



**Missouri Office of Homeland Security**  
**Division of Grants, Local and State Assistance**  
**Information Bulletin**  
**OHS-GT-2012-003-01**

**Subject:** Policy on Funding Restrictions for Management and Administration Costs

**Effective Date:** November 1, 2016

**Table of Contents**

- I. Introduction**
- II. Management and Administration (M&A) Limits**
- III. Procedure for Reimbursement of M&A Expenses**
- IV. Grant Contact Information**

OHS-GT-2012-003-01  
November 1, 2016

## I. Introduction

The Federal Department of Homeland Security (DHS) has clearly defined restrictions of the use of grant funds related to Management and Administration (M&A) reimbursable costs. The Missouri Office of Homeland Security (OHS), Division of Grants, is providing this policy to assist local governments, state agencies, and nonprofits in understanding federal and state requirements regarding M&A.

**This information bulletin replaces OHS-GT-2012-003 “Policy on Funding Restrictions for Management and Administration Costs” dated April 15, 2012.**

## II. Management and Administration (M&A) Limits

Maximum percentages have been established in each funding year for each applicable funding source. The M&A is to be used solely for management and administrative purposes associated with the Homeland Security Grant Program (HSGP) and the Emergency Management Performance Grant (EMPG) awards.

- Supplanting is not permitted
- M&A costs must be identified and approved in your grant application
- All expenditures must be necessary and reasonable, as deemed by the OHS
- Pre-award costs are not allowable
- Activities must be directly related to the Management and Administration of the grant, not the project the grant supports
- Authorized expenditures include costs associated with subgrantee requirements and compliance with reporting, data collections, reimbursements, and site monitoring
- The following items may be considered for reimbursement; if pre-approved; within the period of performance of the grant; supporting documentation is provided; the expenditures are M&A related; and deemed reasonable by the OHS, Division of Grants:
  - Hiring of full or part-time staff (net increase of a full-time employee must be documented) or contractors/consultants to assist with the grant management requirements
  - Overtime costs
  - Authorized office equipment/supplies
  - Travel
  - Meeting related expenses
  - Recurring expenses such as those associated with cell phones and faxes during the period of performance of the grant program
  - Leasing or renting space for personnel during the period of performance of the grant program

OHS-GT-2012-003-01  
November 1, 2016

OHS grant funds may only be used for the purpose set forth in the grant, and must be consistent with the statutory authority for the award. Grant funds may not be used for matching funds for other federal grants/cooperative agreements, lobbying, or intervention in Federal regulatory or adjudicatory proceedings.

### **III. Procedure for Reimbursement of M&A Expenses**

When submitting reimbursement requests to the OHS, Division of Grants, for M&A expenses, subrecipients are required to submit:

- Claim in WebGrants
- Invoice (example: temporary clerical support/invoice)
- Proof of payment (i.e., copy of check or payroll journal)
- Proof of delivery (i.e., signed packing slip, receipt, or statement in writing indicating equipment was delivered)

For personnel costs the following documents are required:

- Claim in WebGrants
- Invoice (example: temporary clerical support/invoice)
- Proof of payment (i.e. copy of check or payroll journal)
- Timesheet(s)
- Wage and benefit cost(s)
- Signed salary certification (examples A and B are listed below) as follows:

#### **Example A: Employees that work solely on a single Federal award or cost objective:**

Certifications will be prepared at least semi-annually and will be signed by the employee or supervisory official having firsthand knowledge of the work performed by the employee. *If the subrecipient submits the certification semi-annually, it must be attached to the OHS Biannual Status Report due on June 10 and December 10. (See example below)*

**Employee Certification – Single Award or Cost Objective:**

PERSONNEL CERTIFICATION	
This is to certify that the following individuals have worked 100% of their time under the _____ (CFDA: _____) cost objective:	
From: _____ Through _____ (FY _____)	
This work supports the implementation of the State Homeland Security Strategies to address the identified planning, organization, equipment, training and exercise needs to prevent protect against, mitigate, respond to and recover from acts of terrorism and other catastrophic events.	
EMPLOYEE NAME	POSITION TITLE
I certify that I have first-hand knowledge of the work performed by these individuals.	
	Title: _____
Printed Name: _____	
	Date: _____
Signature _____	

**Example B: Employee Certification – Multiple Award or Cost Objectives:**

Certifications will be prepared at least monthly that will reflect an after-the-fact distribution of the actual activity of each employee. The certification will account for the total activity for which each employee is compensated and will be signed by the employee or supervisory official having firsthand knowledge of the work performed by the employee. *This certification must be included with the reimbursement request (See example below)*

**Employee Certification – Multiple Award or Cost Objectives:**

Missouri Office of Homeland Security
Monthly Personnel Certification Statement

Employee's Name
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April	2012
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Grant Program	CFDA	Total Hours	% of Time
HSGP	97.067	147	83.5%
BZPP	97.078	13	7.4%
PSIC	11.555	0	0.0%
IECGP	97.055	0	0.0%
TSGP	97.075	0	0.0%
EOC	97.052	8	4.5%
EMPG	97.042	8	4.5%
NSGP	97.008	0	0.0%
Other	N/A	0	0.0%
Total Leave	N/A	0	0.0%
		176	100.0%

I hereby certify this report is an after-the-fact determination of the total activity and actual effort expended for the period indicated, and I have full knowledge of 100% of these activities.
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Employee Signature:	
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**IV. Grant Contact Information**

OHS grant point of contacts can be found online at:  
<http://www.dps.mo.gov/dir/programs/ohs/grantstraining/?h=0>

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