



The Grants Gazette

Ohio EMA's Preparedness Grants Updates

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SPOTLIGHT OF THE MONTH

Grant Funds Must Supplement and Not Supplant

Federal Homeland Security funds are intended to provide local entities with increased capabilities or to increase capacity to address CBRNE/WMD Terrorist Incidents.

Thus, federal funds are meant to “*supplement*” and not “*supplant*” the sub-grantee’s own funds. Federal grant funds should not be used to purchase items or services that would otherwise be purchased with the sub-grantee’s own state or local funds.

Expenditures of funds for the acquisition of new equipment or services, when equipment and/or personnel required for the successful execution of projects are already available, or budgeted for within the sub-grantee organization would be considered supplanting and is disallowed.

For example, a local agency’s budget contains \$10,000 in general funds for the purchase of radios. The agency applies for and receives Homeland Security Grant funding for radios and subsequently redirects the \$10,000 in general funds to a different purpose. This is supplanting and is not allowable. Using the grant funds to purchase radios in addition to the radios purchased with general funds would be supplementing and is allowable.

To clarify for personnel, if the agency personnel budget is \$50,000 per year. The grant should only reimburse costs associated with allowable grant activity above the \$50,000 already budgeted.

Any supplanting of non-Federal funds with grants is a ground for potential suspension or termination of grant funding and recovery of funds already provided.

QUICK COMPLIANCE TIPS

◆ Activity Within the Performance Period

When a sub-grantee submits a request for reimbursement through EGMS, they are verifying the equipment is received and operational, and all activities are complete. If the activities are not complete, equipment received and operational within the performance period of the grant, jurisdictions will be subject to return of funds of those specific activities or equipment.

◆ Copyrights (44 CFR 13.34)

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- (b) Any rights of copyright to which a grantee, sub-grantee, or a contractor purchases ownership with grant support.

◆ Equipment (44 CFR 13.32 (d) (3))

- (a) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.
- (b) The investigation must be fully documented and made a part of the official project record.

Important Dates

- ◆ Performance period ends **March 31, 2013** for the FY 2010 HSGP-SHSP and SHSP-LE grant. If equipment or services cannot be received or complete within that timeframe with good cause, please contact your grant specialist immediately to discuss options.

HSGP Grant Expenditures

As of March 2013

Grant	Award	Expended	Remaining
FY 2010	\$40,769,989	\$18,512,015	\$22,257,974
FY 2011	\$20,499,771	\$ 2,107,969	\$18,391,802

For any questions or comments, please contact your Grant Program Specialist.