Grants Management Bureau
Subrecipient Handbook

Issue 8, October 2018

Homeland Security and Emergency
Management Agency -
Grants Management Bureau

State Administrative Agent for the
District of Columbia and the
National Capital Region

OVERVIEW

Grants from the U.S. Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA) are awarded to a single responsible State Administrative Agent (SAA) for administration of the grant. Grant program objectives are implemented by passing through funds to localities and other eligible subrecipients.

The District of Columbia (District) is the SAA for grants awarded to the District and the National Capital Region (NCR) Urban Area. District officials appointed the Homeland Security and Emergency Management Agency (HSEMA) to carry out the administrative tasks of the SAA. The SAA's function is supported by HSEMA's Grants Bureau. The Grants Bureau is responsible for providing and managing Federal and state assistance programs.

The SAA developed this Subrecipient Handbook as a tool for subrecipients to use in their day-to-day grant management administration. It is intended to increase the subrecipient's understanding of how these grant management activities fit within the subaward lifecycle.

This handbook will discuss in detail the following subaward lifecycle phases:

- Pre subaward grant administration
- Active subaward grant administration
- Post subaward grant administration

The SAA is pleased to respond to any questions not covered by the Subrecipient Handbook and welcomes suggestions to improve the utility and content of the guide. Please contact the SAA at ncr.saa@dc.gov with any questions or suggested revisions. As a reminder all templates, forms and guidance documents are available on the SAA website.

FIGURE 1: NATIONAL CAPITAL REGION
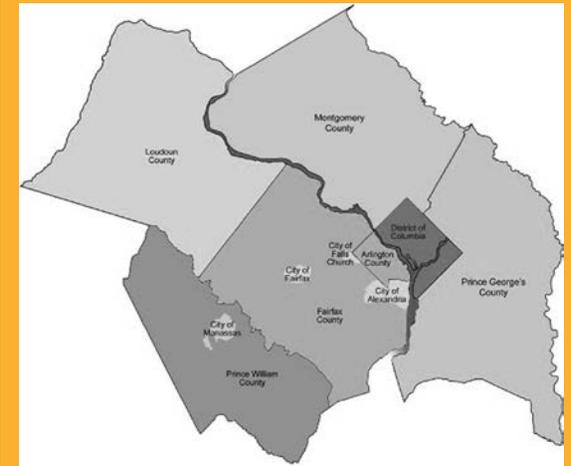
Per the National Capital Planning Act of 1952 (40 U.S.C. § 8702), the NCR is composed of: "The District of Columbia; Montgomery and Prince Georges [sic] Counties in Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties in Virginia; and all cities in Maryland or Virginia in the geographic area bounded by the outer boundaries of the combined area of the counties listed [above]".

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GRANT SYSTEMS

Subrecipients will receive access to the Comprehensive Grants Management System (CGMS) and the National Capital Region Grant Management System (NCR|GMS) in order to perform grant management activities. If there have been any staff changes, please notify the SAA at ncr.saa@dc.gov to ensure points of contact are up to date and to request training.

COMPREHENSIVE GRANTS MANAGEMENT SYSTEM (CGMS)

CGMS is the SAA's online system for subaward project management and reporting for District and non-District subrecipients. The website is hsema.sp.dc.gov/cgms.

All subrecipients should identify at least one CGMS user for each subaward who will have access. The Primary (and Secondary) contact(s) in CGMS should include the individual(s) responsible for implementing and leading the project and the individual(s) responsible for reporting on the project and working with the SAA.

Email ncr.saa@dc.gov to request a password reset, add a new user, or remove a user in CGMS, and to share any system-related concerns.

Include the following contact information in the email when requesting a new user:

- Name
- Organization
- Title
- Email
- Phone Number

Login instructions can be found on the Grants Management website.

NATIONAL CAPITAL REGION GRANT MANAGEMENT SYSTEM (NCR|GMS)

NCR|GMS is the SAA's online financial system for non-District subrecipients to seek reimbursement from the SAA for expenses. The website is www.ncrgms.com.

Non-District subrecipients are required to designate an NCR|GMS point of contact. Users must receive training before obtaining an account. The SAA conducts group training every other month and offers one-on-one sessions as needed.

Email ncr.saa@dc.gov to sign up for the next training opportunity and to share any system-related concerns.

Chapter 1
PRE SUBAWARD GRANT ADMINISTRATION

The pre subaward grant administration phase begins when the SAA announces the prospective subrecipients after funding decisions are made, continues through the approval and acceptance of Federal award from DHS/FEMA, and concludes with the issuance of the subaward to the subrecipient.

This chapter will address the necessary steps in the pre subaward grant administration phase. These steps should begin approximately 30 days before approval of Federal award from DHS/FEMA and conclude approximately 60 days after issuance of subaward letter.

1. CREATE PROJECT MANAGEMENT PLAN (PMP)

All subrecipients are required to submit a PMP in the CGMS within 30 days of request from the SAA. The PMP must:

- Align to threats and capability gaps identified in the Threat and Hazard Identification and Risk Assessment (THIRA) and Stakeholder Preparedness Review (SPR);

- Address the terrorism threat;

- Support priorities defined in the Strategic Plan;

- Build or sustain a core capability;

- Comply with the applicable Notice of Funding Opportunity (NOFO);

- Comply with Environmental and Historic Preservation (EHP) requirements;

- Comply with all the requirements in 2CFR§200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and;

- Identify deliverables and milestones to occur during the subaward period of performance (POP)

The SAA will receive a notification when the subrecipient submits a PMP. As part of the review process, the SAA may ask for additional information and documentation. The subrecipient is not approved to expend funds without an approved PMP and a fully executed subaward letter. Refer to Attachment A to review the PMP planning guide.

2. ALLOWABLE ACTIVITIES AND COSTS

Subrecipients must meet all conditions listed in the subaward terms and conditions prior to incurring costs against the subaward or those costs are considered unallowable.

Subrecipients receiving grant funds can only use funds for the purpose set forth in the NOFO or otherwise approved in writing by DHS. Refer to Attachment B for a list of allowable costs and activities, and Attachment C for a list of unallowable cost and activities.

MULTIPLE PURPOSE OR DUAL-USE OF HSGP GRANT FUNDS

As appropriated by Congress and described in the NOFO issued by FEMA, the Homeland Security Grant Program (HSGP) is intended to "support state and local efforts to prevent terrorism and other catastrophic events and to prepare the Nation for the threats and hazards that pose the greatest risk to the security of the United States".

FEMA does recognize that some capabilities are developed to address terrorism threats and may be useful or relevant for addressing other types of non-terrorism threats and hazards. FEMA addresses this "dual use" or "multiple purpose use" of HSGP grant funds in the NOFO:

For both State Homeland Security Program (SHSP) and Urban Areas Security Initiative (UASI), many activities which support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP and UASI funded projects must assist recipients and subrecipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

It is frequently easier to make this determination when it comes to equipment purchases, which either may or may not be associated with a terrorism-related capability. When it comes to planning, training, or exercise activities, the content, nature, purpose, and outcomes of the activity will need to be evaluated in context by the subrecipient and the SAA to make a final determination.

3. SUBAWARD ISSUANCE

The SAA will issue a subaward package in CGMS after approval of the PMP. The subaward package will include the following:

- Subaward letter to be signed by the authorization official for the subrecipient, indicating acceptance of the subaward and the terms of the subaward

- 2CFR§200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)

- DHS Agreement Articles and Standard Terms and Conditions

- HSEMA Terms and Conditions

- NOFO

- Subrecipient Handbook

The subaward letter identifies the authorized official responsible for accepting the subaward on behalf of the subrecipient. The subrecipient official must sign and upload the subaward letter in CGMS in order to fully accept subaward. By uploading the signed document, the subrecipient accepts and understands the roles and responsibilities presented in the aforementioned documents. Failure to sign and return the agreement may result in the withholding or disallowance of reimbursements on active subawards. A number of other standard or special conditions may be attached or included in the Subaward Details page in the CGMS. A sample subaward letter can be found in Attachment F.

4. PAYMENT SET UP AND REIMBURSEMENT REQUEST

A Non-District subrecipient is treated as a vendor for the purpose of receiving payments from the District. To be established as a vendor for the first time, subrecipients must complete and submit a W-9 form.

For more information on how to set up payment and request reimbursement for District subrecipients, refer to Attachment D. For non-District subrecipients, refer to Attachment E.

Subrecipients should review reimbursement documentation submitted to the SAA to determine if the documents include Protected Personally Identifiable Information (Protected PII). Protected PII is described in 2CFR§200 part 82, and includes information such as:

- Social security number

- Credit card numbers

- Bank account numbers

- Date and place of birth

- Medical records

Subrecipients should take steps to redact or otherwise remove Protected PII from reimbursement requests so it does not become part of the final reimbursement documentation on file with the SAA and with the DC Office of the Chief Financial Officer (OCFO).

NEW SUBRECIPIENTS

New non-District subrecipients should set up payment information early in the subaward period to avoid delays in processing payments.

ESTABLISHED SUBRECIPIENTS

Non-District subrecipients that are previously set up to receive payments should periodically verify that their payment information is still accurate. For updates and/or changes to payment information, the subrecipient should email the SAA at ncr.saa@dc.gov as soon as possible.

Chapter 2
ACTIVE SUBAWARD GRANT ADMINISTRATION

The active subaward grant administration phase includes the implementation of the subaward activities, reimbursement of funds for those activity costs, and submission of grant reports throughout the subaward period of performance (POP).

This chapter will address the necessary steps in the active subaward grant administration phase to include submission of quarterly status reports (QSR) in CGMS and submission of reimbursement requests in NCR|GMS.

1. REQUIREMENTS FOR QUARTERLY REPORTING

All subrecipients are required to submit a QSR for all active subawards in CGMS. The purpose of the QSR is to identify issues that may affect timely implementation, limit exposure to underperforming subawards, and identify and implement corrective actions to mitigate risks.

Subrecipients should update the PMP regularly to account for any proposed changes before those changes are implemented and reimbursed in NCR|GMS.

A recommended best practice is to regularly upload the proof of deliverables (e.g. proof of equipment, training, plans/procedures, exercise product, etc.) in the Attachments section of the Subaward Details page in CGMS and complete the Equipment Purchases form, if applicable.

As part of the review, the SAA will coordinate with subrecipients to request and receive additional information as necessary. Refer to Attachment I for more information on understanding your QSR.

Quarterly Status Report			
Submission Schedule			
Quarter #	Period Covered	Due Date	
1	Jan 1 – Mar 31	Apr 10	If the 10th falls on a weekend or holiday, the QSR will be due on the previous business day.
2	Apr 1 – Jun 30	Jul 10	
3	Jul 1 – Sept 30	Oct 10	
4	Oct 1 – Dec 31	Jan 10	

2. REQUIREMENTS FOR FINANCIAL DOCUMENTATION

Non-District subrecipients who seek reimbursement for subaward-related expenses are required to provide documentation that supports the proof of encumbrance, proof of purchase, and the proof of payment. It is imperative that the subrecipient ensure that the documentation is complete and accurate to prevent delays in the SAA review, approval, and payment process. All documentation submitted with the reimbursement request to the SAA must clearly demonstrate what product (or work) the

reimbursement request is for and that the expense in question is both in compliance with the approved PMP and allowable under the NOFO.

Additionally, all subrecipients must submit reimbursement requests no later than 90 days after the subrecipient has paid for the goods and/or services. The SAA, at its own discretion, can deny a reimbursement request if the submission date exceeds the 90-day limit.

For more information on how to set up payment and reimbursements for District subrecipients, see Attachment D. For non-District subrecipients, refer to Attachment E.

If a subrecipient elects to pass through funds via a subaward agreement or Memorandum of Understanding (MOU) to any organization, the SAA requires the same documentation mandated for proof of encumbrance, proof of purchase and proof of payment from that organization to validate the funds were properly expended. For example, if a subrecipient receives funds to purchase medical supplies for the region and elects to pass through these funds to area hospitals, the subrecipient is responsible for providing documentation to support the hospital's proof of encumbrance, proof of purchase and proof of payment.

3. SUBAWARD ADJUSTMENT REQUESTS

Any proposed changes to the PMP must be approved by the SAA before those changes can be implemented. Expenditures inconsistent with the approved PMP may not be reimbursed.

The SAA may ask the subrecipient to provide additional information and documentation as part of the review process. The SAA may also ask the subrecipient to submit a revised PMP prior to approving the requested change.

The subrecipient may request the following:

- Revise spend plan
- Extension of subaward
- Reduce or rescind subaward

REVISE SPEND PLAN

Changes that involve moving funds between approved spending categories that do not affect the deliverables may be approved or rejected by the SAA.

A subaward adjustment involving a change to the spend plan will require a revision to the PMP. The SAA will send the PMP back to the subrecipient in CGMS to be modified and resubmitted. Once the PMP has been approved by the SAA, the subrecipient must also update NCR|GMS to reflect the changes.

A subaward adjustment notice is NOT required for revisions to the spend plan.

EXTENSION OF SUBAWARD

If the subaward experiences significant delays, the subrecipient may request a period of performance extension. Subaward extensions are only possible if they are within the Federal award period of performance or if the SAA has received an extension from DHS.

For some grant programs, the relevant governing body (District or NCR) may have placed specific limitations or requirements on how to handle extensions for that grant, and the SAA will enforce compliance with those policies.

The subrecipient must utilize Attachment J to request an extension and the request must include the following:

- The reason the extension is needed, including a strong justification as to why the additional time is required.

- Any unusual circumstances that caused the delay and an explanation of how they are being mitigated.

- A brief timeline and explanation of how the subrecipient plans to accomplish the remaining tasks within the extension period.

- Any funding at risk of lapsing if the extension is not granted.

A subaward adjustment involving a change to the timeline will require a revision to the PMP. The SAA will send the PMP back to the subrecipient in CGMS to be modified and resubmitted. Once the PMP has been approved by the SAA, the subrecipient must also update NCR|GMS to reflect the changes outlined in the subaward adjustment notice.

A subaward adjustment notice is required for an extension to the subaward POP.

REDUCE OR RESCIND SUBAWARD

A subrecipient may request a decrease to their subaward amount if the project has changed significantly and/or all funds will not be expended within the current subaward period of performance. A decrease may also occur if a project is not able to be implemented at all.

A subaward adjustment involving a change to the spend plan will require a revision to the PMP, a revised MOU (and Budget Establishment Form for DC subawards). The SAA will send the PMP back to the subrecipient in CGMS to be modified and resubmitted. Once the PMP has been approved by the SAA, the subrecipient must also update NCR|GMS to reflect the changes outlined in the subaward adjustment notice.

A subaward adjustment notice is required to rescind the subaward.

SUBAWARD ADJUSTMENT NOTICE

When a subaward adjustment request has been received and reviewed by the SAA and any other necessary parties, the SAA may make a final determination to approve or deny the adjustment request. If the request is approved, the SAA will issue a subaward adjustment notice to the subrecipient authorizing the modification to the subaward. The subaward adjustment becomes effective when the SAA signs it. The subrecipient must then have the subaward adjustment notice signed by the authorization official and uploaded to the Subaward Details page in CGMS. The SAA may also update NCR|GMS to reflect the changes outlined in the subaward adjustment notice.

4. MONITORING AND OTHER REQUIREMENTS

SINGLE AUDIT

Any subrecipient that expends over $750,000 in Federal funds in a given fiscal year must conduct an independent audit in accordance with 2CFR§200 Subpart F—Audit Requirements. The subrecipient is responsible for providing the auditor's report to the SAA for review via ncr.saa@dc.gov.

SUBRECIPIENT MONITORING

The SAA is required to conduct periodic monitoring of subrecipients in addition to collecting quarterly status reports. The purpose of subrecipient monitoring is to demonstrate that the subrecipient is in compliance with the programmatic and financial administration requirements placed on the Federal grant programs by DHS/FEMA and the SAA.

The SAA will monitor a subrecipient through a site visit. During monitoring, it is the subrecipient's responsibility to answer the questions asked by the SAA and provide any documentation necessary to substantiate those responses.
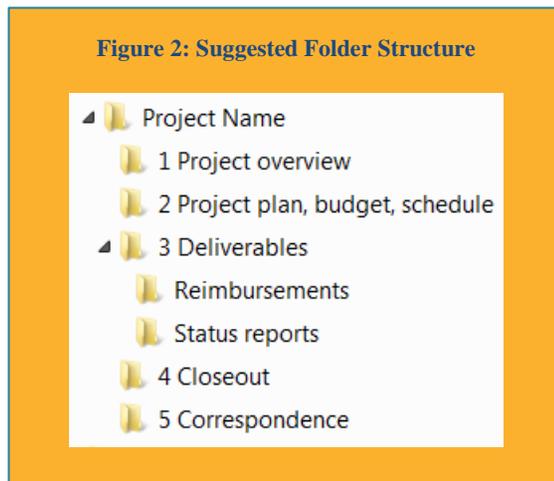
The subrecipient is expected to make all grant-related files available upon request for an on-site monitoring review.

Based on the SAA's risk assessment, the SAA staff will select a number of subrecipients that will receive an on-site monitoring visit during the fiscal year.

See the SAA Monitoring Protocol for more information.

RECORD KEEPING

The subrecipient is responsible for maintaining a subaward file that contains complete and up-to-date records. These records may be paper files and/or electronic, provided that the files are easily and quickly accessible and available for review.

Figure 2: Suggested Folder Structure

```
▲ 📁 Project Name
    📁 1 Project overview
    📁 2 Project plan, budget, schedule
▲ 📁 3 Deliverables
       📁 Reimbursements
       📁 Status reports
    📁 4 Closeout
    📁 5 Correspondence
```

Additionally, subaward files should be transitioned between subrecipient staff during any staff turnover. The subaward files must be kept by the subrecipient for a period of no less than three (3) years from the date of the end of the Federal award period of performance, or three (3) years from the date of any audit that includes the subaward as part of the tested sample, whichever is later.

At a minimum, the subaward file should contain the following documents:

- Subaward (signed)
- Applicable Federal terms and conditions
- Applicable District terms and conditions
- NOFO
- All award adjustments (signed)
- Current approved PMP
- All quarterly status reports
- Noteworthy results and/or deliverables (proof of equipment, training, plans/procedures, exercise product, etc.)
- Procurement files (including contracts and purchase orders) associated with the subaward
- Payment information that supports subaward-related charges, including invoices, reimbursement requests and proofs of payment
- Subrecipient handbook
- Equipment inventory

The SAA understands that procurement and payment documents may be stored elsewhere if that is the subrecipient's standard procedure; however, the subrecipient must ensure that procurement and payment information for all grant-funded purchases are clearly identified and produced when requested.

5. EQUIPMENT

Equipment is tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the amount set by the subrecipient's policy or $5,000, whichever is less.

> Consult 2CFR§200.313 Equipment for more information.
>
> The subrecipient must agree to make the equipment available for inspection at the SAA's request.

EQUIPMENT INVENTORY

The subrecipient is responsible for maintaining property records (inventory) of all grant-funded equipment, including, but not limited to:

- Description of the property
- Serial number or other identification number
- Source of funding for the property (including the Federal award identification number)
- Title holder
- Acquisition date
- Cost of the property
- Percentage of Federal funding contributing to the cost of the property
- Location of the property
- Use and condition of the property
- Disposition data, including the date of disposal and sale price

In addition:

- A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- A control system must be in place to ensure adequate safeguards to prevent the loss, damage, theft or misuse of the property.

Any loss, damage, theft, or misuse of property shall be promptly and properly reported to the SAA for a complete investigation by the SAA and the subrecipient, as appropriate.

EQUIPMENT TRANSFER

Subrecipients that perform collective or unified purchases for the purpose of distributing or delivering equipment to other stakeholders must keep accurate and complete records of the items purchased and to whom those items were delivered or transferred. The subrecipient purchasing the items must follow its own organization's policies for transferring equipment to other entities. The subrecipient must maintain documentation to demonstrate a transfer took place, and the documents should minimally include the subaward funding source, contact information for the transferring and receiving entities, and a summary of what is being transferred, as well as any ongoing obligations that the receiving entity must agree to as a condition of receiving the equipment. Furthermore, the organization receiving the equipment must maintain the equipment in an equipment inventory and management structure consistent with 2CFR§200.313. To assist in equipment transfer, the SAA has provided a model Equipment Transfer form located in Attachment L.

EQUIPMENT DISPOSITION

Before proceeding with any disposition of grant-funded property, the SAA may need to obtain a final determination from DHS/FEMA. Therefore, at a minimum, the subrecipient must provide the following information, using the SAA-provided form:

- Subaward numbers
- Method of disposition, including any applicable policies
- Reason for disposition
- Any capability gap resulting from the disposition, and
- steps taken to mitigate the gap
- Property list
    1. Description
    2. Identification number
    3. Condition
    4. Acquisition date
    5. Acquisition cost
    6. Current fair market value

Federal disposition requirements are outlined in 2CFR§200.414 Equipment (e) Disposition and 2CFR§200.314 Supplies.

> For the purpose of disposition, property includes equipment with an acquisition cost of $5,000 or more and supplies with an aggregate value of $5,000 or more.

Chapter 3
POST SUBAWARD GRANT ADMINISTRATION

The post subaward grant administration phase begins when one or more of the following occur:

- The subrecipient submits a final QSR in CGMS indicating the project is complete
- The subrecipient expends all funds or notifies the SAA that all expenditures are complete
- The subaward period of performance ends

The SAA will work with the subrecipient to ensure all closeout activities are completed. When closeout is fully complete, the subaward will be moved to "archived" status in CGMS.

1. REQUIREMENTS FOR FINAL QUARTERLY REPORTING

All subrecipients are required to submit a QSR for all active subawards in CGMS. When all activities have been completed, the subrecipient should mark the QSR as final to start the closeout process.

A recommended best practice is to regularly upload the proof of deliverables (e.g. proof of equipment, training, plans/procedures, exercise product, etc.) in the Attachments section of the Subaward Details page in CGMS and complete the Equipment Purchases form, if applicable.

2. REQUIREMENTS FOR CLOSEOUT

Non-District subrecipients must submit all reimbursements no later than 30 days after the end of the performance period in NCR|GMS. The subrecipient should complete all activities and mark the QSR as final.

It is the responsibility of the subrecipient to ensure they have submitted all reimbursement requests to the SAA and received all payments before closeout is completed.

- District subrecipients should de-obligate any remaining purchase orders or obligations in PASS.
- Non-District subrecipients should cancel any unobligated expenditure(s) in NCR|GMS.

If a subrecipient issues a refund after the subaward has been closed (e.g. a closeout adjustment has been issued), the SAA will process the refund and record it in NCR|GMS, but will not issue a revised final subaward adjustment.

3. SAA FILE REVIEW

The SAA will complete a file review of the subaward files in CGMS to ensure all the appropriate documentation is saved. If anything is missing from the Subaward Detail page in CGMS, the SAA will request from the subrecipient any outstanding item(s). The SAA may request additional information as necessary and may request an on-site visit to view the project accomplishments during the file review process.

4. FINAL SUBAWARD ADJUSTMENT

The SAA will issue a final subaward adjustment to the subrecipient when the subrecipient has received all reimbursements and determined the amount of funding to be rescinded (if applicable). The subrecipient must sign and return the final subaward adjustment in CGMS as soon as possible.

Closed subawards will periodically be moved to "archived" status in CGMS and will not appear on the main CGMS page. Subrecipients can view archived subawards by clicking the "show all" button at the top of the CGMS menu.

5. LONG-TERM GRANT MANAGEMENT

Subrecipients should maintain all grant records for a minimum of three (3) years from the date the grant was closed (2CFR200.333), unless local record retention rules dictate a longer timeframe. (a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken (2CFR200.333 (a)). Federal regulations dictate that the retention period for equipment records starts from the date of the equipment disposition (2CFR200.333 (c)). Once the retention period is complete, the subrecipient should follow local procedures to archive the files as necessary.

Equipment should continue to be used for its original intended purpose as long as a need exists, whether or not the subaward continues to be supported by Federal funds. When no longer needed for the original subaward, the equipment may be used in other activities, and/or disposed after notifying the SAA.

Attachments

Attachment A
PMP PLANNING GUIDE

All subrecipients are required to submit a PMP in CGMS within 30 days of the request from the SAA. The SAA will receive a notification when the subrecipient submits a PMP. As part of the review process, the SAA may ask for additional information and documentation.

Any proposed changes to the PMP must be approved by the SAA, in writing, before those changes can be implemented. Expenditures inconsistent with the approved PMP may not be reimbursed.

This planning guide serves to provide instructions on how to complete the PMP in CGMS.

1. SUBAWARD INFORMATION

The Subaward ID, Grant Type, Grant Year, Subaward Title, Subrecipient, Award Amount, Subaward Period of Performance Start Date, and Subaward Period of Performance End Date are pre-populated based on funding decisions.

Quick note: After developing a collective set of solution objectives based on leadership strategic direction (priorities), the Emergency Support Function (ESF), Regional Programmatic Working Group (RPWG), and Emergency Response System (ERS) will designate a subrecipient to implement the solution objectives. The subrecipient should select the primary ESF/RPWG/ERS that is sponsoring this subaward throughout the grant administration lifecycle.

2. SUBRECIPIENT PROFILE

This section captures the subrecipient's points of contact. The Authorized Official is pre-populated.

Quick note: Please contact the SAA at ncr.saa@dc.gov to update contact information. These points of contact receive all system-generated notifications related to the subaward, and should maintain regular contact with the SAA throughout the grant administration.

3. ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP)

All subawards are subject to EHP review. The reimbursement of items subject to EHP review without proper approval will be denied by the SAA.

Subrecipients receiving grant funds in part or in full must submit through the SAA to FEMA for EHP review and approval before initiation, unless expressly exempted from the requirement. Exercise and Training with any field-based component (drills and full-scale exercises) require for EHP review.

Subrecipients indicating that their project falls within one of the exempted project types must include a written explanation in the PMP explaining why the project fits within that exemption. The SAA may reject the PMP to revise the EHP section if the justification is not sufficient.

4. SUBAWARD OVERVIEW

The subrecipient must describe how the solution objectives will be implemented. Additionally, this section should clearly identify what will be achieved through the subaward period of performance.

- If the plan is to buy equipment, what is it, who is it for and how will it be used?
- If the solution will pay for services and/or staff, what are the deliverables and milestones that the service and/or staff will perform and how will the staffing method accomplish this goal?

In the Terrorism Risk subsection, the solution should address how the Federal funding will enhance planning, organization, equipment, training, and exercise needs at the state and local levels to prevent, protect against, mitigate, respond to, and recover from acts of terrorism. The subrecipient should provide details on the risk(s) this solution addresses.

5. SCHEDULE OF DELIVERABLES AND MILESTONES

The subrecipient must provide SMART deliverables and milestones that explain how the solution timeline and milestones will be achieved during the period of performance. Subrecipient should work with the

ESF/RPWG/ERS to ensure deliverables tie to the approved solution objective and can be achieved in the subaward period of performance specified in section 1. Use the following instructions when writing SMART deliverables and milestones.

- **Specific**: A specific goal is distinct and defines as much of the goal as possible, and contains no ambiguous language.
- **Measurable**: A specific goal provides feedback and lets the reader know when the goal is complete.
- **Assignable**: A specific goal must be assignable to an individual or group.
- **Realistic**: A specific goal should be attainable within the given timeframe.
- **Time-based**: Timeframe must be realistic.

These deliverables and milestones will be reported on each quarter in the QSR in the form of a percent of completion report as well as a narrative explaining progress or delays.

6. FINANCIAL PLAN

The subrecipient should show how funds will be utilized and expended over the subaward period of performance.

In the Spend Plan subsection, the subrecipient must create line items and include:

- **Item Description**: Use common terminology to describe spending category.
- **AEL**: The Authorized Equipment List (AEL) can be found here.
- **Deliverable/Milestone**: Expenditure should link to a deliverable and milestone.

- **Item Type**: Expenditure should fall under one of the following categories: Personnel, Travel, Equipment, Supplies, Consultants/Contracts, Other Costs, Indirect Costs or M&A.
- **Cost Computation**: Column is free-form and should provide detail on how the Estimated Cost is calculated. For example, if an employee's costs are $30/hr 40hrs/wk × 52 wks, enter that in the computation field. The total amount ($62,400) will go in the Estimated Cost field.

The subrecipient must take full responsibility for every expense that occurs under the subaward. If the subrecipient enters into agreements with a third-party entity, it takes on full responsibility for these activities (compliant or not) as well.

In the Personnel subsection, the subrecipient must identify any staff and/or contractual support funded. If the subrecipient has not yet identified an employee or contractor, the anticipated role should still be detailed. The subrecipient may use "vacant" for positions that have yet to be filled or "TBD" for contractors who have yet to be identified as placeholders. The subrecipient should indicate the Level of Effort this role will require (100%, 50%, etc).

7. STRATEGY

This section gives the subrecipient the opportunity to provide additional detail or highlight important information that may not fit in other sections.

- In the Core Capabilities subsection, the subrecipient should select no more than three Core Capabilities.
- In the Homeland Security Strategic Plan subsection, the subrecipient should select up to two objectives (UASI) or strategic initiatives (SHSP) that apply to the subaward. The respective plans can be found at: https://hsema.dc.gov/page/document-library.

8. FEMA REQUIREMENTS

This section gives the subrecipient the opportunity to provide additional detail or highlight important information that may not fit in other sections.

In the Asset Accessibility subsection, the subrecipient should use the following definition when identifying the appropriate solution accessibility type:

- **Deployable**: An asset that is physically mobile and can be used anywhere in the United States and territories via Emergency Management Assistance Compacts or other mutual aid/assistance agreements.
- **Shareable**: An asset that can be utilized as a local, state, regional, or national capability, but is not physically deployable (e.g., fusion centers).

In the Management Step subsection, the subrecipient should select the primary management step carried out by the subaward.

In the NIMS Resource Types subsection, FEMA has defined a set of resource types as part of the National Incident Management System (NIMS), and has required the SAA to report on how grant funds are used in support of developing these typed resources/capabilities. Enter the resource ID and type of resource from the Resource Typing Library Tool.

Attachment B
ALLOWABLE ACTIVITIES AND COSTS

Proposed subaward costs must be reasonable and allowable under Federal regulations and guidelines, and consistent with the subrecipient's approved PMP. The NOFO is the primary guide for determining if a cost is allowable.

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Consult 2CFR§200.404 Reasonable costs for more information.

1. PERSONNEL

Personnel expenses are charges for individuals who are employed by the jurisdiction or organization. Personnel expenses are only allowable when listed in the NOFO and only to perform allowable planning, organization, training, equipment, and exercise activities listed in the NOFO. The subrecipient must reference the NOFO to determine whether the type of activity is allowable. Personnel costs cannot extend beyond the subaward period of performance.

When in doubt, give the SAA a shout! If you are not sure about the allowability of a particular item, please review the NOFO and the AEL. If you are still uncertain after reviewing the guidelines, please contact the SAA for a ruling.

2. OVERTIME

These expenses are limited to the additional costs that result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of approved activities (as specified in the applicable NOFO). Overtime associated with any other activity is not eligible. Overtime is only allowable under the limited circumstances permitted by the NOFO and must comply with the subrecipient's existing policies regarding overtime pay.

3. OVERTIME AS BACKFILL

These expenses are limited to overtime costs which result from personnel who are working overtime (as identified previously) to perform the duties of other personnel who are temporarily assigned to approved activities (specified in the applicable NOFO) that are outside of their core responsibilities.

4. COMPENSATORY TIME

Because costs associated with compensatory time cannot be easily substantiated and associated with activities in support of the grant, the SAA will not accept any reimbursement requests for compensatory time.

5. TRAVEL

Travel costs are allowable as expenses by employees and contractors who are in travel status on official business in support of grant program activities.

The subrecipient must follow its jurisdiction's or organization's established travel policy, which must generally conform to the Federal travel policy. Any costs not clearly in compliance with the jurisdiction/organization's written travel policy will be considered unallowable. Acceptable Documentation for Travel can be found Attachment H.

> The SAA encourages every subrecipient to provide a copy of their travel policy in advance of requesting reimbursement to help expedite the review and approval process.

6. CONTRACTUAL SERVICES

Any type of service that is procured through a contract agreement is a contractual service. The subrecipient must follow its jurisdiction's or organization's procurement procedures and regulations, provided that the procurement conforms to applicable Federal laws and standards.

All contracts relating to or derived from the subaward must be on a competitive bid agreement. The subrecipient's own specific policy and all Federal regulations applicable to grants and cooperative agreements (with a record of the procedure, bids received, and rationale for the final

decisions) must be maintained to assure the SAA proper procedures were followed.

PROFESSIONAL SERVICES

Services performed by independent contractors or consultants to assist with accomplishing solution goals and objectives are considered professional services. The subrecipient cannot pay for professional services that extend beyond the subaward period of performance. For example, if a subaward period is two years and the contract agreement is three years, only the costs associated with the first two years of the agreement would be allowable. Examples include plan development, exercise development, project management support, advertisement, etc.

SERVICE AGREEMENTS

Service agreements such as wireless services, data services, hosting services (e.g. website), and service renewals cannot extend beyond the subaward period of performance. For example, if a subrecipient's subaward period ends on 12/31/2019, only the costs for services rendered through this date are allowable.

MAINTENANCE/WARRANTY SERVICES

Warranties/maintenance, contracts/licenses and user fees coverage have an exception for exceeding the subaward period of performance only if they are purchased at the same time and on the same invoice or purchase order as the original equipment or system which the warranty/maintenance, contract/license and users fees serve to cover, and are reasonable and consistent with that which is typically provided for or available through these types of agreements.

FP 205-402-125-1 amends the maintenance section within IB 336. All other portions of the IB remain in effect.

7. ORGANIZATION

Organizational activities include, but are not limited to:

- Intelligence analysts, working at one of the four recognized fusion centers supporting the region (the Washington Regional Threat and Analysis Center, the Maryland Coordination and Analysis Center, the National Capital Regional Intelligence Center, and the Virginia Fusion Center).

- Operational overtime for (1) staffing the regional fusion centers, (2) increased security measures at critical infrastructure sites, and (3) public safety, but only with prior approval provided in writing by the FEMA Administrator, per IB 379.

- Program management, though generally limited to those activities carried out by one of the regional Program Management Offices (National Capital Region PMO, DC Emergency Response System, Maryland Emergency Response System, and Northern Virginia Emergency Response System).

For more information on eligible operational costs, see the most recent Notice of Funding Opportunity (NOFO) announcement on the FEMA website.

Costs charged to this subaward must be consistent with the Cost Principles for Federal Awards located at 2CFR§200, Subpart E:

- Building and Sustaining Capabilities
- Planning to Deliver Capabilities
- Validating Capabilities

Subrecipients must be able to demonstrate how investments support closing capability gaps or sustaining capabilities identified in the THIRA/SPR, areas for improvement identified from real-world incidents and preparedness exercises, and national areas for improvement identified in the most recent National Preparedness Report.

Subrecipients should document these priorities and use them to deploy a schedule of exercise events and supporting training activities in a MYTEP.

Training and exercise priorities should be documented through a schedule of exercise events and support training activities in a MYTEP. The exercise program must be consistent with HSEEP. This involves specific planning steps, scope and method of conducting the exercise, and production of an after-action report.

8. PLANNING, TRAINING AND EXERCISE

Allowable planning, exercise, and training-related costs must have a nexus to terrorism preparedness and must be aligned to capability gaps identified during the THIRA/SPR process.

PLANNING

Grant funds may be used for a range of emergency preparedness and management planning activities, including, but not limited to:

- Development, review and revision of the THIRA/SPR
- Continuity of operations plans
- Planning activities that support the strategic goal and Emergency Operation Plan (EOP) that conforms to the guidelines outlined in Comprehensive Preparedness Guide (CPG) 101 v 2.0

TRAINING

Any training or training gaps should be identified in a Training and Exercise Plan (TEP) and addressed in the state or Urban Area training

cycle. Recipients are encouraged to use existing training rather than developing new courses.

When developing new courses, recipients are encouraged to apply the Analyze, Design, Develop, Implement, and Evaluate (ADDIE) model of instructional design. Recipients are also encouraged to utilize the National Training and Education Division's National Preparedness Course Catalog.

Training conducted should address a performance gap identified through a Multi-Year Training and Exercise Plan (MYTEP) and contribute to building a capability that will be evaluated through a formal exercise.

EXERCISES

All grant funded exercises must be consistent with the Homeland Security Exercise and Evaluation Program (HSEEP). This involves specific planning steps, scope and method of conducting the exercise, and production of an after-action report. The after-action report must be submitted to hseep@fema.dhs.gov and ncr.saa@dc.gov within 90 days and upload to the Attachments section of the Subaward Details page in CGMS.

9. FOOD AND/OR BEVERAGES

Food and/or beverages are allowable if provided to participants at a training and exercise session, planning meeting, or conference that is allowable under the particular grant program guidelines. The food and/or beverages must be provided on site where the training and exercise session, meeting, or conference is being held. Any and all such costs must be clearly allowable under the subrecipient's own purchasing and procurement regulations.

Expenses incurred for food and/or beverages provided at training sessions, meetings, or conferences must be:

- Considered reasonable

- Incidental to a work-related event. Costs will not be reimbursed for shorter events scheduled to coincide with meals.

- Not directly related to amusement and/or social events

> Use AEL code 120.oc.01.othe "Other Items" for food and/or beverages in the spend plan.
>
> - Food and beverage costs are unallowable under the Securing the Cities (STC) program.
> - No working lunches.
> - Any event where alcohol is being served is considered a social event, and costs associated with that event are therefore not allowable.

10. EQUIPMENT/SUPPLIES

The NOFO is the primary reference tool to determine allowability. For equipment and supplies costs, DHS has developed an AEL that assigns a numeric code to pre-approved categories of equipment and supplies. Proposed equipment and supplies purchased must list the corresponding AEL code where one exists, and if it does not exist, the subrecipient must notify the SAA in order to get written approval from DHS. Each DHS grant program has an AEL and the subrecipient must ensure they reference the correct AEL when developing their spend plan.

11. MANAGEMENT AND ADMINISTRATION

Management and Administration (M&A) costs are direct and necessary costs incurred to manage and administer a subaward. Subrecipients must reference the NOFO to determine what percentage of their subaward can be used for M&A activities. M&A must be documented just like any other allowable personnel, equipment, or supplies costs.

In addition, M&A costs must be:

- Integral to the subaward

- Specifically identified within that subaward

- Explicitly included in the budget

- Easily separable for accounting and reporting purposes

- Not also recovered as indirect costs

All subrecipients should review the instruction guide on submitting M&A expenditures.

> Examples of M&A activities:
>
> - Completing the subaward application process, including the PMP
>
> - Preparing and submitting required programmatic and financial reports
>
> - Performing financial management activities and monitoring compliance with applicable regulations and requirements
>
> - Establishing and/or maintaining equipment inventory/usage logs
>
> - Responding to activities such as requests for programmatic and or financial data by state and or Federal oversight authorities related to the grant

12. INDIRECT COSTS

Indirect costs are costs of a jurisdiction or organization that are not readily assignable to a particular subaward, but are necessary to the operation of the jurisdiction or organization and the performance of the subaward. The cost of operating and maintaining facilities, depreciation, and administrative salaries are examples of the types of costs that are usually treated as indirect.

The indirect rate agreement must be approved by the cognizant federal agency and provided to the SAA prior to seeking reimbursement.

Non-District subrecipients should review the instruction guide on submitting Indirect Costs.

> Management and Administration and Indirect expenditures are different and should not be confused. If a subrecipient is unsure about a particular expenditure, please contact the SAA.

13. SUPPLANTING

Subrecipients are reminded to be sensitive to supplanting issues. Grant funds can only be used to supplement existing funds, and cannot supplant (replace) funds that have been appropriated in its jurisdiction or organization's budget for the same purpose. Therefore, equipment, supplies, contractual services and personnel previously funded with state and/or local funds cannot be supplanted with Federal grant funding. The subrecipient may be required to supply documentation certifying that a reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

> If a state pays the salaries of three intelligence analysts, it cannot begin to pay the salary of one of them with Federal grant funding, just because the grant funding is now available. It could, however, be used to hire a fourth analyst.

Attachment C
UNALLOWABLE ACTIVITIES AND COSTS

Subrecipients must reference the NOFO to determine if any costs have been specifically called out as unallowable under a particular grant program. In addition, any costs that are not listed as allowable in the NOFO or otherwise approved in writing by DHS must be considered unallowable.

Subrecipients must meet all conditions listed in 2CFR§200, the NOFO and all of the subaward terms and conditions prior to incurring costs against the subaward. Otherwise, those costs are considered unallowable, including:

- Construction and renovation are generally prohibited; however there are a few exceptions and the subrecipient must reference the NOFO for these exceptions.
- Land acquisition costs are unallowable unless otherwise noted in the NOFO.
- Motor vehicles are unallowable unless otherwise noted in the NOFO.
- Non-terrorism-related costs are unallowable. HSGP funds may only be used to build capabilities to prevent, protect against, mitigate, respond to, and recover from acts of terrorism. A dual or secondary use of those capabilities is permitted, but if the capability has no nexus to terrorism, it is not allowable under HSGP.
- Operational costs are generally prohibited. This includes personnel expenses incurred during an activation or deployment, and any equipment or supplies procured during an emergency. There are very limited exceptions allowed for operational overtime, but only with prior approval provided in writing by the FEMA Administrator.
- Preparedness items (e.g. food, water, disaster ready kits, emergency blankets, first-aid kits) that are part of a stockpile for critical emergencies, kept in a manner consistent with a DHS/FEMA approved 5-year viable inventory management plan, may be allowable. Any other type of cache of preparedness items, and particularly any distribution or hand-out of these items to the general public outside of an emergency event is not allowable.
- Promotional materials (bags, pens/pencils, pins, patches, magnets, souvenir clothing/headwear, etc.) are unallowable.

- Training and exercise equipment and supplies for permanent installation and/or use beyond the scope of the conclusion of the training or exercise.
- Training and exercise costs for maintenance and/or wear and tear of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
- Travel costs considered unallowable: entertainment, sporting events, visa fees, passport charges, bar charges and/or alcoholic beverages, laundry charges, and mileage and fuel for a vehicle owned or leased by the sub-recipient's organization. Any costs not clearly in compliance with the jurisdiction/organization's written travel policy, or General Services Administration (GSA) policy, if lack thereof, are considered unallowable.
- Work or services performed after the end of the period of performance, unless otherwise exempted under Maintenance/warranty services. Goods may be received during the subrecipient's liquidation period only if funds were obligated (e.g. contract or purchase order issued) during the period of performance. In those cases, consult with your SAA program manager.
- Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with HSGP funds.
- Grant funds must comply with IB 426 and may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.
- Grant funds may not be used for the purchase of equipment not approved by DHS/FEMA.

Attachment D
PAYMENT SET UP AND REIMBURSEMENT REQUESTS FOR DISTRICT SUBRECIPIENTS

District subrecipients must be current with the submission of required status reports in order for the SAA to approve any purchase requests in the Procurement Automated Support System (PASS).

After a District subrecipient receives Intra-District budget authority, the agency can enter purchase requests (requisitions) in PASS. The SAA reviews every PASS requisition funded with homeland security grant funds to determine if it is allowable, aligns with the subaward scope, is within the subaward period of performance, and is included in the spend plan. The PASS request must match the spend plan in the PMP.

1. ESTABLISHING THE BUDGET

The SAA uses the District's Intra-District process as a means to pass through funds to a District subrecipient. The spend plan section in the PMP serves as the budget and must identify the items to be purchased and the item amount.

The District subrecipient should complete and submit the budget establishment form (BEF) along with the PMP to initiate the budget establishment process.

It takes approximately 45 days to establish Intra-District budget authority; therefore a District subrecipient is encouraged to give the SAA a 45-day lead on such requests. (The subrecipient may begin spending after the Intra-District budget is established.)

After receiving a completed BEF, the SAA:

- Prepares the MOU and Intra-District standard request (IDSR) form for the budget establishment.

- Works with the subrecipient to gather all of the appropriate signatures

- Forwards the fully signed MOU to the DC OCFO legal team for review and approval.

- Receives approval or denial of the MOU from the OCFO legal team. If denied, the SAA works with OCFO legal to provide the appropriate modifications for approval.

- Sends an Intra-District budget establishment request to the Office of Budget and Planning (OBP).

1. If the District subrecipient requesting budget establishment is within the Public Safety and Justice Cluster (PSJC), the SAA prepares and submits an Intra-District budget establishment request to OBP for review and approval.

    2. If the District subrecipient is requesting personnel services (PS) funds, the SAA will forward the budget establishment package to the subrecipient. The subrecipient must prepare the cover memo and submit the Intra-District budget establishment request to OBP.

    3. If the budget needs to be amended, a request is sent to the SAA. If the SAA approves the changes to the budget structure, the SAA will submit a budget modification to OBP. This process can take at least two weeks.

2. PROCUREMENT

OCTO created the FT0 paper agency to establish budget authority for non-personal services. This allows the SAA to maintain financial oversight of spending progress, ensure only allowable costs are charged to the Federal grants, and produce consistent, timely, and accurate financial reports.

In order to procure using grant funds, the designated user must first ensure he or she has the authority to create requisitions in PASS under their own agency. Simply gaining FT0 access without the authority to procure will not work.

INSTRUCTIONS ON HOW TO ACCESS FT0 IN SYSTEM OF ACCOUNTING AND REPORTING (SOAR)

The designated user for the District subrecipient must complete the following steps to access and view funds established under FT0:

- Register and complete the PASS Buyer training course in PeopleSoft

- Register and complete the SOAR training course using the OCFO training request form (consult the Office of Financial Operations and Systems [OFOS] website for the training schedule)

- Submit the PASS/SOAR access form with a training transcript, to the PSJC Cluster Financial Manager, Rosanne Etinoff (rosanne.etinoff@dc.gov)

The user must submit a user maintenance request to gain access to FT0 by:

- In PASS, click on create in the menu bar and select user maintenance request

- Select maintain under maintenance selector

- Select the appropriate name under user

- Select FT0 Query All under roles

- Include the following in the comments section: "[User's agency] is the subrecipient of HSGP funds and needs access to FT0 to procure with these grant funds."

- Submit the request

Once the request has been processed, the user should be ready to procure using FT0.

CREATE A NEW REQUISITION IN PROCUREMENT AUTOMATED SUPPORT SYSTEM (PASS)

A District subrecipient should consider the following when creating a requisition in PASS:

- The subaward number (e.g. 2FAUA8) must be included as part of the title.

- When nearing the end of the fiscal year, only enter requisitions that can be fully received and paid by September 30.

- PSJC Accounts Payable process all invoices for purchase orders funded under FT0. Provide all invoices to Rosanne Etinoff (rosanne.etinoff@dc.gov) in a timely manner.

- Requisitions for subawards with delinquent QSRs will be denied.

- Subawards with a period of performance extending beyond the fiscal year will have their remaining budget reestablished on October 1.

If the District subrecipient experiences difficulties entering a requisition, the SAA recommends the following:

- Check the 80 screen in SOAR to verify that the budget has been established.

- Check the funding attributes and object codes to ensure the budget is the same as established in SOAR.

- Check that the person entering the requisition has proper access to FT0 in PASS.

- Contact the PASS helpdesk at 202.727.8700.

3. INTRA-DISTRICT PROCESS

The SAA uses the Intra-District process as a means to reimburse funds to a District subrecipient. The subrecipient is reimbursed for expenses incurred against its Intra-District subawards through an Intra-District advance. The subrecipient is only able to receive the advance after the funds are expended in SOAR. The subrecipient must submit the pdf version of the agency's 485 payroll report, supporting overtime sheets and sign-in sheets (as applicable), invoices, receipts, receiving reports, overtime justification and any other documentation to support the amount

to be reimbursed. The subrecipient must submit an Intra-District advance request in order for the SAA to process the advance.

As audit requirements may change during the course of the year, additional support documents may be requested.

Additionally, the following information should be included in an advance request:

- Subaward ID

- Appropriation year

- Pay period

- Reclass number

- Primary document number

- Index code

- PCA

- Vendor name

- Invoice number

- Object class

- Amount

Attachment E
PAYMENT SET UP AND REIMBURSEMENT REQUESTS FOR NON-DISTRICT SUBRECIPIENTS

1. SPEND PLAN SUBMISSION

Non-District subrecipients are responsible for developing and submitting a spend plan through the grant application screen in NCR|GMS within 60 days of being available in NCR|GMS. The subrecipient will have access to the funds once the SAA releases them in the NCR|GMS system, shortly after issuing the subaward letter.

In order to submit the spend plan in NCR|GMS, the subrecipient must create line items for each proposed expenditure and select the appropriate Authorized Equipment List (AEL) code and associated amount. The spend plan in NCR|GMS must match the spend plan in the PMP in CGMS.

Non-District subrecipients should use the following instruction guides to build and submit a grant application in NCR|GMS:

- Build and submit spend plan

- Request a new expenditure

- NIMS resource typing

The spend plan should reflect the current approved PMP or is subject to denial. The SAA must approve the spend plan in NCR|GMS before the subrecipient can submit reimbursement requests. Additional instructions can be found here.

> NCR|GMS will not allow a subrecipient to submit a grant application until all funding has been allocated for every subaward. The subrecipient may then submit the grant application to the SAA for review.

2. PROCUREMENT

A non-District subrecipient must upload documentation that identifies what goods and/or services have been ordered or procured after submission and approval of the Spend Plan in NCR|GMS. The expenditure line item is marked as "Needs POE" (proof of encumbrance) in NCR|GMS.

In order to submit in NCR|GMS, the non-District subrecipient is required to assign an accurate description for the expenditure item that also includes the billing period and period of service.

Non-District subrecipients should use the following instruction guide to enter proof of encumbrance (POE) in NCR|GMS:

The spend plan should reflect the current approved PMP or is subject to denial. Additional instructions can be found here.

3. REIMBURSEMENT REQUESTS

Non-District subrecipients must be current with the submission of required status reports in order for the SAA to process reimbursement requests. The subrecipient must submit invoices, receipts, proof of payment, and any other documentation to verify the amount being requested in NCR|GMS.

Reimbursements must be based upon authorized and allowable expenditures consistent with the PMP. Expenditures must be supported with documentation.

Non-District subrecipients should use the following instruction guides to submit proof of invoices and payments in NCR|GMS:

- Submit invoices and payments

- Adjust reimbursement amount

- Cancel expenditure

Subrecipients must submit reimbursement requests no later than 90 days after the subrecipient has paid for the goods and/or services. The SAA, at its own discretion, can deny a reimbursement request if the submission date exceeds the 90-day limit. The SAA will not accept any reimbursement requests after the subaward liquidation period, which is 30 days after the end of the subaward period of performance. Please refer to the subaward letter or applicable subaward adjustment to determine the end of the subaward period of performance.

> If a Subrecipient requests partial payment for an expenditure item, the subrecipient must include a written explanation. This explanation can be in the form of an additional attachment, a cover memo, or a note written directly onto the payment documentation.

4. SAA REVIEW

The SAA reviews the documentation loaded into NCR|GMS to ensure the documentation is sufficient and the reimbursement can be processed. This review takes approximately 15 business days:

- The SAA staff member reviews the documentation for mathematical accuracy, and confirms the expenses are allowable, timely, and consistent with the PMP.

- The SAA staff member reviews the documentation for mathematical accuracy and compliance with 2CFR§200 Subpart E—Cost Principles.

- The Grants Bureau Chief reviews the documentation and signs off on the request for payment to the OCFO.

The SAA submits the reimbursement request to the OCFO for payment after the above three-step review process is complete.

> If a reimbursement request has discrepancies, the SAA will deny the request in NCR|GMS and add comments in the textbox providing an explanation and steps to correct the submission. A system generated notification will be sent to the subrecipient point of contact explaining the denial.

5. OCFO REVIEW AND PAYMENT

The OCFO has 30 business days to pay the subrecipient's reimbursement request in accordance with the District's Quick Payment Act. In total, the subrecipient must allow 45 business days to receive payment after submitting a proper reimbursement request. The subrecipient is encouraged to contact the SAA for status of payment if it does not receive payment after the 45th business day.

In some instances, the OCFO may bundle multiple reimbursement requests into one payment. If a subrecipient cannot easily match a payment to a reimbursement request, please contact the SAA. For a breakout of ACH payments specifically, please contact Rosanne Etinoff at rosanne.etinoff@dc.gov.

6. PAYMENT METHOD

Non-District subrecipients are treated as a vendor for the purpose of receiving payments from the District. To be established as a vendor for the first time, non-District subrecipients must select one of the payment options:

- For Automated Clearing House (ACH): Submit a W-9 form and ACH form
- For Check: Submit a W-9 form

New non-District subrecipients should set up payment information early in the subaward period to avoid delays in processing payments via ncr.saa@dc.gov.

Non-District subrecipients that are previously set up to receive payments should periodically verify that their payment information is still accurate. For updates and/or changes to payment information, the subrecipient should email the SAA at ncr.saa@dc.gov as soon as possible.

7. ADDRESS CHANGES

Any changes to a subrecipient address will require a revised W-9 and ACH, if applicable. The subrecipient should email ncr.saa@dc.gov with the updated payment documentation.

8. REFUNDING THE SAA

In the event of overpayment, the subrecipient must issue a refund to the District. The subrecipient must first notify the program manager of this issue and provide an explanation. The SAA will review the notification and work with the subrecipient to ensure the refund is processed correctly. The District's tax identification number is: 536001131.

Subrecipients must follow these steps:

- Refund checks must be made out to District of Columbia Treasury.

- Refund checks must be mailed to the attention of the Grants Bureau Chief at the following address:

  District of Columbia Homeland Security and Emergency Management Agency
  2720 Martin Luther King Jr Ave SE
  Washington, DC 20032

- The subrecipient should notify the SAA when the refund is sent.

- Once the OCFO has deposited the refund and repaid FEMA, the SAA will notify the subrecipient that the refund is complete.

- Refunds for items paid to non-District subrecipients through NCR|GMS will be reflected in NCR|GMS. The SAA will deduct the refunded amount from the completed item(s) in NCR|GMS that were affected by the refund, and the item(s) in NCR|GMS will show that a refund has been applied. Subrecipients can open the NCR|GMS item to review the original amount requested/paid and the details of the refund.

If a subaward has been closed (e.g. a closeout adjustment has been issued) and a refund is made after closeout, the SAA will process the refund and record it in NCR|GMS, but a revised closeout adjustment will not be issued.

Attachment F
SUBAWARD LETTER

1. **Program Information**: The Program Name, Subrecipient Name, Subaward Title, Subaward ID, Subaward Amount, Subaward Performance Period and Subrecipient DUNS is pre-populated based on funding decisions.

2. **Federal Identification Information**: The Federal Award Identification, Federal Award Date, Federal Awarding Agency, CFDA and State Administrative Agent is identified on the Federal Award documents.

3. **Terms and Conditions**: Each subaward has specific terms and conditions that are laid out by both the District and NCR leadership and the SAA.

4. **Awarding Official Signature**: The HSEMA Director will sign the subaward letter to make the agreement official.

5. **Subrecipient Official Signature**: The Director or Lead Official of the Subrecipient Agency must sign the subaward letter before funding can be spent.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Homeland Security and Emergency Management Agency

Muriel Bowser
Mayor

Dr. Christopher Rodriguez
Director

Subaward

PROGRAM
FY 2018 Homeland Security Grant Program
Urban Areas Security Initiative

FEDERAL AWARD IDENTIFICATION NUMBER
EMW-2018-SS-00051

SUBRECIPIENT
Agency Name

FEDERAL AWARD DATE
08/14/2018

SUBAWARD TITLE
Project Name

FEDERAL AWARDING AGENCY
U.S. Department of Homeland Security
Federal Emergency Management Agency

SUBAWARD ID
Subaward ID

CFDA
97.067 Homeland Security Grant Program

SUBAWARD AMOUNT
Amount

STATE ADMINISTRATIVE AGENT /
PASS-THROUGH ENTITY
District of Columbia Homeland Security and
Emergency Management Agency

SUBAWARD PERFORMANCE PERIOD
09/01/2018–05/31/2020

SUBRECIPIENT DUNS
DUNS Number

3 As the duly authorized representative of the above-listed organization, you hereby accept the subaward and certify that you have read and understand the terms and conditions presented in the following documents:

- 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- FY 2018 DHS Homeland Security Grant Program Agreement Articles
- FY 2018 DHS Standard Terms and Conditions
- FY 2018 District of Columbia Homeland Security and Emergency Management Agency Terms and Conditions
- FY 2018 Homeland Security Grant Program Notice of Funding Opportunity
- Subrecipient Handbook

AWARDING OFFICIAL
Dr. Christopher Rodriguez
Director

SUBRECIPIENT OFFICIAL
Name
Title

4 _____   **5** _____
Signature   Date   Signature   Date

2720 Martin Luther King Jr Ave SE • Washington, DC 20032   202.727.6161   hsema.dc.gov

Attachment G
ACCEPTABLE FORMS OF DOCUMENTATION

Item	Description	Proof of Encumbrance	Proof of Purchase	Proof of Payment
		Shows that a subrecipient has made a commitment or obligation to pay for goods and/or services.	Required to prove that the subrecipient has received goods and/or services and thereby is obligated to pay for such costs.	Required to prove that the subrecipient has released funds for an expense and is therefore owed a reimbursement from the SAA.

Personnel and personal services	Remuneration for services or work performed by individuals who are employees of the subrecipient; includes wages, salaries and fringe benefits.	• Any record that specifies the person's level of effort, such as timesheets or activity reports
		• For overtime or backfill, provide the approval form along with the timesheet.
		• For overtime, properly demonstrate the overtime hours. If the documentation does not distinguish overtime from regular time, the approval form may suffice.
		• For a variable percentage level of effort, include:
		  o How that percentage was calculated
		  o Total cost for the employee (salary, fringe, etc.) for the period
		  o Percentage billed to the grant
		• For a flat percentage fringe multiplier applied to the payroll amount, explain the percentage calculation in a memo or directly on the submitted documentation. Otherwise, provide a fringe report that details the fringe cost.
		• For multiple payrolls (i.e. combination of one employee for multiple pay periods, multiple employees for one pay period, or multiple employees for multiple pay periods), include an "invoice" summary sheet that details who and what pay periods and amounts are included.
			• Pay stub
			• Payroll register
			Documentation must clearly be generated from the subrecipient's official system of record. The SAA cannot accept an Excel spreadsheet, a Word document or a handwritten notation as a justification for payment.

Goods and nonpersonal services	Includes materials and supplies, equipment, contractors and consultants, rental costs, and other services and charges.	• Purchase order (associated amendments or modifications)
		• Contract (associated amendments or modifications)
		• Online purchase: order confirmation
			Invoice
			• Equipment purchase invoices must list:
			  o Item purchased
			  o Unit cost
			  o Number of units delivered
			  o Total amount
			• Shipping costs should be rolled up into the relevant line item in NCR|GMS; submitting them separately creates confusion.
				• Copy of a check
				• Copy of a receipt (receipts can function as invoice and pop)
				• Printout from the subrecipient's financial system of record that shows the payment detail

Food and beverages	Consumable products that are provided at allowable training sessions, meetings, or conferences.	The subrecipient must provide one document from each of the following: • Event registration list, or on-site sign-in sheet, or attendee list; and • Event agenda, or schedule, or program.	• Receipts • Invoices	Receipts

Travel	Expenses for transportation, lodging, subsistence, and related items incurred by employees or contractors who are in travel status on official business of the subrecipient.	• Personnel
		  o Approved travel request form, including detailed purpose of travel (e.g. conference agenda)
		  o Online reservations
		• Contractors/consultants
		  o Purchase order (associated amendments or modifications)
		  o Contract (associated amendments or modifications)
		• Travel must be included as part of the purchase order or contract.
			• Personnel
			  o Receipts
			  o Invoices
			  o Mileage, to include:
			    ▪ Date of travel
			    ▪ Total distance traveled
			    ▪ Points of origin and destination (street addresses are optional; city-to-city is sufficient)
			    ▪ Explanation of any abbreviations used for points of origin/destination
			• Contractors/consultants
			  o Invoice
				Copy of payment the subrecipient made to the person(s) on travel

Attachment H
ACCEPTABLE DOCUMENTATION FOR TRAVEL

Travel costs are allowable as expenses by employees and contractors who are in travel status on official business in support of grant program activities. Use this document as a quick reference guide.

Provide a copy of your travel policy in advance of requesting reimbursement to help expedite the review and approval process.

Details of Expense	Documentation Required for Reimbursement
Airline Flights	Receipt from a travel agent or airline that must show: • Name of traveler • Dates of travel • Cost of travel Note that you may also need to produce your boarding pass.
Airline Baggage	Your airline ticket or voucher may show the quantity and cost of your accompanying baggage. If it doesn't, or you find you need to pay extra baggage costs on arrival at the airport, travel will need to submit: • Baggage receipts • Justification for any baggage costs not included in your reimbursement package
Ground Transportation	Traveler will need: • A taxi or shuttle receipt, preferably showing not only the cost but the date, origin, and destination
Personal Vehicles	The subrecipient is responsible for submitting claims that match the travel policy and support them with clear documentation of your travel, such as: • Mileage traveled • Cost of travel at local, state or GSA rates that match the program activities • Maps showing routes and dates of travel • A trip report of routes taken and purpose of travel • Highway and bridges toll receipts • Parking receipts
Rental Vehicles	In this case, you will need to show the cost of rental, supported by: • Rental contract showing name of renter and dates of rental • Zero balance receipt for the rental vehicle • Highway and bridge toll receipts • Parking receipts
Lodging	The traveler will need to submit: • Original hotel receipts showing a "zero" balance, e.g., paid in full
Meals	Whether paid by per diem or receipt, it is often hopeful to show a worksheet that identifies the per diem rates or actual costs. • Receipts should be as specific as possible, e.g., showing the date, location, and number of personnel. • Receipts for meals should not include alcohol, as this is not an eligible expense.

Attachment I
UNDERSTANDING YOUR QUARTERLY STATUS REPORT (QSR)

1. **Subaward Information:** The Subaward ID, Grant Type, Grant Year, Subaward Title, Subrecipient, Award Amount, Subaward Period of Performance Start Date, and Subaward Period of Performance End Date are pre-populated based on funding decisions.

2. **Deliverables:** The deliverables, along with milestones and start/end dates are populated from the approved PMP. The subrecipient will need to identify the percentage of completion for each deliverable/milestone in order to submit the QSR. If a deliverable/milestone needs to be changed, please complete and submit the current QSR, then coordinate with your Program Manager to make changes to the PMP for the next quarter.

3. **Deliverables Notes:** The subrecipient should explain any noteworthy items, delays or updates to the project implementation.

4. **Spend Plan:** The spend plan in prepopulated based on the information available in the PMP. The subrecipient must enter the total expended to date, whether the final reimbursement has been requested, and identify any funds that will be expended in the next quarter.

5. **Spend Plan Notes:** The subrecipient will identify spending projections or issues negatively impacting spending.

6. **Personnel Notes:** The subrecipient should use the personnel notes section to report any changes in positions funded during the quarter or anticipated changes in the next quarter.

7. **Accomplishments:** Subrecipients will need to highlight positive things that were accomplished during the quarter in the accomplishments section. It is also a place to identify items that impact the entire subaward, such as delays in obtaining budget approval from leadership.

Quarterly Status Report (QSR)

1. Subaward Information

SubawardID :	18UASI123-01
Subrecipient :	Subrecipient Name
Project Title :	Title of Approved Project
Award Amount :	$100,000.00
Period of Performance Start Date :	10/1/17
Period of Performance End Date :	9/30/19
Reporting Period :	Q3 (July-Sept) 2018
Is this the final QSR?	☐
No activity this quarter?	☐ If you report no activity this quarter, you must explain why in the 'Accomplishments and Subaward Updates' section below.
Report Status :	

2. Deliverables

If any deliverables were completed, please upload a copy or proof of the items (e.g plans, AARs, Photos, etc.) in the **Subaward Uploads Section**. If any equipment was acquired, please complete the **property form**.

Equipment

Deliverable #	Equipment	Milestone #	Milestone	Start Date	End Date	% Complete
1	Lighting for parking lot and building	1	Review proposals and select vendor	10/1/17	12/31/17	100
1	Lighting for parking lot and building	2	Installation of lighting	1/1/18	4/30/18	100
2	Security fencing	1	Review proposals and select vendor	3/1/18	8/31/18	100
2	Security fencing	2	Installation of fencing	9/1/18	11/30/18	60

Deliverables Notes

Notes and description of progress against deliverables this quarter

3. Spend Plan

Item	Estimated Cost	Expended to Date	Balance	Final Reimbursement Requested?
Lighting	$55,000.00	$52,500.00	$2,500.00	Yes
Fencing	$45,000.00	$38,000.00	$7,000.00	No
	Total: $100,000.00	Total: $90,500.00	Total: $9,500.00	

Spend Plan Notes

Notes and description of expenditures this quarter and projected spending for next quarter

4. Personnel

Name	Position	Employee / Contractor	Level of Effort	Start Date	End Date

Personnel Notes

Any changes to personnel positions funded under this subaward this quarter or projected for next quarter?

Accomplishments

Describe any significant activities or progress made on the project this quarter. Also note any delays, changes of scope, or other significant challenges to successful project implementation.

If **no activity** has occurred, explain why and whether this represents a challenge to successful project implementation.

If this is the **final QSR**, provide a description of the project as it was implemented, including any accomplishments and shortfalls. Upload a copy or proof of the deliverables (e.g plans, AARs, photos, etc.) in the **Attachments** section of the Subaward Details page, and complete the **Equipment Purchases** form, if applicable.

All items have been purchased. The contractor is installing the fencing this quarter and final QSR will be submitted once complete.

Attachment J
EXTENSION REQUEST

1. SUBAWARD INFORMATION

Subrecipient: _____

Subaward Title: _____

Subrecipient Point of Contact Name and Email Address: _____

Period of Performance: _____ - _____

End Date Requested: _____

2. FINANCIAL SNAPSHOT

Subaward Award	Expended to Date	Obligated (Encumbered)	Amount Reimbursed by the SAA	Balance (Award-Obligated-Expended)
$ _____	$ _____	$ _____	$ _____	$ _____

3. AMOUNT THAT WILL BE UNSPENT (NO INVOICE IN HAND) BY THE END OF THE CURRENT PERIOD OF PERFORMANCE

4. EXPLAIN WHY THE SUBAWARD CANNOT BE COMPLETED WITHIN THE CURRENT PERIOD OF PERFORMANCE

5. EXPLAIN HOW YOU WILL ENSURE THE SUBAWARD IS COMPLETED WITHIN THE EXTENDED PERIOD OF PERFORMANCE

Attachment K
EQUIPMENT DISPOSITION FORM

Subrecipients must provide additional information for items meeting the threshold before taking steps towards disposition. Please provide this completed form to your designated Program Manager.

Items of interest, as outlined in 2CFR§200.313 Equipment (e) Disposition (items of equipment with a current per unit fair market value in excess of $5,000) and 2CFR§200.314 Supplies (residual inventory of unused supplies exceeding $5,000 in total aggregate value).

1. SUBAWARD NUMBER _____

2. BRIEFLY DESCRIBE THE DISPOSITION METHOD THE SUBRECIPIENT WILL USE, AND WHETHER IT COMPLIES WITH THE SUBRECIPIENT'S DISPOSITION POLICY.

_____

3. BRIEFLY EXPLAIN WHY THE ITEMS ARE BEING DISPOSED.

_____

4. WHAT, IF ANY, CAPABILITY GAP DOES DISPOSITION CREATE? HOW WILL THE SUBRECIPIENT ADDRESS THIS GAP?

_____

In the table below, please provide details for each of the items.

DESCRIPTION

_____

SERIAL/ID NUMBER

_____

ACQUISITION COST

_____

COND. CODE

_____

CURRENT FAIR MARKET VALUE

_____

Cond. Code	Enter the applicable condition code from the following list.	
1	Excellent	Property that is in new condition or unused condition and can be used immediately without modification or repairs.
4	Usable	Property which shows some wear, but can be used without significant repair.
7	Repairable	Property which is unusable in its current condition, but can be economically repaired.
X	Salvage	Property which has value in excess of its basic material content, but repair or rehabilitation is impractical and/or uneconomical.
S	Scrap	Property which has no value except for its basic material content.

Attachment L
SAMPLE EQUIPMENT TRANSFER FORM

Federal Award Identification Number:	From (Name of Subrecipient Agency):	To (Name of Recipient Agency):
Subaward ID and Project Title:	Subaward Point of Contact:	Recipient Point of Contact:
Date of Property Transfer:	Receipt Number:	Number of Items to be Transferred:

Description of Item	Model/Catalog Number	Serial Number	Quantity	Value ($)

Grant Requirements: In accordance with the UASI grant requirements, the recipient agency understands and agrees to the following requirements of receiving equipment purchased through this UASI grant.

- The recipient understands that they are receiving equipment purchased through a regional grant program and that the equipment must be maintained and available for regional use and planned events and emergencies across the region at short notice (equipment cost of $5,000 or more).
  - Upon request for regional use, the recipient will deliver the requested equipment to the requested site in a timely manner.
- The recipient agency agrees to maintain original functionality, capability, and working order of the equipment through necessary and yearly maintenance at the agency's expense. The agency agrees not to alter the equipment in a manner that would delay the deployment of the equipment if requested.
- Recipient will comply with the grant guidance (Federal regulations) at the time that the equipment needs to be replaced, sold, or disposed of at the end of useful life (equipment cost of $5,000 or more).
- Recipient is free to use the equipment within their agency as they deem necessary for _____ operations within the National Capital Region.
- If the recipient agency finds that they can no longer meet the deployment or maintenance requirements, they will notify the subrecipient so that the equipment can be redeployed to another agency in the National Capital Region.

Federal regulations regarding equipment can be found at the following website: 2CFR§200:313

Subrecipient (Transferring Agency): Acting on behalf of the subrecipient for the _____, I,_____, am authorized to transfer the property listed above under the terms of the grant to the recipient agency listed above.

_____(Signature)

Date: _____

Recipient Agency: I, _____ (name), representing _____ (agency) am authorized to receive this property on behalf of _____ (agency) in accordance with the grant requirements.

_____(Signature)

Date: _____

Attachment M
ACRONYMS

ACH	Automated Clearing House		**NOFO**	Notice of Funding Opportunity
BEF	Budget Establishment Form		**NPS**	Non-Personal Services
CGMS	Comprehensive Grants Management System		**OBP**	Office of Budget and Planning
DHS	US Department of Homeland Security		**OCFO**	Office of the Chief Financial Officer
DUNS	Data Universal Numbering System		**PS**	Personal Services
EHP	Environmental and Historic Preservation		**PASS**	Procurement Automated Support System
FEMA	Federal Emergency Management Agency		**PMP**	Project Management Plan
HSEMA	Homeland Security and Emergency Management Agency		**QSR**	Quarterly Status Report
HSGP	Homeland Security Grant Program		**R-ESF**	Regional Emergency Support Function
IB	Information Bulletin		**RPWG**	Regional Programmatic Working Group
IDSR	Intra-District Standard Request		**SAA**	State Administrative Agent
M&A	Management and Administration		**SOAR**	System of Accounting and Reporting
MOU	Memorandum of Understanding		**SPR**	Stakeholder Preparedness Review
MYTEP	Multi-Year Training and Exercise Plan		**THIRA**	Threat and Hazard Identification and Risk Assessment
NCR	National Capital Region		**UASI**	Urban Areas Security Initiative
NCR|GMS	National Capital Regional Grant Management System			

Attachment N
SUBAWARD LIFECYCLE CALENDAR WORKSHEET

Subrecipients can use this worksheet to plan for deadlines and other milestones and deliverables to meet during the grant award lifecycle.

START: END:

	JANUARY 1 – MARCH 31 (QUARTER 1)	APRIL 1 – JUNE 30 (QUARTER 2)	JULY 1 – SEPTEMBER 30 (QUARTER 3)	OCTOBER 1 – DECEMBER 31 (QUARTER 4)
PRE SUBAWARD	· · · · ·	· · · · ·	· · · · ·	· · · · ·
ACTIVE SUBAWARD	· · · · ·	· · · · ·	· · · · ·	· · · · ·
POST SUBAWARD	· · · · ·	· · · · ·	· · · · ·	· · · · ·

SUBAWARD LIFECYCLE CALENDAR WORKSHEET