



**State of Texas
Office of the Governor
Homeland Security Grants Division**

General HSGD FAQ Questions

[Application Entry Clarification](#)

Question: The “Narrative” and “Activities” tabs in eGrants look different. What has changed?

Answer: During the previous grant cycle OOG encountered many questions related to the questions on these tabs being duplicative of questions elsewhere in the application kit or more geared towards Criminal Justice applications. As a result, OOG undertook the task of re-working both tabs to ask only Homeland Security specific questions. These questions are now tailored towards gaining information about capability levels, impacts, and priorities.

Question: What do I do on the “Measures” tab in eGrants?

Answer: Beginning with FY 2016 Homeland Security Grants, applicants are required to input target data for a specific set of program measures. You may also create customized measures in addition to the required measures. These measures will be captured by Texas A&M’s Public Policy Research Institute (PPRI) once your award is released and loaded into their online performance reporting system. At six-month intervals, you will be required to provide an update to PPRI on progress towards meeting those target numbers.

HSGD recommends that applicants set targets for the applicable standard measures (i.e. If the application budget or activities do not include training, then a target does not need to be set for “Number of people trained”). Applicants should establish targets for the most relevant measures. Adding custom measures is not necessary for most applicants.

Grantees must track and report performance data for all measures established in the grant award.

Question: Should the entries for Sources of Financial Support on the “Documents” tab reflect the total budget of the organization, the budget of the department requesting the funding, or the budget related to this project?

Answer: You should enter the total amount of Federal Grant Funds received by the organization in the most recently completed fiscal year. You should also enter the total amount of State Grant Funds received by the organization in the most recently completed fiscal year.

Question: Does the FFATA certification apply to political subdivisions? If not, how should these questions be answered?

Answer: The FFATA certification applies to all sub-recipients, including political subdivisions.

eGrants Accessibility

Question: It appears that only one person from a COG will have access to the Grant Writer and the Project Director positions. That’s a potential problem if that one person is out of the office and something needs to be handled on eGrants. State law may not permit the sharing of login credentials. Is there a possible solution to this issue; possibly a way to grant temporary access for circumstances like this?

Answer: eGrants will only allow for the three designated grant officials (authorized official, financial officer, and project director) and one grant writer. There is no mechanism in place to add additional grant officials. If one of the grant officials will be out of the office for an extended period, you may submit a grant adjustment request through eGrants to change one or more of the grant officials at any time which would allow access to a different individual. Once the primary grant official returns, a second grant adjustment can be submitted to reinstate that individual as a grant official.

Records Retention

Question: How many years are sub-recipients required to maintain records related to the HSGP when a grant performance period has ended?

Answer: Sub-recipients must maintain fiscal records and supporting documentation related to a federal grant pursuant to 2CFR 200.333, UGMS, and state law. During the 48th Legislative Session, senate bill 20 was passed requiring a seven year retention period for grant and contract related documents. This seven year requirement applies only to any grants awarded by OOG between 9/1/15 and 8/31/16. The seven year clock will start on the date that a final expenditure report is submitted in eGrants or the date that all issues arising from any litigation, claim, negotiation, audit, or other action involving the grant or documents is resolved. For grants awarded prior to 9/1/15 or grants awarded on or after 9/1/16, the three year requirement noted in 2 CFR 200.333 and UGMS will apply. The three year clock will start on the date that final expenditure report is submitted in eGrants or the date that all issues arising from any litigation, claim, negotiation, audit, or other action involving the grant or documents is resolved.

Question: What grant years have closed and what dates should we use for determining maintenance of records?

Answer: The date for determining when records may be destroyed is driven off of the date that the sub-recipient submitted the final expenditure report to HSGD (the state) or the date that all issues arising from any litigation, claim, negotiation, audit, or other action involving the grant or documents is resolved.

Eligible Budget Items

Question: The RFA states that promotional items are not eligible, but in the past we have purchased small give-away items that include contact and other program advertisement information. Are these types of give-away items considered promotional items?

Answer: Below is an excerpt from the new federal Uniform Grant Guidance, 2 CFR 200 discussing promotional items. Based on this, most give-away items would not be eligible. Section (e) (3) below prohibits promotional items and memorabilia, including models, gifts, and souvenirs. Based on this excerpt the only allowable advertising and public relation cost are:

- Personnel recruitment

- Procurement costs
- Program outreach costs (this would be things like signs, billboards, flyers, etc. but does not include give-away items such as trinkets, gifts, souvenirs, etc.)
- Costs of communicating with the public or press on specific grant-related activities or accomplishments
- Liaison with news media and government public relations to keep the public informed on funding opportunities

Excerpt from 2 CFR 200:

§200.421 Advertising and Public Relations

- (a) The term advertising costs means the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic computer transmittals, and the like.
- (b) The only allowable advertising costs are those which are solely for:
 - (1) The recruitment of personnel required by the non-Federal entity for performance of a Federal award (See also §200.463 Recruiting costs);
 - (2) The procurement of goods and services for the performance of a Federal award
 - (3) The disposal of scrap or surplus materials acquired in the performance of a Federal award except when non-Federal entities are reimbursed for disposal costs at a predetermined amount; or
 - (4) Program outreach and other specific purposes necessary to meet the requirements of the Federal award.
- (c) The Term “public relations” Includes community relations and means those activities dedicated to maintaining the image of the non-Federal entity or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public
- (d) The only allowable public relations costs are:
 - (1) Costs specifically required by the federal award
 - (2) Costs of communicating with the public and press pertaining specific to activities or accomplishments which result from performance of the Federal award (these costs are considered necessary as part of the outreach effort for the Federal award); or
 - (3) Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.
- (e) Unallowable advertising and public relations costs include the following:
 - (1) All advertising and public relations costs other than as specified in paragraphs (b) and (d) of this section;
 - (2) Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also §200.432 Conferences), including:
 - (i) Costs of displays, demonstrations, and exhibits;
 - (ii) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and
 - (iii) Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings;
 - (3) Costs of promotional items and memorabilia, including models, gifts and souvenirs;
 - (4) Costs of advertising and public relations designed solely to promote the non-Federal entity

Question: The FY 2016 RFA prohibits individual membership costs but does allow for agency-wide memberships. In the absence of an agency wide membership, would an individual membership be considered?

Answer: 2 CFR 200.454 allows for the costs associated with an entity's membership in business, technical, and professional organizations. However, section 200.445 states "Costs of ... services for personal use of... employees are unallowable..."

It is the OOG policy to limit grant funds only for Agency or Entity memberships. Sub-recipients may still fund individual memberships with their own local funds if Agency/Entity memberships are not offered or if the sub-recipient determines individual memberships would benefit the organization as a whole.

Multiple Purpose of Dual Use of Funds

***NEW- Question:** Can SHSP and UASI funding be used on projects other than those related to terrorism?

Answer: Many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate this dual-use quality for any activities implemented under this program that are not explicitly focused on terrorism preparedness. Activities implemented under SHSP/USAI/NSGP must support terrorism preparedness by building or sustaining capabilities that relate to the prevention of, protection from, mitigation of, response to, and recovery from terrorism.

***NEW- Question:** Can SHSP or UASI funding be used to support responses to weather related incidents?

Answer: No, the funding from these grants is for the purpose of preventing terrorism and preparing for threats and hazards which pose the greatest risk to the security of Texas and its citizens. Although equipment cannot be purchased for the purpose of responding to weather related incidents, much of the equipment necessary for the response, would also be necessary to respond to a terror attack. Equipment which could serve this dual purpose, would be eligible for grant funding.

Equipment Funding Guidelines

***NEW- Question:** What Kinds of equipment am I allowed to purchase?
What equipment is prohibited and controlled?

Answer: The equipment purchased using grant funds should fulfill the primary purpose of addressing terrorism preparedness. A live list of all authorized equipment by FEMA can be found on the Authorized Equipment list (AEL): <https://www.fema.gov/authorized-equipment-list>. The AEL contains a comprehensive list of federally approved equipment, however, not all equipment listed on the AEL is allowed under the SHSP and UASI grants. Equipment prohibited by FEMA is as follows: tracked armored vehicles, weaponized aircraft/vessels/vehicles of any kind, firearms and ammunition of .50-Caliber or larger, grenade launchers, bayonets, and camouflage for urban settings. In addition to these prohibited items, HSGD does not fund the following items when purchased for general agency use: mobile data terminals, weather response related equipment, and body cameras. For a list of prohibited and controlled equipment, see FEMA IB 407: <https://www.fema.gov/media-library/assets/documents/114557>.

***NEW- Question:** What is the process for purchasing controlled equipment?

Answer: Prior to purchasing an item of controlled equipment, FEMA requires the state to provide specific information about the equipment, how it will be used, whether specific policies and protocols are in place, and if the grantee has met all training and records keeping requirements. HSGD will provide a form to collect this information, forward it to FEMA, and communicate approval to purchase back to the grantee.

*** New - Question:** What items do I need to keep on my inventory?

Answer: Grantees must manage equipment pursuant to the requirements outlined in 2 CFR 200.313(d) and UGMS. Any item that meets the definition of “equipment” under 2 CFR 200.33 or is considered a “controlled asset” by the OOG must be maintained in the grantee’s property records (inventory). The definition of equipment and list of OOG controlled items are as follows.

Controlled Assets (\$500.00 to \$4,999.99)

- Sound Systems And Other Audio Equipment
- Camera – Portable – Digital, SLR
- TVs, Video Players/Recorders
- Computer, Desktop
- Data Projectors

- Smartphones, Tablets & Other Hand Held Devices
- Laptop Computers
- Mobile and Portable Radios*

**Note: These are OOG designated controlled assets. The rest of the items on this list are designated as controlled assets by the State Property Accounting guidance published by the Texas Comptroller of Public Accounts.*

Definition of Equipment (2 CFR 200.33)

Equipment means 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 lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also §§200.12 Capital assets, 200.20 Computing devices, 200.48 General purpose equipment, 200.58 Information technology systems, 200.89 Special purpose equipment, and 200.94 Supplies.

Equipment – Management Requirements (2 CFR 200.313(d))

(d) *Management requirements.* Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:

- (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.
- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.
- (4) Adequate maintenance procedures must be developed to keep the property in good condition.
- (5) If the non-Federal entity is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

Benefitting Entities

Question: What entities may I transfer or loan equipment to, or involve in training/exercises?

Answer: HSGD understands that at times sub-recipients may request to conduct grant activities that substantially benefit another entity. Examples include: Purchasing items to subsequently loan or transfer ownership to an outside entity or conducting training and/or exercises with local/regional partners. In these instances, the sub-recipient is responsible for ensuring those entities meet at a minimum the following requirements:

- National Incident Management System(NIMS)- the benefitting entity, to the extent required, must have adopted and implemented NIMS and be compliant with all NIMS Objectives
- Emergency Management Plans (Intermediate Level) - the benefitting entity must:
 - Have its own current emergency management plan that meets the state preparedness standards at the Intermediate level on file with the Texas Division of Emergency Management (TDEM); or
 - Be a legally established member of an inter-jurisdictional emergency management program that has a plan that meets the state preparedness standards at the Intermediate Level on file with TDEM; or
 - Be an entity other than a city or county that is not required by Texas law to have an emergency management plan (e.g. COG or nonprofit organization).

Grantees may document a benefitting entity's compliance using a self-certification form or any other means deemed appropriate by the grantee. The grantee should keep this documentation on file and make available to HSGD upon request.

Maintenance and Sustainment Funding Guidelines

***NEW- Question:** What is the policy for the use of grant funds for maintenance contracts, extended warranties, licenses, and user fees?

Answer: HSGP funds may be used for the purpose of keeping the equipment functional and capable of serving the purpose for which it was originally purchased. The use of HSGP funds for maintenance and warranties is allowable for equipment necessary to maintain core capabilities to achieve the National Preparedness Goal.

Extended warranties and maintenance contracts purchased at the time of original purchase and with the same award and year, **may extend beyond the period of performance**, as long as it is **reasonable to the usable life of the proposed item(s)**.

Extended warranties and maintenance agreements purchased after the original purchase are limited by the funding year's Period of Performance (PoP). **For sub-grantees, the maintenance agreements and extended warranties may only last until the PoP grant end date on the sub-grantee's award from HSGD.**

This does not mean that extended warranties cannot be split into different award years, if they were purchased ancillary to the original purchase. For example, a vehicle warranty can be purchased with FY14 funds, and prorated until the end of the applicable PoP, and the balance could then be paid with FY15 funds, until the end of that applicable PoP.

Note: In accordance with FEMA IB #336, HSGP funds may not be used for routine upkeep (i.e. gasoline, tire replacement, routine oil changes, etc.)

***NEW- Question:** What is the process for reimbursement of fuel and vehicle maintenance expenses?

Answer: If an individual is **traveling in an agency owned vehicle**, then actual fuel and maintenance costs may be reimbursed. For an agency to submit reimbursement requests, they must have a documented method of how they allocate costs. For example, one method used could be the percentage of time the vehicle is used for grant funded activities. If it is known that on average in a given period of time, the vehicle is used 10% of the time for grant funded activities, the grantee would be justified in charging 10% of that maintenance costs to the grant. This same allocation method could be applied to fuel costs. Grantees must maintain documents that provide support that the percentage being allocated is appropriate.

If an individual is traveling in a **personally owned vehicle**, then a mileage per diem consistent with the agency's own travel policy may be claimed.

Personnel Costs

***NEW- Question:** Can UASI or SHSP funds be used to pay employee overtime and backfill?

Answer: Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable activities. Personnel may include, but are not limited to: training and exercise coordinators, program managers for activities directly associated with SHSP and UASI funded activities, intelligence analysts, and state wide interoperability coordinators.

HSGP funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

Backfill related expenses are limited to overtime costs which result from personnel who are working overtime to perform the duties of other personnel who are temporarily assigned to DHS/FEMA-approved activities outside of their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees. See personnel related definitions as defined by FEMA in the 2016 NOFO (page 61).

***NEW- Question:** Are timesheets, activity reports, and certifications required?

Answer: Employees working solely (100%) on a single grant, are required to maintain a periodic certification, and are not required to maintain a timesheet. A periodic certification consists of a direct supervisor of the employee, who has firsthand knowledge of the work being performed by the employee, certifying semi-annually that the employee has only worked on the single grant.

For employees who work on multiple grants, both a timesheet and a personal activity report must be maintained. The report must remain on file and be prepared at least monthly. The report must account for the time worked and the activity performed, and be signed by a supervisor with firsthand knowledge of the work performed by the employee. An example timesheet can be found at:

[https://egrants.gov.texas.gov/FileDirectory/Grantee Personnel Activity Report Sample v4.xlsx](https://egrants.gov.texas.gov/FileDirectory/Grantee_Personnel_Activity_Report_Sample_v4.xlsx)

Direct Operating Expenses

***NEW- Question:** I have an agency owned building and a building that is leased from a third party. Can I charge both my mortgage expense and rental expense, as compensation for building use, to the HSGP funds?

Answer: Rental costs are allowed subject to limitations as stated in 2 CFR 200.465. As with any cost, the amount must be reasonable, necessary for the project, and properly allocated.

Mortgage expenses are not allowed. However, a grantee may be compensated for the use of its buildings, provided that they are used, needed in the grantee's project activities, and properly allocated to the award. Such compensation must be made by computing depreciation.

Depreciation is the method for allocating the cost of fixed assets to periods benefitting from asset use. See 2 CFR 200.436 for more information.

Program Income

Question: In one of our COG Regions, we fund several projects to build, upgrade, enhance, or replace the regional communications system. The amount of SHSP grant funds the COG receives does not cover all of the necessary upgrade, replacement, or enhancement costs, and some state agencies and other entities that use the system have offered to help contribute to these costs, so more of the necessary upgrades can be made in the coming year(s).

If another entity (such as a state agency that also uses the system) pays the COG a certain amount to cover specific expenses, would that be considered program income?

Answer: After consulting with FEMA, this scenario does not constitute program income, it is instead supplemental program funds, similar to cash match, but not required to be tracked as part of the grant.

Question: If my project earns program income, may I request to show the program income “in addition” to my grant funds, instead of deducting the amount earned from my grant funds?

Answer: Any income generated as a direct result of the grant activities must be reported to HSGD through the Financial Status Report and grant adjustment processes. Program income must be used to offset project costs unless prior approval is granted allowing a supplement to project costs.

2 CFR 200.307 States that only the Federal awarding agency may authorize adding the program income funds to your grant. As a result, in the event that HSGD agrees that supplementing the project costs would be preferable, HSGD would then be required to seek approval from FEMA prior to granting approval to the sub-recipient.