Fiscal Year (FY) 2024 Shelter and Services Program - Allocated (SSP-A) Frequently Asked Questions

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General

What is the purpose of the FY 2024 SSP?

Congress authorized and directed 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, Pub. 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 FY 2024 SSP-A?

The total funds available under FY 2024 SSP-A is \$300 million. \$275 million will be distributed in the first round; the remaining \$25 million will be allocated later in the year.

Where is the FY 2024 SSP-A Notice of Funding Opportunity (NOFO) posted?

The SSP-A NOFO is available online at <u>www.fema.gov/grants</u> as well as on www.grants.gov.



Page 1 of 11

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 newly added 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.

Who is eligible to apply?

The applicants identified in the allocation table in Section B.1 of the SSP-A NOFO are the only entities eligible to submit SSP-A applications. Each eligible applicant may submit one SSP-A grant application that may include requirements of eligible subapplicants. Eligible SSP-A applicants may apply for Shelter and Services Program – Competitive (SSP-C) awards.

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).

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

How do applicants apply?

Applying for an award is a multi-step process. Applicants are encouraged to register early in the System for Award Management (SAM.gov) and the FEMA Grants Outcomes (FEMA GO) system, as the registration process can take four weeks or more to complete. Registration should be done in sufficient time to ensure it does not impact your ability to meet required submission deadlines. Please refer to Section D in the FY 2024 SSP-A NOFO for detailed information and instructions.



Page 2 of 11

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

Eligible applicants must apply on FEMA's Grants Outcomes System (FEMA GO).

Completed applications must be submitted in the FEMA GO system no later than 3 p.m. ET on April 26, 2024.

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



Page 3 of 11

for specified improvements)

- Translation services (contracts and external support)
- 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.

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

The POP is the amount of time 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.

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 of the SSP-A NOFO for more details about POP extensions.

What is the application period and deadline?

The application period opened on April 12, 2024. The deadline for submission is no later than 3 p.m. ET on April 26, 2024. Applicants must submit their application before the application period closes.

Registering and applying for an award under this program is a multi-step process. Applicants are encouraged to register early as the process can take four or more weeks to complete. Registration should be completed in sufficient time to ensure it



Page 4 of 11

does not impact the applicant's ability to meet the submission deadline. FEMA GO records proof of timely submissions, and no applications submitted after the deadline will be accepted unless an applicant experiencing technical problems outside of their control contacts FEMA as soon as possible and before the application deadline.

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 funding will be available in FY 2024?

A second NOFO, announcing the availability of \$340.9 million (SSP – C) was also released on April 12, 2024, and any eligible applicant may apply. An additional \$25 million in reserve funds will be awarded before the end of this fiscal year.

What should I do to prepare before application opening?

Parties identified in the SSP-A NOFO should register your organization in SAM.gov as soon as possible. After registering, SAM.gov assigns a Unique Entity ID (UEI) to the entity, which is required for the SSP-A grant application and the entity's FEMA GO account. If your organization is already registered, verify the registration is up to date, not expired, and has the correct contact information. Expect to allow up to 30 days to receive your assigned UEI.

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

- For SSP-specific questions, please e-mail <u>fema-ssp@fema.dhs.gov</u>.
- For additional technical assistance using FEMA GO, please see the FEMA GO Startup Guide and contact the FEMA GO Helpdesk at femago@fema.dhs.gov 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 <u>ASK-GMD@fema.dhs.gov</u>.



Page 5 of 11

Funding, Payments, and Reporting

Will the SSP-A be advanced funding or reimbursement?

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 30 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. In the case of advance payments, recipients submit additional documentation (e.g. A-Number template) after the disbursement of funds. Environmental Planning and Historic Preservation (EHP) review requirements must be met before advanced payments are made. 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



Page 6 of 11

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?

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 down funds.

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

The 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 when submitting a payment request.

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



Page 7 of 11

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

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

The reporting structure is identified in the 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 recipients on opposite coasts to repeat the same A-Number for multiple 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 <u>www.grants.gov</u>, under the Related Documents tab.

Who do I need to collect A-Numbers for?



Page 8 of 11

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 subrecipients 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.

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.

Allowable Activities

Will there be any flexibility to provide services to unprocessed noncitizen 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, Objectives, and Priorities of the 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.



Page 9 of 11

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

The statute is clear that funding can only be provided for services rendered to 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, recipients will 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% capacity rule apply to buses 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.



Page 10 of 11

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

Refer to Appendix A of the <u>FY 2024 SSP-A NOFO</u> for information on specific funding allowances.

Subapplicants and Subrecipients

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

Only the entities identified in the SSP-A NOFO are eligible to apply to SSP-A. Organizations interested in applying or being subrecipients are encouraged to work with those listed entities to negotiate access to SSP-A funding.

What is needed to apply for funding with subapplicants?

Under the FY 2024 SSP-A NOFO, eligible subapplicants may apply to and receive subawards from a non-federal entity that is applying for and receiving an SSP-A award directly from FEMA. Subapplicants must meet the criteria listed in Section C.3 Subawards and Beneficiaries in the funding notice to be eligible.

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.



Page 11 of 11