



***Cal* E·M·A**
CALIFORNIA EMERGENCY
MANAGEMENT AGENCY

Federal Fiscal Year 2009

BUFFER ZONE PROTECTION PROGRAM (BZPP)

***California Supplement to the
Federal Program Guidance and Application Kit***

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STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

California Emergency Management Agency

Matthew R. Bettenhausen, Secretary

Key Points of Contact for Buffer Zone Protection Program

Critical Infrastructure Protection Division

Kathy McKeever, Director
Joanne Brandani, Chief
Jose Lara, BZPP Coordinator

Grants Management Division

Brendan Murphy, Director
Renee Jackson, Program Manager
Peter Town, Program Representative

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Who to Call

when you have questions regarding:

<ul style="list-style-type: none"> ● BZPP Allocation Notice ● BZPP Assessments ● Protected Critical Infrastructure Information (PCII) ● Automated Critical Asset Management System (ACAMS) ● Environmental Planning and Historic Preservation (EHP) Compliance ● BZP Submission ● VRPP Submissions ● BZP/VRPP Modifications ● Authorized Equipment List (AEL) Expenditures ● Technical Assistance <p>Please contact: Jose Lara BZPP Coordinator, Critical Infrastructure Protection Division (916) 324-6120 Jose.Lara@calema.ca.gov</p> <p style="text-align: center;">or</p> <p>Joanne Brandani Chief, Critical Infrastructure Protection Division (916) 445-3083 Joanne.Brandani@calema.ca.gov</p>	<ul style="list-style-type: none"> ● Resolution ● Grant Assurances ● Authorized Agents ● Award Letter ● Reimbursement Requests/Payments ● Biannual Strategy Implementation Report (BSIR) ● Fiscal Reporting ● Audit Questions ● Closeout ● Financial Management Forms Workbook <p>Please contact: Peter Town Infrastructure Protection Grants Unit Homeland Security Grants Division (916) 322-1503 Peter.Town@calema.ca.gov</p> <p style="text-align: center;">or</p> <p>Renee Jackson Section Chief, Infrastructure Protection Grants Unit (916) 324-6118 Renee.Jackson@calema.ca.gov</p>
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For questions regarding ACAMS or BZPP assessments, please contact the appropriate CIP assessor listed below:

Sacramento Region (Northern Area)	
Eric Nenneman (916) 752-6577 Eric.Nenneman@calema.ca.gov	Ron Hooks (916) 874-1388 Ron.Hooks@calema.ca.gov
Includes counties: Alpine, Amador, Butte, Calaveras, Colusa, El Dorado, Fresno, Glenn, Inyo, Kern, Kings, Lassen, Madera, Mariposa, Merced, Modoc, Mono, Nevada, Placer, Plumas, Sacramento, San Joaquin, Shasta, Sierra, Siskiyou, Stanislaus, Sutter, Tehama, Trinity, Tulare, Tuolumne, Yolo, Yuba	
San Francisco Region (Bay Area)	
Michael O’Leary (415) 436-8556 Michael.Oleary@calema.ca.gov	Tim Louie (415) 342-4226 Tim.Louie@calema.ca.gov
Includes counties: Alameda, Contra Costa, Del Norte, Humboldt, Lake, Marin, Mendocino, Monterey, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma	
Los Angeles Region	
Joe Caston (562) 345-1132 Joseph.Caston@calema.ca.gov	Clay Widdifield (562) 345-1150 Clay.Widdifield@calema.ca.gov
Includes counties: Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Santa Barbara, Ventura	
San Diego Region	
Will Saunry (858) 503-5611 William.Saunry@calema.ca.gov	John Harvey (858) 503-5610 John.Harvey@calema.ca.gov
Includes counties: Imperial, San Diego	

Section 1 – Application Resources

State Administrative Agency (SAA)	California Emergency Management Agency (Cal EMA) Attention: Grants Management 3650 Schriever Avenue Mather, CA 95655
Federal Program Guidance and Updates	<p>The U.S. Department of Homeland Security (U.S. DHS) published the <i>Fiscal Year (FY) 2009 Buffer Zone Protection Program, Guidance and Application Kit</i> on November 5, 2008. Federal Emergency Management Agency (FEMA) will verify compliance with all administrative and eligibility criteria identified in the application kit.</p> <p>The <i>Guidance and Application Kit</i> may be obtained at: http://www.fema.gov/government/grant/bzpp/index.shtm</p>
Press Release	<p>The U.S. DHS issued a Press Release announcing the <i>FY 2009 BZPP</i> on November 5, 2008.</p> <p>The Press Release may be obtained at: http://www.fema.gov/news/newsrelease.fema?id=46633</p>
Fact Sheet	<p>The U.S. DHS issued a Fact Sheet on the <i>FY 2009 BZPP</i> on November 5, 2008.</p> <p>The Fact Sheet may be obtained at: http://www.fema.gov/doc/government/grant/bzpp/fy09_bzpp_faq.doc</p>
Information Bulletins	<p>The U.S. DHS Information Bulletins for numerous homeland security grant programs, including BZPP, provide grant updates, information, clarification, and requirements throughout the life of the grant.</p> <p>The U.S. DHS Information Bulletins may be viewed at: http://www.ojp.usdoj.gov/odp/docs/bulletins.htm</p>
California Supplement	<p>This <i>California Supplement</i> to the Federal Program Guidance is intended for use by the subgrantee and Responsible Jurisdiction Organizations to complement the federal guidance published by the U.S. DHS National Preparedness Directorate. It provides additional guidance and information on administering the program through the California Emergency Management Agency (Cal EMA), including key points of contact, important subgrantee due dates, and fiscal reporting.</p> <p>The California Supplement may be obtained at Cal EMA's website under Grant Management Division: http://www.ohs.ca.gov/grants_infrastructure_protection.html</p>
Responder Knowledge Base	<p>The Responder Knowledge Base (RKB) was created to provide Emergency Responders, purchasers, and planners with a trusted, integrated, on-line source of information on products, standards, certifications, grants, and other equipment-related information. The website contains the Authorized Equipment List (AEL) for the various homeland security programs, including BZPP.</p> <p>Refer to the BZPP Federal Guidance for specific AEL categories allowable for BZPP grant recipients. You can also refer to http://www.rkb.us</p>

Homeland Security Standards and Guidelines	<p>The U.S. Department of Homeland Security's Science and Technology Directorate has adopted and made available guidelines for equipment standards and information sharing tools to assist local, state and federal procurement officials, as well as manufacturers.</p> <p>http://www.dhs.gov/xfrstresp/standards</p>
Target Capabilities List	<p>The Target Capabilities List (TCL) contains 37 core capabilities that describes and sets targets for the capabilities required to achieve the four homeland security mission areas: Prevent, Protect, Respond, and Recover. BZPP projects should fall within the TCL subcategories of Common, Prevent, and Protect.</p> <p>The TCL may be found within the RKB's website: http://www.rkb.us</p>
National Response Framework	<p>The <i>National Response Framework</i> presents the guiding principles that enable all response partners to prepare for and provide a unified national response to disasters and emergencies – from the smallest incident to the largest catastrophe.</p> <p>http://www.fema.gov/emergency/nrf/</p>
National Infrastructure Protection Plan and Sector Specific Plans	<p>The National Infrastructure Protection Plan (NIPP) and supporting Sector-Specific Plans (SSPs) provide a coordinated approach to critical infrastructure and key resources (CIKR) protection roles and responsibilities for federal, state, local, tribal, and private sector security partners. The NIPP sets national priorities, goals, and requirements for effective distribution of funding and resources, which will help ensure that our government, economy, and public services continue in the event of a terrorist attack or other disaster. Homeland Security Presidential Directorate-7 (HSPD-7) identified 18 CIKR sectors and designated Federal Government Sector-Specific Agencies (SSAs) for each of the sectors.</p> <p>Copies of these plans are available on DHS's website: http://www.dhs.gov/xprevprot/programs/editorial_0827.shtm</p>
Protected Critical Infrastructure Information	<p>The Protected Critical Infrastructure Information (PCII) is an information-protection program that enhances information sharing between the private sector and the government. The Department of Homeland Security and other federal, state and local analysts use PCII to: (1) analyze and secure critical infrastructure and protected systems; (2) identify vulnerabilities and develop risk assessments; and (3) enhance recovery preparedness measures.</p> <p>If the information submitted satisfies the requirements of the Critical Infrastructure Information Act of 2002 (PDF, 11 pages - 53KB), it is protected from:</p> <ul style="list-style-type: none"> • The Freedom of Information Act (FOIA), • State and local disclosure laws, and • Use in civil litigation. <p>PCII cannot be used for regulatory purposes and can only be accessed in accordance with strict safeguarding and handling requirements.</p> <p>Submissions that do not meet the requirements are destroyed or returned to the submitter.</p> <p>http://www.dhs.gov/xinfoshare/programs/editorial_0404.shtm</p>

<p>ACAMS</p>	<p>The Automated Critical Asset Management System (ACAMS) is a federal web-enabled information services portal that helps state and local governments build critical infrastructure/key resource (CIKR) protection programs in their local jurisdictions. Buffer Zone Plans and Vulnerability Reduction Purchase Plans are an integrated component of ACAMS. Cal EMA encourages subgrantees and responsible jurisdictions to utilize ACAMS for their BZPP assessments. Subgrantees and/or responsible jurisdictions should contact their respective CIP Assessor for guidance in submitting the BZP and VRPP to Cal EMA CIP Branch through ACAMS.</p> <p>Further information regarding ACAMS is available on U.S. DHS website: www.dhs.gov/acams</p>
<p>Environmental Planning and Historic Preservation Requirement for Grants</p>	<p>The Environmental Planning and Historic Preservation (EHP) program integrates the protection and enhancement of environmental, historic, and cultural resources into FEMA's mission, programs and activities; ensures that FEMA's activities and programs related to disaster response and recovery, hazard mitigation, and emergency preparedness comply with federal environmental and historic preservation laws and executive orders; and provides environmental and historic preservation technical assistance to FEMA staff, local, State and Federal partners, and grantees and subgrantees.</p> <p>Federal environmental and historic preservation laws and Executive Orders provide the basis and direction for the implementation of federal environmental and historic preservation review requirements for FEMA-funded projects. These laws and executive orders are aimed at protecting our nation's water, air, coastal, wildlife, land, agricultural, historical and cultural resources, as well as minimizing potential adverse effects to children, low-income and minority populations. Failure to comply with these laws could result in project delays and denial of funding.</p> <p>BZPP subgrantees shall review their respective BZPs and VRPPs for compliance with EHP requirements. BZPP projects with equipment acquisitions for sites 50 years or older shall be reviewed carefully to determine if an EHP statement of work is needed. Subgrantees are responsible for identifying environmental resources and historic properties in the project area, which may require coordination with appropriate local, State and/or Federal resource agencies. This information should be included in the statement of work and submitted to Cal EMA in the initial stage of project formulation.</p> <p>http://www.fema.gov/plan/ehp/ehp-applicant-help.shtm</p>

Section 2 - Timeline

FY 2009 BZPP Subgrantee Timeline

U.S. DHS announcement of FY 2009 BZPP.	November 5, 2008
Cal EMA's SAA State Grant Award Applications due to DHS.	January 30, 2009
Vulnerability assessments scheduled and conducted on selected BZPP funded projects.	January-October 2009
Cal EMA's SAA State Preparedness Report due to U.S. DHS.	March 31, 2009
U.S. DHS will review and act on SAA applications.	May 16, 2009
Subgrantee and/or Responsible Jurisdictional Organization shall submit Buffer Zone Plans (BZPs) and Vulnerability Reduction Purchase Plans (VRPPs) to Cal EMA CIP Branch for review and State approval.	On or by October 1, 2009
Cal EMA must submit final BZPs and VRPPs to U.S. DHS for consideration of project activities.	November 30, 2009
U.S. DHS/FEMA to begin notification of Cal EMA's approved/disapproved BZPs/VRPPs.	February 1, 2010
Subgrantee Performance Period Ends	December 31, 2011

Section 3 – Overview

Funding Availability	California was awarded \$5.2 million for 2009 BZPP through the U.S. Department of Homeland Security, and is authorized by the <i>Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009</i> (Public Law 110-329).
Program Overview	<p>The BZPP is a targeted infrastructure protection program that provides funds to build security and risk-management capabilities at the State and local levels that will help protect critical infrastructure from acts of terror. Specifically, the program helps to implement BZPs by providing funds to support planning and equipment acquisition. BZPs help identify preventive and protective measures that make it more difficult for terrorists to conduct surveillance or launch attacks within the immediate vicinity of high-risk critical infrastructure assets. BZPs are developed in cooperation with DHS, State, and local officials, and private sector to help increase the preparedness capabilities of the local jurisdictions responsible for the security of surrounding communities.</p> <p>Cal EMA will initiate and coordinate vulnerability assessments to be conducted for each funded site. This site assessment is a critical element in the BZPP process and will include key stakeholders in the protection and security of the site. Upon completion of an assessment, the subgrantee, in conjunction with the responsible jurisdiction, shall complete and submit to Cal EMA a Buffer Zone Plan and Vulnerability Reduction Purchase Plan (VRPP) to support the funded site. The BZP and VRPP must be approved by Cal EMA and U.S. DHS before procurement and implementation of projects designated in the VRPP.</p> <p>Cal EMA shall request PCII validation for each BZP and VRPP and will complete the express and certification statement located within the BZP. For further information regarding PCII, please refer to the <i>Guidelines for the Submission of Buffer Zone Plans Under the Protected Critical Infrastructure Information Program</i>.</p>
Maximum Subgrant	<p>Award amounts are based on a multi-tier system of Critical Infrastructure/Key Resource (CIKR) sites designated by U.S. DHS. Since specific sites and their locations are sensitive, DHS has directly contacted each State with information regarding the identity, location and funding amounts.</p> <p>For 2009, BZPP subgrantees are allocated \$194,000 per approved site.</p>
Match Requirement	There is no cash or in-kind cost share for FY2009 BZPP.
State M&A Costs	As authorized within the federal guidance, Cal EMA may use 3% of the total State Grant Award for state management and administration activities.
Local M&A Costs	Subgrantee may not exceed three percent (3%) of their funding allocation for grant management and administrative (M&A) purposes.
Grant Performance Period	This grant is a 36-month grant program. Subgrantee performance period ends December 31, 2011.

<p>Review/Evaluation Process of BZP/VRPP</p>	<p>Since the use of FY 2009 BZPP funds must be consistent with the State and/or Urban Area Homeland Security Strategy, the BZP and VRPP must be coordinated among Cal EMA, Urban Area Working Groups, Regional Transit Security Working Groups, Area Maritime Security Committees and any other applicable State strategy planning teams.</p> <p>The BZP and VRPP must be submitted to Cal EMA CIP Division to certify that the activities/projects in the BZP/VRPP support the statewide CIKR protection program, as directed in the National Infrastructure Protection Plan (NIPP), and the implementation of the NIPP national priority. Upon certification, Cal EMA will submit the BZP and VRPP for each site to U.S. DHS/FEMA for final approval.</p> <p>FEMA will notify Cal EMA of approvals or incomplete BZPs and/or VRPPs. Cal EMA will then notify the subgrantee and/or responsible jurisdiction of approval or deficiencies from FEMA.</p>
<p>Eligible Subgrant Applicants</p>	<p>FY 2009 BZPP funds are awarded to the state; the state, in turn, passes through funds to the subgrantee. The subgrantee is commonly the Operational Area, however there are some instances when Cal EMA may approve another local jurisdiction to be designated as the subgrantee, such as the police department, sheriff's department, etc., in an effort to effectively administer the program.</p>
<p>Eligible Subrecipients</p>	<p>Responsible Jurisdiction Organizations (RJOs) are the subrecipients to the subgrantee. RJOs should work directly with their respective subgrantee for purchases, reimbursement, and modifications requests for their BZPP projects. This is a non-competitive grant program. Site selections for BZPP funding are determined in advance by the U.S. DHS.</p>
<p>Eligible Activities</p>	<p>FY 2009 BZPP allowable costs are divided into the following three categories:</p> <ol style="list-style-type: none"> 1. Planning 2. Equipment Acquisitions 3. Management and Administration (M&A) <p>For further information on these categories, please refer to the BZPP Federal Guidance.</p>

Section 4 – Subgrant Application Process

<p>BZP and VRPP Submittal</p>	<p>Eligible subgrantees must submit their BZP and VRPP to Cal EMA, Critical Infrastructure Protection Division by October 1, 2009 for review and approval. Subgrantees and subrecipients must comply with PCII requirements for all sensitive materials where applicable.</p>
<p>Allowable Expenditures</p>	<p>BZPP programmatic funds can be used to support multi-discipline prevention and protection-focused planning activities specific to the selected facility. However, the priority should continue to be on mitigating equipment and resource shortfalls identified in the development of the BZPP.</p> <p>BZPP Allowable Equipment Categories in the AEL</p> <p>[2] Explosive Device Mitigation and Remediation Equipment(*) [3] CBRNE Operational Search and Rescue Equipment(**) [4] Information Technology [5] Cyber Security Enhancement Equipment [6] Interoperable Communications Equipment [7] Detection Equipment [10] Power Equipment [13] Terrorism Incident Prevention Equipment [14] Physical Security Enhancement Equipment [15] Inspection and Screening Systems [16] Agricultural Terrorism Prevention, Response, and Mitigation Equipment [20FP] Intervention Equipment - Equipment, Fingerprint Processing, and Identification(**)</p> <p>(*) Requests for equipment to support Explosive Device Response Operations must indicate within the Notes section of the VRPP the name of the FBI accredited bomb squad or prospective bomb squad that is undergoing the accreditation process that will be receiving and utilizing the requested equipment.</p> <p>(**) Only select sub-categories within AEL Category 3 and 20 are eligible for FY 2009 BZPP funding. These sections include: 3OE-02, 3OE-07, 03SR-03-LSTN, 03OE-03-LTPA, 03OE-04-LTHH, 03OE-04-LTHE, 03SR-03-SCAM, 03SR-05, 03WA-01-PROP, 03WA-01-ULHH, 03WA-01-ULIT, 03WA-01-UWMD, 03WA-02-SONR, and 20FP.</p>
<p>Non-Allowable Expenditures</p>	<p>Please refer to pages 18-21 of the FY 2009 BZPP Federal Guidance and Application Kit for additional information on allowable and non-allowable BZPP equipment items.</p>
<p>Exemption Request from AEL</p>	<p>Other specialized equipment not listed within the BZPP AEL categories must be requested to and approved by Cal EMA and U.S. DHS. To request an exemption from the AEL categories, please contact your BZPP Coordinator.</p>

Section 5 - Post DHS Award - Subgrant Applications

<p>Subgrant Application Components</p>	<p>Subgrantees are required to submit subgrant application to Cal EMA before Cal EMA will authorize to draw down grant funds.</p> <p>A completed application will include all of the following components:</p> <ul style="list-style-type: none"> • Completed CAL EMA Financial Management Forms Workbook <ul style="list-style-type: none"> - Submitted electronically to the ODP Secure Portal <ul style="list-style-type: none"> Application Cover Sheet Grant Management Roster Project Ledger Project Description Equipment Inventory Ledger Authorized Agent form with appropriate signatures • Governing Body Resolution – Mailed • Signed Original Grant Assurances – Mailed <p>The Financial Management Forms Workbook can be found at http://www.calema.ca.gov/WebPage/oeswebsite.nsf/Content/72F9BD63CC93B3D38825762000647A97?OpenDocument</p>
<p>Subgrant Application Approval</p>	<p>The subgrantee will receive written notification of BZP and VRPP approval and subgrant award from Cal EMA. For information on BZP and VRPP status, please contact the Critical Infrastructure POC Jose Lara at Jose.Lara@calema.ca.gov. For grant-related questions contact the grant program POC Peter Town at Peter.Town@calema.ca.gov.</p>
<p>Post Award Modifications</p>	<p>Post award budget, scope and time modifications must be requested via a revised VRPP/BZP and Cal EMA’s Financial Management Forms Workbook V 1.10. The subgrantee will also be asked to provide a detailed justification for the modification to the grant. The modification may need to be approved by both Cal EMA and DHS/FEMA prior to implementation.</p> <p>Subgrantee’s must first submit a revised VRPP and BZP (section 8.1-8.3) to the BZPP Coordinator. Once approved modifications by the BZPP Coordinator, they will be forwarded to DHS/FEMA who will consider the modification. After the modification is approved by DHS/FEMA, subgrantee’s must use the Cal EMA Financial Management Forms Workbook V 1.10, signed by the subgrantee’s Authorized Agent, and submit it to the subgrantee’s Program Representative in the Infrastructure Protection Grant Unit at Cal EMA. Equipment items must be allowable within the BZPP Authorized Equipment List (AEL). The AEL is available via the Responder Knowledge Base website at https://www.rkb.us/.</p> <p>Modifications are reviewed on a case by case basis. The subgrantee will be instructed to make the required changes in the National Preparedness Directorate's Grants Reporting Tool (GRT)</p>

	<p>https://www.reporting.odp.dhs.gov .</p> <p>The subgrantee may implement the modifications, and incur associated expenses, only after receiving written final approval of the modification from Cal EMA. Failure to submit modification requests, and receive written approval prior to expenditure, could result in a reduction or disallowance of that part of the grant.</p> <p>Note: Modifications can be requested once per quarter during the grant performance period.</p>
Payment Request Process	<p>To request reimbursement payment of FY 2009 BZPP funds, complete a payment request form using the Cal EMA Financial Management Forms Workbook and return it to the appropriate Program Representative in the Grant Management Division at Cal EMA.</p> <p>Cal EMA Financial Management Forms Workbook http://www.calema.ca.gov/WebPage/oeswebsite.nsf/Content/72F9BD63CC93B3D38825762000647A97?OpenDocument</p> <p>NOTE: Cal EMA will only process reimbursement requests if the subgrantee has an approved Governing Body Resolution, Grant Assurances, and Financial Management Forms Workbook.</p>
Financial Management and Reporting Workshops	<p>Cal EMA conducts regular workshops on grants management, financial management and grant reporting. Please contact your Cal EMA Grant Program Representative for scheduled workshops.</p>
Subgrantee Performance Reports	<p>Subgrantees must prepare and submit performance reports to Cal EMA for the duration of the grant performance period, or until all grant activities are completed and the grant is formally closed. Subgrantees must complete a Biannual Strategy Implementation Report using the GRT, and will also be required to submit additional information and data requested by Cal EMA.</p>
Monitoring Subgrantee Performance	<p>Cal EMA may conduct onsite program monitoring. The monitoring will focus on the subgrantee’s administrative, programmatic and fiscal management of the grant(s).</p> <p>These reviews may include, but are not limited to:</p> <ul style="list-style-type: none"> • Eligibility of expenditures. • Comparing actual subgrantee activities to those approved in the subgrant application and subsequent modifications, if any. • Ensuring that advances have been disbursed in accordance with applicable guidelines. • Confirming compliance with: <ul style="list-style-type: none"> ○ Grant Assurances ○ Information provided on performance reports and payment requests.
Suspension or Termination	<p>Cal EMA may suspend or terminate subgrant funding, in whole or in part, or other measures may be imposed for any of the following reasons:</p> <ul style="list-style-type: none"> • Failing to expend funds in a timely manner consistent with the grant milestones, guidance and assurances.

	<ul style="list-style-type: none"> • Failing to comply with the requirements or statutory objectives of federal or state law. • Failing to follow grant agreement requirements or special conditions. • Proposing or implementing substantial plan changes to the extent that, if originally submitted, the application would not have been selected for funding. • Failing to submit required reports. • Failing to adequately manage, monitor or direct the grant funding activities of their subrecipients. <p>Before taking action, Cal EMA will provide the subgrantee reasonable notice of intent to impose corrective measures and will make every effort to resolve the problem informally.</p>
Closeout	<p>Cal EMA will close a subgrantee award after:</p> <ul style="list-style-type: none"> • Receiving a subgrantee Performance Report indicating that all approved work has been completed, and all funds have been disbursed; • Completing a review to confirm the accuracy of reported information; and • Reconciling actual costs to awards, modifications and payments. <p>If the closeout review and reconciliation indicates that the subgrantee:</p> <ul style="list-style-type: none"> • Is owed additional funds, Cal EMA will send the final payment automatically to the subgrantee. • Did not use all funds received, Cal EMA will issue an Invoice or Grant Modification letter to recover unused funds. <p>In the Grant Closeout letter, Cal EMA will notify the subgrantee of the start of the record retention period for all programmatic and financial grant related records.</p> <p>NOTE: Failure to maintain all grant records for the required retention period could result in a reduction of eligible grant activities, and an invoice to return costs associated with the unsupported activities.</p>