Fiscal Year 2024 Shelter and Services Program - Allocated Round 2 Funding Frequently Asked Questions

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Overview

The Shelter and Services Program (SSP) is administered by the Federal Emergency Management Agency (FEMA) in partnership with U.S. Customs and Border Protection (CBP). SSP provides financial support to non-federal entities that provide humanitarian services to noncitizen migrants following their release from the Department of Homeland Security (DHS). FEMA released the Fiscal Year (FY) 2024 Shelter and Services Program - Allocated (SSP-A) Notice of Funding Opportunity (NOFO) on April 12, 2024. An amended version of this NOFO was released on August 28, 2024, for FY 2024 SSP-A Round 2 funding. Only the applicants identified in the Round 2 table in *Section B.1 Available Funding* of the amended SSP-A NOFO are eligible to submit SSP-A applications.

General

What is the purpose of the fiscal year (FY) 2024 SSP?

Congress appropriated SSP funding in 2024 for costs associated with providing shelter and other eligible services to noncitizen migrants who have been encountered and released by the Department of Homeland Security (DHS). DHS has committed to bolstering the capacity of non-federal entities to receive noncitizen migrants.

What legislation authorized funding for the FY 2024 SSP-A?



Department of Homeland Security Appropriations Act, 2024, P.L. No. 118-47, Title II Security, Enforcement and Investigations, U.S. Customs and Border Protection, Operations and Support.

How much funding is available under the FY 2024 SSP-A?

The total funding available under the FY 2024 SSP-A is \$300 million. FEMA distributed \$259.13 million in Round 1; the remaining \$40.87 million, inclusive of unclaimed Round 1 funding, will be allocated on August 28, 2024.

When will the FY 2024 SSP-A funding notice be released, and where will it be located?

The SSP-A NOFO was issued April 12, 2024, and is available online at <u>FEMA.gov</u> as well as on www.grants.gov.

The amended FY 2024 SSP-A NOFO was issued on August 28, 2024 and can be found online at www.fema.gov/grants and www.grants.gov.

Who is an eligible applicant?

The applicants identified in the Round 1 allocation table in Section B.1 of the SSP-A NOFO were the only eligible entities to submit SSP-A Round 1 applications. The applicants identified in the Round 2 allocation table in Section B.1 of the amended SSP-A NOFO are the only eligible entities to submit SSP-A Round 2 funding applications. Each eligible applicant may submit one SSP-A grant application that may include requirements of eligible subapplicants.

Subapplicants must meet the following criteria to be eligible:

- Local governments as defined by 2 C.F.R. § 200.1;
- Indian Tribes as defined by 2 C.F.R. § 200.1;
- Nonprofit organizations as defined by 2 C.F.R. § 200.1; or
- The 50 states of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and any agency or instrumentality thereof exclusive of local governments (the term "state" or "state government" where used in the funding notice refers to these entities).



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Subapplicants must have capacity to perform each SSP allowable activity that the applicant(s) proposes they will perform.

How do applicants apply?

Eligible applicants need to submit an amendment to their existing FY 2024 SSP-A award. The amendment **submission deadline is no later than 3:00 p.m. ET on September 11, 2024**. Applicants must submit amendments via FEMA GO by the established deadline. For more information on amendment deadlines, see *Section D Application Submission Information* of the amended FY 2024 SSP-A NOFO. For step-by-step instructions on how to submit an amendment, see the <u>FEMA GO</u> Request an Amendment guide.

All application materials, including FY 2024 SSP ancillary documents, will be posted on FEMA.gov. Eligible applicants should submit their amendments through FEMA GO. For FEMA GO support, applicants should contact FEMAGO@fema.dhs.gov or (877) 585-3242, Monday-Friday from 9 a.m. – 6 p.m. ET.

What are the differences between the FY 2024 SSP-A NOFO and the amended FY 2024 SSP-A NOFO?

Both the FY 2024 SSP-A NOFO and the amended FY 2024 SSP-A NOFO announced allocation amounts for FY 2024 SSP-A. The FY 2024 SSP-A NOFO released in April 2024 announced the eligible applicants and program requirements for Round 1 of SSP-A funding. The amended FY 2024 SSP-A NOFO announces the eligible applicants and updated program requirements for the remaining SSP-A Round 2 funding.

Since the original FY 2024 SSP-A NOFO release in April 2024, FEMA implemented and clarified programmatic updates that are included in the amended FY 2024 SSP-A NOFO. Firstly, the time recipients have available to expend advanced funding was expanded from 30 to 90 days. Additionally, FEMA clarified that FY 2024 SSP-A recipients may request reimbursement for rental costs and leases for all SSP services. Finally, the amended FY 2024 SSP-A amended NOFO included an updated allocation table to designate those eligible applicants and their allocated amounts for the FY 2024 SSP-A Round 2 funding.



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What are the differences between the FY 2023 and FY 2024 application?

The FY 2023 program included a service allowability window for noncitizen migrants of 45 days. This window has been removed in FY 2024. There is also a new margin of error for A-number collection to include a rate of less than 5%. Additionally, in FY 2024, charter bus capacity decreased to 66% and the 10% funding cap for hotels and onward destination travel was removed. Further, in FY 2024, recipients are no longer required to submit subrecipients' IRS Form 990.

What are allowable costs under SSP-A?

At least one primary service is required for all eligible applicants. Funds can only be used for providing services to noncitizen migrants following their release from DHS. Below are examples of allowable activities:

Primary Services

- Shelter (cots, beds, linens, shelter utilities, maintenance, housekeeping)
- Food (food items, food banks, contracted meals, storage containers, cookware, utensils)
- Transportation (e.g., transportation from DHS facility to shelter, shelter to shelter, and onward to a final destination)
- Acute medical care (basic first aid care and supplies, health screenings, overthe-counter medication)
- Personal hygiene supplies (hygiene items, toiletries, feminine hygiene products, baby wipes, diapers, etc.)
- Labor for Primary Services (inclusive of staff time not at the director/manager level or administrative)

Secondary Services

- Clothing (shirts, pants, outwear, socks, shoes, backpacks, belts, etc.)
- Renovations or modifications to existing facilities (repairs to facilities to provide services, improvements to expand capacity and services and to address safety concerns, obtaining permits and completing inspections which are necessary for specified improvements)
- Translation services (contracts and external support)



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- Outreach information (communications development and distribution, contracts, printing services)
- Labor for Secondary Services (inclusive of staff time not at the director/manager level or administrative)

Management and Administration

- Management and administration costs are allowable and do not count as a primary or secondary service. These may also include recordkeeping (IT assistance, contracts, and external support) and costs associated with creating a database and/or tracking system to assist with managing SSP-A funds as well as cybersecurity assessments and enhancements, etc.
- For a complete description of allowable activities, see the FY 2024 SSP-A funding notice on www.grants.gov.

Leases

■ Rental costs and leases are allowable under FY 2024 SSP-A. Leased property can be reimbursed (as allocable) for any SSP service.

What is a Period of Performance (POP) and how long is it for SSP-A?

The POP is the amount of time primary recipients have to complete proposed projects. This includes, among other requirements, that costs must be incurred, and products or services be delivered within the award's POP. For SSP-A, the POP is 36 months; October 1, 2023 – September 30, 2026. The POP is the same for SSP-A Round 2 funding.

Extensions to the POP for this program may be permitted only with prior written approval from FEMA. Recipients must request extensions prior to the expiration of the POP. Please refer to Section H Additional Information in the amended SSP-A NOFO and the SSP-A Amended NOFO for more details about POP extensions.

What is the application period and deadline?



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The FY 2024 SSP-A Round 2 funding application period opened on August 28, 2024. The deadline for submission is no later than 3 p.m. ET on September 11, 2024. Applicants must submit their amendment before the application period closes. Eligible applicants will need to submit an amendment via FEMA GO in place of an application.

What should I do if I'm going to miss the application deadline?

If your application is delayed due to technical difficulties outside of your control, exigent or emergency circumstances, or other statutory requirements, FEMA may extend the application deadline upon request. Applicants must contact FEMA as soon as possible and before the application deadline. Applicants will be required to demonstrate that good cause exists for the extension.

Is this the only time SSP-A funding will be available?

Congress may appropriate SSP in future fiscal years.

What should I do to prepare before the application opening?

Parties identified is the amended SSP-A NOFO should ensure their organization's registration is up to date, not expired, and has the correct contact information.

What other resources are available to address programmatic, technical, and financial questions?

For SSP-specific questions, please e-mail fema-ssp@fema.dhs.gov.

For additional technical assistance using FEMA GO, please see the <u>FEMA GO</u>
<u>Startup Guide</u> and contact the FEMA GO Helpdesk at <u>femago@fema.dhs.gov</u> or (877) 585-3242, Monday through Friday, 9 a.m.–6 p.m. ET.

For support regarding financial matters and budgetary technical assistance, contact the AAD's Help Desk via e-mail at ASK-GMD@fema.dhs.gov.

Funding, Payments, and Reporting

Will the SSP-A be advanced funding or reimbursement?



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FEMA will allow for advanced-based funding in addition to the preferred reimbursement-based funding, with the following caveats:

Reimbursement:

Payment by reimbursement is the preferred method (see 2 C.F.R. § 200.305). As a prerequisite of SSP-A approval for reimbursement requests, recipients shall include proof of purchase, in the form of a canceled check or credit card transaction, active SAM.gov registration, and a final invoice(s) in each reimbursement SSP-A payment/drawdown request. In accordance with U.S. Department of Treasury regulations at 31 C.F.R. § 205, if applicable, the recipient shall maintain procedures to minimize the time elapsing between the transfer of funds and the disbursement of said funds.

Advanced Funding:

Recipients may be paid in advance, provided they maintain or demonstrate the willingness and ability to maintain procedures to minimize the time elapsing between the transfer of funds and its disbursement by the recipient (not to exceed 90 days), and the financial management systems that meet the standards for fund control and accountability as established in 2 C.F.R. § 200. The recipient shall include invoice(s) and/or purchase orders for advance SSP-A payment/drawdown requests. EHP review requirements must be met prior to advanced payments. Although advance drawdown requests are permissible, recipients remain subject to applicable federal laws in effect at the time a grant is awarded to the recipient. Governing interest requirements include the Uniform Administrative Requirements Cost Principles, and Audit Requirements for Federal Awards at 2 C.F.R. § 200 and the Cash Management Improvement Act (CMIA) and its implementing regulations at 31 C.F.R. § 205. Interest under CMIA will accrue from the time federal funds are credited to a recipient's account until the time the recipient pays out the funds for program purposes. For the rate to use in calculating interest, please visit Treasury Current Value rate.

If we are not requesting immediate reimbursement, is my organization required to provide invoices and proof of purchases at the time of application?



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No. At the time of application, the SSP-A Application Worksheet (inclusive of your detailed budget) is required. Please use the SSP FY 2024 Application Worksheet – Allocated found on grants.gov when developing your application. SSP recipients must submit proofs of purchase and additional supporting documentation when drawing draw downs.

What is an Alien Registration Number (A-Number) Submission Template, and what role does it play in the SSP payment request process?

The amended SSP-A NOFO requires A-Number collection and submission to FEMA to ensure SSP-A funds are used to support noncitizen migrants encountered and released by DHS. FEMA provides an A-Number Template that recipients must use to populate A-Numbers, names, corresponding DHS release dates of the served population, and corresponding service dates of the served population. A populated A-Number Template is required to upload when submitting a payment request.

Who do I need to collect A-Numbers for?

For SSP funding to cover the service, recipients must collect an A-Number for every noncitizen migrant served. Each individual receives their own A-Number. This includes dependents.

Do recipients need to obtain their own A-Numbers?

For payment reimbursement or advanced funding, an A-number must be provided for all individuals served. Recipients will need to coordinate with their subrecipients to ensure that an A-number is collected for each individual in order to receive reimbursement.

Allowable Activities

Will there be any flexibility to provide services to unprocessed migrants?

The SSP-A NOFO currently makes funds available for costs associated with providing shelter and other eligible services to only noncitizen migrants who have been encountered and released by DHS. See Section A. 10 Program Overview,



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Objectives, and Priorities of the amended SSP-A NOFO.

If an entity's original budget plan changes due to circumstances on the ground (e.g., increased primary costs), can we submit for other eligible grant expenditures?

Yes, the budget can be amended in coordination with FEMA staff.

How will the program handle scenarios where noncitizens do not consent to providing A-Numbers?

The statute is clear that funding can only be provided for noncitizen migrants who have been released from DHS custody. Proof of release from DHS custody is determined by forms that are provided to noncitizen migrants upon processing. Examples of these forms include the I-94, I-385, I-860 and I-862.

Do shelter providers need to choose between per diem reimbursements or rental expenses?

Yes, you need to choose. If the building is owned by the entity, please choose per diem reimbursement. If it is rented, please choose rental expenses. If you are requesting funding for multiple shelters, you can choose per diem for one and rental expenses for the other.

Under the shelter category, what expenses are included as per diem?

The per diem rate of \$12.50 covers shelter for each night of shelter provided to noncitizen migrants following their release from federal facilities. Recipients requesting per diem can also request other shelter categories as long as there is no duplication. Recipients must ensure they are not supplanting prior costs associated with the Emergency Food and Shelter Program – Humanitarian (EFSP-H) and FY 2023 SSP.

Does the 66 percent capacity rule apply to busses going to airports and bus terminals?

The 66% rule applies to any group charters. Recipients should ensure that the bus is filled to 66% capacity.



How is final transportation defined?

Final transportation refers to the trip a noncitizen migrant makes to their final destination to connect with their sponsor or family. The destination does not need to be the city listed in their federal documents.

Where do I find more specific definitions of transportation, labor costs, or other expenses?

Refer to Appendix A of the amended FY 2024 SSP-A NOFO for information on specific funding allowances.

Do I need to provide Hard copies of A-Number documentation?

No. The only requirement is the completed A-Number Template. Recipients also do not need to make copies of the A-numbers for their records.

When should the A-Number Template be submitted?

The A-Number Template is only submitted as part of the payment request process and should not be submitted with the application. The A-Number Template is required to be submitted with each payment request or request for advanced funding.

How can we apply for advanced funding, and how does this affect the requirement of recording A-Numbers, as specified in the NOFO?

Applying for advanced funding will work the same way as applying for reimbursement. You must submit documentation to show what you are using the funding for and where it is going. At the time of draw down, you are required to submit proofs of purchases and any additional supporting documentation. Additional documentation (e.g., the A-Number Template) is required after submitting an advanced funding request.

How will you determine the amount of advanced funding an organization is eligible for?

There is no limit to how much of a recipient's award is advance funding versus reimbursement. Requests for payment will be authorized based on the



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requirements and eligible activities listed in the amended SSP-A NOFO.

Can entities request more funds than what was allocated?

Eligible applicants can only submit applications for up to their allocated amounts, as listed in the amended SSP-A NOFO.

Will a quarterly report be required, or are there additional reporting requirements?

The reporting structure is identified in the amended SSP-A NOFO. It includes two different reports that are due quarterly: the Federal Financial Report and the Performance Progress Report. When recipients submit for reimbursement, recipients must provide appropriate documentation as specified in the NOFO.

What if there are errors in my A-Number Template?

DHS recognizes there is a high potential for error when collecting this amount of data. As such, DHS instituted an acceptable margin of error (error rate of less than 5 percent) for A-Number reporting.

What happens if two SSP recipients submit A-Number Templates containing the same A-Number?

FEMA and U.S. Customs and Border Protection understand that some A-Numbers will be duplicated across SSP recipients. A-Number repetition becomes a concern when the repetition is unreasonable. For example, it is unreasonable for two overlapping service dates. However, noncitizen migrants may receive different services from different recipients on the same day.

Where can I access the A-Number Template and other related documents?

The A-Number Template, along with additional SSP-A documentation and resources, are located on www.grants.gov, under the related documents tab.

Subapplicants and Subrecipients

Are subrecipient agencies providing direct services able to apply in FEMA GO, or can only the pre-determined organizations apply?



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Only those directly identified in the amended SSP-A NOFO are eligible to apply for SSP-A Round 2 funding. FEMA encourage those organizations that were interested in applying or being subrecipients to work with those listed entities to negotiate access to SSP-A funding. This recommendation remains the same for SSP-A Round 2 funding applications.

What is needed to apply for funding with subapplicants?

Under the FY 2024 SSP-A NOFO, eligible subapplicants could apply to and receive subawards from a non-federal entity that applied for and received an SSP-A award directly from FEMA. Subapplicants were required meet the criteria listed in *Section C.3 Subawards and Beneficiaries* in the funding notice to be eligible. These requirements remain the same for SSP-A Round 2 funding applications.

Are recipients required to provide funding to subrecipients?

No, there is no requirement to provide funding to subrecipients.

However, direct recipients are strongly encouraged to include subrecipients. This program does not use the fiscal agent approach that was used by EFSP-H. It is up to the recipient to determine whether to include subrecipients.

Can FEMA help manage subrecipient activities?

It is the responsibility of the recipient to manage their subrecipient's spending, services provided, etc. FEMA is unable to engage in any organizational/managerial aspects of recipients' and subrecipients' working relationships with each other. Subrecipient management guidelines are established in the subaward agreement. For more information on subaward agreement requirements, please visit 2 C.F.R Part 200.

