Michigan State Police
Emergency Management and Homeland Security Division
Informational Bulletin

Issue: 26-03 **June 16, 2026**

Processing of Homeland Security Grant Program Personnel Reimbursement Requests

Applies to: This bulletin applies to Homeland Security Grant Program (HSGP) subrecipients and fiduciaries within Michigan. It specifically covers activities under the State Homeland Security Program (SHSP) and the Urban Areas Security Initiative (UASI).

Purpose and Background

The HSGP assists state, local, tribal, and territorial efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism. Hiring personnel to carry out approved HSGP planning, organization, training, and exercise activities is allowable under the grant.

Allowable activities are limited to those activities necessary to carry out the mission of the grant program. The HSGP is not intended to support the hiring of any personnel to fulfill traditional public health and safety duties nor to supplant traditional public health and safety positions and responsibilities.

Adequate documentation of personnel activity is required to be submitted to the Michigan State Police, Emergency Management and Homeland Security Division (MSP/EMHSD) for reimbursement of personnel costs. All personnel reimbursements must comply with 2 CFR §200.430 (Compensation - personal services), including documentation requirements (e.g., time/effort records that accurately reflect work performed) and reasonableness standards.

The purpose of this informational bulletin is to outline how MSP/EMHSD processes personnel reimbursements, establish new rules for reimbursement packet submissions, and provide instructions for requesting an amendment or appeal when necessary.

Note: This policy applies only to full-time or part-time personnel whose positions are HSGP funded. It does not apply to backfill or overtime costs for non-grant-funded personnel participating in allowable HSGP activities.

New Requirements and Updates

To ensure timely processing, consistency statewide, and clear expectations for all jurisdictions, MSP/EMHSD is implementing the following policies for personnel reimbursements:

1. **Partial Processing of Reimbursements with Unallowable Activities**
    - If MSP/EMHSD identifies activities that appear unallowable or insufficiently justified, those hours/costs will be deducted, and the remainder of the reimbursement will move forward for processing and drawdown.
    - Subrecipients may submit an amendment to request reconsideration of any deducted hours/costs, with additional justification provided (see page 3, Subrecipient Amendment Process).
2. **Timeliness**
    - Effective December 12, 2026, MSP/EMHSD will not accept personnel reimbursements that are older than six months.
    - The reimbursement “age” is measured from the end date of the last pay period included in the reimbursement packet to the date the reimbursement is submitted to MSP/EMHSD via Smartsheet.
    - Submissions received on/after December 12, 2026, must meet the six-month timeliness requirement.
    - The effective date provides a six-month grace period to allow jurisdictions time to bring older reimbursements up to date.

- Subrecipients are encouraged to submit personnel reimbursements more frequently.

3. **Submission Format**
   - A separate reimbursement packet must be submitted for each grant funded individual.
   - Each reimbursement packet may include no more than two months worth of pay periods.
     - If a pay period spans two calendar months, it is considered part of the month in which the pay period begins.
     - An exception applies to contracted personnel who invoice quarterly; these individuals may continue submitting quarterly reimbursement packets, limited to one quarter per packet.
   - Submissions that do not follow these limits will be returned for correction and must be resubmitted.
4. **Notification Process**
   - For any reduction due to unallowable activities, MSP/EMHSD will notify the fiduciary through Smartsheet and email and include the reason for the reduction.
   - When sufficient detail is present, MSP/EMHSD will also include the jurisdiction that is directly impacted on the email.

Allowability and Documentation

Subrecipients must ensure that claimed personnel costs are allowable, allocable, reasonable, and properly documented.

Reimbursable costs must be:

- Directly related to HSGP objectives and cannot include traditional public safety duties or supplanting of existing positions.
- Supported by records that accurately reflect the work performed (e.g., activity logs/timesheets that identify the date, employee, specific activity, and how the activity aligns with HSGP), along with payroll records supporting wages/fringe.
- Consistent with local written policies for compensation and timekeeping and applied uniformly to federal and non-federal activities.

If MSP/EMHSD determines that an activity description is not sufficiently detailed to demonstrate allowability, the item may be reduced in processing. Subrecipients may then submit an amendment with additional justification (see page 3, Subrecipient Amendment Process).

Refer to MSP/EMHSD Informational Bulletin (IB) 22-02 (dated March 28, 2022) for additional information on allowable activities and personnel reporting requirements specific to HSGP funded planners.

Reimbursement Submission Requirements

Personnel reimbursement packets must be submitted through the regional fiduciary using the Smartsheet reimbursement link. Each packet must include:

- Reimbursement Coversheet (EMD-054) and Payroll Reimbursement Detail sheet (EMD-055).
- Activity logs/time and effort documentation showing:
  - Employee name
  - Date of activity
  - Hours worked
  - Specific activity(ies) performed
  - Sufficient detail to allow MSP/EMHSD to determine allowability

- Approved Alignment and Allowability Form with page 5 completed.
- Payroll documentation supporting the hours and rates claimed (e.g., pay stubs, payroll registers, fringe benefit calculations if applicable).

Timeliness and Submission Requirements

- Include no more than one individual per reimbursement packet.
- Limit each submission to two months worth of pay periods.
- Ensure that the reimbursement request is submitted no later than six months after the end date of the last pay period included.

MSP/EMHSD Review and Notification

- MSP/EMHSD will review for allowability and documentation sufficiency under 2 CFR §200.430 and the Federal Emergency Management Agency's (FEMA) Preparedness Grants Manual.
- If reductions are necessary, MSP/EMHSD will:
  - Proceed with partial payment of allowable items.
  - Provide written notice in Smartsheet and by email to the fiduciary (and impacted jurisdiction when identifiable) outlining the reason(s) and the amount reduced.
  - Add a tracking number to the reimbursement packet on the EMD-054, if the subrecipient does not already include one.
- MSP/EMHSD may request additional information when needed to establish allowability.

Subrecipient Amendment Process

Subrecipients may seek reconsideration of reduced hours/costs through an amendment:

- Deadline: Submit within 45 calendar days of MSP/EMHSD's reimbursement reduction notice.
  - If the reimbursement request falls under a grant year in which the subrecipient's period of performance has ended or is scheduled to end within the next two weeks, email EMD_HSGP@michigan.gov prior to submitting.
- How to Submit: Through the regional fiduciary using the Smartsheet reimbursement link; title the Request Description: "Amendment to Reimbursement #XXXX." Use the tracking number added to your EMD-054 as the reimbursement number.

Required Format - Memo Attached as First Page

The amendment must include a memo or letter attached as the first page of the previously reviewed reimbursement packet (i.e., the version containing all MSP/EMHSD notes and reduction markings).

The memo must include:

- Date
- Region
- Jurisdiction name (if applicable)
- Name of person submitting the request
- Original reimbursement packet number
- Total amount requested for reconsideration
- Employee name
- Separate entry for each day and each activity included in the request, with the following:

- Date of activity
- Activity originally submitted
- Justification for that specific activity

Justification Expectations

All justifications must:

- Clearly articulate how the activity aligns with objectives and allowable uses of the HSGP.
- Provide detailed, activity-specific descriptions of the tasks performed. *General or non-descriptive statements are not sufficient.*
- Demonstrate why the activity itself meets HSGP allowability criteria, rather than relying on broad assertions about what types of activities are typically permitted.

MSP/EMHSD Review

MSP/EMHSD will review the amendment and will approve, partially approve (with explanation), or deny (with explanation).

All outcomes will be provided in writing, and approved amounts will be forwarded to finance for processing.

Contact Information

Questions concerning this informational bulletin may be directed to EMD_HSGP@michigan.gov.