



FEMA

**Grant Programs Directorate Information Bulletin
No. 418
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MEMORANDUM FOR: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All Urban Areas Security Initiative Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors

FROM: Thomas DiNanno
Assistant Administrator for Grant Programs
Federal Emergency Management Agency

A handwritten signature in blue ink that reads "Thomas DiNanno".

SUBJECT: Guidance for Use of Homeland Security Grant Program Funds for
Unaccompanied Children and Families (Southwest border)

I. Purpose

This Information Bulletin (IB) supersedes IB No. 402, dated March 26, 2015, and provides updated guidance for Homeland Security Grant Program (HSGP) recipients located along the Southwest border on the process to reprioritize or modify existing investments and projects funded under HSGP to address humanitarian relief for unaccompanied children and families. For purposes of this guidance, Arizona, California, New Mexico, and Texas are the only states located along the Southwest border permitted to charge the types of costs identified in this guidance to their HSGP awards.

II. Applicability

This IB applies to HSGP recipients along the Southwest border for costs related to providing humanitarian relief to unaccompanied alien children and alien adults accompanied by an alien minor. Through several appropriations acts¹, Congress has expanded the allowability for the use of Fiscal Years (FY) 2013 through 2017 State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI) grants to ease the burden on state and local jurisdictions along the Southwest border caused by the influx of unaccompanied children and families. States and locals may use funding under their FY 2013 through 2017

¹ *Department of Homeland Security Appropriations Act, 2017* at § 308 (a) (Pub. L. No. 115-31); *Department of Homeland Security Appropriations Act, 2016* at § 560 (Pub. L. No. 114-113); and *Department of Homeland Security Appropriations Act, 2015* at § 572 (Pub. L. No. 114-4).

SHSP and UASI awards for costs or the reimbursement of costs described in section III below provided that such costs were incurred during the award's period of performance or during the period of January 1, 2014 – December 31, 2014.

III. Allowable Costs and Guidance

- A. Notwithstanding any other provision of law or term of a recipient's HSGP award, recipients and subrecipients on the Southwest border may use grant funding for costs, or reimbursement of costs, related to providing humanitarian relief to unaccompanied alien children and alien adults accompanied by an alien minor where they are encountered after entering the United States, in a manner consistent with the terms of this guidance. In addition to activities already allowable under SHSP and UASI, any costs associated with the immediate care or transportation of unaccompanied children and families are allowable. These allowable costs include costs for food, water, hygiene products, medicine, medical supplies and temporary housing, as well as costs for transportation to and from temporary housing or to permanent housing.
- B. Only recipients and subrecipients located in Arizona, California, New Mexico, and Texas may use HSGP funds for such costs related to the provision of humanitarian relief.
- C. Those recipients and subrecipients may charge costs allowable under this IB to a FY 2013, 2014, 2015, 2016, or 2017 HSGP award provided that the costs were incurred and obligated **between January 1, 2014, and December 31, 2014 or during the award's period of performance**. To clarify, a recipient or subrecipient may charge such costs related to the provision of humanitarian relief incurred during calendar year 2014 even if the costs were incurred prior to the award's original period of performance. For example, a recipient or subrecipient may charge costs incurred in October 2014 to its FY 2015 SHSP or UASI award even though the award's period of performance did not start until September 1, 2015. The State Administrative Agency (SAA) must request an amendment to its award in order to charge costs incurred and obligated prior to the award's original period performance in calendar year 2014. Congress has authorized and directed this limited exception to the period of performance.
- D. As with all allowable expenditures under HSGP, the SAA or its subrecipients (e.g., Urban Area Security Initiative jurisdictions) must agree to and approve the use of funds for this purpose and request to amend their grant award accordingly.
- E. Recipients and subrecipients must continue to comply with all applicable provisions of their awards, including the applicable Uniform Administrative Requirements at 44 C.F.R. Part 13 and 2 C.F.R. Part 215 (for awards made by FEMA prior to Dec. 26, 2014), or 2 C.F.R. Part 200 (for awards made by FEMA on or after Dec. 26, 2014), as well as all applicable Cost Principles², when incurring costs subject to this IB.

² For awards made by FEMA prior to Dec. 26, 2014, this includes: 2 C.F.R. Part 225, "Cost Principles for State and Local and Indian Tribal Governments"; 2 C.F.R. Part 230 "Cost Principles for Non-Profit Organizations"; and 2

- F. Subrecipients who wish to use existing HSGP funding for costs associated with humanitarian relief under the terms of this IB should contact their SAA with any questions concerning the need for modification of their subaward, and for instructions on how to properly charge and account for those costs under their subawards. The SAA, as the grant recipient, is responsible for clearly communicating the approval of any requests to use HSGP funding for humanitarian relief to the subrecipient. Additionally, the recipient is responsible for ensuring that the terms and conditions of any existing subaward or other agreements or contracts that may require modification as a result of the reprioritization are updated in a manner that is consistent with the applicable provisions of the terms of the HSGP award, including 2 C.F.R. Part 200, 44 C.F.R. Part 13 or 2 C.F.R. Part 215, and any applicable state or local laws. The recipient is also responsible for clearly communicating any new or updated terms and conditions to the subrecipient.
- G. The SAA must report all use of funding for costs associated with the provision of humanitarian relief in the next submission of the Biannual Implementation Strategy Report (BSIR) within the Grants Reporting Tool (GRT).
- H. Use of grant funds for the provision of humanitarian relief described in this IB is not justification for extensions to the end date of the periods of performance for the grants covered under this Information Bulletin.
- I. Costs for projects or activities that are already in progress that require environmental and historic preservation reviews, including previously installed equipment or previously constructed shelters, are not allowable.
- J. Recipients and subrecipients may not use HSGP funding for other types of costs incurred or obligated prior to the award's period of performance except as otherwise described in the award's Notice of Funding Opportunity.

IV. Questions

Any questions regarding this IB may be directed to your FEMA Program Analyst (PA) or the Centralized Scheduling and Information Desk (CSID) at askcsid@fema.dhs.gov or (800) 368-6498.

V. Review Date

This IB will be reviewed within five years (5) from date of issuance.

C.F.R. Part 220, "Cost Principles for Educational Institutions," as applicable. For awards made by FEMA on or after Dec. 26, 2014, non-Federal entities must comply with the applicable Cost Principles at 2 C.F.R. Part 200.