbursement for HOME Program Expenditures  
Emergency Shelter Expenses  
Hurricanes Katrina and Rita

This document has been  
signed by  
**Pamela H. Patenaude**

In response to the mass displacement of Gulf area residents by Hurricanes Katrina and Rita, many HOME participating jurisdictions (PJs) used their limited HOME Investment Partnerships Program funds to provide tenant-based rental assistance to evacuees. The generosity of these State and local governments is particularly commendable because they had no guarantee of reimbursement of their costs from other Federal funds. To assist these PJs in determining their eligibility to recover all or a portion of the HOME costs that they incurred for serving evacuees, HUD requested a legal determination from FEMA regarding potential reimbursement of costs. HUD has received guidance from David A. Trissell, FEMA Chief Counsel, concerning the criteria for FEMA reimbursement of emergency shelter expenditures by HUD's State and local HOME participating jurisdictions (PJs).

In a March 28, 2006, letter (attached), FEMA has advised HUD that if a PJ used its HOME funds for emergency sheltering, it may apply to FEMA for reimbursement through FEMA's emergency sheltering program under section 403 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. Therefore, any HOME funds used for emergency tenant-based rental assistance (TBRA) between the date of the Presidential disaster declaration (August 29, 2005, for Hurricane Katrina and September 24, 2005 for Hurricane Rita) and the date that FEMA's section 403 assistance ended (March 1, 2006), qualifies for FEMA reimbursement.

Jurisdictions must submit their requests for reimbursement to the appropriate FEMA Regional Office. Participating jurisdictions should include a copy of the March 28, 2006, FEMA letter as well as documentation that the HOME TBRA recipients were registered with FEMA no later than sixty days after the emergency HOME TBRA was provided to these households. PJs should contact their FEMA Regional Office for further guidance. FEMA contact information can be found on FEMA's web page at:

<http://www.fema.gov/about/structure.shtm>

FEMA fund reimbursements are applicable credits under OMB Circular A-87. Therefore, PJs must return all FEMA fund reimbursements to their U.S. Treasury HOME Investment Trust Fund Account and make corresponding adjustments in the Integrated Disbursement and Information System (IDIS). If a PJ receives FEMA reimbursement for the entire TBRA activity, the activity must be cancelled in IDIS. If a PJ receives partial reimbursement, the activity must be revised in IDIS to delete the corresponding information about beneficiaries and HOME funds drawn. Attached are instructions for returning HOME funds and updating IDIS information.

To enable HUD to document how PJs used their HOME funds to assist the victims of Hurricanes Katrina and Rita, please request your PJs to provide HUD with the TBRA IDIS activity number, fund amount and household beneficiary information for which FEMA reimbursement was received. PJs should submit this documentation to the attention of Peter Huber, Director, Financial and Information Services Division, Office of Affordable Housing Programs, U.S. Department of Housing and Urban Development, 451 Seventh Street SW, Washington, DC 20410-4500, at the same time that the funds are returned to the U.S. Treasury Account.

If you or your staff have any questions, please contact your OAHP Desk Officer.

Attachments