



FEMA

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

FROM: Elizabeth M. Harman
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SUBJECT: Clarification of Allowable Management and Administration (M&A)
Cost under the Operation Stonegarden Grant Program (OPSG)

The Fiscal Year 2011 Operation Stonegarden grant program (OPSG) allows participants receiving an award or a sub-award to use up to five percent (5%) of their award to cover costs incurred for the Management and Administration (M&A) of the grants awarded under OPSG. The purpose of this Information Bulletin (IB) is to clarify the allowable activities and limitations of M&A given the unique operational nature and law enforcement centric purpose of the OPSG program.

M&A costs are *not* operational costs, but are necessary costs incurred in direct support of the grant or as a consequence of the grant. M&A activities are those directly relating to the management and administration of a grant, such as financial management and reporting or in the oversight of those involved in the operational aspects of the grant. M&A costs are specifically identifiable (with respect to who, what, when, where, and how much), therefore, the costs can be easily separable for accounting and reporting purposes.

Examples of M&A costs that could be reimbursed under OPSG include, but are not limited to, the following:

- Preparing and submitting required programmatic and financial reports;
- Establishing and/or maintaining OPSG equipment inventory and/or usage logs;
- Documenting OPSG operational expenditures for financial accounting purposes;

- Responding to activities such as requests for programmatic and or financial data by State and or Federal oversight authorities related to OPSG; and
- Planning coordinating, drafting/documenting orders/amendments related to specific transportation related needs/ issues between Federal, State, local and Tribal law enforcement agencies.

Examples of OPSG operational costs that should *not* be counted as M&A include, but are not limited to, the following:

- Overtime costs incurred for law enforcement activities associated with OPSG including the planning, coordination, and execution of specific operations;
- Equipment and expendable supply costs incurred for law enforcement activities associated with OPSG;
- Transportation costs (such as mileage or per diem for travel) law enforcement activities associated with OPSG; and
- Personnel expenses to secure back-fill coverage for those law enforcement officials involved in activities associated with OPSG.

The use of M&A is only applicable to the grantee State Administrative Agent (SAA) and the sub-grantee (county level or equivalent specifically named in the SAAs grant award documentation). As indicated above, M&A expenses are specifically identifiable, therefore, documentable. As such, the use of M&A funds will be closely monitored by the program officials.

If you have questions regarding this IB please contact your assigned FEMA Program Analyst or the Centralized Scheduling and Information Desk at askcsid@fema.gov or 1-800-368-6498.