Grant Programs Directorate Information Bulletin
No. 449
April 30, 2020

MEMORANDUM FOR: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All Urban Area Security Initiative Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors
All Eligible Regional Transit Agencies
All Private Sector Transportation Security Partners
All Public and Private Sector Port Security Partners
All Tribal Nation Points of Contact

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Grant Programs Directorate


I. Purpose

This Information Bulletin (IB) serves to provide an expedited submission, review, and decision process to grant recipients Period of Performance (PoP) extension requests for certain FY 2016 and FY 2017 preparedness grant programs, which are identified in Section II below. This IB is being issued in response to the Office of Management and Budget’s (OMB) recently issued memo, M-20-17, Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations on March 19, 2020. In response, FEMA, through the Grant Programs Directorate (GPD), issued implementing guidance under the same title on March 27, 2020 on the allowance of certain time limited administrative relief flexibilities (exceptions) under 2 C.F.R. Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards.

FEMA’s implementation of OMB Memo M-20-17 with regard to extensions stated that to the extent permitted by law, FEMA may extend the period of performance of awards that are active as of March 31, 2020 and scheduled to expire through December 31, 2020 at no-cost (i.e., no additional Federal funding) for a period of up to twelve (12) months. The preparedness grants eligible for this relief are from FYs 2016 and 2017. For purposes of these
grants, GPD is publishing this IB to provide recipients with guidance for eligibility parameters and the expedited submission, review, and decision process for PoP extensions.

FEMA has received many requests from grant recipients regarding PoP extensions, in part or in whole, due to the challenges facing our stakeholder community as a result of the ongoing COVID-19 pandemic. FEMA recognizes that resources are stretched thin and to relieve some of the administrative burden on grant recipients, FEMA is instituting a streamlined process for these extension requests.

II. Applicability

A. This IB is applicable to the following FY 2016 and FY 2017 Preparedness Grant Programs:

1. Homeland Security Grant Program (HSGP)
2. Nonprofit Security Grant Program (NSGP)
3. Tribal Homeland Security Grant Program (THSGP)
4. Port Security Grant Program (PSGP)
5. Transit Security Grant Program (TSGP)
6. Intercity Passenger Rail (IPR)

B. The deadline for submitting PoP extension requests under this IB is June 15, 2020.

C. Extensions will be for a no-cost PoP extension, and no project scope changes are approved as a part of this process.

D. Liquidation extensions and closeout reporting extensions will continue to follow the regular submission and review process permitted under 2 C.F.R. § 200.343 and are not applicable to this IB.

III. Guidance

A. Requirements for all PoP Extension Requests covered under this IB.

1. For all extension requests, recipients must submit a PoP Amendment in the ND-Grants system and upload a copy of this IB at the time of request to serve as the approval authorizing document for FEMA.

2. In the ND-Grants Amendment Request Narrative section, recipients shall indicate they are requesting a PoP extension through the authority of this IB.

   a. Recipients shall include a brief explanation for the request (i.e. operational impacts due to the COVID-19 pandemic). The explanation should be limited to a brief paragraph.
3. No additional attachments, justification, or documentation is needed. The recipient will receive all communications, including the final outcome (approved/disapproved) of the amendment request for the extension via the normal ND-Grants electronic notification process.

B. Specific Requirements for FY 2016 Grants

1. For all open FY 2016 preparedness grant awards with a PoP set to expire on or before December 31, 2020, where a recipient is requesting a PoP extension due to COVID-19 related delays, may only request an extension for up to 12 months beyond the current end date of their award or May 31, 2021, whichever is earlier. FEMA cannot extend FY 2016 preparedness grant funds beyond the statutory five-year availability of funds limit.

2. Deadlines required per 2 C.F.R. § 200.343(a)-(b): Non-federal entities must liquidate all obligations incurred under the federal award not later than 90 calendar days after the end date of the period of performance as specified in the terms and conditions of the federal award. Non-federal entities must also submit closeout reports within 90 calendar days from the end of the PoP.

C. Specific Requirements for FY 2017 Grants

1. For all open Fiscal Year FY 2017 preparedness grant awards set to expire on or before December 31, 2020 where a recipient is requesting a PoP extension due to COVID 19 related delays will be approved for extensions of up to 12 months.

2. Deadlines required per 2 C.F.R. § 200.343(a)-(b): Non-federal entities must liquidate all obligations incurred under the federal award not later than 90 calendar days after the end date of the period of performance as specified in the terms and conditions of the federal award. Non-federal entities must also submit closeout reports within 90 calendar days from the end of the PoP.

IV. Questions

Questions regarding this IB may be directed to your assigned FEMA Preparedness Officer or the Centralized Scheduling and Information Desk (CSID) at askcsid@fema.dhs.gov or (800) 368-6498, Monday through Friday, 9:00 a.m. – 5:00 p.m. ET.

V. Review Date

This IB will sunset upon the expiration of OMB Memorandum M-20-17, which is June 17, 2020, unless M-20-17 is extended.