



Fiscal Year 2023 Preparedness Grants Manual

FEMA Grant Programs Directorate

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FEMA

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About the Federal Emergency Management Agency (FEMA)

Overview of FEMA

FEMA's mission is helping people before, during, and after disasters, and it has done so for more than 40 years. FEMA remains committed to building resilience and developing a culture of preparedness across the country and unifying all levels of community and government in an integrated approach to emergency management. FEMA is part of a larger team of federal agencies, state, local, tribal, and territorial (SLTT) governments, and non-governmental partners that share responsibility for emergency management and national preparedness. Those closest to areas impacted by any emergency or disaster are the true first responders—individuals, families, neighbors, and local communities. FEMA's role is to coordinate federal resources to supplement SLTT capabilities. FEMA does this by coordinating across the levels of government, meaning that states and their local units of government, tribes, and territories are FEMA's primary partners.

Overview of Preparedness Grant Programs

FEMA has the statutory authority to deliver numerous disaster and non-disaster financial assistance programs in support of its mission, and that of the U.S. Department of Homeland Security (DHS), largely through grants and cooperative agreements. These programs account for a significant amount of the federal assistance funds for which FEMA is accountable. FEMA officials are responsible and accountable for the proper administration of these funds pursuant to federal laws and regulations, Office of Management and Budget circulars, and federal appropriations laws and principles. FEMA has developed this Manual to provide additional direction on grant policy and implementation for the following grant programs:

Homeland Security Grant Program (HSGP)

The HSGP includes a suite of risk-based grants to assist SLTT efforts in preventing, preparing for, protecting against, and responding to acts of terrorism. The grants under HSGP include:

- *State Homeland Security Program (SHSP)*
The SHSP assists SLTT efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.
- *Urban Area Security Initiative (UASI)*
The UASI Program assists high-risk urban areas' efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.
- *Operation Stonegarden (OPSG)*
OPSG supports enhanced cooperation and coordination among U.S. Customs and Border Protection (CBP), United States Border Patrol (USBP), and federal and SLTT law enforcement agencies to improve overall border security. OPSG provides funding to support joint efforts to secure the United States' borders along routes of ingress/egress to and from international borders, to include travel corridors in states bordering Mexico and Canada, as well as states and territories with international water borders. SLTT law enforcement agencies utilize their own law enforcement authorities to support the border security mission and do not receive any additional authority by participating in OPSG.

Tribal Homeland Security Grant Program (THSGP)

The THSGP provides funding directly to eligible tribes to strengthen their capacity to prevent, prepare for, protect against, and respond to potential terrorist attacks.

Nonprofit Security Grant Program (NSGP)

The NSGP provides funding for physical security enhancements and other security-related activities to nonprofit organizations that are at high risk of a terrorist or other extremist attack. The NSGP also seeks to integrate the preparedness activities of nonprofit organizations with broader state and local preparedness efforts.

Transit Security Grant Program (TSGP)

The TSGP provides funds to eligible public transportation systems (which include intra-city bus, ferries, and all forms of passenger rail) to protect critical transportation infrastructure and the travelling public from terrorism, and to increase transportation infrastructure resilience.

Intercity Bus Security Grant Program (IBSGP)

The IBSGP provides funds to eligible private operators of intercity over-the-road bus transportation systems to protect critical transportation infrastructure and travelling public from acts of terrorism, and to increase transportation infrastructure resilience.

Intercity Passenger Rail (IPR) Program – Amtrak

The IPR provides funds to the National Railroad Passenger Corporation (Amtrak) to protect critical transportation infrastructure and the travelling public from terrorism, and to increase transportation infrastructure resilience.

Port Security Grant Program (PSGP)

The PSGP provides funding to port authorities, facility operators, and state and local agencies for activities associated with implementing Area Maritime Security Plans, facility security plans, and other port-wide risk management efforts.

Emergency Management Performance Grant (EMPG) Program

The EMPG Program provides funds to assist SLTT emergency management agencies in obtaining the resources required for implementation of the National Preparedness System and the National Preparedness Goal of a secure and resilient nation.

Foreword

FEMA has developed this **Preparedness Grants Manual** to guide applicants and grant recipients on how to manage their grants and other resources. Recipients seeking guidance on policies and procedures for managing preparedness grants should reference this Manual for further information on both program-specific information as well as overall guidance on rules and regulations that guide the proper management of FEMA grants.

The National Preparedness Goal

The [National Preparedness Goal](#) (the Goal) is “[a] secure and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.” See Department of Homeland Security, [National Preparedness Goal, Second Edition](#), (Sept. 2015). The Goal essentially defines what it means for all communities to be prepared collectively for the threats and hazards that pose the greatest risk to the nation. The Goal identifies 32 distinct activities, called core capabilities, needed to address the risks. The Goal organizes these core capabilities into five categories, called mission areas. Some core capabilities apply to more than one mission area. For example, the first three core capabilities—Planning, Public Information and Warning, and Operational Coordination—are cross-cutting capabilities, meaning they apply to each of the five mission areas. The [National Preparedness Goal](#) describes the five mission areas as follows:

- **Prevention:** Prevent, avoid, or stop an imminent, threatened, or actual act of terrorism.
- **Protection:** Protect our citizens, residents, visitors, and assets against the greatest threats and hazards in a manner that allows our interests, aspirations, and way of life to thrive.
- **Mitigation:** Reduce the loss of life and property by lessening the impact of future disasters.
- **Response:** Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of an incident.
- **Recovery:** Recover through a focus on the timely restoration, strengthening, and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by an incident.

The mission areas and core capabilities organize the activities and tasks performed before, during, and after disasters into a framework for achieving the goal of a secure and resilient Nation. Resilience is the desired outcome, defined in the Goal as the “ability to adapt to changing conditions and withstand and rapidly recover from disruption due to emergencies.” *Id.* at A-2. For more information about the Goal, go to [National Preparedness Goal | FEMA.gov](#).

Recipients will use the National Preparedness System to build, sustain, and deliver these core capabilities. The components of the National Preparedness System are Identifying and Assessing Risk, Estimating Capability Requirements, Building and Sustaining Capabilities, Planning to Deliver Capabilities, Validating Capabilities, and Reviewing and Updating. Additional information on the National Preparedness System is available at [National Preparedness System | FEMA.gov](#). Additional details regarding the National Preparedness System and how it is supported by these grant programs can be found in the program-specific appendices.

Pre-Award Application and Submission

Pre-Submission Information

These instructions apply to the following programs:

- Homeland Security Grant Program;¹
- Tribal Homeland Security Grant Program;
- Nonprofit Security Grant Program;
- Transit Security Grant Program;
- Intercity Bus Security Grant Program;
- Intercity Passenger Rail Program;
- Port Security Grant Program; and
- Emergency Management Performance Grant Program.

All applications **must** be received by the established deadline established in each program’s Notice of Funding Opportunity (NOFO). The Non-Disaster (ND) Grants System has a date stamp that indicates when an applicant submits their application. Applicants will receive an electronic message confirming receipt of their submission. For additional information on how an applicant will be notified of application receipt, see the section titled “Timely Receipt Requirements and Proof of Timely Submission.”

FEMA will not review applications that it receives after the deadline, nor will it consider these late applications for funding. FEMA may, however, extend the application deadline on request for an applicant who can demonstrate that good cause exists to justify extending the deadline. Good cause for an extension may include technical problems outside of the applicant’s control that prevent submission of the application by the deadline, other exigent or emergency circumstances, or statutory requirements for FEMA to make an award.

Applicants experiencing technical problems outside of their control must notify the respective FEMA Preparedness Officer or Program Manager as soon as possible and before the application deadline. Failure to timely notify FEMA of the issue that prevented the timely filing of the application may preclude consideration of the award. “Timely notification” of FEMA means the following: prior to the application deadline and within 48 hours after the applicant became aware of the issue.

For additional assistance using the ND Grants System, please contact the ND Grants Service Desk at (800) 865-4076 or NDGrants@fema.dhs.gov. The ND Grants Service Desk is available Monday through Friday, 9 a.m. – 6 p.m. ET. For programmatic or grants management questions, please contact your Preparedness Officer or Program Manager. If applicants do not know their FEMA Preparedness Officer or if there are programmatic questions or concerns, please contact the Centralized Scheduling and Information Desk (CSID) by phone at (800) 368-6498 or by e-mail at askcsid@fema.dhs.gov, Monday through Friday, 9 a.m. – 5 p.m. ET.

Agreeing to Terms and Conditions of the Award

By submitting an application, the applicant agrees to comply with the requirements of the applicable NOFO, this Manual, and the applicable appendix to this Manual, as well as the terms and conditions of its award should it receive an award.

¹ Under this program, these instructions apply to SHSP, UASI, and OPSG.

Address to Request Application Package

Initial applications are processed through the [Grants.gov](https://www.grants.gov) portal. Final applications are completed and submitted through FEMA's ND Grants System. Application forms and instructions are available on [Grants.gov](https://www.grants.gov). Hard copies of the NOFO and associated application materials can also be downloaded at [Grants.gov](https://www.grants.gov). To access these materials, go to [Grants.gov](https://www.grants.gov), select "Applicants" then "Apply for Grants." In order to obtain the application package, select "Download a Grant Application Package." Enter the Assistance Listing (formerly CFDA) and/or the funding opportunity number located on the cover of the program's NOFO, select "Download Package," and then follow the prompts to download the application package. In addition, the following Telephone Device for the Deaf (TDD) and/or Federal Information Relay Service (FIRS) number available for this Notice and all relevant NOFOs is (800) 462-7585.

Steps Required to Obtain a Unique Entity Identifier, Register in the System for Award Management (SAM), and Submit an Application

Applying for an award under the programs covered by this Manual is a multi-step process and requires time to complete. Applicants are encouraged to register early, as the registration process can take four weeks or more to complete. Therefore, registration should be done in sufficient time to ensure it does not impact the applicant's ability to meet required submission deadlines. Failure of an applicant to comply with any of the required steps in submitting an application before the deadline may disqualify that application from funding consideration.

To apply for an award, all applicants must:

1. Apply for, update, or verify their Unique Entity Identifier (UEI) number from SAM.gov, and Employer Identification Number (EIN) from the Internal Revenue Service;
2. In the application, provide a UEI number;
3. Have an account with [login.gov](https://www.login.gov);
4. Register for, update, or verify their SAM account and ensure the account is active before submitting the application;
5. Create a Grants.gov account;
6. Add a profile to a Grants.gov account;
7. Establish an Authorized Organizational Representative (AOR) in Grants.gov;
8. Register in ND Grants;
9. Submit an initial application in Grants.gov;
10. **Submit the final application in ND Grants, including electronically signing applicable forms;** and
11. Continue to maintain an active SAM registration with current information *at all times* during which they have an active federal award or an application or plan under consideration by a federal awarding agency. As part of this, applicants must also provide information on an applicant's immediate and highest-level owner and subsidiaries, as well as on all predecessors that have been awarded federal contracts or federal financial assistance within the past three years, if applicable.

Specific instructions on how to apply for, update, or verify a UEI number or SAM registration or establish an AOR are included in the steps below for applying through Grants.gov. Applicants are advised that FEMA may not make a federal award until the applicant has complied with all applicable UEI and SAM requirements. Therefore, an applicant's SAM registration must be active not only at the time of application, but also during the application review period and when FEMA is ready to make a federal award. Further, as noted above, an applicant's or recipient's SAM registration must remain active for the duration of an active federal award. If an applicant's SAM registration is expired at the time of application, expires during application review, or expires any other time before award, FEMA may

determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

Per 2 C.F.R. § 25.110(c)(2)(iii), if an applicant is experiencing exigent circumstances that prevent it from receiving a UEI number and completing SAM registration prior to receiving a federal award, the applicant must notify FEMA as soon as possible by contacting askcsid@fema.dhs.gov and providing the details of the circumstances that prevent completion of these requirements. If FEMA determines there are exigent circumstances and FEMA has decided to make an award, the applicant will be required to obtain a UEI number, if applicable, and complete SAM registration within 30 days of the federal award date.

Electronic Delivery

FEMA is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. FEMA requires applicants to submit their initial applications online through Grants.gov and to submit their final applications through ND Grants.

How to Register to Apply through Grants.gov

1. **General Instructions:** Registering and applying for an award under these programs is a multi-step process and requires time to complete. Read the instructions below about registering to apply for FEMA funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. To ensure an application meets the deadline, applicants are advised to start the required steps well in advance of their submission.

Organizations must have a UEI number, an EIN, and an active SAM registration to apply for grants. Organizations must also have a Grants.gov account to apply for an award under these programs. Creating a Grants.gov account can be completed online in minutes, but UEI and SAM registrations may take several weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet the required application submission deadlines. Complete organizational instructions can be found on [Grants.gov](https://www.grants.gov).

If individual applicants are eligible to apply for a grant funding opportunity, refer to [Applicant Registration | Grants.gov](#) to create an account with [Grants.gov](https://www.grants.gov).

2. **Obtain a UEI Number:** All entities applying for funding, including renewal funding, must have a UEI number. Applicants must enter the UEI number in the applicable data entry field on the SF-424 form.

For more detailed instructions for obtaining a UEI number, refer to [SAM.gov](https://www.sam.gov).

3. **Obtain Employer Identification Number:** All entities applying for funding must provide an EIN. The EIN can be obtained from the IRS by visiting [Apply for an Employer Identification Number \(EIN\) Online | Internal Revenue Service \(irs.gov\)](#).
4. **Create a login.gov account:** Applicants must have a login.gov account in order to register with SAM or update their SAM registration. Applicants can create a login.gov account at [Create your account - Login.gov](#).

Applicants only have to create a login.gov account once. For applicants that are existing SAM users, use the same email address for the login.gov account as with SAM.gov so that the two accounts can be linked.

For more information on the login.gov requirements for SAM registration, refer to [SAM.gov | Home](#).

5. **Register with SAM:** All organizations applying online through Grants.gov must register with SAM. Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to [Step 2: Register with SAM | Grants.gov](#).

Note: As a new requirement per 2 C.F.R. § 25.200, applicants must also provide the applicant's immediate and highest-level owner, subsidiaries, and predecessors that have been awarded federal contracts or federal financial assistance within the last three years, if applicable.

- a. Additional SAM Reminders

Existing SAM.gov account holders should check their account to make sure it is "ACTIVE." SAM registration should be completed at the very beginning of the application period and should be renewed annually to avoid being "INACTIVE." **Please allow plenty of time before the grant application submission deadline to obtain a UEI number and then to register in SAM. It may be four weeks or more after an applicant submits the SAM registration before the registration is active in SAM, and then it may be an additional 24 hours before FEMA's system recognizes the information.**

It is imperative that the information applicants provide is correct and current. Please ensure that your organization's name, address, and EIN are up to date in SAM and that the UEI number used in SAM is the same one used to apply for all other FEMA awards. Payment under any FEMA award is contingent on the recipient's having a current SAM registration.

- b. Help with SAM

The [SAM quick start guide](#) for new recipient registration and [SAM video tutorial](#) for new applicants are tools created by the General Services Administration to assist those registering with SAM. If applicants have questions or concerns about a SAM registration, please contact the Federal Support Desk at [GDIT Shared \(fsd.gov\)](#) or call toll free (866) 606-8220.

6. **Create a Grants.gov Account:** The next step in the registration process is to create an account with Grants.gov. Applicants must know their or their organization's UEI number to complete this process.

For more information, follow the on-screen instructions or refer to [Applicant Registration | Grants.gov](#).

7. **Add a Profile to a Grants.gov Account:** A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all your grant applications. To add an organizational profile to your Grants.gov account, enter the UEI number for the organization in the UEI field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to [Add Profile | Grants.gov](#).

8. **EBiz Point of Contact (POC) Authorized Profile Roles:** After you register with Grants.gov and create an Organization Applicant Profile, the organization applicant's request for Grants.gov roles and access are sent to the EBiz POC. The EBiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to [EBiz POC Authorizes Profile Roles | Grants.gov](#).

9. **Track Role Status:** To track your role request, refer to [Track Profile Role Status | Grants.gov](#).
10. **Electronic Signature:** When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC **must** authorize individuals who are able to make legally binding commitments on behalf of the organization as an AOR. Please ensure you have been authorized by the EBiz POC as **this step is often missed, and it is crucial for valid and timely submissions.**

How to Submit an Initial Application to DHS/FEMA via Grants.gov

Standard Form 424 (SF 424) is the initial application form.

Grants.gov applicants can apply online using a workspace. A workspace is a shared, online environment where members of a grant team may simultaneously access and edit different web forms within an application. For each NOFO, you can create individual instances of a workspace. Applicants are encouraged to submit their initial applications in [Grants.gov](#) **at least** three days before the application deadline.

In Grants.gov, applicants need to submit the following forms:

- SF-424, Application for Federal Assistance; and
- Grants.gov Lobbying Form, Certification Regarding Lobbying.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using a workspace, refer to: [Workspace Overview | Grants.gov](#)

1. **Create a Workspace:** Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
2. **Complete a Workspace:** Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission.
3. **Adobe Reader:** If you decide not to apply by filling out web forms, you can download individual PDF forms in Workspace so that they will appear similar to other Standard or DHS/FEMA forms. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, and then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on [Grants.gov](https://www.grants.gov) to download the appropriate version of the software at [Adobe Software Compatibility | Grants.gov](https://www.grants.gov/adobe-software-compatibility).

4. **Mandatory Fields in Forms:** In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
5. **Complete SF-424 Fields First:** The forms are designed to fill in common required fields across other forms, such as the applicant name, address, and UEI number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
6. **Submit a Workspace:** An application may be submitted through workspace by clicking the “Sign and Submit” button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package *at least 24-48 hours prior to the close date* to provide you with time to correct any potential technical issues that may disrupt the application submission.
7. **Track a Workspace:** After successfully submitting a workspace package, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

Additional Training and Applicant Support: For additional training resources, including video tutorials, refer to [Applicant Training | Grants.gov](https://www.grants.gov/applicant-training).

Grants.gov provides applicants 24/7 support (except federal holidays) via the toll-free number (800) 518-4726 and email at support@grants.gov and the website at [Support | Grants.gov](https://www.grants.gov/support). For questions related to a specific grant contact the number listed in the NOFO of the grant for which you are applying for.

If you are experiencing difficulties with your submission, it is best to call the [Grants.gov](https://www.grants.gov) Support Center and get a ticket number. The Support Center ticket number will assist FEMA with tracking your issue and understanding background information on the issue.

Submitting the Final Application in ND Grants

After submitting the initial application in [Grants.gov](https://www.grants.gov), eligible applicants will be notified by FEMA and asked to proceed with submitting their complete application package in ND Grants. Applicants can register early with ND Grants and are encouraged to begin their ND Grants registration at the time of the NOFO announcement or, at the latest, seven days before the application deadline. Early registration will allow applicants to have adequate time to start and complete their applications.

Applicants needing assistance registering for the ND Grants system should contact ndgrants@fema.dhs.gov or (800) 865-4076. For step-by-step directions on using the ND Grants system and other guides, please see [Non-Disaster Grants Management System | FEMA.gov](https://www.fema.gov/non-disaster-grants-management-system).

In ND Grants, applicants will be prompted to submit the standard application information required as described in the “Content and Form of Application Submission” section below. The Standard Forms (SFs) are auto-generated in ND Grants, but applicants may access these forms in advance through the Forms tab under the [SF-424 family](https://www.grants.gov/sf-424-family) on [Grants.gov](https://www.grants.gov). Applicants should review these forms before applying to ensure they have all the information required.

An application submitted by an otherwise eligible non-federal entity (i.e., the applicant) may be deemed ineligible when the person that submitted the application is not: 1) a ***current employee, personnel, official, staff, or leadership*** of the non-federal entity; and 2) ***duly authorized to apply*** for an award on behalf of the non-federal entity at the time of application.

Further, the AOR and Signatory Authority (SA) must be a duly authorized current employee, personnel, official, staff, or leadership of the recipient, and ***provide an email address unique to the recipient at the time of application and upon any change in assignment during the period of performance. Consultants or contractors of the recipient are not permitted to be the AOR or SA of the recipient.***

For program-specific application submission requirements, please refer to the applicable program NOFO and applicable appendix to this Manual.

Timely Receipt Requirements and Proof of Timely Submission

As application submission is a two-step process, the applicant with the AOR role who submitted the application in [Grants.gov](https://www.Grants.gov) will receive an acknowledgement of receipt, a tracking number (GRANTXXXXXXXX) from [Grants.gov](https://www.Grants.gov) with the successful transmission of its initial application. **This notification does not serve as proof of timely submission, as the application is not complete until it is submitted in ND Grants.** Applicants can also view the ND Grants Agency Tracking Number by accessing the Details tab in the submitted workspace section in Grants.gov, under the Agency Tracking Number column. Should the Agency Tracking Number not appear, the application has not yet migrated from Grants.gov into the ND Grants system. Please allow 24 hours for your ND Grants application tracking number to migrate.

All applications must be received in ND Grants by **5 p.m. Eastern Time** on the application deadline. Proof of timely submission is automatically recorded by ND Grants. An electronic date/time stamp is generated within the system when the application is successfully received by ND Grants. Additionally, the applicant(s) listed as contacts on the application will receive a system-generated email to confirm receipt.

Standard Required Application Forms and Information

For all programs, the following forms or information are required to be submitted in either Grants.gov or ND Grants. The SFs are submitted either through Grants.gov, through forms generated in ND Grants, or as an attachment in ND Grants. Applicants may also access the SFs at [SF-424 Family | Grants.gov](https://www.Grants.gov).

Grants.gov:

- **SF-424, Application for Federal Assistance**, initial application submitted through Grants.gov; and
- **Grants.gov Lobbying Form, Certification Regarding Lobbying**, submitted through Grants.gov.

ND Grants:

- **SF-424A, Budget Information (Non-Construction)**, submitted via the forms generated by ND Grants;
 - **For construction under an award, submit: SF-424C, Budget Information (Construction)**, submitted via the forms generated by ND Grants, in addition to or instead of SF-424A
- **SF-424B, Standard Assurances (Non-Construction)**, submitted via the forms generated by ND Grants;

- **For construction under an award, submit: SF-424D, Standard Assurances (Construction)**, submitted via the forms generated by ND Grants, in addition to or instead of SF-424B
- **SF-LLL, Disclosure of Lobbying Activities**, submitted via the forms generated by ND Grants; and
- **Indirect Cost Agreement or Proposal**, submitted as an attachment in ND Grants if the budget includes indirect costs and the applicant is required to have an indirect cost rate agreement or proposal. If the applicant does not have or is not required to have an indirect cost rate agreement or proposal, please see the “Funding Restrictions and Allowable Costs” section in the relevant program NOFO and the section below on indirect costs for further information regarding allowability of indirect costs and whether alternatives to an indirect cost rate agreement or proposal might be available or contact the relevant Preparedness Officer or Program Manager for further instructions.

Generally, applicants need to submit either the non-construction forms (i.e., SF-424A and SF-424B) or construction forms (i.e., SF-424C and SF-424D), meaning that applicants that only have construction work and do not have any non-construction work need only submit the construction forms (i.e., SF-424C and SF-424D) and not the non-construction forms (i.e., SF-424A and SF-424B), and vice versa. However, applicants who have *both* construction and non-construction work under these programs need to submit both the construction and non-construction forms.

Intergovernmental Review

An intergovernmental review may be required. Applicants must contact their state’s Single Point of Contact to comply with the state’s process under Executive Order 12372.

See [Executive Orders | National Archives](#) and [Intergovernmental Review \(SPOC List\) \(whitehouse.gov\)](#).

Funding Restrictions and Allowable Costs

All costs charged to awards covered by this Manual must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements at 2 C.F.R. Part 200, unless otherwise indicated in this Manual, the applicable program NOFO, or the terms and conditions of the award. This includes, among other requirements, that costs must be incurred, and products and services must be delivered, within the period of performance of the award. *See* 2 C.F.R. § 200.403(h) (referring to budget periods, which for FEMA preparedness grant awards is the same as the period of performance).

In general, the Cost Principles establish standards for the allowability of costs, provide detailed guidance on the cost accounting treatment of costs as direct or administrative costs, and set forth allowability principles for selected items of cost. More specifically, except as otherwise stated in the applicable program appendix to this Manual, the program NOFO, or the terms and condition of an award, costs charged to awards covered by this Manual must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E. In order to be allowable, all costs charged to a FEMA award or applied to the cost share must be reasonable in nature and amount and allocable to the particular FEMA award.

Additionally, all costs charged to awards must comply with the grant program’s applicable statutes, policies, NOFOs, and requirements in this Manual and the applicable NOFO, as well as with the terms and conditions of the award. If FEMA staff identify costs that are inconsistent with any of these requirements, these costs may be disallowed, and FEMA may recover funds as appropriate, consistent with applicable laws, regulations, and policies.

As part of those requirements, grant recipients and subrecipients may only use federal funds or funds applied to a cost share for the purposes set forth in this Manual, applicable NOFOs, and the terms and conditions of the award, and those costs and must be consistent with the statutory authority for the award.

Federal funds made available through these awards may be used for the purposes set forth in this Manual, the applicable program NOFO, and the terms and conditions of the award 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. In addition, federal funds may not be used to sue the federal government or any other government entity.

Specific investments made in support of the funding priorities discussed in the appendices to this Manual generally fall into one of the following eight allowable expense categories:

1. Construction;
2. Equipment;
3. Exercises;
4. Management & Administration (M&A);
5. Organization;
6. Operational Activities;
7. Planning; and
8. Training.

Please refer to the relevant program-specific appendix for more information on funding restrictions, funding priorities, and these categories.

Accessibility Compliance

Preparedness grant program recipients using funds to build or alter buildings must comply with accessibility requirements under the *Rehabilitation Act of 1973 and Architectural Barriers Act of 1968 (ABA)*, as well as the *Americans with Disabilities Act (ADA)*, if applicable, to ensure individuals with disabilities have access to such buildings. Accessibility standards under the ABA and ADA are highly similar. Additional information regarding compliance with the *Architectural Barriers Act* is available at [Chapter 1: Using the ABA Standards \(access-board.gov\)](#).

Authorized Equipment List

[The Authorized Equipment List \(AEL\)](#) is a list of approved equipment types allowed under FEMA's preparedness grant programs. The intended audience of this tool is emergency managers, first responders, and other homeland security professionals. The list consists of equipment categories divided into categories, sub-categories, and then individual equipment items.

Prohibitions on Expending Grant or Cooperative Agreement Funds for Certain Telecommunications and Video Surveillance Services or Equipment

Recipients and subrecipients of FEMA federal financial assistance are subject to the prohibitions described in section 889 of the [John S. McCain National Defense Authorization Act for Fiscal Year 2019 \(FY 2019 NDAA\)](#), Pub. L. No. 115-232 (2018) and 2 C.F.R. §§ 200.216, 200.327, 200.471, and Appendix II to 2 C.F.R. Part 200. Beginning August 13, 2020, the statute – as it applies to FEMA recipients, subrecipients, and their contractors and subcontractors – prohibits obligating or expending federal award funds on certain telecommunications and video surveillance products and contracting with certain entities for national security reasons.

Guidance is available in [FEMA Policy #405-143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#).

Additional guidance is available at [Contract Provisions Guide: Navigating Appendix II to Part 200 - Contract Provisions for Non-Federal Entity Contracts Under Federal Awards](#).

Effective August 13, 2020, FEMA recipients and subrecipients **may not** use any FEMA funds under open or new awards to:

1. Procure or obtain any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology of any system;
2. Enter into, extend, or renew a contract to procure or obtain any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology of any system; or
3. Enter into, extend, or renew contracts with entities that use covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system.

Replacement Equipment and Services: FEMA grant funding may be permitted to procure replacement equipment and services impacted by this prohibition, provided the costs are otherwise consistent with the requirements in this Manual and the applicable NOFO.

Definitions

Per section 889(f)(2)-(3) of the FY 2019 NDAA and 2 C.F.R. § 200.216, covered telecommunications equipment or services means:

1. Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation, (or any subsidiary or affiliate of such entities);
2. For the purpose of public safety, security of Government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunications equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities);
3. Telecommunications or video surveillance services provided by such entities or using such equipment; or
4. Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned or controlled by, or otherwise connected to, the People's Republic of China.

Examples of the types of products covered by this prohibition include phones, internet, video surveillance, and cloud servers when produced, provided, or used by the entities listed in the definition of "covered telecommunications equipment or services." *See* 2 C.F.R. § 200.471.

Management and Administration (M&A)

M&A costs are for activities directly related to the management and administration of the award, such as financial management, reporting, and program and financial monitoring. Some examples of M&A costs include grants management training for M&A staff, equipment and supplies for M&A staff to administer the grant award, travel costs for M&A staff to attend conferences or training related to the grant program, travel costs for the M&A staff to conduct subrecipient monitoring, contractual services to support the

M&A staff with M&A activities, and auditing costs related to the grant award to the extent required or permitted by statute or 2 C.F.R. Part 200. Characteristics of M&A expenses can include the following: 1) direct costs that are incurred to administer a particular Federal award; 2) identifiable and unique to each Federal award; 3) charged based on the activity performed for that particular Federal award; and 4) not duplicative of the same costs that are included in the approved Indirect Cost Rate Agreement, if applicable.

Procedures for Establishing Indirect Cost Rates

The requirements and procedures for establishing indirect cost rates are the same for all the preparedness programs outlined in the Preparedness Grants Manual. The process for establishing the indirect cost rate varies based on the type of entity and the amount of funding they receive:

- If the entity is a non-governmental entity, and is a subrecipient, indirect cost rate procedures are outlined in 2 CFR 200.332(a)(4). These types of entities may either use the de minimis rate or negotiate a rate with the pass-through entity.
- If the subrecipient is a state or local governmental entity, indirect cost rate procedures are established in 2 CFR 200, Appendix VII.
 - Per Paragraph D.1.b. of Appendix VII, state or local governmental entities receiving grant funds must develop an indirect cost rate proposal.
 - If the state or local entity receives more than \$35 million in grant funding, the proposal must be approved by the cognizant agency.
 - If a state or local entity receives \$35 million or less in grant funding, they have to develop an indirect cost rate proposal, but that indirect cost rate proposal does *not* need to be approved by the cognizant agency.
- If a state or local governmental entity wants to use the de minimis rate (instead of developing an indirect cost rate proposal), they can request a case-by-case exception from FEMA (per 2 CFR 200.102(b)).

Award Determination and Obligation

Allocations

Risk Methodology

DHS defines risk as: “potential for an adverse outcome assessed as a function of hazard/threats, assets and their vulnerabilities, and consequences.” [See DHS Lexicon Terms and Definitions: 2017 Edition – Revision 2](#), (Oct. 2017). The FEMA risk methodology is focused on three elements:

- **Threat:** the likelihood of an attack being attempted by an adversary;
- **Vulnerability:** the likelihood that an attack is successful, given that it is attempted; and
- **Consequence:** the effect of an event, incident, or occurrence.

Please see the applicable appendix of this Manual for each award program for specific information on the risk methodology applied for each program.

Application Evaluation Criteria

Programmatic Criteria

See the Manual appendices and relevant program NOFOs for specific information on the application criteria specific to each program.

Financial Integrity Criteria

Prior to making a federal award, FEMA is required by 31 U.S.C. § 3354, as enacted by the Payment Integrity Information Act of 2019, Pub. L. No. 116-117 (2020); 41 U.S.C. § 2313; and 2 C.F.R. § 200.206 to review information available through any Office of Management and Budget (OMB)-designated repositories of governmentwide eligibility qualification or financial integrity information, including whether the applicant is suspended or debarred. FEMA may also pose additional questions to the applicant to aid in conducting the pre-award risk review. Therefore, application evaluation criteria may include the following risk-based considerations of the applicant:

1. Financial stability;
2. Quality of management systems and ability to meet management standards;
3. History of performance in managing federal award;
4. Reports and findings from audits; and
5. Ability to effectively implement statutory, regulatory, or other requirements.

All investments selected for recommendation will also undergo an additional risk review conducted by the FEMA Grants Management Specialist to evaluate the risk for noncompliance in carrying out the federal award. Using their subject-matter expertise, the questions the FEMA Grants Management Specialist may assess include, but are not limited to:

- Is the applicant on any exclusion lists as identified in SAM.gov?
- If the applicant has received federal funding in the past, has the applicant performed all audits required by the Single Audit requirements under 2 C.F.R. Part 200, Subpart F?
- Has the applicant provided sufficient budget information and justification as required by the NOFO?
- Are the costs proposed by the applicant in the budget information and justification allowable and reasonable based on the criteria set forth in this Manual and the applicable appendix, NOFO, and regulations?

- Is the budget representative of the total cost of performance of the projects?
- If indirect costs are included, is the applicant required to have an approved indirect cost rate agreement? If so, has the applicant provided an approved indirect cost rate agreement?
- Is the applicant delinquent on any federal debt?
- Has the applicant had substandard performance in a prior award?
- Is the applicant on the Do Not Pay List?

Based on the outcome of this review, FEMA may determine that it will not make an award to an applicant that poses a risk of noncompliance. FEMA may also determine that it will make an award to an at-risk applicant, subject to additional terms and conditions as described in 2 C.F.R. § 200.208.

Supplemental Financial Integrity Review

Prior to making a federal award where the anticipated total federal share will be greater than the simplified acquisition threshold, currently \$250,000:

- FEMA is required to review and consider any information about the applicant, including information on the applicant's immediate and highest-level owner, subsidiaries, and predecessors, if applicable, that is in the designated integrity and performance system accessible through [SAM](#), which is currently the [Federal Awardee Performance and Integrity Information System](#) (FAPIIS).
- An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
- FEMA will consider any comments by the applicant, in addition to the other information in FAPIIS, in making a judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants, as described in 2 C.F.R. § 200.206.

Review and Selection Process

FEMA will follow all applicable statutes, rules, and requirements and will take into consideration materials accompanying the annual appropriations acts, such as the Joint Explanatory Statement, as appropriate, in reviewing and selecting recipients.

Please see the applicable NOFO for the review and selection process for that program.

Federal Award Administration Information

Notice of Award

Before accepting the award, the AOR and recipient should carefully review the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under federal awards. **Recipients must accept all conditions in the applicable program NOFO, as well as this Manual, in addition to any special terms and conditions in the Notice of Award to receive an award under the applicable program.**

Notification of award approval is made through the ND Grants system through an automatic electronic mail to the recipient's authorized official listed in the initial application. The award date will be the date that FEMA approves the award. The recipient should follow the directions in the notification to confirm acceptance of the award.

Recipients must accept their awards no later than **60 days** from the award date. The recipient shall notify FEMA of its intent to accept and proceed with work under the award or provide a notice of intent to decline through the ND Grants system. For instructions on how to accept or decline an award in the ND

Grants system, please see the [Grant Recipient User Guide](#). Funds will remain on hold until the recipient accepts the award through the ND Grants system and all other conditions of the award have been satisfied or until the award is otherwise rescinded. Failure to accept a grant award within the 60-day timeframe may result in a loss of funds.

Pass-Through Requirements

Please see the applicable NOFO and appendix to this Manual for information on pass-through requirements for that program.

Administrative and National Policy Requirements

In addition to the requirements in this section and the applicable NOFO, FEMA may place specific terms and conditions on individual awards in accordance with 2 C.F.R. Part 200.

All successful applicants for all FEMA grants and cooperative agreements are required to comply with the [DHS Standard Terms and Conditions](#).

The applicable DHS Standard Terms and Conditions will be those in effect at the time the award was made. The specific terms and conditions that will apply for the award will be clearly stated in the award package at the time of award.

Ensuring the Protection of Civil Rights

As the Nation works towards achieving the [National Preparedness Goal](#), it is important to continue to protect the civil rights of individuals. Recipients must carry out their programs and activities, including those related to the building, sustainment, and delivery of core capabilities, in a manner that respects and ensures the protection of civil rights for protected populations.

Federal civil rights statutes, such as Section 308 of the Stafford Act, Section 504 of the Rehabilitation Act of 1973, and Title VI of the Civil Rights Act of 1964, Age Discrimination Act, along with DHS and FEMA regulations, prohibit discrimination on the basis of race, color, national origin, sex, religion, age, disability, limited English proficiency, or economic status in connection with programs and activities receiving [federal financial assistance](#) from FEMA.

Recipients must complete the [DHS Civil Rights Evaluation Tool](#) within 30 days of receipt of the Notice of Award. Information about this requirement and a fuller list of the civil rights provisions that apply to recipients can be found in the [DHS Standard Terms and Conditions](#). Additional information on civil rights provisions is available at: [Civil Rights Resources for Recipients of DHS Financial Assistance | Homeland Security](#) and [Office of Equal Rights | FEMA.gov](#).

Monitoring and oversight requirements in connection with recipient compliance with federal civil rights laws are also authorized pursuant to 44 C.F.R Part 7.

In accordance with civil rights laws and regulations, recipients and subrecipients must ensure the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

Environmental Planning and Historic Preservation (EHP) Compliance

As a federal agency, FEMA is required to consider the effects of its actions on the environment and historic properties to ensure that all activities and programs funded by FEMA, including grant-funded projects, comply with federal EHP regulations, laws, and Executive Orders, as applicable.

All non-critical new construction or substantial improvement of structures in a Special Flood Hazard Area must, at a minimum, apply the flood elevations of the Federal Flood Risk Management Standard's Freeboard Value Approach unless doing so would cause the project to be unable to meet applicable program cost-effectiveness requirements. All other types of projects may choose to apply the flood elevations of the Federal Flood Risk Management Standard's Freeboard Value Approach. See [Executive Order \(EO\) 14030, Climate-Related Financial Risk](#) and [FEMA Policy #-206-21-0003, Partial Implementation of the Federal Flood Risk Management Standard for Hazard Mitigation Assistance Programs \(Interim\)](#).

The Grant Programs Directorate (GPD) manages and administers FEMA's preparedness and non-disaster grants and consolidates the grant business operations, systems, training, policy, and oversight of all FEMA grants. All GPD actions, including grant-funded actions, must comply with National Flood Insurance Program criteria or any more restrictive federal, state, or local floodplain management standards or building code (44 CFR § 9.11(d)(6)). All GPD-funded non-critical actions in 1% annual chance floodplains (also known as 100-year floodplains) that involve new construction or substantial improvement of structures must be elevated, at a minimum, to the lower of:

- Two feet above the 1% annual chance flood elevation (also known as the base flood elevation), in accordance with the Federal Flood Risk Management Standard (FFRMS) "Freeboard Value Approach" (FVA); or
- The 0.2% annual chance flood elevation. Where 0.2% annual chance flood elevations are not available, such actions must be elevated to at least two feet above the 1% annual chance flood elevation.

All GPD-funded critical actions in 0.2% annual chance floodplains (also known as 500-year floodplains) that involve new construction or substantial improvement of structures must be elevated, at a minimum, to the higher of:

- Three feet above the 1% annual chance flood elevation; or
- The 0.2% annual chance flood elevation. Where 0.2% annual chance flood elevations are not available, such actions must be elevated to at least three feet above the 1% annual chance flood elevation.

See [Executive Order \(EO\) 11988, Floodplain Management](#), as amended by [EO 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input](#).

Recipients and subrecipients proposing projects that have the potential to impact the environment, including, but not limited to, the construction of communication towers, modification or renovation of existing buildings, structures, and facilities, new construction, including replacement of facilities, and some training activities, must participate in the FEMA EHP review process. The EHP review process involves the submission of a detailed project description along with any supporting documentation requested by FEMA in order to determine whether the proposed project has the potential to impact environmental resources or historic properties.

In some cases, FEMA is also required to consult with other regulatory agencies and the public in order to complete the review process. The EHP review process must be completed before funds are released to carry out the proposed project; otherwise, FEMA may not be able to fund the project due to noncompliance with EHP laws, Executive Orders, regulations, and policies.

DHS and FEMA EHP policy is found in directives and instructions available on [Environmental and Historic Preservation Guidance for FEMA Grant Applications](#), the FEMA website page that includes

documents regarding EHP responsibilities and program requirements, including implementation of the National Environmental Policy Act and other EHP regulations and Executive Orders.

A [GPD EHP screening form](#) and supporting documentation for preparedness projects requiring EHP review should be submitted to gdpehpinfo@fema.dhs.gov. Additionally, all recipients under this funding opportunity are required to comply with the FEMA GPD EHP Policy Guidance, [FEMA Policy #108-023-1, Grant Programs Directorate Environmental and Historic Preservation Policy Guidance](#).

[Executive Order \(EO\) 13985, Advancing Racial Equity and Support for Underserved Communities through the Federal Government](#), rearticulates and strengthens the environmental justice framework articulated in 1994 in [EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations](#). Specifically, Section 1 of E.O. 13985 states that:

“Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systemic approach to embedding fairness in decision-making processes, executive departments and agencies...must recognize and work to redress inequalities in their policies and programs that serve as barriers to equal opportunity.”

Many projects funded by GPD’s grant programs can have significant impacts on environmental justice. In particular, construction of buildings and other structures and construction of new communication towers may have disproportionately high and adverse effects on minority and low-income populations. FEMA acknowledges the important role that FEMA recipients and subrecipients play in advancing and achieving environmental justice by identifying low-income and minority populations within a proposed project’s affected area as early as possible and taking steps to accommodate these interests.

For consistency with the Administration’s policy, FEMA will review and evaluate potential projects for racial equity and justice concerns. If FEMA determines that a proposed project would have a disproportionately high and adverse effect on minority or low-income populations, FEMA will consult with recipients and subrecipients to discuss the feasibility of revising the scope of work to avoid these adverse impacts, or otherwise applying mitigation measures to alleviate these effects. In addition, FEMA may work with other recipients and subrecipients to solicit public input on the proposed projects for a more informed decision-making process. To learn more about how FEMA environmental justice responsibilities might affect your project, go to [Executive Order 12898: Environmental Justice | FEMA.gov](#).

National Incident Management System (NIMS) Implementation

NIMS guides all levels of government, nongovernmental organizations (NGO), and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System.

The *NIMS Implementation Objectives for Local, State, Tribal, and Territorial Jurisdictions* clarify the NIMS implementation requirements in FEMA preparedness grant NOFOs. As recipients and subrecipients of federal preparedness (non-disaster) grant awards, jurisdictions and organizations must achieve, or be actively working to achieve, all of the NIMS Implementation Objectives. The objectives can be found on the NIMS webpage at [NIMS Implementation and Training | FEMA.gov](#).

Emergency management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment, and/or supplies) to meet incident needs. NIMS defines a national, interoperable approach for sharing resources, coordinating, and managing incidents, and communicating information. Incident management refers to how incidents are managed across all homeland security activities, including prevention, protection, mitigation, response, and recovery. Utilization of the

standardized resource management concepts such as typing, credentialing, and inventorying promote a strong national mutual aid capability needed to support the delivery of core capabilities. Additional information on resource management, NIMS resource typing definitions, job titles, and position qualifications is available at [NIMS Components - Guidance and Tools | FEMA.gov](#). Please also see the individual program appendices in this Manual for additional requirements regarding NIMS implementation for specific programs.

FEMA developed the [NIMS Guideline for the National Qualification System](#) (NQS) to describe national credentialing standards and to provide written guidance regarding the use of those standards. This guideline describes credentialing and typing processes and identifies tools that Federal Emergency Response Officials and emergency managers at all levels of government may use both routinely and to facilitate multijurisdictional coordinated responses. Starting in FY 2023, EMPG program recipients are required to use EMPG Program funds to support NQS implementation efforts.

Additional information about NIMS in general is available on FEMA's website at [National Incident Management System | FEMA.gov](#).

The NQS doctrine promotes interoperability by establishing a common language for defining job titles and by enabling jurisdictions and organizations to plan for, request, and have confidence in the capabilities of personnel deployed for disasters and emergencies from other entities through mutual aid agreements and compacts. Following the concepts and processes in this Guideline will enhance national preparedness by expanding the network of qualified incident management and support personnel who can be deployed nationwide.

Additional information about NIMS implementation is available at [NIMS Implementation and Training | FEMA.gov](#).

FirstNet

The Middle-Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, as amended (codified in part at 47 U.S.C. §§ 1401-1473) established the First Responder Network Authority (hereinafter FirstNet Authority) as an independent authority within the National Telecommunications and Information Administration (NTIA). 47 U.S.C. § 1424(a). The FirstNet Authority's statutory mission is to establish a nationwide public safety broadband network (FirstNet). 47 U.S.C. § 1426(b). FirstNet uses the 700 MHz D block spectrum to provide Long-Term Evolution (LTE)-based broadband services and applications to public safety entities. 47 U.S.C. §§ 1401(2), 1421(a). FirstNet became operational in March 2018 and is based on a single, national network architecture that evolves with technological advances and consists of a physically separate evolved packet core (EPC) network and radio access networks (RANs).

FirstNet provides public safety entities with mission-critical broadband data capabilities and services including, but not limited to messaging, image sharing, video streaming, group text, voice, data storage, application, location-based services, and Quality of Service, Priority, and Preemption. Public safety entities seeking to enhance their operational capabilities using broadband technology may seek grant funding from appropriate programs to support the following:

- Planning for integration of information technology (IT) infrastructure, software, and site upgrades necessary to connect to FirstNet;
- Handheld broadband devices including smartphones, feature phones, tablets, wearables, push-to-talk (PTT) devices;
- Vehicle-mounted or otherwise field operated data devices, such as ruggedized laptops;

- Network access devices, including portable Wi-Fi devices, Universal Serial Bus (USB) modems/dongles, trunk-mounted modems, routers;
- Customer-Owned and Managed (COAM) broadband deployable equipment, enabling public safety to own and dispatch coverage expansion or capacity enhancement equipment within their jurisdiction;
- Broadband device accessories that enable efficient and safe public safety operations such as headsets, belt clips, earpieces, remote Bluetooth sensors, ruggedized cases;
- Subscriber Identification Modules (SIMs)/Universal Integrated Circuit Cards (UICCs) to allow public safety users to update existing devices to operate on public safety prioritized services; and
- One-time purchase and subscription-based applications for public safety use which could include, among several other options, enterprise mobility management (EMM), mobile device management (MDM), mobile Virtual Private Network (VPN), identity services, or cloud service tools.

As FirstNet is built out in all 56 states and territories, and coverage and capacity for first responders expands, recipients are strongly encouraged to coordinate with the Statewide Interoperability Coordinator (SWIC) and FirstNet on the planning, deployment timelines, and operational availability of the network deployment within a specific state or territory, and to ensure that project does not conflict with network planning efforts and complies with all technical requirements. FirstNet requires participating agencies to demonstrate a subscription to public safety-prioritized broadband services to purchase FirstNet broadband devices or applications. Recipients must coordinate with FirstNet in advance of any strategic acquisition of broadband LTE equipment to ensure that purchases adhere to all applicable standards for public safety entities. Recipients with questions on FirstNet should contact info@firstnet.gov. Please also refer to the most recent [SAFECOM Guidance on Emergency Communications Grants](#) for additional guidance.

SAFECOM Guidance Compliance

All entities using preparedness grant funding to support emergency communications investments are required to comply with the [SAFECOM Guidance on Emergency Communications Grants \(SAFECOM Guidance\)](#). The SAFECOM Guidance provides current information on emergency communications policies, eligible costs, best practices, and technical standards for SLTT recipients investing federal funds in emergency communications projects. It is also designed to promote and align with the National Emergency Communications Plan (NECP). Compliance with the SAFECOM Guidance helps ensure that federally funded investments are compatible, interoperable, resilient, and support national goals and objectives for improving emergency communications. Applicants should use the SAFECOM Guidance during planning, development, and implementation of emergency communications projects and in conjunction with other planning documents (e.g., Statewide Communication Interoperability Plans (SCIP)). Specifically, Appendix D of the SAFECOM Guidance contains compliance instructions for FEMA grant recipients.

Emergency communications investments also will be reviewed jointly by FEMA and the Cybersecurity and Infrastructure Security Agency (CISA) to verify compliance with SAFECOM Guidance. FEMA will coordinate directly with the recipient on any compliance concerns and will provide technical assistance as necessary to help ensure full compliance.

Post-Award Management and Implementation

Reporting

Recipients are required to submit various financial and programmatic reports as a condition of award acceptance. Future awards and funds drawdown may be withheld if these reports are delinquent.

Consultants or contractors are not permitted to be the AOR or the SA of the recipient. The AOR, as the Authorized Official for the award, is responsible for submitting programmatic and financial performance reports, accepting award packages, signing assurances and certifications, and submitting award amendments.

Federal Financial Reporting Requirements

Federal Financial Report (FFR)

Recipients must report obligations and expenditures to FEMA on a quarterly basis through the FFR form (SF-425). Recipients may review the FFR Form (SF-425) at [Post-Award Reporting Forms | Grants.gov](#). Recipients must file the FFR electronically using the Payment and Reporting Systems ([PARS](#)).

Financial Reporting Periods and Due Dates

An FFR must be submitted quarterly throughout the period of performance (POP), including partial calendar quarters, as well as in periods where no grant award activity occurs. The final FFR is due within 120 days after the end of the POP. Future awards and fund drawdowns may be withheld if these reports are delinquent, demonstrate a lack of progress, or are insufficient in detail.

Except for the final FFR due at 120 days after the end of the POP for purposes of closeout, the following reporting periods and due dates apply for the FFR:

FFR Reporting Period	Report Due Date
October 1 – December 31	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

Because of a system limitation, if at the end of the POP a recipient still has funds to draw down, PARS requires an FFR be submitted within 30 days of the end of the POP in order to access those funds. In that case, the recipient will need to submit an FFR within 30 days of the end of the POP in addition to the final FFR within 120 days of the end of the POP. All other recipients who do not need to draw down funds after the end of the POP are only required to submit the final FFR within 120 days after the end of the POP.

Program Performance Reporting Requirements

Performance Progress Report (PPR)

Recipients are responsible for providing updated performance reports on a biannual basis as an attachment in ND Grants. The PPR should include the following:

- A brief narrative of overall project(s) status;
- A summary of project expenditures; and
- A description of any potential issues that may affect project completion.

Note: This requirement does NOT apply to the EMPG Program, which has different performance reporting requirements. These are described in the EMPG Program Appendix in this Manual.

Program Performance Reporting Periods and Due Dates

The following reporting periods and due dates apply for the PPR:

Reporting Period	Report Due Date
January 1 – June 30	July 30
July 1 – December 31	January 30

Additional Programmatic Reporting Requirements and Information

Biannual Strategy Implementation Report (BSIR)²

In addition to the quarterly financial and biannual performance progress reports, recipients are responsible for completing and submitting BSIRs through the [Grants Reporting Tool](#) (GRT). The BSIR is due within 30 days after the end of the reporting period: July 30 for the reporting period of January 1 through June 30 (summer BSIR report); and January 30 for the reporting period of July 1 through December 31 (winter BSIR report). All required attributes of each project must be included. Updated obligations, expenditures, and significant developments must be provided within the BSIR to show the progress of implementation for every project as well as how expenditures support Planning, Organization, Equipment, Training, and Exercises (POETE). The first BSIR will be due by January 30, or 30 days after the end of the first reporting period of the award. Subsequent BSIR reports will require recipients to report on a project-by-project basis.

Recipients also are responsible for completing and submitting a closeout BSIR. When an award’s POP or the liquidation period ends in the middle of a reporting period, a “regular” BSIR must be submitted with full accounting of actual project information/expenditures before a Closeout BSIR can be created/ submitted. The last “regular” BSIR is required because the Closeout BSIR does NOT contain full functionality to edit any project information/expenditures. Once the last “regular” BSIR is approved by GPD, the Closeout BSIR can be created/submitted. Please contact your HQ Preparedness Officer for guidance on the information required for the Closeout BSIR.

Closeout Reporting Requirements

Within 120 days after the end of the POP for the prime award or after an amendment has been issued to close out an award before the original POP ends, whichever occurs first, recipients must liquidate all financial obligations and submit the following documentation in ND Grants:

1. The final request for payment, if applicable;
2. The final FFR (SF-425);
3. The final PPR;

² BSIR requirements are applicable to the following grant programs: HSGP (SHSP, UASI, and OPSG), THSGP, EMPG, and NSGP.

4. A qualitative narrative summary of the impact of those accomplishments throughout the entire POP submitted to the respective FEMA Preparedness Officer; and
5. Other documents required by program guidance, NOFOs, appendices to this Manual, terms and conditions of the award, or other FEMA guidance.

In addition, any recipient that issues subawards to any subrecipient is responsible for closing out those subawards as described in 2 C.F.R. § 200.344; subrecipients are still required to submit closeout materials within 90 days of the subaward POP end date. When a subrecipient completes all closeout requirements, pass-through entities must promptly complete all closeout actions for subawards in time for the recipient to submit all necessary documentation and information to FEMA during the closeout of their prime award.

After the prime award closeout reports have been reviewed and approved by FEMA, a closeout notice will be completed to close out the grant. The notice will indicate the POP as closed, list any remaining funds that will be deobligated, and address the requirement of maintaining the award records for at least three years from the date of the final FFR. The record retention period may be longer than three years due to an audit, litigation, for equipment or real property used beyond the period of performance or other circumstances outlined in 2 C.F.R. § 200.334.

Recipients are responsible for refunding to FEMA any balances of unobligated cash that FEMA paid that are not authorized to be retained per 2 C.F.R. § 200.344(d).

Administrative Closeout

Administrative closeout is a mechanism for FEMA to unilaterally move forward with closeout of an award using available award information in lieu of final reports from the recipient per 2 C.F.R. § 200.344(h)-(i). It is a last resort available to FEMA, and **if FEMA needs to administratively close an award, this may negatively impact a recipient's ability to obtain future funding**. This mechanism can also require FEMA to make cash or cost adjustments and ineligible cost determinations based on the information it has, which may result in identifying a debt owed to FEMA by the recipient.

When a recipient is not responsive to FEMA's reasonable efforts to collect required reports needed to complete the standard closeout process, FEMA is required under 2 C.F.R. § 200.344(h) to start the administrative closeout process within the regulatory timeframe. FEMA will make at least three written attempts to collect required reports before initiating administrative closeout. If the recipient does not submit all required reports in accordance with 2 C.F.R. § 200.344, the relevant program NOFO, this Manual, and the terms and conditions of the award, FEMA must proceed to administratively close the award with the information available within one year of the POP end date. Additionally, if the recipient does not submit all required reports within one year of the POP end date, per 2 C.F.R. § 200.344(i), FEMA must report in FAPIIS the recipient's material failure to comply with the terms and conditions of the award.

If FEMA administratively closes an award where no final FFR has been submitted, FEMA uses that administrative closeout date in lieu of the final FFR submission date as the start of the three-year record retention period under 2 C.F.R. § 200.334.

In addition, if an award is administratively closed, FEMA may decide to impose remedies for noncompliance per 2 C.F.R. § 200.339, consider this information in reviewing future award applications, or apply special conditions to existing or future awards.

Disclosing Information per 2 C.F.R. § 180.335

This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with FEMA, the recipient must notify FEMA if it knows if it or any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335:

- Are presently excluded or disqualified;
- Have been convicted within the preceding three years of any of the offenses listed in 2 C.F.R. § 180.800(a) or had a civil judgment rendered against it or any of the recipient's principals for one of those offenses within that time period;
- Are presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses listed in 2 C.F.R. § 180.800(a); or
- Have had one or more public transactions (federal, state, or local) terminated within the preceding three years for cause or default.

At any time after accepting the award, if the recipient learns that it or any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to FEMA in accordance with 2 C.F.R. § 180.350.

Reporting of Matters Related to Recipient Integrity and Performance

Per 2 C.F.R. Part 200, Appendix I § F.3, the additional post-award reporting requirements in 2 C.F.R. Part 200, Appendix XII may apply to applicants who, if upon becoming recipients, have a total value of currently active grants, cooperative agreements, and procurement contracts from all federal awarding agencies that exceeds \$10 million for any period of time during the POP of an award under these funding opportunities.

Recipients that meet these criteria must maintain current information reported in FAPIIS about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII at the reporting frequency described in paragraph 4 of Appendix XII.

Single Audit Report

For audits of fiscal years beginning on or after December 26, 2014, recipients that expend \$750,000.00 or more from all federal funding sources during their fiscal year are required to submit an organization-wide financial and compliance audit report, also known as a "single audit" report.

The audit must be performed in accordance with the requirements of the U.S. Government Accountability Office's (GAO) Government Auditing Standards, located at [Yellow Book | U.S. GAO](#), and the requirements of Subpart F of 2 C.F.R. Part 200, located at [eCFR :: 2 CFR Part 200 Subpart F -- Audit Requirements](#).

Additional Information

Monitoring and Oversight

Overview

Per 2 C.F.R. § 200.337, FEMA, through its authorized representatives, has the right, at all reasonable times, to make site visits or conduct desk reviews to review project accomplishments and management control systems in order to evaluate award progress and to provide any required technical assistance. During site visits or desk reviews, FEMA will review recipients' files related to the award. As part of any monitoring and program evaluation activities, recipients must permit FEMA, upon reasonable notice, to review grant-related records and to interview the organization's staff and contractors regarding the program. Recipients must respond in a timely and accurate manner to FEMA requests for information relating to the award.

Effective monitoring and oversight help FEMA ensure that recipients use grant funds for their intended purpose(s), verify that projects undertaken are consistent with approved plans, and ensure that recipients make adequate progress towards stated goals and objectives. Additionally, monitoring serves as the primary mechanism to ensure that recipients comply with applicable laws, rules, regulations, program guidance, and requirements. FEMA regularly monitors all grant programs both financially and programmatically in accordance with federal laws, regulations (including 2 C.F.R. Part 200), program guidance, and the terms and conditions of the award. All monitoring efforts ultimately serve to evaluate progress towards grant goals and proactively target and address issues that may threaten grant success during the period of performance.

FEMA staff will periodically monitor recipients to ensure that administrative processes, policies and procedures, budgets, and other related award criteria are meeting Federal Government-wide and FEMA regulations. Aside from reviewing quarterly financial and programmatic reports, FEMA may also conduct enhanced monitoring through desk-based reviews, onsite monitoring visits, or both. Enhanced monitoring will involve the review and analysis of financial compliance and administrative processes, policies, activities, and other attributes of each federal assistance award, and it will identify areas where the recipient may need technical assistance, corrective actions, or other support.

Financial and programmatic monitoring are complementary processes within FEMA's overarching monitoring strategy that function together to ensure effective grants management, accountability, and transparency; validate progress against grant and program goals; and safeguard federal funds against fraud, waste, and abuse. Financial monitoring primarily focuses on statutory and regulatory compliance with administrative grant requirements, while programmatic monitoring seeks to validate and assist in grant progress, targeting issues that may be hindering project goals and ensuring compliance with the purpose of the grant and grant program. Both monitoring processes are similar in that they feature initial reviews of all open awards, and in-depth monitoring of grants requiring additional attention.

Recipients and subrecipients who are pass-through entities are responsible for monitoring their subrecipients in a manner consistent with the terms of the federal award at 2 C.F.R. Part 200, including 2 C.F.R. § 200.332. This includes the pass-through entity's responsibility to monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

In terms of overall award management, recipient and subrecipient responsibilities include, but are not limited to accounting of receipts and expenditures, cash management, maintaining adequate financial

records, reporting, and refunding expenditures disallowed by audits, monitoring if acting as a pass-through entity, other assessments and reviews, and ensuring overall compliance with the terms and conditions of the award or subaward, as applicable, including the terms of 2 C.F.R. Part 200.

Financial Monitoring Overview and Approach

FEMA’s approach to financial monitoring provides a standard monitoring framework that promotes consistent processes across all monitoring staff. There are four core components of the monitoring process:

1. **Monitoring Assessment:** Monitoring staff measure each grant’s monitoring needs using a system of pre-determined evaluation criteria. The criteria help assess the recipient and potential challenges to the success of the grant award.
2. **Monitoring Selection and Scheduling:** Monitoring staff make selection and scheduling decisions in accordance with applicable statutory requirements, such as the *Homeland Security Act of 2002*, as amended (hereafter “HSA”), and consider the results of the monitoring assessment process.
3. **Monitoring Activities:** Monitoring activities include cash analysis, desk reviews, and site visits. Grants Management Specialists are responsible for conducting quarterly or semi-annual reviews of all grants via cash analysis. Desk reviews and site visits are additional monitoring activities conducted on grants where the monitoring assessment process identified the need for additional monitoring and validated the use of FEMA resources for these activities.
4. **Post-Monitoring Actions:** Monitoring staff may follow up with recipients via post-monitoring actions based on the outcomes of monitoring activities. Post-monitoring actions include conducting additional monitoring; reviewing Corrective Action Plans (CAP) and monitoring the progress of CAP deliverables; documenting the resolution of identified corrective actions and issues; providing technical assistance and recipient training; and debt collection.

In addition to the monitoring guidance outlined above, section 2022(a)(2)(A) of the HSA mandates the frequency of monitoring activities for applicable preparedness grants. The applicable section of the HSA reads as follows:

Not less than once every 2 years, the Administrator shall conduct, for each state and high-risk urban area receiving a grant administered by the Department, a programmatic and financial review of all grants awarded by the Department to prevent, prepare for, protect against, or respond to natural disasters, acts of terrorism, or other man-made disasters, excluding assistance provided under section 203, title IV, or title V of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5133, 5170 et seq., and 5191 et seq.).

The following preparedness grant programs covered by this Manual are subject to HSA monitoring requirements:

- HSGP
 - SHSP
 - UASI
 - OPSG
- NSGP
- TSGP

- PSGP
- EMPG Program

Standard Monitoring Activity: Cash Analysis

Through cash analysis, a Grants Management Specialist assesses and reports on the recipients’ cash-on-hand, expenditures, and unliquidated obligations; gauges potential cost share shortfalls; cash on hand issues; and spend down activities within the POP. The analysis reconciles and compares grant disbursement records with the recipient submitted FFR. This process identifies recipients that may require additional monitoring due to issues identified with drawdowns or FFR submissions.

Enhanced Monitoring Activities: Desk Review, Site Visit

Desk reviews and site visits are two forms of additional monitoring that FEMA conducts on a recipient. Table 1 defines the key differences and similarities.

Table 1 - Enhanced Financial Monitoring Activities (Desk Review and Site Visit)

Attribute	Desk Review	Site Visit
Location/ Logistics	A detailed, paper-based review and evaluation conducted at a FEMA office. Desk reviews do not require travel.	A visit by FEMA grants management staff conducted at the site of the recipient’s operations and/or selected performance sites. Site visits may require travel.
Materials Reviewed	Required reports, correspondence, and other documentation, including policies and procedures, to substantiate compliance. Additional documentation available remotely may include information available through the grant file, financial reports, interviews, and other documentation and correspondence to verify compliance.	Includes documents listed under the desk review in addition to all applicable documents and required reports necessary to assess recipient capability and progress, validate records, and substantiate compliance with laws, regulations, and policies.
Goal of Monitoring Activity	<p>The goals of FEMA’s financial desk review monitoring activities are, as applicable, to:</p> <ul style="list-style-type: none"> • Review grant files to verify compliance, conduct interviews to confirm adherence to approved program plans, and confirm equipment acquisition, allowable use, and inventory controls; • Document that recipient institutions possess adequate internal controls, policies, processes, and systems to manage FEMA grants effectively; • Assist the recipient with the grant process and provide guidance to improve recipient administrative efficiencies; • Identify and analyze relevant 	<p>The goals of FEMA’s financial site visit monitoring activities are, as applicable, to:</p> <ul style="list-style-type: none"> • Review grant files to verify compliance, conduct interviews to confirm adherence to approved program plans, and confirm equipment acquisition, allowable use, and inventory controls; • Document that recipient institutions possess adequate internal controls, policies, processes, and systems to manage FEMA grants effectively; • Assist the recipient with the grant process and provide guidance to improve recipient administrative efficiencies; • Identify and analyze relevant problems that might prevent the program from achieving its

Attribute	Desk Review	Site Visit
	<p>problems that might prevent the program from achieving its internal and external objectives; and</p> <ul style="list-style-type: none"> • Provide technical assistance. 	<p>internal and external objectives; and</p> <ul style="list-style-type: none"> • Provide technical assistance.

Programmatic Monitoring Overview and Approach

Programmatic monitoring involves oversight throughout the award lifecycle in order for FEMA to verify that programs and projects undertaken by recipients are consistent with approved plans and comply with applicable laws, regulations, program guidance, and the terms and conditions of the award.

FEMA’s monitoring approach complies with the monitoring requirements described in section 2022 of the HSA. Programmatic monitoring also plays an important role in ensuring that FEMA preparedness grant funding builds and sustains capabilities at the SLTT levels that advance the National Preparedness Goal. Programmatic monitoring also is an opportunity for FEMA staff to build relationships with recipients and to work collaboratively to identify and mitigate factors that may impede programmatic performance.

Programs covered by this Manual that are included in the programmatic monitoring approach are listed below, including the programs subject to section 2022 of the HSA and three additional programs (THSGP, IPR, and IBSGP):

- HSGP
 - SHSP
 - UASI
 - OPSG
- NSGP
- THSGP
- TSGP
- IPR
- IBSGP
- PSGP
- EMPG Program

FEMA uses a risk- and project-based programmatic monitoring framework for its preparedness grant programs that is designed for data-driven grants management, and which interacts seamlessly with other aspects of the grant lifecycle. FEMA uses monitoring as a vehicle to validate data previously self-reported by recipients in applications and reporting tools. FEMA does not utilize monitoring as a data collection tool in and of itself. By specializing monitoring in this way, FEMA avoids duplicative data collection, targets its resources more effectively, and provides stronger and more proactive technical assistance to its recipients. The framework also comprehensively documents grant management decisions for resource allocation.

This programmatic monitoring approach establishes baseline monitoring of all open awards across the FEMA preparedness grant portfolio using a First Line Review (FLR). The FLR identifies recipients and awards with a high potential for noncompliance with regulations or failure to meet project objectives. The FLR uses quantifiable measures (criteria) to prioritize and rank recipients and awards according to identified risks that threaten the success of FEMA’s preparedness grant awards. Results of this prioritization process determine which high-risk recipients and awards will receive advanced monitoring.

Post-monitoring actions document and communicate findings and recommendations for resolution to the recipients and FEMA leadership and allow for increasingly cohesive programmatic and financial monitoring processes.

Case Studies and Use of Grant-Funded Resources During Real-World Incident Operations

Analyzing the use of grant-funded investments in real-world incidents will improve the ability of FEMA and its SLTT partners to assess the effectiveness of these investments and to better understand how grant funds support improvements in nationwide capability levels. Currently, FEMA conducts case studies with a limited number of grant recipients each year to explore how jurisdictions prioritize grant investments based on risk and capability assessments, and the ways specific investments improve SLTT preparedness ([Preparedness Grants Case Studies | FEMA.gov](#)). By accepting the award, the recipient agrees to participate in a case study or evaluation if requested.

Termination Provisions

FEMA may terminate a federal award in whole or in part for one of the following reasons. FEMA and the recipient must still comply with closeout requirements at 2 C.F.R. §§ 200.344-200.345 even if an award is terminated in whole or in part. To the extent that subawards are permitted under the respective program's NOFO, pass-through entities should refer to 2 C.F.R. § 200.340 for additional information on termination regarding subawards.

1. **Noncompliance.** If an applicant fails to comply with the terms and conditions of a federal award, FEMA may terminate the award in whole or in part. If the noncompliance can be corrected, FEMA may first attempt to direct the recipient to correct the noncompliance. This may take the form of a Compliance Notification. If the noncompliance cannot be corrected or the recipient is non-responsive, FEMA may proceed with a Remedy Notification, which could impose a remedy for noncompliance per 2 C.F.R. § 200.339, including termination. Any action to terminate based on noncompliance will follow the requirements of 2 C.F.R. §§ 200.341-200.342 as well as the requirement of 2 C.F.R. § 200.340(c) to report in FAPIIS the recipient's material failure to comply with the award terms and conditions. See also the section on Actions to Address Noncompliance.
2. **With the Consent of the Recipient.** FEMA may also terminate an award in whole or in part with the consent of the recipient, in which case the parties must agree upon the termination conditions, including the effective date, and in the case of partial termination, the portion to be terminated.
3. **Notification by the Recipient.** The recipient may terminate the award, in whole or in part, by sending written notification to FEMA setting forth the reasons for such termination, the effective date, and in the case of partial termination, the portion to be terminated. In the case of partial termination, FEMA may determine that a partially terminated award will not accomplish the purpose of the federal award, so FEMA may terminate the award in its entirety. If that occurs, FEMA will follow the requirements of 2 C.F.R. §§ 200.341-200.342 in deciding to fully terminate the award.

Period of Performance (POP) Extensions

Extensions to the POP for programs addressed in this Manual are allowed under limited circumstances. Extensions to the initial POP identified in the award will only be considered through formal, written requests to the recipient's FEMA Preparedness Officer or Program Manager and must contain specific

and compelling justifications as to why an extension is required. Recipients are advised to coordinate with their FEMA Preparedness Officer or Program Manager as needed when preparing an extension request.

All extension requests must address the following:

1. The grant program, fiscal year, and award number;
2. Reason for the delay—including details of the legal, policy, or operational challenges that prevent the final outlay of awarded funds by the deadline;
3. Current status of the activity(ies);
4. Approved POP termination date and new project completion date;
5. Amount of funds drawn down to date;
6. Remaining available funds, both federal and, if applicable, non-federal;
7. Budget outlining how remaining federal and, if applicable, non-federal funds will be expended;
8. Plan for completion, including milestones and timeframes for achieving each milestone and the position or person responsible for implementing the plan for completion; and
9. Certification that the activity(ies) will be completed within the extended POP without any modification to the original statement of work, as described in the investment justification and as approved by FEMA.

Extension requests will be granted only due to compelling legal, policy, or operational challenges. Extension requests will only be considered for the following reasons:

- Contractual commitments by the recipient or subrecipient with vendors prevent completion of the project within the existing POP;
- The project must undergo a complex environmental review that cannot be completed within the existing POP;
- Projects are long-term by design, and therefore acceleration would compromise core programmatic goals; or
- Where other special or extenuating circumstances exist.

Recipients should submit all proposed extension requests to FEMA for review and approval at least 120 days prior to the end of the POP to allow sufficient processing time. Extensions are typically granted for no more than a six-month period. Recipients are advised to coordinate with their FEMA Preparedness Officer or Program Manager as needed when preparing an extension request.

Disability Integration

Pursuant to Section 504 of the Rehabilitation Act of 1973, recipients of FEMA financial assistance must ensure that their programs and activities do not discriminate against otherwise qualified individuals with disabilities.

Preparedness grant recipients should engage with the whole community to advance individual and community preparedness and to work as a nation to build and sustain resilience. In doing so, recipients are encouraged to consider the needs of individuals with disabilities into the activities and projects funded by the grant.

FEMA expects that the integration of the needs of people with disabilities will occur at all levels, including planning; alerting, notification, and public outreach; training; purchasing of equipment and supplies; protective action implementation; and exercises/drills.

The following are examples that demonstrate the integration of the needs of people with disabilities in carrying out FEMA awards:

- Include representatives of organizations that work with/for people with disabilities on planning committees, work groups and other bodies engaged in development and implementation of the grant programs and activities.
- Hold all activities related to the grant in locations that are accessible to persons with physical disabilities to the extent practicable.
- Acquire language translation services, including American Sign Language, that provide public information across the community and in shelters.
- Ensure shelter-specific grant funds are in alignment with FEMA's [Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters](#).
- If making alterations to an existing building to a primary function area utilizing federal funds, complying with the most recent codes and standards, and making path of travel to the primary function area accessible to the greatest extent possible.
- Implement specific procedures used by public transportation agencies that include evacuation and passenger communication plans and measures for individuals with disabilities.
- Identify, create, and deliver training to address any training gaps specifically aimed toward whole-community preparedness. Include and interact with individuals with disabilities, aligning with the designated program capability.
- Establish best practices in inclusive planning and preparedness that consider physical access, language access, and information access. Examples of effective communication access include providing auxiliary aids and services such sign language interpreters, Computer Aided Real-time Translation (CART), and materials in Braille or alternate formats.

FEMA grant recipients can fund projects towards the resiliency of the whole community, including people with disabilities, such as training, outreach, and safety campaigns, provided that the project aligns with the applicable NOFO, this Manual, the applicable appendix to this Manual, and the terms and conditions of the award. For specific guidelines on funding a disability inclusive project, please refer to the program-specific appendix in this Manual.

Conflicts of Interest in the Administration of Federal Awards or Subawards

For conflicts of interest under grant-funded procurements and contracts, refer to the section on Procurement Integrity in the applicable NOFO, this Manual, and 2 C.F.R. §§ 200.317 – 200.327.

To eliminate and reduce the impact of conflicts of interest in the subaward process, recipients and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making subawards. Recipients and pass-through entities are also required to follow any applicable federal or SLTT statutes or regulations governing conflicts of interest in the making of subawards.

The recipient or pass-through entity must disclose to the respective Preparedness Officer or Program Manager, in writing, any real or potential conflict of interest that may arise during the administration of the federal award, as defined by the federal or SLTT statutes or regulations or their own existing policies, within five days of learning of the conflict of interest. Similarly, subrecipients, whether acting as subrecipients or as pass-through entities, must disclose any real or potential conflict of interest to the

recipient or next-level pass-through entity as required by the recipient or pass-through entity's conflict of interest policies, or any applicable federal or SLTT statutes or regulations.

Conflicts of interest may arise during the process of FEMA making a federal award in situations where an employee, officer, or agent, any members of his or her immediate family, his or her partner has a close personal relationship, a business relationship, or a professional relationship, with an applicant, subapplicant, recipient, subrecipient, or FEMA employees.

Procurement Integrity

Through audits conducted by the DHS Office of Inspector General (OIG) and FEMA grant monitoring, findings have shown that some FEMA recipients have not fully adhered to the proper procurement requirements when spending grant funds. Anything less than full compliance with federal procurement requirements jeopardizes the integrity of the grant, as well as the grant program. To assist with determining whether an action is a procurement or instead a subaward, please consult 2 C.F.R. § 200.331. For detailed guidance on the federal procurement standards, recipients and subrecipients should refer to various materials issued by FEMA's Procurement Disaster Assistance Team (PDAT), such as the [PDAT Field Manual](#) and [Contract Provisions Guide](#). Additional resources, including an upcoming trainings schedule, can be found on the PDAT Website [Contracting with Federal Funds for Goods and Services Before, During and After Disasters | FEMA.gov](#).

The below highlights the federal procurement requirements for FEMA recipients when procuring goods and services with federal grant funds. FEMA will include a review of recipients' procurement practices as part of the normal monitoring activities. **All procurement activity must be conducted in accordance with federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327.** Select requirements under these standards are listed below. The recipient and any of its subrecipients must comply with all requirements, even if they are not listed below.

Under 2 C.F.R. § 200.317, when procuring property and services under a federal award, states (including territories) must follow the same policies and procedures they use for procurements from their non-federal funds; additionally, states must now follow 2 C.F.R. § 200.321 regarding socioeconomic steps, § 200.322 regarding domestic preferences for procurements, § 200.323 regarding procurement of recovered materials, and § 200.327 regarding required contract provisions.

All other non-federal entities, such as tribes (collectively, non-state entities), must have and use their own documented procurement procedures that reflect applicable SLTT laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in 2 C.F.R. Part 200. These standards include, but are not limited to, providing for full and open competition consistent with the standards of 2 C.F.R. § 200.319 and § 200.320.

Important Changes to Procurement Standards in 2 C.F.R Part 200

OMB recently updated various parts of Title 2 of the Code of Federal Regulations, among them, the procurement standards. States are now required to follow the socioeconomic steps in soliciting small and minority businesses, women's business enterprises, and labor surplus area firms per 2 C.F.R. § 200.321. All non-federal entities should also, to the greatest extent practicable under a federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States per 2 C.F.R. § 200.322. More information on OMB's revisions to the federal procurement standards can be found in [Purchasing Under a FEMA Award: OMB Revisions Fact Sheet](#).

The recognized procurement methods in 2 C.F.R. § 200.320 have been reorganized into informal procurement methods, which include micro-purchases and small purchases; formal procurement methods, which include sealed bidding and competitive proposals; and noncompetitive procurements. The federal micro-purchase threshold is currently \$10,000, and non-state entities may use a lower threshold when using micro-purchase procedures under a FEMA award. If a non-state entity wants to use a micro-purchase threshold higher than the federal threshold, it must follow the requirements of 2 C.F.R. § 200.320(a)(1)(iii)-(v). The federal simplified acquisition threshold is currently \$250,000, and a non-state entity may use a lower threshold but may not exceed the federal threshold when using small purchase procedures under a FEMA award. *See* 2 C.F.R. § 200.1 (citing the definition of simplified acquisition threshold from [48 C.F.R. Part 2, Subpart 2.1](#)).

See 2 C.F.R. §§ 200.216, 200.471, and Appendix II as well as [FEMA Policy #405-143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), the relevant program NOFO, and this Manual regarding prohibitions on covered telecommunications equipment or services.

Competition and Conflicts of Interest

Among the requirements of 2 C.F.R. § 200.319(b) applicable to all non-federal entities other than states, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements in order to ensure objective contractor performance and eliminate unfair competitive advantages. FEMA considers these actions to be an organizational conflict of interest and interprets this restriction as applying to contractors that help a non-federal entity develop its grant application, project plans, or project budget. This prohibition also applies to the use of former employees to manage the grant or carry out a contract when those former employees worked on such activities while they were employees of the non-federal entity.

Under this prohibition, unless the non-federal entity solicits for and awards a contract covering both development and execution of specifications (or similar elements as described above), and this contract was procured in compliance with 2 C.F.R. §§ 200.317 – 200.327, federal funds cannot be used to pay a contractor to carry out the work if that contractor also worked on the development of those specifications. This rule applies to all contracts funded with federal grant funds, including pre-award costs, such as grant writer fees, as well as post-award costs, such as grant management fees.

Additionally, some of the situations considered to be restrictive of competition include but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Organizational conflicts of interest;
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
- Any arbitrary action in the procurement process.

Per 2 C.F.R. § 200.319(c), non-federal entities other than states must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed SLTT geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering services, geographic location may be a selection criterion

provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Under 2 C.F.R. § 200.318(c)(1), non-federal entities other than states are required to maintain written standards of conduct covering conflicts of interest and governing the actions of their employees engaged in the selection, award, and administration of contracts. **No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.** Such conflicts of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-federal entity.

Under 2 C.F.R. § 200.318(c)(2), if the recipient or subrecipient (other than states) has a parent, affiliate, or subsidiary organization that is not a state, local, tribal, or territorial government, the non-federal entity must also maintain written standards of conduct covering organizational conflicts of interest. In this context, organizational conflict of interest means that because of a relationship with a parent company, affiliate, or subsidiary organization, the non-federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. The non-federal entity must disclose in writing any potential conflicts of interest to FEMA or the pass-through entity in accordance with applicable FEMA policy.

Supply Schedules and Purchasing Programs

Generally, a non-federal entity may seek to procure goods or services from a federal supply schedule, state supply schedule, or group purchasing agreement.

General Services Administration Schedules

States, tribes, and local governments, and any instrumentality thereof (such as local education agencies or institutions of higher education), may procure goods and services from a General Services Administration (GSA) schedule. GSA offers multiple efficient and effective procurement programs for state, tribal, and local governments, and instrumentalities thereof, to purchase products and services directly from pre-vetted contractors. The GSA Schedules (also referred to as the Multiple Award Schedules and the Federal Supply Schedules) are long-term government-wide contracts with commercial firms that provide access to millions of commercial products and services at volume discount pricing.

Information about GSA programs for states, tribes, and local governments, and instrumentalities thereof, can be found at [Programs for State and Local Governments | GSA](#) and [State and Local Governments | GSA](#).

For tribes, local governments, and their instrumentalities that purchase off of a GSA schedule, this will satisfy the federal requirements for full and open competition provided that the recipient follows the GSA ordering procedures; however, tribes, local governments, and their instrumentalities will still need to follow the other rules under 2 C.F.R. §§ 200.317 – 200.327, such as solicitation of minority businesses, women’s business enterprises, small businesses, or labor surplus area firms (§ 200.321), domestic preferences (§ 200.322), contract cost and price (§ 200.324), and required contract provisions (§ 200.327 and Appendix II).

Other Supply Schedules and Programs

For non-federal entities other than states, such as tribes, local governments, and nonprofits, that want to procure goods or services from a state supply schedule, cooperative purchasing program, or other similar program, in order for such procurements to be permissible under federal requirements, the following must be true:

- The procurement of the original contract or purchasing schedule and its use by the non-federal entity complies with state and local law, regulations, and written procurement procedures;
- The state or other entity that originally procured the original contract or purchasing schedule entered into the contract or schedule with the express purpose of making it available to the non-federal entity and other similar types of entities;
- The contract or purchasing schedule specifically allows for such use, and the work to be performed for the non-federal entity falls within the scope of work under the contract as to type, amount, and geography;
- The procurement of the original contract or purchasing schedule complied with all the procurement standards applicable to a non-federal entity other than states under at 2 C.F.R. §§ 200.317 – 200.327; and
- With respect to the use of a purchasing schedule, the non-federal entity must follow ordering procedures that adhere to applicable state, tribal, and local laws and regulations and the minimum requirements of full and open competition under 2 C.F.R. Part 200.

If a non-federal entity other than a state seeks to use a state supply schedule, cooperative purchasing program, or other similar type of arrangement, FEMA recommends the recipient discuss the procurement plans with its FEMA Preparedness Officer or Program Manager.

Procurement Documentation

Per 2 C.F.R. § 200.318(i), non-federal entities other than states and territories are required to maintain and retain records sufficient to detail the history of procurement covering at least the rationale for the procurement method, contract type, contractor selection or rejection, and the basis for the contract price. States and territories are encouraged to maintain and retain this information as well and are reminded that in order for any cost to be allowable, it must be adequately documented per 2 C.F.R. § 200.403(g).

Examples of the types of documents that would cover this information include but are not limited to:

- Solicitation documentation, such as requests for quotes, invitations for bids, or requests for proposals;
- Responses to solicitations, such as quotes, bids, or proposals;
- Pre-solicitation independent cost estimates and post-solicitation cost/price analyses on file for review by federal personnel, if applicable;
- Contract documents and amendments, including required contract provisions; and
- Other documents required by federal regulations applicable at the time a grant is awarded to a recipient.

Additional information on required procurement records can be found on pages 24-26 of the [PDAT Field Manual](#).

Financial Assistance Programs for Infrastructure

Build America, Buy America Act

Recipients and subrecipients must comply with the Build America, Buy America Act (BABAA), which was enacted as part of the Infrastructure Investment and Jobs Act §§ 70901-70927, Pub. L. No. 117-58 (2021); and Executive Order 14005, Ensuring the Future is Made in All of America by All of America's Workers. See also [OMB Memorandum M-22-11, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure](#).

None of the funds provided under this program may be used for a project for infrastructure unless the iron and steel, manufactured products, and construction materials used in that infrastructure are produced in the United States.

The Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America preference apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

To see whether a particular FEMA federal financial assistance program is considered an infrastructure program and thus required to include a Buy America preference, please see [Programs and Definitions: Build America, Buy America Act | FEMA.gov](#) and [Build America, Buy America Act Frequently Asked Questions \(FAQs\) | FEMA.gov](#). Additional information is found in [Buy America Preference in FEMA Financial Assistance Programs for Infrastructure, FEMA Interim Policy #207-22-0001](#).

Waivers

When necessary, recipients (and subrecipients through their pass-through entity) may apply for, and FEMA may grant, a waiver from these requirements.

A waiver of the domestic content procurement preference may be granted by the agency awarding official if FEMA determines that:

- Applying the domestic content procurement preference would be inconsistent with the public interest.
- The types of iron, steel, manufactured products, or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality.
- The inclusion of iron, steel, manufactured products, or construction materials produced in the United States will increase the cost of the overall project by more than 25%.

For FEMA awards, the process for requesting a waiver from the Buy America preference requirements can be found on FEMA's website at ["Buy America" Preference in FEMA Financial Assistance Programs for Infrastructure | FEMA.gov](#).

Definitions

Construction materials: an article, material, or supply—other than an item primarily of iron or steel; a manufactured product; cement and cementitious materials; aggregates such as stone, sand, or gravel; or aggregate binding agents or additives—that is or consists primarily of non-ferrous metals, plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables), glass (including optic glass), lumber, paint, and drywall.

Domestic content procurement preference: Means all iron and steel used in the project are produced in the United States; the manufactured products used in the project are produced in the United States; or the construction materials used in the project are produced in the United States.

Federal financial assistance: Generally defined in 2 C.F.R. § 200.1 and includes all expenditures by a federal agency to a non-federal entity for an infrastructure project, except that it does not include expenditures for assistance authorities relating to major disasters or emergencies under sections 402, 403, 404, 406, 408, or 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act relating to a major disaster or emergency declared under section 401 or 501, respectively, or pre and post disaster or emergency response expenditures.

Infrastructure: infrastructure projects which serve a public function, including at a minimum, the structures, facilities, and equipment for, in the United States, roads, highways, and bridges; public transportation; dams, ports, harbors, and other maritime facilities; intercity passenger and freight railroads; freight and intermodal facilities; airports; water systems, including drinking water and wastewater systems; electrical transmission facilities and systems; utilities; broadband infrastructure; and buildings and real property; and structures, facilities, and equipment that generate, transport, and distribute energy.

Produced in the United States means the following for:

- Iron and steel: All manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.
- Manufactured products: The product was manufactured in the United States, and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55% of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation.
- Construction Materials: All manufacturing processes for the construction material occurred in the United States.

Project: is any activity related to the construction, alteration, maintenance, or repair of infrastructure in the United States.

Records Retention

Record Retention Period

Financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to a federal award generally must be maintained for at least three years from the date the final FFR is submitted. *See* 2 C.F.R. § 200.334. Further, if the recipient does not submit a final FFR and the award is administratively closed, FEMA uses the date of administrative closeout as the start of the general record retention period.

The record retention period **may be longer than three years or have a different start date** in certain cases. These include:

- Records for real property and equipment acquired with federal funds must be retained for **three years after final disposition of the property**. *See* 2 C.F.R. § 200.334(c).
- If any litigation, claim, or audit is started before the expiration of the three-year period, the records **must be retained until** all litigation, claims, or audit findings involving the records **have been resolved and final action taken**. *See* 2 C.F.R. § 200.334(a).

- The **record retention period will be extended if the recipient is notified in writing** of the extension by FEMA, the cognizant or oversight agency for audit, or the cognizant agency for indirect costs. *See* 2 C.F.R. § 200.334(b).
- Where FEMA requires recipients to report program income after the period of performance ends, the **program income record retention period begins at the end of the recipient's fiscal year in which program income is earned**. *See* 2 C.F.R. § 200.334(e).
- For indirect cost rate proposals, cost allocation plans, or other rate computations records, the start of the record retention period depends on whether the indirect cost rate documents were submitted for negotiation. If the **indirect cost rate documents were submitted for negotiation, the record retention period begins from the date those documents were submitted** for negotiation. If indirect cost rate documents **were not submitted for negotiation, the record retention period begins at the end of the recipient's fiscal year or other accounting period covered by that indirect cost rate**. *See* 2 C.F.R. § 200.334(f).

Types of Records to Retain

FEMA requires that non-federal entities maintain the following documentation for federally funded purchases:

- Specifications;
- Solicitations;
- Competitive quotes or proposals;
- Basis for selection decisions;
- Purchase orders;
- Contracts;
- Invoices; and
- Canceled checks.

Non-federal entities should keep detailed records of all transactions involving the grant. FEMA may at any time request copies of any relevant documentation and records, including purchasing documentation along with copies of canceled checks for verification. *See, e.g.,* 2 C.F.R. §§ 200.318(i), 200.334, 200.337.

In order for any cost to be allowable, it must be adequately documented per 2 C.F.R. § 200.403(g). Non-federal entities who fail to fully document all purchases may find their expenditures questioned and subsequently disallowed.

Actions to Address Noncompliance

Non-federal entities receiving financial assistance from FEMA are required to comply with requirements in the terms and conditions of their awards or subawards, including the terms set forth in applicable federal statutes, regulations, NOFOs, policies, and this Manual. Throughout the award lifecycle or even after an award has been closed, FEMA or the pass-through entity may discover potential or actual noncompliance on the part of a recipient or subrecipient. This potential or actual noncompliance may be discovered through routine monitoring, audits, closeout, or reporting from various sources.

In the case of any potential or actual noncompliance, FEMA may place special conditions on an award per 2 C.F.R. §§ 200.208 and 200.339, FEMA may place a hold on funds until the matter is corrected, or additional information is provided per 2 C.F.R. § 200.339, or it may do both. Similar remedies for noncompliance with certain federal civil rights laws are authorized pursuant to 44 C.F.R Parts 7 and 19.

In the event the noncompliance is not able to be corrected by imposing additional conditions or the recipient or subrecipient refuses to correct the matter, FEMA might take other remedies allowed under 2 C.F.R. § 200.339. These remedies include actions to disallow costs, recover funds, wholly or partly suspend or terminate the award, initiate suspension and debarment proceedings, withhold further federal awards, or take other remedies that may be legally available. For further information on termination due to noncompliance, see the section on Termination Provisions in the relevant NOFO.

FEMA may discover and take action on noncompliance even after an award has been closed. The closeout of an award does not affect FEMA's right to disallow costs and recover funds as long as the action to disallow costs takes place during the record retention period. *See* 2 C.F.R. §§ 200.334, 200.345(a). Closeout also does not affect the obligation of the non-federal entity to return any funds due as a result of later refunds, corrections, or other transactions. *See* 2 C.F.R. § 200.345(a)(2).

The types of funds FEMA might attempt to recover include, but are not limited to, improper payments, cost share reimbursements, program income, interest earned on advance payments, or equipment disposition amounts.

FEMA may seek to recover disallowed costs through a Notice of Potential Debt Letter, a Remedy Notification, or other letter. The document will describe the potential amount owed, the reason why FEMA is recovering the funds, the recipient's appeal rights, the requirement to retain records, how the amount can be paid, and the consequences, including billing and collection, for not appealing or paying the amount by the deadline.

If the recipient neither appeals nor pays the amount by the deadline, the amount owed will become final. Potential consequences if the debt is not paid in full or otherwise resolved by the deadline include the assessment of interest, administrative fees, and penalty charges; administratively offsetting the debt against other payable federal funds; and transferring the debt to the U.S. Department of the Treasury for collection.

FEMA notes the following common areas of noncompliance for the preparedness grant programs:

- Insufficient documentation and lack of record retention;
- Failure to follow the procurement under grants requirements;
- Failure to submit closeout documents in a timely manner;
- Failure to follow EHP requirements; and
- Failure to comply with the POP deadline.

Audits

FEMA grant recipients are subject to audit oversight from multiple entities including the DHS OIG, the GAO, the pass-through entity, or independent auditing firms for single audits, and may cover activities and costs incurred under the award. Auditing agencies such as the DHS OIG, the GAO, and the pass-through entity (if applicable), and FEMA in its oversight capacity, must have access to records pertaining to the FEMA award. Recipients and subrecipients must retain award documents for at least three years from the date the final FFR is submitted, and even longer in many cases subject to the requirements of 2 C.F.R. § 200.334. In the case of administrative closeout, documents must be retained for at least three years from the date of closeout, or longer subject to the requirements of 2 C.F.R. § 200.334. If documents are retained longer than the required retention period, the DHS OIG, the GAO, and the pass-through entity, as well as FEMA in its oversight capacity, have the right to access these records as well. *See* 2 C.F.R. §§ 200.334, 200.337.

Additionally, non-federal entities must comply with the single audit requirements at 2 C.F.R. Part 200, Subpart F. Specifically, non-federal entities, other than for-profit subrecipients, that expend \$750,000 or more in federal awards during their fiscal year must have a single or program-specific audit conducted for that year in accordance with Subpart F. 2 C.F.R. § 200.501. A single audit covers all federal funds expended during a fiscal year, not just FEMA funds. The cost of audit services may be allowable per 2 C.F.R. § 200.425, but non-federal entities must select auditors in accordance with 2 C.F.R. § 200.509, including following the proper procurement procedures. For additional information on single audit reporting requirements, see the section in this Manual titled “Single Audit Report.”

The objectives of single audits are to:

- Determine if financial statements conform to generally accepted accounting principles (GAAP);
- Determine whether the schedule of expenditures of federal awards is presented fairly;
- Understand, assess, and test the adequacy of internal controls for compliance with major programs; and
- Determine if the entity complied with applicable laws, regulations, and contracts or grants.

For single audits, the auditee is required to prepare financial statements reflecting its financial position, a schedule of federal award expenditures, and a summary of the status of prior audit findings and questioned costs. The auditee also is required to follow up and take appropriate corrective actions on new and previously issued but not yet addressed audit findings. The auditee must prepare a corrective action plan to address the new audit findings. *See* 2 C.F.R. §§ 200.508, 200.510, 200.511.

Non-federal entities must have an audit conducted, either single or program-specific, of their financial statements and federal expenditures annually or biennially pursuant to 2 C.F.R. § 200.504. Non-federal entities must also follow the information submission requirements of 2 C.F.R. § 200.512, including submitting the audit information to the [Federal Audit Clearinghouse](#) within the earlier of 30 calendar days after receipt of the auditor’s report(s) or nine months after the end of the audit period. The audit information to be submitted include the data collection form described at 2 C.F.R. § 200.512(c) and Appendix X to 2 C.F.R. Part 200 as well as the reporting package described at 2 C.F.R. § 200.512(b).

The non-federal entity must retain one copy of the data collection form and one copy of the reporting package for three years from the date of submission to the Federal Audit Clearinghouse. 2 C.F.R. § 200.512; *see also* 2 C.F.R. § 200.517 (setting requirements for retention of documents by the auditor and access to audit records in the auditor’s possession).

FEMA, the DHS OIG, the GAO, and the pass-through entity (if applicable), as part of monitoring or as part of an audit, may review a non-federal entity’s compliance with the single audit requirements. In cases of continued inability or unwillingness to have an audit conducted in compliance with 2 C.F.R. Part 200, Subpart F, FEMA and the pass-through entity, if applicable, are required to take appropriate remedial action under 2 C.F.R. § 200.339 for noncompliance, pursuant to 2 C.F.R. § 200.505.

Payment Information

FEMA uses the Direct Deposit/Electronic Funds Transfer (DD/EFT) method of payment to recipients. To enroll in the DD/EFT, the recipient must complete the SF-1199A, Direct Deposit Form.

FEMA utilizes the Payment and Reporting System (PARS) for financial reporting, invoicing, and tracking payments. For additional information, refer to [PARS Security \(fema.gov\)](#).

National Campaigns and Programs

Preparedness grant funding can generally be used to support the following campaigns and programs that have been developed by or in partnership with DHS or FEMA.

FEMA Strategic Plan

The [2022–2026 FEMA Strategic Plan](#) outlines a bold vision and three ambitious goals designed to address key challenges the agency faces during a pivotal moment in the field of emergency management. Wide-ranging and long-term, the goals defined in the plan respond to the changing landscape in which we find ourselves. The goals to meet this challenge are:

- **Goal 1 - Instill Equity as a Foundation of Emergency Management.** Disasters impact people and communities differently. Every disaster occurs within a unique context based on a community’s geographic, demographic, political, historical, and cultural characteristics. These unique contexts require tailored solutions that are designed to meet their unique needs;
- **Goal 2 - Lead Whole of Community in Climate Resilience.** Climate change represents a profound crisis for the nation, making natural disasters more frequent, more intense, and more destructive. The growing severity of disasters increases the time it takes for communities to recover – a process that can be further complicated by repeat events in areas already struggling to bounce back. These cascading and compounding impacts, propelled by climate change, pose the greatest risk to our communal and nationwide resilience; and
- **Goal 3 - Promote and Sustain a Ready FEMA and Prepared Nation.** The increase in frequency, severity, and complexity of emergency, disaster, and fire incidents has heightened demands on FEMA and on the larger emergency management community. FEMA must expand its approach to agency readiness and to national preparedness. The only way to achieve this is to increase the nation’s overall emergency management capabilities at all levels of government, as well as the private sector, the nonprofit sector, and among individuals.

These goals position FEMA to address the increasing range and complexity of disasters, support the diversity of communities we serve, and complement the nation’s growing expectations of the emergency management community. All preparedness grant program recipients are encouraged to review the [2022–2026 FEMA Strategic Plan](#) and consider how FY 2023 grant funding can be used to support the Plan’s goals and objectives of equity, climate resilience, and readiness as they apply to an entity’s specific needs and the needs of the whole community. We invite all stakeholders and partners to also adopt these priorities and join us in building a more prepared and resilient nation.

Whole Community Preparedness

Preparedness is a shared responsibility that calls for the involvement of everyone—not just the government—in preparedness efforts. By working together, everyone can help keep the nation safe from harm and help keep it resilient when struck by hazards, such as natural disasters, acts of terrorism, and pandemics.

[Whole Community](#) includes, but is not limited to:

- Individuals and families, including those with access and functional needs;
- Businesses;

- Faith-based and community organizations;
- Nonprofit groups;
- Schools and academia;
- Media outlets; and
- All levels of government, including state, local, tribal, territorial, and federal partners.

The phrase “Whole Community” often appears repeatedly in preparedness materials, as it is one of the guiding principles. It means two things:

1. Involving people in the development of national preparedness documents; and
2. Ensuring their roles and responsibilities are reflected in the content of the materials.

Additional information on incorporating whole community preparedness is available in the relevant program-specific appendix to this Manual, as applicable.

Active Shooter Preparedness

DHS aims to enhance national preparedness through a whole-community approach by providing the necessary products, tools, and resources to help all stakeholders prepare for and respond to an active shooter incident. To that end, DHS has developed a comprehensive Active Shooter Preparedness website, which includes informational resources, available at [Active Shooter Preparedness | CISA](#).

An additional resource, the Joint DHS and Federal Bureau of Investigation (FBI) Countering Violent Extremism (CVE) and Active Shooter Web Portal is located within the Homeland Security Information Network (HSIN). The portal provides a restricted-access forum to share Unclassified, For Official Use Only (FOUO), Sensitive but Unclassified (SBU), and Law Enforcement Sensitive (LES) information. The portal provides users and training practitioners with accurate, appropriate, and relevant CVE and Active Shooter training development resources, subject-matter expert information, and outreach initiatives. It also has forums to provide feedback, products useful to others, and allows participants to ask questions concerning CVE or the Active Shooter Program. Persons with a job-related duty, public service interest, or who support a CVE and/or Active Shooter program can request access to this Portal. Additional information can be found at: [CVEAS Portal | Homeland Security \(dhs.gov\)](#).

States and high-risk urban areas are encouraged to review the referenced [active shooter guidance](#), evaluate their preparedness needs, and consider applying for funding to address any needs identified in this area (please see the most current NOFO for allowable costs). To address training needs associated with active shooter incidents, FEMA’s Emergency Management Institute provides a free, web-based training course entitled *IS-907: Active Shooter: What You Can Do*, available at [FEMA - Emergency Management Institute \(EMI\) Course | IS-907: Active Shooter: What You Can Do](#).

Soft Targets and Crowded Places

There are continued and growing threats facing Soft Targets and Crowded Places (ST-CP) throughout the nation. ST-CPs are those locations or environments that are easily accessible to large numbers of people on a predictable or semi-predictable basis that have limited security or protective measures in place. These locations are vulnerable to attack using simple tactics and readily accessible weapons such as small arms, edged weapons, vehicles, improvised explosive devices, and unmanned aircraft systems. ST-CPs can include places such as town centers, shopping malls, open-air venues, outside hard targets/venues perimeters, and other places of meeting and gathering. DHS is committed to reducing the risk of attacks against ST-CPs and the impact of attacks if they do occur. However, the protection and security of ST-

CPs is a shared responsibility among whole community partners including the public, ST-CP owners and operators, security industry partners, the Federal Government, and SLTT government partners. States, territories, high-risk urban areas, and public and private sector partners are encouraged to identify security gaps and build capabilities that address security needs of ST-CPs, understanding the unique challenges related to protecting locations that are open to the public. States, territories, high-risk urban areas, and public and private sector partners are also encouraged to use resources to instill a culture of awareness, vigilance, and preparedness. For more information and additional resources, please see the DHS's [Hometown Security Program](#).

Community Lifelines

FEMA created Community Lifelines to reframe incident information, understand and communicate incident impacts using plain language, and promote unity of effort across the whole community to prioritize efforts to stabilize the lifelines during incident response. Although lifelines were developed to support response planning and operations, the concept can be applied across the entire preparedness cycle. Efforts to protect lifelines, prevent and mitigate potential impacts to them, and build back stronger and smarter during recovery will drive overall resilience of the nation. Applying the lifelines construct allows decision-makers to:

- Prioritize, sequence, and focus response efforts towards maintaining or restoring the most critical services and infrastructure;
- Utilize a common lexicon to facilitate unity of purpose among all stakeholders;
- Promote a response that facilitates unity of purpose and better communication among the whole community (federal, state, tribal, territorial, and local governments, and private sector and non-governmental entities); and
- Clarify which components of the disaster are complex (multifaceted) or complicated (difficult), requiring cross-sector coordination.

Lifelines are used to:

- Enhance the ability to gain, maintain, and communicate situational awareness for the whole community in responding to disasters;
- Analyze impacts to the various lifelines and develop priority focus areas for each operational period during response;
- Identify and communicate complex interdependencies to identify major limiting factors hindering stabilization; and
- Update the National Response Framework to reflect use of lifelines in response planning.

Lifelines include opportunities to:

- Enable a true unity of effort between government, non-governmental organizations, and the private sector, including infrastructure owners and operators;
- Integrate preparedness efforts, existing plans, and identify unmet needs to better anticipate response requirements; and
- Refine reporting sources and products to enhance situational awareness, best determine capability gaps, and demonstrate progress towards stabilization.

For more information on lifelines, please visit [FEMA's Community Lifelines Page](#) and [Implementation Toolkit](#).

Strategic Framework for Countering Terrorism and Targeted Violence

The United States faces increasingly complex threats from terrorism and targeted violence. Both continue to pose a grave threat in ways that have evolved dramatically in the nearly two decades since the 9/11 attacks. Although foreign terrorist organizations remain intent on striking our Homeland, we also face a growing threat from domestic actors. Combating terrorism and targeted violence requires the combined efforts of DHS, our federal and SLTT government partners, and civil society.

To address these threats, in September 2019 DHS adopted the [DHS Strategic Framework for Countering Terrorism and Targeted Violence](#) which explains how the department will use the tools and expertise that have protected and strengthened the country from foreign terrorist organizations to address the evolving challenges of today. DHS has also now finalized a corresponding [Public Action Plan](#). Preparedness grant recipients are encouraged to familiarize themselves with these documents and consider adopting the concepts, principles, and goals and objectives they outline.

Countering Violent Extremism (CVE) Training

Per FEMA Grant Programs Directorate [Information Bulletin 432, Review and Approval Requirements for Training Courses Funded Through Preparedness Grants](#), issued on July 19, 2018, states, territories, tribal entities, and high-risk urban areas are no longer required to request approval from FEMA for personnel to attend non-DHS FEMA training as long as the training is coordinated with and approved by the state, territory, tribal, or high-risk urban area Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction's Emergency Operations Plan.

FEMA will conduct periodic reviews of all state, territory, and high-risk urban area training funded by FEMA. These reviews may include requests for all course materials and physical observation of, or participation in, the funded training. If these reviews determine that courses are outside the scope of this guidance, the costs will be disallowed.

When developing new courses, recipients are encouraged to apply the Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model of instructional design. For further information on developing courses using the instructional design methodology and tools that can facilitate the process, State Administrative Agencies, and TPOCs are encouraged to review the National Training and Education Division Training Resource and Development Center website at [First Responder Training Resource and Development Center](#).

All training, presentations, and speakers regarding CVE must be consistent with DHS and U.S. Government policy, in particular by avoiding the use of hostile, stereotypical, or factually inaccurate information about Muslims and Islam or any community, and by emphasizing the importance of community engagement and interaction to promote communities as part of the solution rather than the problem needing solution.

Foreign terrorist groups and individual terrorist thought leaders are seeking to recruit or inspire Westerners to carry out attacks against western and U.S. targets. They seek to recruit and/or inspire individuals living in communities with the U.S. via, but not limited to, print, video, and social media, as well as through personal interaction. But we also know that violent extremism is not a phenomenon restricted solely to one community and that any effort to counter violent extremism must be applicable to **all** ideologically motivated violence. Efforts to provide information and training regarding CVE should emphasize the *strength of local communities* approach. The following are examples that demonstrate the integration of community engagement and CVE that reflect the *strength of local communities* approach:

- Training objectives should be clearly defined to meet specific CVE goals, such as community engagement, cultural awareness, community-based policing, etc.;
- Engaging diverse American communities around CVE may require working with local grassroots community organizations to develop engagement and outreach initiatives;
- Training programs should be sensitive to Constitutional values, such as protecting fundamental civil rights and civil liberties, and eschew notions of racial and ethnic profiling;
- It may be necessary to conduct vetting procedures for self-selected CVE training experts who offer programs that may claim to address CVE, but serve to demonize certain individuals or whole cross sections of a community;
- Training programs must ensure that the clearly defined objectives are in line with DHS strategies to counter violent extremism;
- It may be necessary to provide a review process to determine if CVE training focuses on community engagement and outreach;
- Support may be needed for law enforcement to increase knowledge, skills, and abilities to increase engagement techniques with diverse American communities; and
- Cultural awareness courses of diverse American communities may be necessary to ensure stakeholders are taught to work with communities and build trust, rather than feed existing misconceptions and stereotypes of people, culture, or religion.

1 Program Appendix A:

2 Homeland Security Grant Program (HSGP)

3
4 As a reminder, while this appendix contains HSGP-specific information and requirements, the main
5 content of this Manual (non-appendix information) contains important information relevant to **all**
6 preparedness grant programs, including the HSGP. Please be sure to read the main content of this Manual
7 in addition to the program-specific appendices.
8

9 Alignment of HSGP to the National Preparedness System

10 The Nation uses the National Preparedness System to build, sustain, and deliver core capabilities to
11 achieve the [National Preparedness Goal](#) (the Goal). Recipients will use the National Preparedness System
12 to support their efforts to build, sustain, and deliver these core capabilities. The components of the National
13 Preparedness System are Identifying and Assessing Risk, Estimating Capability Requirements, Building
14 and Sustaining Capabilities, Planning to Deliver Capabilities, Validating Capabilities, and Reviewing and
15 Updating. Additional information on the National Preparedness System is available at [National
16 Preparedness System | FEMA.gov](#).

17
18 As the National Preparedness System matures, we are getting better data on our capabilities as a Nation
19 that can be used to drive our focus and our resources at all levels. States and territories provide annual
20 data on their proficiency across [32 core capabilities](#) through the [Threat and Hazard Identification and Risk
21 Assessment \(THIRA\)](#), [Stakeholder Preparedness Review \(SPR\)](#), exercise and real world after-action
22 reports, and other preparedness data. This data feeds into the [National Preparedness Report](#) and forms a
23 shared national picture of needs relative to capability gaps—including what threats and hazards are posing
24 the greatest risks, and what core capabilities are most in need of improvement or sustainment.
25 Communities and federal agencies alike use this data to prioritize, synchronize, and guide programs and
26 activities to build and sustain capabilities. Analytic results help shape prioritization decisions at FEMA
27 and across the nation to make sure we are focusing our time and our resources in the right areas.
28

29 The HSGP provides financial support to state, local, tribal, and territorial (SLTT) jurisdictions to help
30 them build, sustain, and deliver core capabilities identified in the Goal. A key focus and requirement of
31 the HSGP is to prevent terrorism and other catastrophic events and to prepare the Nation for the threats
32 and hazards that pose the greatest risk to the security of the United States, including risks along the
33 Nation’s borders. When applicable, funding should support deployable assets that can be used anywhere
34 in the Nation through automatic assistance and mutual aid agreements, including, but not limited to, the
35 Emergency Management Assistance Compact (EMAC).
36

37 The HSGP supports investments that improve the ability of jurisdictions nationwide to:

- 38
- 39 • Prevent a threatened or an actual act of terrorism;
- 40 • Protect citizens, residents, visitors, and assets against the threats that pose the greatest risk to the
41 security of the United States;
- 42 • Mitigate the loss of life and property by lessening the impact of future catastrophic events;
- 43 • Respond quickly to save lives, protect property and the environment, and meet basic human
44 needs in the aftermath of a catastrophic incident; and/or
45

46 HSGP Funding Guidelines

47 Recipients must comply with all the requirements in 2 C.F.R. Part 200 (*Uniform Administrative*
48 *Requirements, Cost Principles, and Audit Requirements for Federal Awards*). In general, recipients should
49 consult with their FEMA HQ Preparedness Officer prior to making any investment that does not clearly
50 meet the allowable expense criteria. Funding guidelines established within this section support four of the
51 five mission areas—Prevention, Protection, Mitigation, and Response—and associated core capabilities
52 within the Goal. While Recovery is part of the Goal, it is not explicitly part of the HSGP. Allowable
53 investments made in support of the national priorities, as well as other capability-enhancing projects must
54 have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises,
55 training, or equipment, aligned to building capability, closing capability gaps, and/or sustaining
56 capabilities, as defined by CPG 201: THIRA/SPR Guide—3rd Edition ([Comprehensive Preparedness](#)
57 [Guide \(CPG\) 201, 3rd Edition \(fema.gov\)](#)). Recipients are encouraged to use grant funds for evaluating
58 grant-funded project effectiveness and return on investment. FEMA encourages recipients to provide the
59 results of that analysis to FEMA.
60

61 **Multiple Purpose or Dual-Use of Funds**

62 For both the State Homeland Security Program (SHSP) and Urban Area Security Initiative (UASI), many
63 activities that support the achievement of core capabilities related to the national priorities and terrorism
64 preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of
65 terrorism. However, all SHSP- and UASI-funded projects must assist recipients and subrecipients in
66 achieving core capabilities related to preventing, preparing for, protecting against, or responding to acts of
67 terrorism per section 2008(c) of the *Homeland Security Act of 2002* (6 U.S.C. § 609(c)).
68

69 **Planning (SHSP and UASI)**

70 SHSP and UASI funds may be used for a range of emergency preparedness and management planning
71 activities, such as those associated with the development, review, and revision of the THIRA, SPR,
72 continuity plans, and other planning activities that support the Goal and placing an emphasis on updating
73 and maintaining a current Emergency Operations Plan (EOP) that conforms to the guidelines outlined in
74 [Comprehensive Preparedness Guide \(CPG\) 101 v2](#). Planning efforts can also include conducting risk and
75 resilience assessments on increasingly connected cyber and physical systems, on which security depends,
76 using the [Infrastructure Resilience Planning Framework](#) and related Cybersecurity and Infrastructure
77 Security Agency (CISA) resources.
78

79 Additionally, SHSP and UASI funds may be used for planning efforts related to state court cybersecurity,
80 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID Act (Pub. L. No.
81 109-13).
82

83 **Organization (SHSP and UASI)**

84 States and high-risk urban areas must justify proposed expenditures of SHSP or UASI funds to support
85 organization activities within their Investment Justification (IJ) submission. Organizational activities
86 include:
87

- 88 • Program management;
- 89 • Development of whole community partnerships, through groups such as Citizen Corp Councils;
- 90 • Structures and mechanisms for information sharing between the public and private sector;
- 91 • Implementing models, programs, and workforce enhancement initiatives to address
92 ideologically inspired radicalization to violence in the homeland;

- 93 • Tools, resources, and activities that facilitate shared situational awareness between the public
- 94 and private sectors;
- 95 • Operational Support;
- 96 • Utilization of standardized resource management concepts such as typing, inventorying,
- 97 organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before,
- 98 during, and after an incident;
- 99 • Responding to an increase in the threat level under the National Terrorism Advisory System
- 100 (NTAS) or needs resulting from a National Special Security Event;
- 101 • Paying salaries and benefits for personnel to serve as qualified Intelligence Analysts. Per the
- 102 *Personnel Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security*
- 103 *Act (PRICE Act)*, Pub. L. No. 110-412, § 2, codified in relevant part, as amended, at 6 U.S.C. §
- 104 609(a), SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve
- 105 as intelligence analysts to enable information/intelligence sharing capabilities, as well as support
- 106 existing intelligence analysts previously covered by SHSP or UASI funding. *See* 6 U.S.C. §
- 107 609(a). To be hired as an intelligence analyst, staff and/or contractor personnel must meet at least
- 108 one of the following criteria:
 - 109 ○ Complete training to ensure baseline proficiency in intelligence analysis and production
 - 110 within six months of being hired; and/or,
 - 111 ○ Previously served as an intelligence analyst for a minimum of two years either in a
 - 112 federal intelligence agency, the military, or state and/or local law enforcement
 - 113 intelligence unit.
- 114 • All fusion center analytical personnel must demonstrate qualifications that meet or exceed
- 115 competencies identified in the Common Competencies for state, local, and tribal intelligence
- 116 analysts, which outlines the minimum categories of training needed for intelligence analysts. A
- 117 certificate of completion of such training must be on file with the State Administrative Agency
- 118 (SAA) and must be made available to the recipient’s respective FEMA HQ Preparedness Officer
- 119 upon request; and
- 120 • Migrating online services to the “.gov” internet domain.

121
 122 All SAAs are allowed to use up to 50% of their SHSP funding, and all high-risk urban areas are allowed to
 123 use up to 50% of their UASI funding, for personnel costs per 6 U.S.C. § 609(b)(2)(A). Personnel hiring,
 124 overtime, and backfill expenses are permitted under this grant only to the extent that such expenses are for
 125 the allowable activities within the scope of the grant. Personnel expenses may include, but are not limited
 126 to training and exercise coordinators, program managers and planners, intelligence analysts, and
 127 Statewide Interoperability Coordinators (SWICs).

128
 129 At the request of a recipient, the FEMA Administrator (or their designee) may grant a waiver of this 50%
 130 limitation under 6 U.S.C. § 609(b)(2)(B). Requests for waivers to the personnel cap must be submitted by
 131 the authorized representative of the SAA to FEMA in writing on official letterhead, with the following
 132 information:

- 133 • Documentation explaining why the cap should be waived;
- 134 • Conditions under which the request is being submitted; and
- 135 • A budget and method of calculation of personnel costs both in percentages of the grant award and
- 136 in total dollar amount.

137
 138
 139 Please see Information Bulletin ([IB](#) 421b, Clarification on the Personnel Reimbursement for Intelligence
 140 Cooperation and Enhancement of Homeland Security Act of 2008 (Public L. No. 110-412 – the PRICE
 141 Act), dated October 30, 2019, for additional information on the waiver request process.

142 **Organizational activities under SHSP and UASI include:**

143 **Operational Overtime Costs.** In support of efforts to enhance capabilities for detecting, deterring,
 144 disrupting, and preventing acts of terrorism and other catastrophic events, operational overtime costs are
 145 allowable for increased protective security measures at critical infrastructure sites or other high-risk
 146 locations and to enhance public safety during mass gatherings and high-profile events. In that regard, HSGP
 147 recipients are urged to consider using grant funding to support soft target preparedness activities. SHSP or
 148 UASI funds may be used to support select operational expenses associated with increased security measures
 149 in the authorized categories cited in the table below, but this table is not exhaustive. FEMA retains the
 150 discretion to approve other types of requests that do not fit within one of the categories of the table.

151 *Table 2 - Authorized Operational Overtime Categories*

	Category	Description
1	National Terrorism Advisory System (NTAS)	Security measures in response to an <u>increase in the threat level</u> under the NTAS to an “elevated” or “imminent” alert status. FEMA Information Bulletin No. 367, Impact of National Terrorism Advisory System on Homeland Security Grant Programs , remains applicable; therefore, advance authorization from FEMA is not required. Refer to National Terrorism Advisory System Homeland Security (dhs.gov) for additional information on the NTAS.
2	National Security Special Event (NSSE)	Security measures for a <u>designated</u> NSSE. NSSEs are events of national or international significance deemed by DHS to be a potential target for terrorism or other criminal activity.
3	Special Event Assessment Rating (SEAR) Level 1 through Level 4 Events	Security measures required for SEAR Level 1 through Level 4 events as designated by DHS and included in the DHS National Special Events List, as defined below: <ul style="list-style-type: none"> • SEAR 1: A significant event with national and/or international importance that may require extensive federal interagency support. • SEAR 2: A significant event with national and/or international importance that may require some level of federal interagency support. • SEAR 3: An event of national and/or international importance that requires only limited federal support. • SEAR 4: An event with limited national importance that is managed at state and local level. NOTE: In cases where a threat of terrorism can be associated with a SEAR Level 5 event, the event planners should coordinate with their state or territory Homeland Security Advisor to seek re-adjudication of the SEAR rating. Operational overtime for security measures associated with such events will be considered for approval by FEMA if re-adjudication results in a SEAR 1 through 4 rating.
4	States of Emergency	Declarations of states of emergency by the Governor <u>associated with a terrorism-related threat or incident</u> . This excludes Presidentially declared major disasters or emergencies where federal funding support for the proposed grant-funded activity is made available through the FEMA Public Assistance program or other federal disaster grants.

	Category	Description
5	National Critical Infrastructure Prioritization Program (NCIPP)	Protection of Level 1 and Level 2 facilities identified through DHS's NCIPP <u>based on a terrorism-related threat</u> to critical infrastructure.
6	Directed Transit Patrols	Targeted security patrols in airports and major transit hubs <u>based on a terrorism-related threat</u> to transportation systems.
7	Other Related Personnel Overtime Costs	Overtime costs may be authorized for personnel assigned to directly support any of the security activities relating to the categories above. Examples include firefighters and emergency medical services personnel; public works employees who may be responsible for installing protective barriers and fencing; public safety personnel assigned to assist with event access and crowd control; emergency communications specialists; backfill and overtime for staffing state or major urban area fusion centers; state Active Duty National Guard deployments to protect critical infrastructure sites, including all resources that are part of the standard National Guard deployment package (note: consumable costs, such as fuel expenses, are not allowed except as part of the standard National Guard deployment package); contract security services for critical infrastructure sites; participation in Regional Resiliency Assessment Program activities, increased border security activities in coordination with USBP, etc.
8	Operational Support to a Federal Agency	Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities related to homeland security/terrorism preparedness and specifically requested by a federal agency. Allowable costs are limited to overtime associated with federally requested participation in eligible activities, including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees (as required by the <i>Maritime Transportation Security Act of 2002</i>), DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. In addition, reimbursement for operational overtime law enforcement activities related to combating transnational crime organizations in support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism is an allowable expense under SHSP and UASI on a case-by-case basis. Grant funding can only be used in proportion to the federal man-hour estimate and only after funding for these activities from other federal sources (i.e., FBI JTTF payments to state and local agencies) has been exhausted.

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All allowable operational overtime costs are also subject to the administration requirements outlined in the following subsection.

Administration of Operational Overtime Requests

- Except for an elevated NTAS alert, SHSP or UASI funds may only be spent for operational overtime costs upon prior written approval by FEMA. The SAA must submit operational overtime requests in writing to its assigned FEMA Preparedness Officer. FEMA will consider

160 requests for special event activities up to one year in advance. However such requests must be
161 within the award’s current POP and must not result in the need for a request to extend the period
162 of performance. SAAs should contact the Centralized Scheduling and Information Desk (CSID)
163 for Preparedness Officer contact information. CSID can be reached by phone at (800) 368-6498
164 or by e-mail at askcsid@fema.dhs.gov, Monday through Friday, 9a.m. – 5p.m. ET;

- 165 • All operational overtime requests must clearly explain how the request meets the criteria of one
166 or more of the categories listed in the table above. Requests must address the threat environment
167 as it relates to the event or activity requiring operational overtime support and explain how the
168 overtime activity is responsive to the threat. Request letters sent to FEMA must be
169 UNCLASSIFIED but may be labeled “For Official Use Only.” If explaining the threat will
170 require the sharing of classified information, the letter should state that fact. FEMA will then plan
171 for the sharing of classified information through official channels;
- 172 • Post-event operational overtime requests will only be considered on a case-by-case basis, where it
173 is demonstrated that exigent circumstances prevented submission of a request in advance of the
174 event or activity;
- 175 • Under no circumstances may FEMA grant funding be used to pay for costs already supported by
176 funding from another federal source;
- 177 • States with UASI jurisdictions can use funds retained at the state level to reimburse eligible
178 operational overtime expenses incurred by the state (per the above guidance limitations). Any
179 UASI funds retained by the state must be used in direct support of the high-risk urban area. States
180 must provide documentation to the Urban Area Working Group (UAWG) and FEMA upon
181 request demonstrating how any UASI funds retained by a state would directly support the high-
182 risk urban area; and
- 183 • FEMA will consult and coordinate with appropriate DHS components as necessary to verify
184 information used to support operational overtime requests.

185
186 **Personnel Costs.** Personnel hiring, overtime, and backfill expenses are permitted under this grant to
187 perform allowable HSGP planning, training, exercise, and equipment activities. Personnel may include
188 but are not limited to training and exercise coordinators, program managers for activities directly
189 associated with SHSP and UASI funded activities, intelligence analysts, and SWICs.

190
191 For further details, SAAs should refer to [IB #421b](#), (Clarification on the Personnel Reimbursement for
192 Intelligence Cooperation and Enhancement of Homeland Security Act of 2008) or contact their FEMA
193 Preparedness Officer. HSGP funds may not be used to support the hiring of any personnel to fulfill
194 traditional public health and safety duties nor to supplant traditional public health and safety positions and
195 responsibilities. The following definitions apply to personnel costs:

- 196
197 • *Hiring.* State and local entities may use grant funding to cover the salary of newly hired personnel
198 who are exclusively undertaking allowable FEMA grant activities as specified in this guidance.
199 This may not include new personnel who are hired to fulfill any non-FEMA program activities
200 under any circumstances. Hiring will always result in a net increase of Full Time Equivalent
201 (FTE) employees.
- 202 • *Overtime.* These expenses are limited to the additional costs that result from personnel working
203 over and above 40 hours of weekly work time as the direct result of their performance of FEMA-
204 approved activities specified in this guidance. Overtime associated with any other activity is not
205 eligible.
- 206 • *Backfill-Related Overtime.* Also called “Overtime as Backfill,” these expenses are limited to
207 overtime costs that result from personnel who are working overtime (as identified above) to
208 perform the duties of other personnel who are temporarily assigned to FEMA-approved activities

209 outside their core responsibilities. Neither overtime nor backfill expenses are the result of an
210 increase of FTE employees.
211 • *Supplanting*. Grant funds will be used to supplement existing funds and will not replace
212 (supplant) funds that have been appropriated for the same purpose. Applicants or recipients may
213 be required to supply documentation certifying that a reduction in non-federal resources occurred
214 for reasons other than the receipt or expected receipt of federal funds.

215 **Organization (OPSG)**

216 **Personnel Costs**

217 OPSG funds may be used for domestic travel and *per diem*, including costs associated with the
218 deployment/redeployment of personnel to border areas and for travel associated with law enforcement
219 entities assisting other local jurisdictions in law enforcement activities. In addition, allowable costs
220 include supporting up to six-month deployment of law enforcement personnel to critical Southwest
221 Border locations for operational activities (travel costs must be in accordance with applicable travel
222 regulations).

223 **Operational Overtime Costs**

224 OPSG funds should be used for operational overtime costs associated with law enforcement activities in
225 support of border law enforcement agencies for enhanced border security. Overtime pay is for increased
226 patrol time for certified public safety officers, along with limited support for other law enforcement direct
227 support personnel (e.g., Communication Officers/Dispatchers, non-sworn patrol pilots, etc.). Overtime
228 shall be reimbursed consistent with the non-federal entity's overtime policy and the requirements as stated
229 below:
230
231

- 232 • Overtime is time worked that exceeds the required number of hours during an employee's
233 designated shift;
- 234 • Overtime must be worked to increase patrol capacity and be in support of identified and approved
235 United States Border Patrol (USBP) border security operations;
- 236 • The OPSG overtime hourly rate of pay will be no more than the approved overtime rate per local
237 law and policy and must be in accordance with applicable state and federal regulations;
- 238 • All overtime expenses under OPSG must be reasonable for the services rendered and conform to
239 the non-federal entity's established written policy, which must apply to both federally funded and
240 non-federally funded activities and comply with the other applicable requirements under 2 C.F.R.
241 §§ 200.430-200.431; and
- 242 • The non-federal entity may not utilize OPSG funding to pay for an employee's overtime hours or
243 pay that exceeds 16 hours worked in any 24-hour period.

244 **Personnel Costs**

245 Up to 50% of an OPSG award may be used to pay for all personnel costs (only to the extent that such
246 expenses are for the allowable activities within the scope of the grant). At the request of a recipient or
247 subrecipient, the FEMA Administrator (or designee) may waive the 50% personnel cap. Waiver decisions
248 are at the discretion of the FEMA Administrator and will be considered on a case-by-case basis in
249 accordance with [IB 421b](#), 6 U.S.C. § 609(b)(2). A formal OPSG personnel waiver request should:
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251

- 252 • Be on official letterhead, include a written justification, and be signed by the local jurisdiction;
- 253 • Include a budget and method of calculation of personnel costs both in the percentage of the grant
254 award and in total dollar amount, reflecting the change in scope or objective to the project;
- 255 • Include an approved Operations Order from the USBP Sector office that supports the local
256 jurisdiction's written justification; and
257

- 258 • Be coordinated with the USBP Sector, SAA, and the DHS/Customs and Border Protection (CBP)
259 Office of the Border Patrol (OBP).
260

261 Further, changes in scope or objective also require FEMA’s prior written approval pursuant to 2 C.F.R. §
262 200.308(c)(1). If the cost changes are allowable under the grant, a Fragmentary Order (FRAGO) must be
263 submitted to HSIN to obtain FEMA’s prior written approval of such changes in accordance with 2 C.F.R.
264 § 200.308(c)(1). These modifications will be annotated in the annex section of the FRAGO.
265

266 OPSG funds may be used to pay additional current part-time law enforcement personnel salaries to bring
267 them to temporary full-time status. OPSG funds may support a Governor’s request to activate, deploy, or
268 redeploy specialized National Guard Units/Package and/or elements of state law enforcement serving as
269 friendly forces to increase or augment specialized/technical law enforcement elements’ operational
270 activities. Costs associated with backfill for personnel supporting operational activities are allowable.
271

272 As with all OPSG personnel costs, OPSG grant funds will be used to supplement existing funds and will
273 not replace (supplant) funds that have been appropriated for the same purpose. Applicants or recipients
274 may be required to supply documentation certifying that a reduction in non-federal resources occurred for
275 reasons other than the receipt or expected receipt of federal funds.
276

277 **Intelligence Support**

278 Per 6 U.S.C. § 609(a), OPSG funds may, as applicable and operationally beneficial, be used to pay
279 salaries and benefits or overtime for personnel to serve as qualified Intelligence Analysts to enable and
280 enhance information/intelligence sharing capabilities, as well as support existing intelligence analysts
281 previously covered by OPSG funding. Qualified OPSG-funded intelligence analysts can be assigned to an
282 applicable law enforcement facility/intelligence function as long as information/intelligence sharing is
283 maintained. To serve as an OPSG-funded intelligence analyst, personnel must meet at least one of the
284 following criteria:
285

- 286 • Complete training to ensure baseline proficiency in intelligence analysis and production within
287 six months of being hired; and/or,
- 288 • Previously served as an intelligence analyst for a minimum of two years either in a federal
289 intelligence agency, the military, or state and/or local law enforcement intelligence unit.
290

291 OPSG-funded intelligence analysts must demonstrate qualifications that meet or exceed competencies
292 identified in the Common Competencies for state, local, and tribal intelligence analysts, which outlines
293 the minimum categories of training needed for intelligence analysts. A certificate of completion of such
294 training must be on file with the SAA and must be made available to the recipient’s respective FEMA HQ
295 Preparedness Officer upon request.
296

297 **Temporary or Term Appointments**

- 298 • Subrecipients may utilize temporary or term appointments to augment the law enforcement
299 presence on the borders. However, applying funds toward hiring full-time or permanent sworn
300 public safety officers is unallowable;
- 301 • OPSG-funded temporary or term appointments may not exceed the approved period of
302 performance:
 - 303 ○ For OPSG purposes, temporary appointments are non-status appointments for less than
304 one year; and
 - 305 ○ For OPSG purposes, term appointments are non-status appointments for one year,
306 extendable for one year as necessary.

- 307 • OPSG funding for temporary or term appointments may pay for salary only. Benefits are not
308 allowable expenses for term or temporary employees;
- 309 • OPSG remains a non-hiring program. Appropriate uses of temporary or term appointments
310 include:
 - 311 ○ To carry out specific enforcement operations work for ongoing OPSG-funded patrols
312 throughout the Sector Area of Operation;
 - 313 ○ To staff operations of limited duration, such as OPSG-enhanced enforcement patrols
314 targeting specific locations or criminal activity; and
 - 315 ○ To fill OPSG positions in activities undergoing transition or personnel shortages and
316 local backfill policies (medical/military deployments).
- 317 • OPSG term and temporary appointments must have all necessary certifications and training to
318 enforce state and local laws. OPSG funds will not be used to train or certify term or temporary
319 appointments except as otherwise stated in this Manual and the HSGP Notice of Funding
320 Opportunity (NOFO); and
- 321 • FEMA provides no guarantee of funding for temporary or term appointments. In addition to the
322 terms of this Manual and the HSGP NOFO, subrecipients must follow their own applicable
323 policies and procedures regarding temporary or term appointments.

325 **Management and Administration**

326 Management and administration (M&A) costs are allowed. Recipients may use a maximum of up to 5%
327 of HSGP funds awarded for their M&A, and any funds retained are to be used solely for M&A purposes
328 associated with the HSGP award. Subrecipients may also retain a maximum of up to 5% of the funding
329 passed through by the state solely for M&A purposes associated with the HSGP award. M&A activities
330 are those directly relating to the management and administration of HSGP funds, such as financial
331 management and monitoring. M&A expenses must be based on actual expenses or known contractual
332 costs. M&A requests that are simple percentages of the award, without supporting justification, will not
333 be allowed or considered for reimbursement.

334
335 M&A costs are not operational costs. They are the necessary costs incurred in direct support of the grant
336 or as a result of the grant and should be allocated across the entire lifecycle of the grant. Examples include
337 preparing and submitting required programmatic and financial reports, establishing and/or maintaining
338 equipment inventory, documenting operational and equipment expenditures for financial accounting
339 purposes, responding to official informational requests from state and federal oversight authorities,
340 including completing the Civil Rights Evaluation Tool as required by DHS, and grant performance
341 measurement or evaluation activities.

342
343 Recipients or subrecipients may apply or credit M&A funding toward the recipient's requirement to
344 allocate funding toward the National Priority Areas. For example, if a recipient spends \$5,000 to manage
345 or administer its funding dedicated toward its protection of soft targets/crowded places investment, the
346 recipient may credit that funding toward its requirement to allocate at least 3% of its award to the
347 protection of soft targets and crowded places National Priority Area.

348
349 A state's HSGP funds for M&A calculation purposes includes the total of its SHSP, UASI, and OPSG
350 awards. While the SAA may retain up to 5% of this total for M&A, the state must still ensure that all
351 subrecipient award amounts meet the mandatory minimum pass-through requirements that are applicable
352 to each HSGP program. To meet this requirement, the percentage of SHSP and UASI funds passed
353 through to local or tribal jurisdictions must be based on the state's total HSGP award prior to withholding
354 any M&A.

356 In retaining these funds, states may retain a maximum of 2.5% of the OPSG allocation, which must be
357 withheld from the pass-through to each subrecipient county or tribe in an equal percentage. The SAA may
358 also retain additional funding from its SHSP award to manage and administer the OPSG award, but that
359 additional amount is also capped at an amount equal to 2.5% of the OPSG award. Examples applying this
360 principle:

361
362 SAA 1:

363 Total award: \$6,000,000

364 SHSP: \$1,000,000 OPSG: \$2,500,000 UASI: \$2,500,000

365 M&A Maximum: \$300,000 (5% of \$6,000,000)

366 Maximum M&A for SHSP = \$50,000

367 Maximum M&A for OPSG = \$125,000. Of that amount, \$62,500 (2.5%) may be retained from
368 the OPSG allocation, and the other \$62,500 would come from the SHSP allocation. Any
369 amount used to manage and administer OPSG that is charged to SHSP may be above and
370 beyond the \$50,000 available to manage the SHSP allocation.

371 Maximum M&A for UASI = \$125,000

372
373 SAA 2:

374 Total award: \$4,500,000

375 SHSP: \$3,500,000 OPSG: \$1,000,000

376 M&A Maximum: \$225,000 (5% of \$4,500,000)

377 Maximum M&A for SHSP = \$175,000

378 Maximum M&A for OPSG = \$50,000. Of that amount, \$25,000 (2.5%) may be retained from
379 the OPSG allocation, and the other \$25,000 would come from the SHSP allocation. Any
380 amount used to manage and administer OPSG that is charged to SHSP may be above and
381 beyond the \$175,000 available to manage the SHSP allocation.

382
383 HSGP recipients are also reminded that any M&A charged to a recipient's or subrecipient's UASI
384 funding must be directly allocable to administration of the UASI grant program and cannot be used to
385 cover M&A costs that are directly allocable to SHSP or OPSG funding. Similarly, any M&A charged to a
386 recipient's or subrecipient's SHSP or OPSG funding cannot be used to cover M&A costs directly
387 allocable to UASI funding.

388
389 Specific for OPSG, subrecipients and friendly forces may retain funding for M&A purposes; however, the
390 total amount retained cannot exceed 5% of the subrecipient's subaward. Friendly forces are local law
391 enforcement entities that are subordinate subrecipients under OPSG. In other words, friendly forces are
392 entities that receive a subaward from a subrecipient under the OPSG program. Friendly forces must
393 comply with all requirements of subrecipients under 2 C.F.R. Part 200.

394
395 **Equipment (SHSP and UASI)**

396 The 21 allowable prevention, protection, mitigation, and response equipment categories for HSGP are
397 listed on the [Authorized Equipment List](#) (AEL). Some equipment items require prior approval from
398 FEMA before obligation or purchase of the items. Please reference the grant notes for each equipment
399 item to ensure prior approval is not required or to ensure prior approval is obtained if necessary.
400 Recipients and subrecipients may purchase equipment not listed on the AEL, but **only** if they first seek
401 and obtain **prior approval** from FEMA.

402
403 Unless otherwise stated, all equipment must meet all mandatory regulatory and/or FEMA-adopted
404 standards to be eligible for purchase using these funds. In addition, recipients will be responsible for
405 obtaining and maintaining all necessary certifications and licenses for the requested equipment.

406 Investments in emergency communications systems and equipment must meet applicable [SAFECOM](#)
407 [Guidance on Emergency Communications Grants](#) (SAFECOM Guidance) recommendations. Such
408 investments must be coordinated with the SWIC and the State Interoperability Governing Body (SIGB) to
409 ensure interoperability and long-term compatibility. For personal protective equipment (PPE), recipients
410 are encouraged to give procurement preference to domestic manufacturers of PPE or PPE raw materials to
411 the maximum practicable and allowed by law.

412
413 Grant funds may be used for the procurement of medical countermeasures. Procurement of medical
414 countermeasures must be conducted in collaboration with state, city, or local health departments that
415 administer federal funds from the Department of Health and Human Services for this purpose and with
416 existing Metropolitan Medical Response System committees where available, to sustain their long-term
417 planning for appropriate, rapid, and local medical countermeasures, including antibiotics and antidotes for
418 nerve agents, cyanide, and other toxins. Procurement must have a sound threat-based justification with an
419 aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response.
420 Prior to procuring pharmaceuticals, recipients must have in place an inventory management plan to avoid
421 large periodic variations in supplies due to coinciding purchase and expiration dates. Recipients are
422 encouraged to enter into rotational procurement agreements with vendors and distributors. Purchases of
423 pharmaceuticals must include a budget for the disposal of expired drugs within each fiscal year's POP for
424 HSGP. The cost of disposal cannot be carried over to another FEMA grant or grant period.

425
426 EMS electronic patient care data systems should comply with the most current data standard of the
427 [National Emergency Medical Services Information System](#).

428
429 Recipients are reminded that school hardening is an eligible activity under SHSP and UASI. School
430 hardening measures include but are not limited to:

- 431 • Bullet resistant doors and glass;
- 432 • Hinge-locking mechanisms;
- 433 • Immediate notification to emergency 911 systems;
- 434 • Mechanisms that provide real time actionable intelligence directly to law enforcement and first
435 responders;
- 436 • Installation of distraction devices or other countermeasures administered by law enforcement; and
- 437 • Other measures determined to provide significant improvements to schools' physical security.

438
439 Additionally, SHSP and UASI funds may be used for equipment purchases related to state court
440 cybersecurity, 911 call capabilities, alert and warning capabilities, and implementation of the REAL ID
441 Act (Pub. L. No. 109-13).

442 **Equipment (OPSG)**

443
444 OPSG equipment is intended to be incidental to the enhanced border security operations being performed.
445 The grant is not intended to be used to outfit or supply general equipment to SLTT law enforcement
446 agencies. Equipment must be relatable to and justified by the operational benefit it will provide. Each
447 appropriate OPSG sector coordinator is required to keep an inventory of OPSG purchased equipment that
448 includes at a minimum: 1) grant funding year; 2) purchase amount; 3) purchase date; 4) purchase
449 quantity; 5) equipment ID; 6) source of funding for the property, including the Federal Award
450 Identification Number; 7) who holds title to the property; 8) federal share percent of the property; 9)
451 location of the property; 10) use and condition of the property; 11) disposal date; and 12) brief disposal
452 justification information and sale price if sold. Each Operations Order/FRAGO will require that each
453 friendly force submit the equipment inventory for each Operations Order/FRAGO submission.

- 454
455 • **Equipment Marking.** Because equipment purchased with OPSG funding is intended to be used
456 to support OPSG activities, it **may** be appropriately marked to ensure its ready identification and

457 primary use for that purpose. **When practicable**, any equipment purchased with OPSG funding
458 **should** be prominently marked as follows: "**Purchased with DHS funds for Operation**
459 **Stonegarden Use.**"

- 460 • **Fuel Cost and Mileage Reimbursement.** There is no cap for reimbursement of fuel or mileage
461 costs in support of operational activities. Subrecipients and friendly forces may not claim
462 reimbursements for both mileage and fuel/maintenance for the same equipment at the same time.
- 463 • **Vehicle and Equipment Acquisition, Including Leasing and Rentals.** Allowable purchases
464 under OPSG include patrol vehicles and other mission-specific equipment whose primary purpose
465 is to increase operational capabilities on or near a border nexus in support of approved border
466 security operations. A detailed justification must be submitted to the respective FEMA HQ
467 Preparedness Officer prior to purchase.
- 468 • **Medical Emergency Countermeasures.** Allowable purchases under OPSG include narcotic
469 antagonist pharmaceuticals, detection and identification equipment, safe storage and
470 transportation, personnel protective equipment, and initial equipment training, as reflected in the
471 AEL.

472

473 **Requirements for Small Unmanned Aircraft System (SHSP, UASI, and OPSG)**

474 All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply
475 with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and also
476 include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights,
477 and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment.
478 sUAS policies are not required at the time of application but must be received and approved by FEMA prior
479 to obligating HSGP funds. All grant-funded procurements must be executed in a manner compliant with
480 federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use HSGP funds for
481 sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the
482 data the devices collect is transmitted to servers not under the control of the operator. It has been reported
483 that some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The
484 U.S. Department of Homeland Security's Privacy Office suggests the recipient fully explore data
485 transmission and storage issues with vendors to reduce the possibility of data breaches.

486

487 Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2023 DHS Appropriations Act
488 further requires recipients to certify they have reviewed the [Industry Alert on Chinese Manufactured](#)
489 [Unmanned Aircraft Systems](#), and completed a risk assessment that considers the proposed use of foreign-
490 made sUAS to ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign-
491 made versus domestic sUAS.

492

493 **Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)**

494 In August 2020, FEMA was alerted of an advisory guidance document issued by DHS, the Department of
495 Justice, the Federal Aviation Administration, and the Federal Communications Commission: [Interagency](#)
496 [Legal Advisory on UAS Detection and Mitigation Technologies | Homeland Security \(dhs.gov\)](#). The
497 purpose of the advisory guidance document is to help non-federal public and private entities better
498 understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate
499 threats posed by UAS operations (i.e., Counter-UAS or C-UAS).

500

501 The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the
502 authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do
503 they conduct legal reviews of commercially available product compliance with those laws. The advisory
504 does not address state and local laws nor potential civil liability, which UAS detection and mitigation
505 capabilities may also implicate.

506

507 It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection
508 and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state
509 criminal, surveillance, and communications laws. Entities should conduct their own legal and technical
510 analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’
511 representations of the systems’ legality or functionality. Please also see the DHS press release on this
512 topic for further information: [Interagency Issues Advisory on Use of Technology to Detect and Mitigate](#)
513 [Unmanned Aircraft Systems | Homeland Security \(dhs.gov\)](#).
514

515 **Training (SHSP and UASI)**

516 Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of
517 training specifically identified under the SHSP and UASI program and/or in conjunction with emergency
518 preparedness training by other federal agencies (e.g., HHS and Department of Transportation [DOT]).
519 Training conducted using HSGP funds should address a performance gap identified through an Integrated
520 Preparedness Plan (IPP) or other assessments (e.g., National Emergency Communications Plan [NECP]
521 Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise.
522 Any training or training gaps, including training related to under-represented, diverse populations that may
523 be more impacted by disasters, including children, seniors, individuals with disabilities or other access and
524 functional needs, individuals with diverse culture and language use, individuals with lower economic
525 capacity and other underserved populations, should be identified in an IPP and addressed in the state or
526 high-risk urban area training cycle. Emergency preparedness training related to those training gaps,
527 including related to under-represented, diverse populations that may be more impacted by disasters, is
528 allowable. Recipients are encouraged to use existing training rather than developing new courses. When
529 developing new courses, recipients are encouraged to apply the Analysis, Design, Development,
530 Implementation, and Evaluation (ADDIE) model of instructional design.
531

532 Recipients are also encouraged to utilize FEMA’s National Preparedness Course Catalog. Trainings include
533 programs or courses developed for and delivered by institutions and organizations funded by FEMA. This
534 includes the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and
535 FEMA’s Training Partner Programs, including the Continuing Training Grants (CTG), the National
536 Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and
537 other partners.
538

539 The catalog features a wide range of course topics in multiple delivery modes to meet FEMA’s mission
540 scope as well as the increasing training needs of federal, state, local, territorial, and tribal audiences. The
541 catalog can be accessed at [NTED | National Preparedness Course Catalog Home](#)
542 [\(firstrespondertraining.gov\)](#).
543

544 Some training activities require Environmental and Historic Preservation (EHP) Review, including
545 exercises, drills or trainings that require any type of land, water, or vegetation disturbance or building of
546 temporary structures or that are not located at facilities designed to conduct training and exercises.
547 Additional information on training requirements and EHP review can be found online at [Environmental &](#)
548 [Historic Preservation Guidance for FEMA Grant Applications | FEMA.gov](#).
549

550 **Exercises (SHSP and UASI)**

551 Exercises conducted with grant funding should be managed and conducted consistent with Homeland
552 Security Exercise and Evaluation Program (HSEEP). HSEEP guidance for exercise design, development,
553 conduct, evaluation, and improvement planning is located at [Homeland Security Exercise and Evaluation](#)
554 [Program | FEMA.gov](#).
555

556 Some exercise activities require EHP review, including exercises, drills or trainings that require any type of
557 land, water, or vegetation disturbance or building of temporary structures or that are not located at facilities
558 designed to conduct training and exercises. Additional information on training requirements and EHP
559 review can be found online at [Environmental & Historic Preservation Guidance for FEMA Grant
560 Applications | FEMA.gov](#).
561

562 **Maintenance and Sustainment (SHSP, UASI, and OPSG)**

563 Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
564 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
565 purchased incidental to the original purchase of the system or equipment as long as the original purchase
566 of the system or equipment is consistent with that which is typically provided for, or available through,
567 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending
568 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
569 may not exceed the period of performance of the award used to purchase the maintenance agreement or
570 warranty, and it may only cover equipment purchased with HSGP funds or for equipment dedicated for
571 HSGP-related purposes. As with warranties and maintenance agreements, this extends to licenses and
572 user fees as well.
573

574 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
575 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
576 noted. Except for maintenance plans or extended warranties purchased incidental to the original purchase
577 of the equipment, the period covered by maintenance or warranty plan must not exceed the POP of the
578 specific grant funds used to purchase the plan or warranty.
579

580 Grant funds are intended to support the Goal by funding projects that build and sustain the core
581 capabilities necessary to prevent, protect against, mitigate the effects of, and respond to those threats that
582 pose the greatest risk to the security of the Nation. In order to provide recipients the ability to meet this
583 objective, the policy set forth in FEMA's [IB 379, Guidance to State Administrative Agencies to Expedite
584 the Expenditure of Certain DHS/FEMA Grant Funding](#), initially for FY 2007-2011, allows for the
585 expansion of eligible maintenance and sustainment costs which must be in (1) direct support of existing
586 capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be
587 tied to one of the core capabilities in the five mission areas contained within the Goal, and (4) shareable
588 through the EMAC. Additionally, eligible costs may also be in support of equipment, training, and critical
589 resources that have previously been purchased with either federal grant or any other source of funding
590 other than FEMA preparedness grant program dollars.
591

592 **Law Enforcement Terrorism Prevention Activities Allowable Costs (SHSP and UASI)**

593 When identifying and selecting projects to meet the Law Enforcement Terrorism Prevention Activities
594 (LETPA) set-aside requirement, recipients are strongly encouraged to consult with the law enforcement
595 community and to consider the capabilities and resource requirements of law enforcement agencies and
596 their unique and central role in preventing and protecting against acts of terrorism. LETPAs can also
597 support a National Priority Area (e.g., an investment can be counted as supporting both the Soft
598 Targets/Crowded Places and LETPA minimum allocation requirements, if applicable). **For FY 2023, the
599 LETPA set-aside requirement is 35% of SHSP and UASI awards.** In particular, recipients should
600 consider investing in projects such as:

- 601
- 602 • Maturation and enhancement of designated state and major urban area fusion centers, including
603 information sharing and analysis, threat recognition, terrorist interdiction, and intelligence
604 analyst training and salaries (subject to certain conditions);

- 605 • Regional counterterrorism training programs for small, medium, and large jurisdictions to
606 exchange information and discuss the current threat environment, lessons learned, and best
607 practices to help prevent, protect against, and mitigate acts of terrorism;
- 608 • Support for coordination of regional full-scale training exercises (federal, state, and local law
609 enforcement participation) focused on terrorism-related events; and
- 610 • Law enforcement Chemical, Biological, Radiological, Nuclear, and high yield Explosives
611 detection and response capabilities, such as bomb detection/disposal capability deployment,
612 sustainment, or enhancement, including canine teams, robotics platforms, and x-ray technology.
613

614 Additional examples of allowable LETPA projects include but are not limited to:

- 615 • Coordination between fusion centers and other intelligence, operational, analytic, or
616 investigative efforts including, but not limited to JTTFs, Field Intelligence Groups (FIGs), High-
617 Intensity Drug Trafficking Areas (HIDTA), Regional Information Sharing Systems (RISS)
618 Centers, criminal intelligence units, real-time crime analysis centers and DHS intelligence,
619 operational, analytic, and investigative entities;
- 620 • Implementation and maintenance of the Nationwide Suspicious Activity Reporting (SAR)
621 Initiative (NSI), including training for front-line personnel on identifying and reporting
622 suspicious activities, tips/leads, and online/social media-based threats, as well as the execution
623 and management of threat assessment programs to identify, evaluate, and analyze indicators and
624 behaviors indicative of terrorism, targeted violence, threats to life, and other criminal activity;
- 625 • Management and operation of activities that support the execution of the intelligence process
626 and fusion centers, including but not limited to: Fusion Liaison Officer (FLO) programs,
627 security programs to protect the facility, personnel, and information, and the protection of
628 privacy, civil rights, and civil liberties;
- 629 • Implementation of the “If You See Something, Say Something®” campaign to raise public
630 awareness of indicators of terrorism and terrorism-related crime and associated efforts to
631 increase the sharing of information with public and private sector partners, including nonprofit
632 organizations. Note: DHS requires that all public and private sector partners wanting to
633 implement and/or expand the DHS “If You See Something, Say Something®” campaign using
634 grant funds work directly with the DHS Office of Partnership and Engagement (OPE) to ensure
635 all public awareness materials (e.g., videos, posters, tri-folds, etc.) are consistent with DHS’s
636 messaging and strategy for the campaign and compliant with the initiative’s trademark, which is
637 licensed to DHS by the New York Metropolitan Transportation Authority. Coordination with
638 OPE, through the Campaign’s Office (seesay@hq.dhs.gov), must be facilitated by the FEMA
639 HQ Preparedness Officer;
- 640 • Increase physical security, through law enforcement personnel and other protective measures,
641 by implementing preventive and protective measures at critical infrastructure sites or at-risk
642 nonprofit organizations;
- 643 • Building and sustaining preventive radiological and nuclear detection capabilities, including
644 those developed through the Securing the Cities initiative;
- 645 • Integration and interoperability of systems and data, such as computer aided dispatch (CAD)
646 and record management systems (RMS), to facilitate the collection, evaluation, and assessment
647 of suspicious activity reports, tips/leads, and online/social media-based threats; and
- 648 • Development of countering violent extremism programs, projects, and initiatives, addressing
649 prevention, intervention, and diversion efforts, including training on roles of law enforcement
650 and how to effectively partner with law enforcement; developing and promoting training
651 specifically for law enforcement executives and frontline officers on potential behaviors and
652 indicators of violent extremism and how to appropriately analyze and report them; supporting
653 community and law enforcement engagement strategies such as table top exercises, roundtable
654 events, town hall meetings, and peer to peer activities; funding for existing and/or expansion of

655 law enforcement community relations efforts, support for the development of community
656 engagement plans, and joint projects to increase the awareness of violent extremist threats and
657 community mitigation solutions.
658

659 **Law Enforcement Readiness (SHSP, UASI, and OPSG)**

660 OPSG grant funds may be used to increase operational, material, and technological readiness of SLTT
661 law enforcement agencies. The Delegation of Immigration Authority, Section 287(g) of the *Immigration
662 and Nationality Act (INA)* program allows a state or local law enforcement entity to enter into a
663 partnership with Immigration and Customs Enforcement (ICE), under a joint Memorandum of Agreement
664 (MOA), to receive delegated authority for immigration enforcement within their jurisdictions.
665

666 SHSP, UASI, or OPSG grant funds may be requested and may be approved on a case-by-case basis for
667 immigration enforcement training in support of the border security mission. Requests for training will be
668 evaluated on a case-by-case basis and can only be used for certification in the section 287(g) program
669 provided by DHS/ICE. SHSP, UASI, or OPSG subrecipients with agreements under section 287(g) of the
670 *INA* (8 U.S.C. § 1357(g)) to receive delegated authority for immigration enforcement within their
671 jurisdictions may also be reimbursed for section 287(g) related operational activities with approval from
672 FEMA on a case-by-case basis. For OPSG, subrecipients must be authorized by USBP Headquarters and
673 Sectors, and operational activities must be coordinated through a USBP Sector.
674

675 **Regional Border Projects (OPSG)**

676 Recipients are encouraged to prioritize the acquisition and development of regional projects on the
677 borders to maximize interoperability and coordination capabilities among federal agencies and with state,
678 local, and tribal law enforcement partners. Such regional projects include:
679

- 680 • Communications equipment;
- 681 • Radio systems and repeaters;
- 682 • Integration with regional intelligence and information sharing effort (i.e., fusion centers):
683 ○ Intelligence analysts.
- 684 • Situational Awareness equipment:
685 ○ License Plate Reader Networks;
686 ○ Visual detection and surveillance systems;
687 ○ Sensor Systems;
688 ○ Radar Systems (for air and/or marine incursions); and
689 ○ Aircraft systems (manned or unmanned).
690

691 **Critical Emergency Supplies (SHSP and UASI)**

692 Critical emergency supplies, such as shelf stable products, water, and medical equipment and supplies are
693 an allowable expense under SHSP and UASI. Prior to the allocation of grant funds for stockpiling
694 purposes, each state must have FEMA's approval of a five-year viable inventory management plan, which
695 should include a distribution strategy and related sustainment costs if planned grant expenditure is over
696 \$100,000.00.
697

698 If grant expenditures exceed the minimum threshold, the five-year inventory management plan will be
699 developed by the recipient and monitored by FEMA. FEMA will provide program oversight and technical
700 assistance as it relates to the purchase of critical emergency supplies under UASI. FEMA will establish
701 guidelines and requirements for the purchase of these supplies under UASI and monitor development and
702 status of the state's inventory management plan.
703

704 SAAs (through their state Emergency Management Office) are strongly encouraged to consult with their
705 respective FEMA Regional Logistics Chief regarding disaster logistics-related issues. States are further
706 encouraged to share their FEMA approved plan with local jurisdictions and tribes.

707

708 **Construction and Renovation (SHSP and UASI)**

709 Project construction using SHSP and UASI funds may not exceed the greater of \$1 million or 15% of the
710 grant award. For the purposes of the limitations on funding levels, communications towers are *not*
711 considered construction. See guidance on communication towers below.

712

713 All construction and renovation projects require EHP review. Recipients and subrecipients are
714 encouraged to have completed as many steps as possible for a successful EHP review in support of their
715 proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential
716 historic preservation issues and to discuss the potential for project effects, compliance with all state and
717 local EHP laws and requirements). Projects for which the recipient believes an Environmental
718 Assessment (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Rev 01](#), [FEMA](#)
719 [Directive 108-1](#), and [FEMA Instruction 108-1-1](#), must also be identified to the FEMA HQ Preparedness
720 Officer within six months of the award and completed EHP review materials must be submitted no later
721 than 12 months before the end of the period of performance. [EHP policy guidance](#) and the [EHP Screening](#)
722 [Form](#) can both be found on FEMA.gov. EHP review materials should be sent to
723 gpdehpinfo@fema.dhs.gov.

724

725 Written approval must be provided by FEMA prior to the use of any HSGP funds for construction or
726 renovation. When applying for construction funds, recipients must submit evidence of approved zoning
727 ordinances, architectural plans, and any other locally required planning permits. Additionally, recipients
728 are required to submit a SF-424C form with budget detail citing the project costs, and an SF-424D Form
729 for standard assurances for the construction project.

730

731 Recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified as
732 amended at 40 U.S.C. §§ 3141 *et seq.*). See 6 U.S.C. § 609(b)(4)(B) (cross-referencing 42 U.S.C. §
733 5196(j)(9), which cross-references *Davis-Bacon*). Recipients must ensure that their contractors or
734 subcontractors for construction projects pay workers no less than the prevailing wages for laborers and
735 mechanics employed on projects of a character like the contract work in the civil subdivision of the state
736 in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon*
737 *Act*, including Department of Labor (DOL) wage determinations, is available online at
738 <https://www.dol.gov/whd/govcontracts/dbra.htm>.

739

740 **Construction and Renovation (OPSG)**

741 OPSG funds may not be used for any construction.

742

743 **Communications Towers**

744 All construction of communication towers requires EHP review. When applying for funds to construct
745 communication towers, recipients and subrecipients must submit evidence that the Federal
746 Communication Commission's Section 106 of the *National Historic Preservation Act*, Pub. L. No. 89-
747 665, as amended, review process has been completed and submit all documentation resulting from that
748 review to FEMA with a GPD EHP Screening Form and supporting materials for EHP review. Recipients
749 and subrecipients are encouraged to have completed as many steps as possible for a successful EHP
750 review in support of their proposal for funding (e.g., coordination with their State Historic Preservation
751 Office to identify potential historic preservation issues and to discuss the potential for project effects,
752 compliance with all state and local EHP laws and requirements). Projects for which the recipient believes
753 an EA may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision 01](#), [FEMA](#)

754 [Directive 108-1, and FEMA Instruction 108-1-1](#), Instruction on Implementation of the Environmental
755 Planning and Historic Preservation Responsibilities and Program Requirements, must also be identified to
756 the FEMA HQ Preparedness Officer within six months of the award and completed EHP review materials
757 must be submitted no later than 12 months before the end of the period of performance. [EHP policy](#)
758 [guidance](#) and the [EHP Screening Form](#) can both be found on FEMA.gov. [EHP](#) review materials should be
759 sent to gpdehpinfo@fema.dhs.gov.

760

761 **Western Hemispheric Travel Initiative (SHSP)**

762 In addition to the expenditures outlined above, SHSP funds may be used to support the implementation
763 activities associated with the Western Hemisphere Travel Initiative (WHTI), including the issuance of
764 WHTI-compliant tribal identification cards.

765

766 **Emergency Management Accreditation Program**

767 States can encourage their local jurisdictions to pursue assessment and accreditation under the Emergency
768 Management Accreditation Program (EMAP). EMAP's assessment and accreditation of emergency
769 management organizations against consensus-based, American National Standards Institute (ANSI)-
770 certified standards allows for standardized benchmarking of critical functions necessary for an emergency
771 management organization to meet the core capabilities identified in the Goal. Additional information on
772 the EMAP Standard is available at <http://www.emap.org>.

773

774 **28 C.F.R. Part 23 Guidance**

775 FEMA requires that any information technology system funded or supported by these funds comply with
776 28 C.F.R. Part 23, Criminal Intelligence Systems Operating Policies if this regulation is determined to be
777 applicable. Additionally, please see 28 C.F.R. Part 23 requirements that pertain to fusion centers at
778 <http://www.dhs.gov/homeland-security-grant-programs-hsgp>.

779

780 **Unallowable Costs (OPSG)**

781 OPSG unallowable costs include costs associated with evidence collection, arrest processing, prosecution,
782 and Traffic/DUI checkpoints, such as evidence documentation cameras, fingerprinting supplies, alcohol
783 breathalyzers, portable work lights, traffic barricades, and similar law enforcement expenses. OPSG
784 unallowable costs also include costs associated with staffing and general IT computing equipment and
785 hardware, such as personal computers, faxes, copy machines, modems, etc. OPSG is not intended as a
786 hiring program. Therefore, applying funds toward hiring full-time or permanent sworn public safety
787 officers is unallowable. OPSG funding shall not be used to supplant inherent routine patrols and law
788 enforcement operations or activities not directly related to providing enhanced coordination between local
789 and federal law enforcement agencies. Finally, construction and/or renovation costs are prohibited under
790 OPSG. Applicants should refer to [IB 421b](#), or contact their FEMA HQ Preparedness Officer for guidance
791 and clarification. Due to the nature of OPSG, exercise expenses are not allowable costs under OPSG.

792

793 **Unallowable Costs (SHSP, UASI, and OPSG)**

- 794 • Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is
795 not allowed with HSGP funds;
- 796 • Grant funds may not be used for the purchase of equipment not approved by FEMA. Grant funds
797 must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA](#)
798 [Awards](#), and may not be used for the purchase of the following equipment: firearms; ammunition;
799 grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons
800 installed;
- 801 • Unauthorized exercise-related costs include:

- 802 ○ Reimbursement for the maintenance or wear and tear costs of general use vehicles (e.g.,
803 construction vehicles), medical supplies, and emergency response apparatus (e.g., fire
804 trucks, ambulances); and
- 805 ○ Equipment that is purchased for permanent installation and/or use, beyond the scope of
806 the conclusion of the exercise (e.g., electronic messaging sign).
- 807

808 Indirect Costs

809 Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost Rates”
810 Section in “Pre-Submission Information” for more information.

812 Resources for Planning, Training, and Exercising (SHSP, UASI, and OPSG)

813 Planning Assistance

814 FEMA’s National Preparedness Directorate (NPD) offers technical assistance (TA) that is designed to
815 provide recipients and subrecipients with specialized expertise to improve and enhance the continuing
816 development of state and local emergency management across the five mission areas of the Goal and
817 across all core capabilities. TA provides the opportunity to engage emergency managers, emergency
818 planners, and appropriate decision-makers in open discussion of options to improve plans and planning
819 considering their jurisdiction’s needs. Although there is no direct cost to approved jurisdictions for FEMA
820 TA, jurisdictions are expected to invest staff resources and take ownership of the resulting products and
821 tools.

822
823 TA deliveries combine current emergency management best practices with practical consideration of
824 emerging trends, through discussion facilitated by FEMA contract specialists and with the support of
825 FEMA Region operational specialists. Additionally, peer-to-peer representation may also be included
826 from other jurisdictions that have recently addressed the same planning issue. The TA request form can be
827 accessed at <https://www.fema.gov/emergency-managers/nims/implementation-training>.

828

829 Training Information

830 Per [IB 432, Review and Approval Requirements for Training Courses Funded Through Preparedness](#)
831 Grants, issued on July 19, 2018, states, territories, tribal entities, and high-risk urban areas are no longer
832 required to request approval from FEMA for personnel to attend non-DHS FEMA training as long as the
833 training is coordinated with and approved by the state, territory, tribal, or high-risk urban area Training
834 Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction’s EOP. For
835 additional information on review and approval requirements for training courses funded with
836 preparedness grants, see [FEMA Policy 207-22-0002, Prohibited or Controlled](#)
837 [Equipment Under FEMA Awards](#).

838

839 FEMA will conduct periodic reviews of all state, local, territory, tribal entities, and high-risk urban area
840 training funded by FEMA. These reviews may include requests for all course materials and physical
841 observation of, or participation in, the funded training. If these reviews determine that courses are outside
842 the scope of this guidance, recipients will be asked to repay grant funds expended in support of those
843 efforts. For further information on developing courses using the ADDIE model (Analysis, Design,
844 Development, Implementation, and Evaluation) and tools that can facilitate the process, SAAs and
845 TPOCs are encouraged to review the National Training and Education Division Training Resource and
846 Development Center website at [FRT-TRDC Home \(firstrespondertraining.gov\)](#).

847

848 Some training and exercise activities require EHP Review, including exercises, drills or trainings that
849 require any type of land, water, or vegetation disturbance or building of temporary structures or that are not
850 located at facilities designed to conduct training and exercises. Additional information on training

851 requirements and EHP review can be found online at [Environmental & Historic Preservation Guidance](#)
852 [for FEMA Grant Applications | FEMA.gov](#).

853

854 **DHS/FEMA Provided Training and Education**

855 FEMA offers tuition-free training and education programs and courses through several providers including
856 the CDP, EMI, and the National Training and Education Division’s Training Partners Program (TPP). TPP
857 includes the Center for Homeland Defense and Security, NDPC, RDPC, and the CTG Program.

858

859 **FEMA’s National Preparedness Course Catalog**

860 This online searchable catalog features a wide range of course topics in multiple delivery modes to meet
861 FEMA’s mission scope as well as the increasing training needs of federal, state, local, territorial, and tribal
862 audiences. The catalog can be accessed at [NTED | National Preparedness Course Catalog Home](#)
863 [\(firstrespondertraining.gov\)](#).

864

865 **Training Not Provided by DHS/FEMA**

866 These trainings include courses that are either state-sponsored or federal-sponsored (non-DHS/FEMA),
867 coordinated and approved by the SAA or their designated TPOC, and fall within the FEMA mission scope
868 to prepare SLTT personnel to prevent, protect against, mitigate, and respond to acts of terrorism or
869 catastrophic events.

870

- 871 • *State Sponsored Courses.* These courses are developed for and/or delivered by institutions or
872 organizations other than federal entities or FEMA and are sponsored by the SAA or their
873 designated TPOC.
- 874 • *Joint Training and Exercises with the Public and Private Sectors.* These courses are sponsored
875 and coordinated by private sector entities to enhance public-private partnerships for training
876 personnel to prevent, protect against, mitigate, and respond to acts of terrorism or catastrophic
877 events. In addition, states, territories, tribes, and high-risk urban areas are encouraged to
878 incorporate the private sector in government- sponsored training and exercises.

879

880 Additional information on both FEMA provided training and other federal and state training can be found
881 at [National Training and Education Division \(NTED\) \(firstrespondertraining.gov\)](#).

882

883 **Training Information Reporting System (“Web-Forms”)**

884 Web-Forms is an electronic data management system built to assist SAA TPOCs and federal agencies
885 with submitting non-National Training and Education Division provided training courses for inclusion in
886 the State/Federal-Sponsored Course Catalog through electronic forms. The information collected is used
887 in a two-step review process to ensure the training programs adhere to the intent of the HSGP guidance
888 and the course content is structurally sound and current. As these programs may be delivered nationwide,
889 it is vital to ensure each training program’s viability and relevance to the Homeland Security mission.
890 Reporting training activities through Web-Forms is not required under present funding. However, the
891 system remains available and can be accessed through the [Web-Forms section of the FEMA National](#)
892 [Preparedness Course Catalog](#) to support recipients in their own tracking of training deliveries. Users need
893 to request FRTS Admin rights from NTED in order to access the Web-Forms.

894

895 **Exercise Information**

896 Recipients that use HSGP funds to conduct an exercise(s) are encouraged to complete a progressive
897 exercise series. Exercises conducted by states and high-risk urban areas may be used to fulfill similar
898 exercise requirements required by other grant programs. Recipients are encouraged to invite
899 representatives/planners involved with other federally mandated or private exercise activities. States and

900 high-risk urban areas are encouraged to share, at a minimum, the multi- year training and exercise
901 schedule with those departments, agencies, and organizations included in the plan.

- 902
- 903 • *Validating Capabilities.* Exercises examine and validate capabilities-based planning across the
904 Prevention, Protection, Mitigation, and Response mission areas. The extensive engagement of
905 the whole community, including but not limited to examining the needs and requirements for
906 individuals with disabilities, individuals with limited English proficiency, and others with other
907 access and functional needs, is essential to the development of an effective and comprehensive
908 exercise program. Exercises are designed to be progressive – increasing in scope and complexity
909 and drawing upon results and outcomes from prior exercises and real-world incidents – to
910 challenge participating communities. Consistent with HSEEP guidance and tools, the National
911 Exercise Program (NEP) serves as the principal exercise mechanism for examining national
912 preparedness and measuring readiness. Exercises should align with priorities and capabilities
913 identified in a multi-year IPP.
- 914 • *Special Event Planning.* If a state or high-risk urban area will be hosting a special event (e.g.,
915 Super Bowl, G-8 Summit), the special event planning should be considered as a training or
916 exercise activity for the multi-year IPP. States must include all confirmed or planned special
917 events in the multi-year IPP. The state or high-risk urban area may plan to use SHSP or UASI
918 funding to finance training and exercise activities in preparation for those events. States and
919 high-risk urban areas should also consider exercises at major venues (e.g., arenas, convention
920 centers) that focus on evacuations, communications, and command and control.
- 921 • *Regional Exercises.* States should also anticipate participating in at least one regional exercise
922 annually.
- 923 • *Role of Non-Governmental Entities in Exercises.* Non-governmental participation in all levels of
924 exercises is strongly encouraged. Leaders from non-governmental entities should be included in
925 the planning, design, and evaluation of an exercise. SLTT jurisdictions are encouraged to
926 develop exercises that test the integration and use of resources provided by non-governmental
927 entities, defined as the private sector and private non-profit, faith-based, and community
928 organizations. Participation in exercises should be coordinated with local Citizen Corps Whole
929 Community Council(s) or their equivalents and other partner agencies.

931 Reporting on the Implementation of the National Preparedness 932 System

933 Identifying and Assessing Risk and Estimating Capability Requirements

934 By December 31, 2022, states, territories, and high-risk urban areas are required to complete a
935 THIRA/SPR that addresses all 32 core capabilities and is compliant with CPG 201, Third Edition.
936 Beginning in 2020, jurisdictions began the requirement to respond to a series of planning-related
937 questions as part of the THIRA/SPR.

938

939 Jurisdictions are required to submit a THIRA every three years to establish a consistent baseline for
940 assessment. While the THIRA is only required every three years, jurisdictions are required to submit an
941 SPR annually. For additional guidance on the THIRA/SPR, please refer to [Comprehensive Preparedness
942 Guide \(CPG\) 201, Third Edition](#).

943 Reporting

- 944
- 945 • States and territories will submit their THIRA and SPR through the Unified Reporting Tool
946 (URT) on [Prep Toolkit](#) no later than December 31 of the applicable year (every three years for
947 THIRA and each year for SPR).

- 948 • High-risk urban areas that receive UASI funding will submit their THIRA/SPR through the URT
949 on [Prep Toolkit](#) no later than December 31 for the years they have UASI open grants. If a UASI
950 recipient has completed closeout for their UASI grant award period of performance, they do not
951 have to submit a THIRA/SPR as the requirement is not applicable to closed grant awards. While
952 UASIs that have completed closeout for the award period of performance are not required to
953 complete a THIRA/SPR, it is encouraged.
- 954 • Calendar year 2022 is the start of the new 3-year THIRA/SPR cycle and baseline assessment year
955 for existing recipients. Any new grant recipients during calendar year 2023, for which the
956 THIRA/SPR requirement applies, will start their new 3-year THIRA/SPR cycle and baseline
957 assessment year in 2023. States, territories, and high-risk urban areas should work collaboratively
958 to create the most accurate THIRA and SPR possible. States, territories, and high-risk urban areas
959 may share scenarios, targets, and assessed capabilities when appropriate.
- 960 • Please contact FEMA-SPR@fema.dhs.gov if you have questions.

961
962 **Building and Sustaining Capabilities**

963 States, territories, and high-risk urban areas must prioritize and align SHSP and UASI grant funding
964 investments in building and sustaining capabilities in areas that align with the national priorities in the
965 annual HSGP NOFO and capability gaps identified in their THIRA and SPR.

966
967 **Reporting**

968 In each HSGP recipient’s Biannual Strategy and Implementation Report (BSIR), as part of programmatic
969 monitoring, the recipient must describe how expenditures support building capability, closing capability
970 gaps, or sustaining capabilities identified in the THIRA and SPR. HSGP recipients must, on a project-by-
971 project basis, check one of the following:

- 972
- 973 • Building a capability with HSGP funding; and
- 974 • Sustaining a capability with HSGP funding.

975
976 **National Incident Management System (NIMS) Implementation**

977 Recipients receiving HSGP funding are required to implement NIMS. NIMS guides all levels of
978 government, nongovernmental organizations (NGO), and the private sector to work together to prevent,
979 protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the
980 whole community with the shared vocabulary, systems, and processes to successfully deliver the
981 capabilities described in the National Preparedness System. HSGP recipients must use standardized
982 resource management concepts for resource typing, credentialing, and an inventory to facilitate the
983 effective identification, dispatch, deployment, tracking, and recovery of resources.

984
985 The *NIMS Implementation Objectives for Local, State, Tribal, and Territorial Jurisdictions* clarify the
986 NIMS implementation requirements in FEMA preparedness grant NOFOs. As recipients and
987 subrecipients of federal preparedness (non-disaster) grant awards, jurisdictions and organizations must
988 achieve, or be actively working to achieve, all of the NIMS Implementation Objectives. The objectives
989 can be found on the NIMS webpage at [NIMS Implementation and Training | FEMA.gov](#).

990
991 **Reporting**

- 992 • Recipients report in the applicable secondary NIMS assessment portion of the URT as part of
993 their THIRA/SPR submission, as outlined in the HSGP NOFO.

994
995 **Planning to Deliver Capabilities**

996 Recipients shall develop and maintain, jurisdiction-wide, all threats and hazards EOPs consistent with
997 [Comprehensive Preparedness Guide 101, Version 2.0 \(CPG 101 v2\), Developing and Maintaining](#)

998 [Emergency Operations Plans \(November 2010\)](#). Recipients must update their EOPs at least once every
999 two years.

1000

1001 **Reporting**

- 1002 • Recipients report EOP compliance with CPG 101 v2 by completing the secondary CPG-101
1003 assessment as part of their THIRA/SPR submission in the URT.

1004

1005 **Validating Capabilities**

1006 All recipients will develop and maintain a progressive exercise program consistent with HSEEP guidance
1007 in support of the NEP. The NEP serves as the principal exercise mechanism for examining national
1008 preparedness and measuring readiness. The NEP is a two-year cycle of exercises across the nation that
1009 validates capabilities in all preparedness mission areas. The two-year NEP cycle is guided by Principals’
1010 Strategic Priorities, established by the National Security Council, and informed by preparedness data from
1011 jurisdictions across the Nation.

1012

1013 To develop and maintain a progressive exercise program consistent with HSEEP and in support of the
1014 NEP, recipients should engage senior leaders and other whole community stakeholders to identify
1015 preparedness priorities. These priorities should be informed by various factors, including jurisdiction-
1016 specific threats and hazards (i.e., the THIRA); areas for improvement identified by real-world events and
1017 exercises; external requirements such as state or national preparedness reports, homeland security policy,
1018 and industry reports; and accreditation standards, regulations, or legislative requirements. Recipients
1019 should document these priorities and use them to deploy a schedule of preparedness events in a multi-year
1020 IPP. Information related to Integrated Preparedness Planning Workshops (IPPWs) can be found on the
1021 HSEEP website at [Homeland Security Exercise and Evaluation Program | FEMA.gov](#) and [Welcome -
1022 Preparedness Toolkit \(fema.gov\)](#).

1023

1024 The NEP provides exercise sponsors the opportunity to receive exercise design and delivery assistance,
1025 tools and resources, enhanced coordination, and the ability to directly influence and inform policy and
1026 preparedness programs. If you have any questions, or would like to request assistance through the NEP,
1027 please visit the NEP website at [Exercises | FEMA.gov](#), or reach out to the National Exercise Program
1028 directly at NEP@fema.dhs.gov.

1029

- 1030 • Recipients must have a current multi-year IPP that identifies preparedness priorities and
1031 activities. The current multi-year IPP must be submitted to hseep@fema.dhs.gov before January
1032 31 of each year:
 - 1033 ○ Recipients are encouraged to enter their exercise information into the Preparedness
1034 Toolkit at [Welcome - Preparedness Toolkit \(fema.gov\)](#).
- 1035 • Recipients must submit After-Action Report (AAR)/Improvement Plans (IPs) to
1036 hseep@fema.dhs.gov and indicate which fiscal year’s funds were used (if applicable);
- 1037 • Submission of AAR/IPs must take place within 90 days following completion of the single
1038 exercise or progressive series:
 - 1039 ○ Recipients are encouraged to submit AAR/IPs reflecting tabletop exercises that validate
1040 critical plans or those reflecting large-scale functional or full-scale exercises that took
1041 place at the state, territorial, tribal, or UASI level. Recipients are discouraged from
1042 submitting AAR/IPs specific to local jurisdictions that reflect drills;
 - 1043 ○ If a recipient endures a significant real-world incident during the calendar year that
1044 delays or prevents conduct of a grant-funded exercise, they can submit the AAR from
1045 that event in place of the exercise AARs. Jurisdictions submitting real world AARs
1046 should include an explanation with the AAR submission to hseep@fema.dhs.gov; and

- 1047 ○ Recipients can access a sample AAR/IP template at:
1048 <https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning>.
1049

1050 Fusion Centers

1051 A critical component of the national response to the 9/11 terrorist attacks was the development of a
1052 national-level, decentralized, and coordinated terrorism-related information sharing environment (ISE).
1053 State and local governments, supported by federal investments from DHS, the Department of Justice
1054 (DOJ), Department of Health and Human Services (HHS), and other federal agencies, established the
1055 National Network of Fusion Centers (National Network), which became the backbone of the national ISE.
1056 This National Network, comprised of 80 state and major urban area fusion centers, collaborates and
1057 shares information with partners from all levels of government and the private sector, as well as other
1058 field-based information sharing partners, including HIDTAs, RISS Centers, JTTFs, major city/county
1059 intelligence units, and real-time crime analysis centers, among others.

1060
1061 National Network participation in NSI enables fusion centers to identify, receive and analyze suspicious
1062 activity reporting and other tips/leads from frontline public safety personnel, the private sector, and the
1063 public, and ensure the sharing of SARs with DHS and the FBI’s JTTFs for further investigation. In
1064 addition to those activities identified in the National Prevention Framework, fusion centers are also
1065 required to collaborate with those intelligence, operational, analytic, investigative, and information-
1066 sharing focused entities to combat a wide array of threats – noted below – in support of efforts to enhance
1067 capabilities for detecting, deterring, disrupting, and preventing acts of terrorism, targeted violence, and
1068 other threats. Such entities include, but are not limited to JTTFs, Area Maritime Security Committees,
1069 Border Enforcement Security Task Forces, Integrated Border Enforcement Teams, HIDTAs, and RISS
1070 Centers as well as other federal intelligence, operational, analytic, and investigative entities. Applicants
1071 should describe their collaboration plan and proposed efforts in their required Fusion Center project as
1072 part of the Intelligence and Information Sharing National Priority.

1073
1074 Today’s threats—including international and domestic terrorism, drugs, gangs, active shooters, targeted
1075 violence, transnational organized crime, and cyber—require federal, state, and local governments to
1076 leverage this national capacity to effectively respond to the evolving nature of the various national and
1077 homeland security threats confronting our Nation. Ultimately, timely identification and analysis of key
1078 indicators from local, state, and federal partners will enable all stakeholders to address threats and
1079 develop and implement data-driven strategies to prevent, protect against, mitigate, and respond
1080 effectively, while ensuring the protection of privacy, civil rights, and civil liberties.

1081
1082 To underscore the importance of the National Network as a critical component of our Nation’s distributed
1083 homeland security and counterterrorism architecture, FEMA preparedness grants will continue to
1084 prioritize support for designated fusion centers ([http://www.dhs.gov/fusion-center-locations-and-contact-](http://www.dhs.gov/fusion-center-locations-and-contact-information)
1085 [information](http://www.dhs.gov/fusion-center-locations-and-contact-information)) and the maturation of the ISE. Fusion centers **must** prioritize the following capabilities to
1086 further enable and mature this national asset and strengthen the collective capacity to identify, collect,
1087 analyze, and share information, and to disseminate actionable and strategic intelligence to key
1088 stakeholders:

- 1089
1090 • **Addressing Threats:** Fusion centers provide a national level, decentralized, and coordinated ISE
1091 across all levels of government and disciplines that can be leveraged and applied to address
1092 threats to homeland security, national security, public safety, and/or public health, and especially
1093 those threats that may have little or no warning. Fusion centers should leverage and build upon
1094 their terrorism-focused analytic and information-sharing capabilities so they can be applied to
1095 address threats across the DHS mission space, including threats from both international terrorism

1096 and domestic violent extremists, threats to life and targeted violence, transnational organized
1097 criminal activity, cyber threats, and natural hazards, among others that require close collaboration
1098 with DHS operational, investigative, and analytic entities such as CBP, ICE, United States Secret
1099 Service (USSS), CISA, the United States Coast Guard (USCG), and FEMA.

- 1100 • **Analytic Capability:** Fusion centers must maintain strong analytic capabilities at tactical,
1101 operational, and strategic levels to address a wide array of threats or hazards that could have
1102 implications for homeland security or national security. These capabilities directly support
1103 operational, investigative, and information sharing efforts across all levels of government. These
1104 capabilities include, but are not limited to:
 - 1105 ○ Building and sustaining a capable workforce of analysts who have the necessary
1106 experience and training; access to open source, unclassified and classified information,
1107 products, data, suspicious activity reporting; tips/leads and online/social media-based
1108 threats; as well as necessary services and technology to facilitate analytic capabilities and
1109 collaboration;
 - 1110 ○ Assessing, evaluating, and deconflicting acts of targeted violence, threats to life, and
1111 other criminal or suspicious activity, to include potential indicators and behaviors, for
1112 potential connection to or implications for international or domestic terrorism, or other
1113 threats within the DHS mission space;
 - 1114 ○ Providing analytic support and responses to requests for information from federal, state,
1115 and local partners during no notice threats, attacks, or incidents, as well as other planned
1116 events such as NSSEs;
 - 1117 ○ Conducting threat assessments within their respective jurisdictions, including the
1118 identification of threats, intelligence gaps, and mitigation efforts;
 - 1119 ○ Establishing, formalizing, and maintaining bi-directional information sharing with federal
1120 and other state agencies in accordance with jurisdictional authorities;
 - 1121 ○ Leveraging available resources and capabilities to conduct target and event deconfliction
1122 in support of threat identification, officer safety, and information sharing.
 - 1123 ○ Maintaining an ability to routinely support federal government efforts to watchlist
1124 terrorists and transnational organized crime actors; and
 - 1125 ○ Appropriately planning for, and assessing/forecasting, prioritizing, and executing against
1126 both known and emerging threat vectors, and ensuring the safety and security of all
1127 operations, while protecting privacy, civil rights, and civil liberties.

1128
1129 Fusion centers should also consider their operational capacity when aligning manpower and
1130 resources in support of this capability (e.g., the ability to maintain watch and analytic support
1131 functions over a 24/7 operational tempo).

- 1132 • **Technological Integration:** Access to data, information, and products is essential for fusion
1133 centers and the federal government to effectively identify, collect, analyze, and share information.
1134 Just as threats do not stop at jurisdictional borders, fusion centers must be able to effectively
1135 access and share appropriate information and data across jurisdictions, agencies, and disciplines.
1136 Fusion centers must **ensure and certify via the Fusion Center Assessment** they have the
1137 necessary technological capacity to access, analyze, and share information, including criminal
1138 intelligence and online/social media threat information, both within their jurisdictions, as well as
1139 with other fusion centers across the country and with the Federal Government through a variety
1140 of systems, databases, tools, and technologies that allow for federated searching and
1141 data/information analysis that protects Personally Identifiable Information and includes
1142 appropriate security, privacy, civil rights, and civil liberties protections. This includes
1143 maintenance of the ability to collect, integrate, evaluate, and assess SAR, tips/leads, data resident
1144 in CAD and RMS, and online/social media-based threats from agencies across the jurisdiction.
1145 Such approaches should also address the evaluation and use of emerging capabilities, including
1146 social network analysis, federated search technology across CAD, RMS, and other data systems,

1147 complex data indexing, social media, open source, facial recognition, unmanned aircraft systems,
 1148 geographic information systems (GIS), license plate reader technologies, and other artificial
 1149 intelligence technologies.

- 1150 • **Interagency Collaboration:** Fusion centers must maintain strong partnerships to enable
 1151 intelligence, operational, investigative, and analytic collaboration and deconfliction of threat
 1152 information with other partners located within their jurisdiction and across their region, including
 1153 HIDTAs, RISS Centers, DHS intelligence, operational, investigative, and analytic entities, FBI
 1154 Field Offices, JTTFs, and major city/county intelligence units.

1155
 1156 State and urban area fusion centers receiving SHSP or UASI grant funds will be evaluated based on
 1157 compliance with the guidance and requirements for the National Network as set forth by DHS
 1158 Intelligence and Analysis (I&A) through the annual Fusion Center Assessment.

- 1159
- 1160 • Additional fusion center grant requirements are listed at [http://www.dhs.gov/homeland-security-](http://www.dhs.gov/homeland-security-grant-program-hsgp)
 1161 [grant-program-hsgp](http://www.dhs.gov/homeland-security-grant-program-hsgp).
- 1162 • FEMA approved analyst courses that meet the grant requirement are listed at
 1163 <http://www.dhs.gov/fema-approved-intelligence-analyst-training-courses>.

1164
 1165 Through the Program Performance Report (PPR), fusion centers will report on the compliance with
 1166 measurement requirements within the fusion centers through the annual Fusion Center Assessment
 1167 managed by DHS I&A and reported to FEMA. In addition to the activities identified in the National
 1168 Prevention Framework, fusion centers are also **required** to collaborate with those analytic, investigative,
 1169 and information-sharing entities focused on preventing, detecting, deterring, and disrupting acts of
 1170 terrorism and combating transnational criminal organizations. Such entities include, but are not limited to
 1171 JTTFs, Area Maritime Security Committees, Border Enforcement Security Task Forces, Integrated
 1172 Border Enforcement Teams, HIDTAs, and RISS Centers, as well as other federal intelligence,
 1173 operational, analytic, and investigative entities. **Applicants will be required to provide information**
 1174 **regarding their information sharing partnerships, including how they will identify, address, and**
 1175 **overcome any existing laws, policies, and practices that prevent information sharing, via the**
 1176 **Information and Intelligence National Priority Investment and supporting data via the annual**
 1177 **Fusion Center Assessment.**

1178
 1179 **Fusion Center Performance Measures**

Reference Number	Performance Measures
2023.1	Percentage of federal Information Intelligence Reports (IIRs) originating from fusion center information that address a specific Intelligence Community need
2023.2	Percentage of federal IIRs originating from fusion center information that the Intelligence Community otherwise used in performing its mission (e.g., contained first-time reporting; corroborated existing information; addressed a critical intelligence gap; or helped to define an issue or target)
2023.3	Number of SARs vetted and submitted by fusion centers that result in the initiation or enhancement of an investigation by the FBI
2023.4	Number of SAR vetted and submitted by fusion centers that involve an individual on the Watchlist
2023.5	Percentage of Requests for Information (RFIs) from the Terrorist Screening Center (TSC) for which fusion centers provided information for a TSC case file
2023.6	Percentage of I&A Watchlist nominations that were initiated or updated existing case files based on information provided by fusion centers

Reference Number	Performance Measures
2023.7	Number of distributable analytic products co-authored by one or more fusion centers and/or federal agencies
2023.8	Percentage of fusion center distributable analytic products that address Homeland Security topics
2023.9	Percentage of fusion center distributable analytic products that address state/local customer information needs
2023.10	Percentage of key customers reporting that fusion center products are relevant
2023.11	Percentage of key customers reporting that fusion center services are relevant
2023.12	Percentage of key customers reporting that fusion center products are timely for mission needs
2023.13	Percentage of key customers reporting that fusion center services are timely for mission needs
2023.14	Percentage of key customers reporting that fusion center products influenced their decision making related to threat response activities within their AOR
2023.15	Percentage of key customers reporting that fusion center services influenced their decision making related to threat response activities within their AOR
2023.16	Percentage of key customers reporting that fusion center products resulted in increased situational awareness of threats within their AOR
2023.17	Percentage of key customers reporting that fusion center services resulted in increased situational awareness of threats within their AOR
2023.18	Number of tips and leads vetted by the fusion center
2023.19	Number of tips and leads vetted by the fusion center that were provided to other F/SLTT agencies for follow up action
2023.20	Number of responses to RFIs from all sources
2023.21	Number of situational awareness products developed and disseminated by fusion centers
2023.22	Number of case support and/or tactical products developed and disseminated by fusion centers
2023.23	Percentage of federally designated special events in which fusion centers played a direct role
2023.24	Percentage of federally declared disasters in which fusion centers played a direct role
2023.25	Number of public safety incidents in which fusion centers played a direct role

1180

1181 **Continuity Capability**

1182 Continuity should be integrated into each core capability and the coordinating structures that provide
1183 them. Continuity capabilities increase resilience and the probability that organizations can perform
1184 essential functions in the delivery of core capabilities that support the mission areas. FEMA is responsible
1185 for coordinating the implementation and development, execution, and assessment of continuity
1186 capabilities among executive departments and agencies. To support this role, FEMA develops and
1187 promulgates directives, policy, and guidance for federal and SLTT governments, non-governmental
1188 organizations, and private sector critical infrastructure owners and operators. Federal Continuity
1189 Directives (FCDs) establish continuity program and planning requirements for executive departments and
1190 agencies. This direction and guidance assist in developing capabilities for continuing the essential
1191 functions of federal and SLTT governmental entities, as well as public/private critical infrastructure
1192 owners, operators, and regulators enabling them.

1193

1194 The Federal Continuity Directives and the Continuity Resource Toolkit provide guidance and resources
1195 for organizations. For additional information on continuity programs, guidance, and directives, visit
1196 <https://www.fema.gov/emergency-managers/national-preparedness/continuity>.
1197

1198 Governance

1199 In keeping with the guiding principles of governance for all FEMA preparedness programs, recipients
1200 must coordinate activities across preparedness disciplines and levels of government, including state,
1201 territorial, local, and tribal governments. A cohesive planning framework should incorporate FEMA
1202 resources, as well as those from other federal and SLTT entities, the private sector, and faith-based
1203 community organizations. Specific attention should be paid to how available preparedness funding
1204 sources can effectively support a whole community approach to emergency preparedness and
1205 management and the enhancement of core capabilities. To ensure this, the SAA must establish or
1206 reestablish a unified Senior Advisory Committee. Additionally, high-risk urban areas are required to
1207 establish UAWGs representative of the counties, cities, towns, and tribes within the high-risk urban area,
1208 including, as appropriate, representatives of rural jurisdictions, high-population jurisdictions, and high-
1209 threat jurisdictions.
1210

1211 Senior Advisory Committee (SAC)

1212 The SAC builds upon previously established advisory bodies under the SHSP, UASI Program, Transit
1213 Security Grant Program (TSGP), and Port Security Grant Program (PSGP). Examples of advisory bodies
1214 that should be included on a SAC include UAWGs, SIGB, Area Maritime Security Committees
1215 (AMSCs), Regional Transportation Security Working Groups (RTSWGs), Citizen Corps Whole
1216 Community Councils, Disability Inclusion Working Groups, and Children’s Working Groups. The
1217 membership of the SAC must reflect a state’s unique risk profile and the interests of the five mission areas
1218 as outlined in the Goal. Further, the SAC must include representatives that were involved in the production
1219 of the state’s THIRA and SPR.
1220

1221 SAC Composition and Scope

1222 SAC membership shall include at least one representative from relevant stakeholders including:
1223

- 1224 • Individuals from the counties, cities, towns, and Indian tribes within the state or high-risk urban
1225 area, including, as appropriate, representatives of rural, high-population, and high-threat
1226 jurisdictions of UASI-funded high-risk urban areas;
- 1227 • Representatives that were involved in the production of the state’s THIRA and SPR;
- 1228 • State and urban area Chief Information Officers (CIOs) and Chief Information Security Officers
1229 (CISOs);
- 1230 • SWIC and SIGB members;
- 1231 • Citizen Corps Whole Community Councils;
- 1232 • Local or tribal government officials;
- 1233 • Tribal organizations;
- 1234 • Emergency response providers, including representatives of the fire service, law enforcement,
1235 emergency medical services, and emergency managers;
- 1236 • Public health officials and other appropriate medical practitioners;
- 1237 • Hospitals;
- 1238 • Individuals representing educational institutions, including elementary schools, middle schools,
1239 junior high schools, high schools, community colleges, and other institutions of higher education;
- 1240 • State and regional interoperable communications coordinators, as appropriate;

- 1241 • State and major urban area fusion centers, as appropriate; and
- 1242 • Nonprofit, faith-based, and other voluntary organizations, such as the American Red Cross.

1243
1244 Additionally, program representatives from the following entities should be members of the SAC (as
1245 applicable): State Primary Care Association, State Homeland Security Advisor (HSA) (if this role is not
1246 also the SAA), State Emergency Management Agency (EMA) Director, State Public Health Officer, State
1247 Awardee for HHS' Hospital Preparedness Program, State Public Safety Officer (and SAA for Justice
1248 Assistance Grants, if different), State Coordinator for the DoD 1033 Program (also known as the Law
1249 Enforcement Support Office [LESO] Program), State Court Official, State Emergency Medical Services
1250 (EMS) Director, State Trauma System Manager, Statewide Interoperability Coordinator, State Citizen
1251 Corps Whole Community Council, the State Emergency Medical Services for Children (EMSC)
1252 Coordinator, State Education Department, State Human Services Department, State Child Welfare
1253 Services, State Juvenile Justice Services, Urban Area POC, Senior Members of AMSCs, Senior Members
1254 of the RTSWG, Senior Security Officials from Major Transportation Systems, and the Adjutant General.

1255
1256 SACs are encouraged to develop subcommittee structures, as necessary, to address the issue or region-
1257 specific considerations. The SAC must include whole community intrastate and interstate partners as
1258 applicable and have balanced representation among entities with operational responsibilities for
1259 terrorism/disaster prevention, protection, mitigation, and response activities within the state, and include
1260 representation from the stakeholder groups and disciplines identified above.

1261
1262 The above membership requirement does not prohibit states, high-risk urban areas, regional transit and
1263 port entities, or other recipients of FEMA preparedness funding from retaining their existing structure
1264 under separate programs; however, at a minimum, those bodies must support and feed into the larger
1265 SAC. The composition, structure, and charter of the SAC should reflect this focus on building core
1266 capabilities, instead of simply joining previously existing advisory bodies under other grant programs. For
1267 designated high-risk urban areas, the SAA Point of Contacts (POCs) are responsible for identifying and
1268 coordinating with the POC for the UAWG, which should be a member of the SAC. The POC's contact
1269 information must be provided to FEMA with the grant application. SAAs must work with existing high-
1270 risk urban areas to ensure that information for current POCs is on file with FEMA.

1271
1272 Finally, FEMA recommends that organizations advocating on behalf of youth, older adults, individuals
1273 with disabilities, individuals with limited English proficiency and others with other access and functional
1274 needs, socio-economic factors and cultural diversity be invited to participate in the SAC. Applicants must
1275 submit the list of SAC members and the SAC charter at the time of application as an attachment in ND
1276 Grants. SAAs will use the URT to verify compliance with SAC charter requirements.

1277 1278 SAC Responsibilities

1279 The responsibilities of a SAC include:

- 1280
1281 • Integrating preparedness activities across disciplines, the private sector, nonprofit, faith-based,
1282 and community organizations, and SLTT governments, with the goal of maximizing coordination
1283 and reducing duplication of effort;
- 1284 • Creating a cohesive planning network that builds and implements preparedness initiatives using
1285 FEMA resources, as well as other federal, SLTT, private sector, and faith-based community
1286 resources;
- 1287 • Management of all available preparedness funding sources to ensure their effective use and to
1288 minimize duplication of effort;
- 1289 • Ensuring investments support building capability, closing capability gaps, or sustaining
1290 capabilities identified in the THIRA/SPR;

- 1291 • Assist in preparation and revision of the state, regional, or local homeland security plan or the
1292 threat and hazard identification and risk assessment, as the case may be; and
- 1293 • Assist in determining effective funding priorities for SHSP grants.
1294

1295 SAC Charter

1296 The governance of the SHSP and UASI programs through the SAC should be directed by a charter. All
1297 members of the SAC should sign and date the charter showing their agreement with its content and their
1298 representation on the Committee. Revisions to the governing charter must be sent to the recipient’s
1299 assigned FEMA HQ Preparedness Officer. The SAC charter must at a minimum address the following:
1300

- 1301 • A detailed description of the SAC’s composition and an explanation of key governance processes,
1302 including how the SAC is informed by the state’s and urban area’s THIRA/SPR;
- 1303 • A description of the frequency at which the SAC will meet;
- 1304 • How the committee will leverage existing governance bodies;
- 1305 • A detailed description of how decisions on programmatic priorities funded by SHSP and UASI
1306 are made and how those decisions will be documented and shared with its members and other
1307 stakeholders, as appropriate; and
- 1308 • A description of defined roles and responsibilities for financial decision making and meeting
1309 administrative requirements.
1310

1311 To ensure ongoing coordination efforts, SAAs are encouraged to share community preparedness
1312 information submitted in a state’s BSIR with members of the SAC. SAAs are also encouraged to share
1313 their THIRA/SPR data with members of the SAC who are applying for other FEMA preparedness grants
1314 to enhance their understanding of statewide capability gaps. The charter should be made available upon
1315 request to promote transparency in decision-making related to SHSP and UASI activities.
1316

1317 To manage this effort and to further reinforce collaboration and coordination across the stakeholder
1318 community, a portion of the 20% holdback of a state or territory award may be utilized by the SAA to
1319 support the SAC and to ensure representation and active participation of SAC members. Funding may be
1320 used for hiring and training planners, establishing and maintaining a program management structure,
1321 identifying and managing projects, conducting research necessary to inform the planning process, and
1322 developing plans that bridge mechanisms, documents, protocols, and procedures.
1323

1324 Urban Area Working Group (UAWG)

1325 UASI program implementation and governance must include regional partners and should have balanced
1326 representation among entities with operational responsibilities for prevention, protection, mitigation, and
1327 response activities within the region. In some instances, high-risk urban area boundaries cross state
1328 borders. States must ensure that the identified high-risk urban areas take an inclusive regional approach to
1329 the development and implementation of the UASI program and involve the contiguous jurisdictions,
1330 mutual aid partners, port authorities, rail and transit authorities, state agencies, Statewide Interoperability
1331 Coordinators, Citizen Corps Whole Community Council(s), and campus law enforcement in their
1332 program activities.
1333

1334 UAWG Composition and Scope

1335 Pursuant to section 2003(b) of the *Homeland Security Act of 2002* (codified as amended at 6 U.S.C. §
1336 604(b)), eligible high-risk urban areas were determined based on an analysis of relative risk of the 100
1337 most populous Metropolitan Statistical Areas (MSAs), as defined by the Office of Management and
1338 Budget (OMB). MSAs are used by FEMA to determine eligibility for participation in the program.

1339 Geographical areas queried do not equate to minimum mandated membership representation of an urban
1340 area, nor does this guarantee funding for geographical areas queried. UAWGs are not required to expand
1341 or contract existing urban area participation to conform to MSA composition. Detailed information on
1342 MSAs is publicly available from the United States Census Bureau at [https://www.census.gov/programs-](https://www.census.gov/programs-surveys/metro-micro.html)
1343 [surveys/metro-micro.html](https://www.census.gov/programs-surveys/metro-micro.html).

1344
1345 An SAA must confirm a specific POC with the designated high-risk urban area. The SAA POC is
1346 responsible for identifying and coordinating with the POC for the UAWG. This information must be
1347 provided to FEMA with the grant application. SAAs must work with existing high-risk urban areas to
1348 ensure that information for current POCs is on file with FEMA.

1349
1350 Membership in the UAWG must provide either direct or indirect representation for all relevant
1351 jurisdictions and response disciplines (including law enforcement, fire service, EMS, hospitals, public
1352 health, and emergency management) that comprise the defined high-risk urban area. It must also be
1353 inclusive of local Whole Community Citizen Corps Council and tribal representatives. The UAWG
1354 should also include at least one representative from each of the following significant stakeholders:

- 1355
- 1356 • Local or tribal government officials
- 1357 • CIO and CISO
- 1358 • Emergency response providers, which shall include representatives of the fire service, law
1359 enforcement, emergency medical services, and emergency managers
- 1360 • Public health officials and other appropriate medical practitioners, including Health Care
1361 Coalitions (HCCs)
- 1362 • Individuals representing educational institutions, including elementary schools, middle schools,
1363 junior high schools, high schools, community colleges, and other institutions of higher education
- 1364 • State and regional interoperable communications coordinators, and state and major urban area
1365 fusion centers, as appropriate
- 1366

1367 In addition to representatives from the local jurisdictions and tribes within the state or high-risk urban
1368 area, the UAWG should include officials responsible for the administration of Centers for Disease
1369 Control and Prevention’s (CDC) and the HHS Assistant Secretary for Preparedness and Response’s
1370 (ASPR) cooperative agreements. Finally, it must be inclusive of members advocating on behalf of youth,
1371 older adults, individuals with disabilities, individuals with limited English proficiency and others with
1372 other access and functional needs, socio-economic factors, and cultural diversity.

1373
1374 High-risk urban areas will use the URT to verify UAWG structure and membership. The list of UAWG
1375 members must also be submitted at the time of application as an attachment in ND Grants. High-risk
1376 urban areas must notify the SAA and the FEMA Headquarters Preparedness Officer of any updates to the
1377 UAWG structure or membership after the application is submitted.

1378 1379 UAWG Responsibilities

1380 UAWGs must ensure that applications for funding under the UASI program support building capability,
1381 closing capability gaps, or sustaining capabilities identified in the high-risk urban area’s THIRA/SPR.
1382 The UAWG should support state efforts to develop the SPR, particularly as it relates to UASI-funded
1383 activities. The UAWG, in coordination with the SAA POC, must develop a methodology for allocating
1384 funding available through the UASI program. The UAWG must reach consensus on all UASI funding
1385 allocations. If consensus cannot be reached within the 45-day period allotted for the state to obligate
1386 funds to subrecipients, the SAA must make the allocation determination. The SAA must provide written
1387 documentation verifying the consensus of the UAWG or the failure to achieve otherwise on the allocation
1388 of funds and submit it to FEMA immediately after the 45-day period allotted for the state to obligate

1389 funds to subrecipients. Any UASI funds retained by the state must be used in direct support of the high-
1390 risk urban area. States must provide documentation to the UAWG, and FEMA upon request,
1391 demonstrating how any UASI funds retained by a state are directly supporting the high-risk urban area.
1392

1393 UAWG Charter

1394 In keeping with sound project management practices, the UAWG must ensure that its approach to critical
1395 issues such as membership, governance structure, voting rights, grant management and administration
1396 responsibilities, and funding allocation methodologies are formalized in a working group charter, or
1397 another form of standard operating procedure related to the UASI program governance. The charter must
1398 also outline how decisions made in UAWG meetings will be documented and shared with UAWG
1399 members. The UAWG charter must be submitted at the time of application as an attachment in ND Grants
1400 and must be on file with FEMA prior to drawing down UASI funding. It also must be available to all
1401 UAWG members to promote transparency in decision making related to the UASI program.

1402

1403 Supplemental SHSP and UASI Guidance

1404 Collaboration

1405 **Collaboration with Other Federal Preparedness Programs**

1406 FEMA strongly encourages states, high-risk urban areas, tribes, and territories to understand other federal
1407 preparedness programs in their jurisdictions and to work with them in a collaborative manner to leverage
1408 all available resources and avoid duplicative activities. For example, HHS has two robust preparedness
1409 programs—CDC’s Public Health Emergency Preparedness (PHEP) cooperative agreement and ASPR’s
1410 Hospital Preparedness Program (HPP) cooperative agreement—that focus on preparedness capabilities.
1411 CDC’s 15 public health preparedness capabilities and ASPR’s 4 healthcare preparedness capabilities
1412 serve as operational components for many of the core capabilities, and collaboration with the PHEP
1413 directors and HPP coordinators can build capacity around shared interests and investments that fall in the
1414 scope of these HHS cooperative agreements and the HSGP.

1415

1416 States and high-risk urban areas should coordinate among the entire scope of federal partners, national
1417 initiatives, and grant programs to identify opportunities to leverage resources when implementing their
1418 preparedness programs. These may include but are not limited to: Medical Reserve Corps; Emergency
1419 Medical Services for Children grants; ASPR HPP; CDC PHEP; CDC Cities Readiness Initiative;
1420 Strategic National Stockpile Programs; EMS; DOJ grants; the Department of Defense 1033 Program (also
1421 known as the LESO Program); and the Resilience Directorate/Office of Infrastructure Protection’s (OIP)
1422 Regional Resilience Assessment Program (RRAP). However, coordination is not limited to grant funding.
1423 It also includes leveraging assessments such a Transportation Security Agency’s (TSA) Baseline
1424 Assessment for Security Enhancement (BASE), reporting from the Intelligence Community, risk
1425 information such as USCG’s Maritime Security Risk Analysis Model (MSRAM), and USBP Sector
1426 Analysis.

1427

1428 Each SHSP- and UASI-funded investment that addresses biological risk, patient care, or health systems
1429 preparedness should be implemented in a coordinated manner with other federal programs that support
1430 biological and public health incident preparedness such as those administered by HHS ASPR, CDC, and
1431 DOT’s National Highway Traffic Safety Administration (NHTSA).

1432

1433 **Collaboration with Health Care Coalitions (HCCs)**

1434 HCCs are regional entities comprised of health care, public health, emergency management, and
1435 emergency medical services organizations that plan and respond together, leverage resources, and address

1436 challenges in health care delivery brought on by public health and medical incidents. Given that many of
1437 the risks being mitigated include the potential for a range of mass casualties, including those across the
1438 chemical, biological, radiological, nuclear, explosive (CBRNE) spectrum, planning efforts should include
1439 the participation of HCCs and should take into account the elements and capabilities articulated in the
1440 2017-2022 Health Care Preparedness and Response Capabilities
1441 ([https://www.phe.gov/Preparedness/planning/hpp/reports/Documents/2017-2022-healthcare-pr-
1443 capabilities.pdf](https://www.phe.gov/Preparedness/planning/hpp/reports/Documents/2017-2022-healthcare-pr-
1442 capabilities.pdf)).

1444 **Collaboration with Nonprofit Organizations**

1445 SHSP and UASI recipients are encouraged to work with the nonprofit community to address terrorism
1446 and all-hazards prevention concerns, seek input on the needs of the nonprofit sector, and support the goals
1447 of their investments.
1448

1449 **Collaboration with Tribes**

1450 FEMA strongly encourages states, high-risk urban areas, and territories to work with tribal nations in
1451 overall initiatives, such as whole community preparedness and emergency management planning.
1452

1453 **Whole Community Preparedness**

1454 SHSP and UASI recipients should engage with the whole community to advance community and
1455 individual preparedness and to work as a nation to build and sustain resilience. Recipients should consider
1456 the three goals of the [2022-2026 FEMA Strategic Plan](#) in their program design and delivery, specifically
1457 Strategic Objective 1.3: Achieve equitable outcomes for those we serve, and Goal 3: Promote and sustain
1458 a ready FEMA and prepared nation. Recipients should integrate program design and delivery practices
1459 that ensure representation and services for under-represented diverse populations that may be more
1460 impacted by disasters including children, seniors, individuals with disabilities or other access and
1461 functional needs, individuals with diverse culture and language use, individuals with lower economic
1462 capacity, and other underserved populations. Individual preparedness must be coordinated by an
1463 integrated body of government and nongovernmental representatives as well, including but not limited to,
1464 elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits,
1465 nongovernmental organizations (including faith-based, community-based, and voluntary organizations),
1466 advocacy groups for under-represented diverse populations that may be more impacted by disasters
1467 including children, seniors, individuals with disabilities or other access and functional needs, individuals
1468 with diverse culture and language use, individuals with lower economic capacity, and other underserved
1469 populations.

1470
1471 FEMA has programming designed to increase the resilience of individual Americans and communities.
1472 Please email Prepare@fema.dhs.gov to contact one of the Agency’s subject matter experts to receive
1473 guidance and assistance. The following tools, trainings, and products may be ordered directly, free of
1474 charge, from FEMA’s warehouse at <https://orders.gpo.gov/icpd/ICPD.aspx>; **many of them might be
1475 allowable costs, but recipients and subrecipients should ensure that these activities can also help
1476 build target capabilities for preventing, preparing for, protecting against, and responding to acts of
1477 terrorism.**

- 1478
1479 • **Community Emergency Response Team (CERT)** programs, which educate volunteers about
1480 disaster preparedness for the hazards that may impact their area and train them in basic disaster
1481 response skills, such as fire safety, light search and rescue, team organization, and disaster
1482 medical operations. CERT offers a consistent, nationwide approach to volunteer training and
1483 organization that professional responders can rely on during disaster situations, allowing them to
1484 focus on more complex tasks.

- 1485 ● **Financial Resilience:** FEMA partners with philanthropic and nonprofit organizations to increase
1486 the financial resilience of the public in advance of disasters, including acts of terrorism. Activities
1487 include helping the public to organize finances and increasing the understanding of what FEMA
1488 assistance can provide. Partnerships with local financial wellness organizations such as credit
1489 unions, financial counselors, community banks, and others that reach a variety of audiences are
1490 encouraged. The [Emergency Financial First Aid Kit \(EFFAK\)](#) provides individuals, families, and
1491 businesses the ability to organize critical financial, medical, and household information. It
1492 includes a checklist of important documents and forms to compile your relevant information.
- 1493 ● **Building Capacity with Community Based Organizations:** Community-Based Organizations
1494 serve as a critical safety net for Americans disproportionately impacted by disasters, including
1495 acts of terrorism. Allowable activities include Whole Community exercises, trainings, and
1496 activities focused on staff preparedness; information sharing with clients and government; and
1497 continuity of essential functions in the event of an emergency. In 2019, FEMA launched the
1498 Organizations Preparing for [Emergency Needs Training \(OPEN\)](#). OPEN includes both a web-
1499 based, self-guided training, and a downloadable instructor kit that will guide participants on how
1500 to identify risks, locate resources, and take preparedness actions. When Community-Based
1501 Organizations, such as food pantries, daycares, and nonprofits, are unable to sustain operations
1502 during an emergency incident, individuals who rely on them are exponentially impacted. Because
1503 of their importance in keeping the community going, OPEN is designed to empower these
1504 organizations to better prepare for incidents. Community-Based Organizations include but are not
1505 limited to food banks, food pantries, homeless shelters, school readiness and after school centers,
1506 adult day care centers, job training centers, legal assistance centers, and cultural centers.
- 1507 ● **Preparedness Actions:** FEMA curates validated guidance for decision-making (protective
1508 actions) for the public in order to increase survival rates and improve disaster recovery, including
1509 from acts of terrorism. Recipients may order, free of charge, hazard information sheets on 17
1510 different types of threats and hazards, the “12 Ways to Prepare Postcard,” guidance on how to
1511 create an emergency communications plan for a family, and a breadth of depth of other material
1512 at <https://orders.gpo.gov/icpd/ICPD.aspx>.
- 1513 ● **Youth Preparedness Resources** are available on www.ready.gov/kids. Bolstering youth
1514 preparedness across the nation is a priority for FEMA as the Agency works with state, local,
1515 tribal, and territorial partners to create a culture of preparedness in the United States. Information
1516 on youth-centric educational curricula, games, planning materials, and other relevant resources
1517 can be found at www.ready.gov/kids.

1519 The following are examples of youth preparedness activities that grantees are encouraged to
1520 undertake as allowable costs:

- 1521 ○ Reach out to a local school board or elementary school to encourage the adoption of the
1522 Student Tools for Emergency Planning (STEP) curriculum. STEP is a classroom-based
1523 emergency preparedness curriculum for 4th- and 5th-graders in an easy, ready-to-teach
1524 format. Students will learn about disasters, emergencies, and hazards, and how to create a
1525 disaster supply kit and family emergency communication plan. An overview of the STEP
1526 program along with the instructor guide and student activity book is available at
1527 <https://www.ready.gov/student-tools-emergency-planning-step>; and
- 1528 ○ Sponsor the creation of a Teen CERT in your jurisdiction. The CERT Program is a
1529 national program of volunteers trained in disaster preparedness and emergency response.
1530 Volunteers come from all ages and all walks of life, including teenagers. Additional
1531 information, including a step-by-step guide on how to start a Teen CERT, is available at
1532 <https://www.ready.gov/teen-cert>.

1533
1534 The following tools are available to order from FEMA’s warehouse free of charge:

- 1535 ○ “Prepare with Pedro” is a joint product of FEMA and the American Red Cross. The
1536 “Prepare with Pedro: Disaster Preparedness Activity Book” is designed to teach young
1537 children and their families about how to stay safe during disasters and emergencies. The
1538 book follows Pedro around the United States and offers safety advice through
1539 crosswords, coloring pages, matching games, and more. Additional information,
1540 including an ordering form, is available at <https://www.ready.gov/prepare-pedro>; and
1541 ○ The Ready 2 Help card game is a fun way for kids to learn how to respond to
1542 emergencies by working with friends and using skills that will help in a real emergency.
1543 Ready 2 Help teaches five simple steps to stay safe and make a difference until help
1544 arrives:
1545 • Stay Safe;
1546 • Stay Calm;
1547 • Get Help;
1548 • Give Info; and
1549 • Give Care.
1550 Ready 2 Help is designed for children ages 8 and up. Additional information, including
1551 an ordering form, is available at <https://www.ready.gov/ready-2-help>.
1552

1553 Supplemental OPSG Program Guidance

1554 OPSG supports enhanced cooperation and coordination among CBP, USBP, and federal and SLTT law
1555 enforcement agencies to improve overall border security. OPSG provides funding to support joint efforts
1556 to secure the United States’ borders along routes of ingress/egress to and from international borders to
1557 include travel corridors in states bordering Mexico and Canada, as well as states and territories with
1558 international water borders. OPSG also further enhances the sharing of threat information and intelligence
1559 between federal, state, local, tribal, and territorial law enforcement agencies through the development and
1560 sustainment of a capable workforce of analysts that have the necessary experience and training, access to
1561 open source, unclassified and classified information, products, data, suspicious activity reporting,
1562 tips/leads, and online/social media-based threats, as well as necessary services and technology to facilitate
1563 analytic capabilities and collaboration.
1564

1565 SLTT law enforcement agencies will utilize their own law enforcement authorities to support the CBP
1566 and USBP border security mission and will not receive any additional authority as a result of participation
1567 in the grant. An OPSG award does not provide any additional authority to SLTT law enforcement
1568 agencies. More specifically, SLTT law enforcement agencies are not empowered through OPSG to
1569 enforce immigration authorities under Title 8 of the U.S. Code (i.e., the *Immigration and Nationality Act*).
1570

1571 SLTT law enforcement agencies are expected utilize their own jurisdictional authority in support of
1572 enhanced border security unless some other agreement applies. SLTT law enforcement agencies are
1573 further expected to operate within the bounds of all applicable laws, to include federal laws, state statutes,
1574 and local laws, policies, and procedures.
1575

1576 OPSG is intended to support border states and territories of the United States in accomplishing the
1577 following objectives:
1578

- 1579 • Increase intelligence and operational capabilities to prevent, protect against, and respond to
1580 border security issues;
1581 • Increase coordination and collaboration among federal and SLTT law enforcement agencies;
1582 • Continue the distinct capability enhancements required for border security and border protection;

- 1583 • Provide intelligence-based operations through USBP Sector Level experts to ensure safety and
- 1584 operational oversight of federal and SLTT law enforcement agencies participating in OPSG
- 1585 operational activities;
- 1586 • Support a request to any Governor to activate, deploy, or redeploy specialized National Guard
- 1587 Units/Packages and/or elements of state law enforcement to increase or augment
- 1588 specialized/technical law enforcement elements operational activities;
- 1589 • Continue to increase operational, material, and technological readiness of SLTT law enforcement
- 1590 agencies;
- 1591 • Enhance the sharing of threat information and intelligence between federal and SLTT law
- 1592 enforcement agencies; and
- 1593 • Develop and sustain a capable workforce of analysts that have the necessary experience and
- 1594 training, as well as access to open source, unclassified, and/or classified information, products,
- 1595 data, suspicious activity reporting, tips/leads, and online/social media-based threats, and the
- 1596 necessary services and technology to facilitate these analytic activities.
- 1597

1598 OPSG funds must be used to provide an enhanced law enforcement presence and to increase operational
 1599 and intelligence capabilities of federal and SLTT law enforcement, promoting a layered, coordinated
 1600 approach to law enforcement within border states and territories of the United States.

- 1601
- 1602 • **Federal and SLTT OPSG Integrated Planning Team (IPT).** Federal and SLTT partners must
- 1603 establish and maintain a formalized OPSG IPT with representation from all participating law
- 1604 enforcement agencies, co-chaired by representatives from USBP, the SAA, and participating law
- 1605 enforcement agencies’ OPSG program representatives.
- 1606 • No fewer than two IPT meetings must take **place during every funding year:**
- 1607 ○ Prior to submitting the Concept of Operations (application)
- 1608 ○ Prior to submitting the Campaign Plan
- 1609 • OPSG funds may be used for travel and per diem in support of the IPTs and OPSG strategic
- 1610 planning events as long as the costs are otherwise compliant with other program and regulatory
- 1611 requirements.
- 1612

1613 **Coordination Requirements**

1614 All operational plans should be crafted in cooperation and coordination among federal and SLTT
 1615 partners. Consideration will be given to applications that are coordinated across multiple jurisdictions. All
 1616 applicants must coordinate with the USBP Sector Headquarters with geographic responsibility for the
 1617 applicant’s location in developing and submitting an Operations Order with an embedded budget to the
 1618 SAA. OPSG funds must be used to provide increased operational capabilities to SLTT partners in support
 1619 of enhanced border security through:

- 1620
- 1621 • Enhanced Law Enforcement Presence;
- 1622 • Enhanced Situational Awareness; and
- 1623 • Enhanced Intelligence Collection and Distribution.
- 1624

1625 After awards are announced, prospective recipients will re-scope the draft Operations Order and resubmit
 1626 it as a final Operations Order with an embedded budget based on actual dollar amounts awarded. The
 1627 appropriate Sector Headquarters will approve final Operations Orders and forward those orders to
 1628 Headquarters, Office of Border Patrol, Washington, DC, before funding is released. Recipients may not
 1629 begin operations, obligate, or expend any funds until FEMA and USBP Headquarters have approved the
 1630 final Operations Order and the embedded budget and removed any existing special conditions and/or
 1631 restrictions.

1632

1633 **Transportation Costs and Costs Related to the Provision of Acute Medical Care**
1634 Vehicle, fuel, mileage, operational overtime, and other types of costs otherwise allowable under an OPSG
1635 award's HSGP NOFO are allowable where the costs are in support of the necessary transportation of
1636 individuals interdicted while carrying out allowable OPSG-funded activities or operations from the point
1637 of interdiction to an applicable law enforcement facility.

1638
1639 When transporting individuals interdicted in the course of carrying out allowable OPSG-funded activities
1640 or operations from the point of interdiction, non-Federal entities may charge vehicle, fuel, mileage,
1641 operational overtime, and other types of costs otherwise allowable under an OPSG award's HSGP NOFO
1642 associated with necessary transportation to provide acute medical care for individuals being transported
1643 from the point of interdiction. In such cases, non-Federal entities may also charge operational overtime
1644 for personnel that monitor a detained individual receiving acute medical care where the individual
1645 remains in the custody of the non-Federal law enforcement agency. Costs incurred beyond the acute phase
1646 of medical care (e.g., upon admission to the hospital, or after transfer from an acute care facility to the
1647 hospital) and costs incurred once the custodial responsibility of the individual is transferred to CBP are
1648 not allowable under OPSG.

1649
1650 Costs described above are allowable regardless of what entity or agency initially makes the interdiction.
1651 Personnel costs incurred by non-Federal law enforcement agencies eligible under OPSG (including
1652 deputies, corrections officers, or detention officers) for costs described above are allowable.

1654 OPSG Operations Order Template and Instructions

1655 Operations Order Template Instructions

1656 To access the OPSG Operations Order Template:

- 1657
- 1658 • Find the Homeland Security Grant Program posting via the search function on [Grants.gov](https://www.grants.gov);
- 1659 • Select the Related Documents tab on the posting; and
- 1660 • Click on the OPSG Operations Order Template and fill out all sections of the template.

1661

1662 Executive Summary Overview

1663 Operations Order Executive Summary

1664 Operations Order Executive Summary must:

1665

- 1666 • Identify the organization name, point of contact, committees, and other structures accountable for
1667 implementing OPSG in the jurisdiction (typically this will be a program lead or manager
1668 overseeing operations and individuals assigned to that agency); and
- 1669 • Describe how federal and SLTT law enforcement agencies will work together to establish and
1670 enhance coordination and collaboration on border security issues.

1671

1672 Budget Requirements Overview

1673 Operations Order Detailed Annual Budget must:

1674

- 1675 • Explain how costs and expenses were estimated; and
- 1676 • Provide a narrative justification for costs and expenses. Supporting tables describing cost and
1677 expense elements (e.g., equipment, fuel, vehicle maintenance costs) may be included.

1678

1679 Submission Requirements

1680 Operations Orders must meet the following submission requirements:

- 1681
- 1682
- 1683
- 1684
- 1685
- 1686
- 1687
- Must be submitted as an Adobe PDF document;
 - All documents submitted must use the unique identifier created by the OPSG data management system from the original associated operation order; and
 - Applicable OPSG sector representatives must coordinate with the SAA and OPSG participants to submit an accurate inventory of all specified OPSG purchased property with each Operations Order/FRAGO.

1688

1689 Due to the competitive nature of this program, separate attachments will neither be accepted nor

1690 reviewed.

1691

1692 OPSG Operational Guidance

1693 This section provides operational guidance to OPSG applicants on the development of a concept of

1694 operations and campaign planning, the tactical operation period, and reporting procedures. This guidance

1695 also delineates specific roles and responsibilities, expectations for operations, and performance measures.

1696 Successful execution of these objectives will promote situational awareness among participating agencies

1697 and ensure a rapid, fluid response to emerging border-security conditions.

1698

1699 OPSG uses an integrated approach to address transnational criminal activity. Federal and SLTT partners

1700 are required to establish and maintain an OPSG IPT with representation from all participating law

1701 enforcement agencies, co-chaired by representatives from USBP, the SAA, and participating local law

1702 enforcement agencies' OPSG program representatives. Each operational order will address specific

1703 threats, gaps, and vulnerabilities identified by the USBP. All requests in the operational plan will be

1704 reviewed and approved by the corresponding sector's Chief Patrol Agent or his/her designee for border

1705 security value. USBP will provide routine monitoring and technical expertise to each participating

1706 agency. The content of each operational plan, to include the requested items will be reviewed for border-

1707 security value and approved by the corresponding sector's Chief Patrol Agent or his/her designee.

1708

1709 All operational plans should be crafted in cooperation and coordination with federal and SLTT partners to

1710 meet the needs of the USBP Sector. Consideration will be given to applications that are coordinated

1711 across multiple jurisdictions. All applicants must coordinate with the CBP/USBP Sector Headquarters

1712 with geographic responsibility for the applicant's location in developing and submitting an Operations

1713 Order with an embedded budget to the SAA. Operations are to be crafted so that resources are allocated to

1714 one or more of the supportable categories:

- 1715
- 1716
- 1717
- 1718
- 1) Law Enforcement Presence;
 - 2) Situational Awareness; and/or
 - 3) Intelligence Collection, Analysis, and Distribution.

1719

1720

1721 Law Enforcement Presence includes activities and costs associated to having an SLTT partner provide a
1722 law enforcement patrol presence in an area designated by the USBP Sector in support of border security
1723 efforts. Situational Awareness includes technology to provide current and immediately relevant
1724 information about currently active border security threats. Intelligence Collection and Distribution
1725 includes both technology and manpower related to the gathering and analysis of intelligence with a nexus
1726 to border security.

1727
1728 The terms of an OPSG award do not extend to an SLTT partner any authority to enforce additional laws,
1729 statues, or regulations beyond their own authorities; SLTT partners are not empowered through OPSG to
1730 enforce immigration authorities under Title 8 of the U.S. Code (i.e., the INA). Participation in the grant
1731 does not grant participants the power to operate outside of their own jurisdictional boundaries.
1732

1733 **Concept of Operations and Campaign Planning**

1734 **Post-Allocation Announcement/Pre-Award**

1735 The overarching operational cycle involves three stages: 1) application; and 2) concept of operations to
1736 formulate a Campaign Plan, which are all developed by the IPT. All Operations Orders: Concept of
1737 Operations (CONOPS), Operation Orders (OO) or Campaign Plans and FRAGOs shall be submitted
1738 through the CBP Stonegarden Data Management System. All OPSG grant Application packages shall be
1739 submitted to the SAA for entry into [Grants.gov](https://www.grants.gov).

1740
1741 **Application:** Please refer to the current fiscal year’s HSGP NOFO and relevant information in this
1742 Manual.

1743
1744 **Campaign Plan:** After awards are announced, participants will create and submit an operations order that
1745 forms a campaign plan and captures the initial, generalized-budgetary intent to their IPT.

1746
1747 The campaign plan should articulate the participant agency’s long-term border security objectives and
1748 goals designed to mitigate border-security risk.

1749
1750 Funds should be obligated as needed to target specific threats or vulnerabilities and ensure that OPSG
1751 usage is commensurate to the unique risk of each border region. This may require several short-term
1752 operations that combine to form an ongoing operational cycle, ensuring that USBP commanders and
1753 SLTT agency partners reserve the flexibility to respond to the ever-changing elements of border security.

1754
1755 The operations plan also will articulate the budgetary intent of how funds are to be used throughout the
1756 performance period. The operations plan will project planned expenditures in the following categories:
1757 overtime, equipment, travel, maintenance, fuel, and administrative funds. The subrecipient can initiate the
1758 procurement of equipment as well as state how much the county intends to use for M&A while keeping
1759 funds for overtime or residual equipment funds available for use as needed. If the subrecipient intends to
1760 spend more than 50% of its award on overtime over the course of the performance period, a PRICE Act
1761 waiver request must be submitted in accordance with the policy initially outlined in [IB 379: Guidance to
1762 State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding. The](#)
1763 operations plan will meet both the SAA expectations to obligate the funds within 45 days of the award
1764 announcement and the demands of the grant’s operational intent. **Sector approved campaign plans must
1765 be submitted to USBP Headquarters no later than four months after the official awards
1766 announcement has been made.**

1767
1768 **Investment Modifications - Changes in Scope or Objective:** Changes in scope or objective of the
1769 award – including those resulting from intended actions by the recipient or subrecipients – require
1770 FEMA’s prior written approval, in accordance with 2 C.F.R. §§ 200.308(c)(1), 200.407.

1771 In the event that changes must be made to the original operational plan, such as additional funding
1772 requests or other changes to the original scope or objectives, a FRAGO must be submitted in HSIN to
1773 obtain FEMA’s prior written approval of such changes in accordance with 2 C.F.R. § 200.308(c)(1).
1774 These modifications will be annotated in the annex section of the FRAGO.
1775

1776 **Operational Execution**

1777 In the event that changes or additional funding requests to the original operational order must be made, a
1778 FRAGO will be created. These modifications will be annotated in the annex section of the FRAGO.
1779 Operational discipline is necessary for the success of OPSG. Deliberate, adaptive, integrated, and
1780 intelligence-driven planning is critical to conducting targeted enforcement operations consistent with the
1781 objectives of the OPSG. By participating in the OPSG, the state, local, tribal, and territorial agencies
1782 agree to conduct operations designed to reduce border-security risk.
1783

1784 Operations are composed of six critical elements: 1) a pre-planning meeting with the IPT; 2) specified
1785 beginning and ending dates; 3) the integration of intelligence and border security; 4) use of targeted
1786 enforcement techniques; 5) clearly stated objectives; and 6) an after-action meeting. These operations
1787 require deliberate on-going planning to ensure command, staff, and unit activities synchronize to current
1788 and future operations. The cyclical nature of the process will ensure OPSG activities align with the
1789 fluctuating border-security threats and vulnerabilities. The IPT should leverage information provided by
1790 the fusion center, Border Intelligence Centers, or other local intelligence center, when possible, and
1791 establish a common operational vision.
1792

1793 The USBP Sector’s Chief Patrol Agent, or his/her designee, will ensure that the information or
1794 intelligence has a clear nexus to border security. Intelligence will be shared and vetted for border security
1795 value, driving the focus of operations. Once intelligence-driven targets are identified, the IPT will decide
1796 on operational objectives that reflect the intended impact of operations. The objectives should outline how
1797 the operation will deter, deny, degrade, or dismantle the operational capacity of the targeted transnational
1798 criminal organizations.
1799

1800 Each operational period will begin on a predetermined date and end on a predetermined date, but the dates
1801 may be subject to change commensurate with emerging security conditions. The starting date of the
1802 operational period should be established to allow sufficient time for the order to be submitted and
1803 approved by the corresponding USBP Sector and in concurrence with its SAA and USBP Headquarters.
1804 The USBP Sectors will upload copies of operations order in the corresponding folder in the CBP
1805 Stonegarden Data Management System.
1806

1807 **Reporting Procedures**

1808 Participation in OPSG requires accurate, consistent, and timely reporting of how funds are used, and how
1809 the state, local and tribal agencies’ operations have impacted border security through the mitigation of
1810 threat or vulnerability and the overall reduction of risk. Reporting will focus on monitoring program
1811 performance; determining the level of integration and information sharing; and developing best practices
1812 for future operations. To ensure consistent reporting each state, local, and tribal agency will identify a
1813 single point of contact to represent their agency as a member of the IPT and to coordinate the submission
1814 of reports or execute other aspects of the grant.
1815

1816 The Daily Activity Report (DAR), which can be found by selecting the link for the current fiscal year
1817 HSGP NOFO on FEMA’s preparedness grants page ([https://www.fema.gov/homeland-security-grant-
1818 program](https://www.fema.gov/homeland-security-grant-program)) to be used to submit the ongoing results and outputs from OPSG operations conducted. The
1819 information and statistics included in the DAR will be delineated by agency (friendly forces). The DAR
1820 must be submitted to the USBP sector or the participating agency’s OPSG coordinator within 48 hours

1821 of the conclusion of each OPSG shift. Subrecipients and Sectors are responsible to ensure that DARs are
1822 submitted in the proper format and in a timely manner. DARs will be submitted using the CBP
1823 Stonegarden Data Management System. Friendly Forces receiving funding through a subrecipient will
1824 submit DARs within 48 hours. Border Patrol Sectors and OPSG subrecipients will implement internal
1825 protocols to ensure operational data from subrecipients and friendly force DARs are properly collected
1826 following the established guidelines.

1827
1828 In addition to the ongoing reporting of outputs, subrecipient participants will be required to submit AARs
1829 to USBP sectors within 10 days of closing the operational POP for that funding year. The AAR should
1830 carefully articulate outcomes and outputs as well as how the results of the operation compare with the
1831 objectives identified during the pre-planning meeting. Failure to submit the AAR in a timely manner may
1832 prevent the approval of future operations requests. All AARs and other OPSG reporting requirements will
1833 be submitted through the CBP Stonegarden Data Management System. Sectors are responsible for
1834 submitting AARs into Border Patrol Enforcement Tracking System (BPETS) as applicable.

1835

1836 **Operational Roles and Responsibilities**

1837 To achieve unity of effort, it is essential that each participant know the roles and responsibilities within
1838 the IPT. The USBP sector's Chief Patrol Agent, or his/her designee, will:

1839

- 1840 • Coordinate and chair the area IPT's meetings;
- 1841 • Coordinate with all interested and eligible SLTT agencies in the sector's area of operation during
1842 the open period of the OPSG application process by:
 - 1843 ○ Assisting applicants in completing the operations planning portion of the application,
1844 which is like the Operations Order used by the USBP;
 - 1845 ○ Forwarding the approved operation portion of the application to CBP/USBP
1846 Headquarters as well as to the SAA to complete the application process set by FEMA;
1847 and
 - 1848 ○ Detailing what operational support the USBP Sector anticipates for specific periods and
1849 matching the capabilities of partners to fill those gaps.
- 1850 • Following the announcement of grant awards, coordinate and chair a meeting with SLTT
1851 agencies that received OPSG awards to develop an individualized campaign plan. This includes:
 - 1852 ○ Working with SLTT agencies, along with other federal law enforcement agencies to
1853 determine the dates, focus, and needs of each operational period, ensuring that each
1854 operation has a nexus to border security;
 - 1855 ○ Receiving the first periodic operations order from the SLTT agencies and ensuring that
1856 the operation is conducted as outlined in the Campaign Planning section;
 - 1857 ○ Monitoring and supporting the Operational Cycle throughout the performance period
 - 1858 ○ Ensuring the DAR and the AAR are submitted by state, local, and tribal agencies in the
1859 proper format and within the established timeframes;
 - 1860 ○ Providing instruction, when possible, to state, local, and tribal agencies regarding
1861 techniques, methods, and trends used by transnational criminal organizations in the area;
 - 1862 ○ Providing a single point of contact to participants as a subject-matter expert in OPSG that
1863 can coordinate, collect, and report operational activities within the established reporting
1864 procedures;
 - 1865 ○ Providing verification that operations are conducted;
 - 1866 ○ Documenting and conducting random, on-site operational verification of OPSG patrols
1867 by subrecipients and friendly forces;
 - 1868 ○ Verifying that subrecipients are performing OPSG enforcement duties in accordance with
1869 the applicable grant, statute, and regulatory guidance and instructions; and

- 1870 ○ Ensuring that grant funds are appropriately expended to meet sector border enforcement
1871 operational requirements and assist in enhancing subrecipient/friendly force capabilities
1872 to provide for enhanced enforcement presence, operational integration, and intelligence
1873 sharing in border communities.

1874
1875 The state, local or tribal agency lead, or their designee, will:

- 1876
- 1877 ● Coordinate with the SAA on all grant management matters including but not limited to the
1878 development and review of operations orders, expenditure of funds, allowable costs, reporting
1879 requirements;
- 1880 ● Upon receiving a grant award, coordinate and meet as a member of the IPT to develop an
1881 individualized campaign plan that covers the length of the grant performance period;
- 1882 ● Work within the IPT to develop an initial Operational Cycle and determine the duration of the
1883 first operational period based on the tactical needs specific to the area;
- 1884 ● Submit all operations orders for review and submit the operations order to the Border Patrol and
1885 ensure the operation meets the six criteria established in the Operations Section:
 - 1886 ○ Conduct operations on an as-needed basis throughout the length of the grant performance
1887 period;
 - 1888 ○ Integrate law enforcement partners from contiguous counties and towns into their tactical
1889 operations to expand the layer of security beyond existing areas;
 - 1890 ○ Ensure all required reports, including reports from friendly forces, are submitted to the
1891 Border Patrol and the SAA, when applicable, in the proper format and within established
1892 timeframes;
 - 1893 ○ Ensure applicable OPSG-derived data is shared with the designated fusion center in the
1894 state or high-risk urban areas;
 - 1895 ○ Ensure applicable intelligence is shared with the designated fusion center in the state
1896 and/or high-risk urban areas;
 - 1897 ○ Request instruction and information from the SAA, when applicable, and/or USBP and
1898 other federal law enforcement agencies regarding techniques, methods, and trends used
1899 by transnational criminal organizations in the area;
 - 1900 ○ Provide the SAA and USBP a single point of contact that maintains subject-matter
1901 expertise in OPSG who can coordinate, collect, and report operational activities within
1902 the established reporting procedures; and
 - 1903 ○ Assist as required with the coordination, management, and operational aspects of the
1904 grant.

1905
1906 The SAA will:

- 1907
- 1908 ● Actively engage in the IPT meetings;
- 1909 ● Work in direct coordination and communication with the local or tribal agency lead on all grant
1910 management matters;
- 1911 ● Review all operations orders created by the local or tribal agency;
- 1912 ● Acts as the fiduciary agent for the program and provide expertise in state policy and regulations;
- 1913 ● Enter into a subaward agreement to disburse the allocated funding awarded through FEMA;
- 1914 ● Generate biannual reports to FEMA capturing the subrecipients' obligations and expenditures of
1915 funds;
- 1916 ● Determine if the grant's performance period requires additional refinement over the federally
1917 established 36-month period;
- 1918 ● Conduct audits of the program to ensure that the subrecipients are following program guidance;
1919 and

- Assist as required with the coordination, management, and operational aspects of the grant.

1921

1922 **Definitions (OPSG only)**

1923 Area of Interest: A specific area, areas, or facilities known to be used by transnational criminal
1924 organizations in furtherance of their criminal activity.

1925

1926 Border-security related crime: Any action or enterprise that constitutes an offense which is punishable by
1927 law:

- That results in a favorable environment for criminal enterprise network, transnational criminal, or
1929 terrorist organizations; the smuggling/trafficking of humans, contraband, narcotics, or weapons of
1930 mass destruction across or in proximity to the U.S. border or;
- That has a direct nexus to illicit cross-border activity; and
- For which prosecution would serve established border security goals as outlined by the CBP for a
1933 whole of community approach.

1934

1935 Campaign Plan: The first Operational Order based on the CONOP aimed at accomplishing a strategic or
1936 operational objective within a given time and space.

1937

1938 Concept of Operations (CONOP): A written statement that clearly and concisely expresses what the
1939 State, local, or tribal commander intends to accomplish and how it will be done using available resources
1940 (and funding). It is also the operational equivalent of the OPSG grant application.

1941

1942 Fragmentary Order (FRAGO): A fragmentary order is a modification of the approved campaign plan,
1943 reflecting changes to the scope or objective pursuant to 2 C.F.R. § 200.308(c)(1). After an operation order
1944 has been approved, any changes to a campaign plan will be submitted via HSIN as a FRAGO for FEMA’s
1945 approval. Subsequent FRAGOs are permissible, subject to FEMA’s prior written approval, consistent
1946 with the requirements of 2 C.F.R. §§ 200.308, 200.407.

1947

1948 Friendly Forces: Local law enforcement entities with whom OPSG subrecipients provide funding to
1949 support border security operations.

1950

1951 Integrated Planning Team (IPT): Group that coordinates on all aspects of OPSG application, planning,
1952 and de-briefings.

1953

1954 Operational Cycle: A deliberate on-going cycle of command, staff, and unit activities intended to
1955 synchronize current and future operations (driven by current intelligence and short-term goals that
1956 support the campaign).

1957

1958 Operational Discipline: The organized manner in which an organization plans, coordinates, and executes
1959 the OPSG mission with common objectives toward a particular outcome.

1960

1961 Operation/Operational Order (OO): A formal description of the action to be taken to accomplish or
1962 satisfy a CONOP, Campaign Plan, or FRAGO. The OO includes a detailed description of actions to be
1963 taken and required logistical needs to execute an operation.

1964

1965 Opioid Receptor Antagonists: Any medically approved drug or medical substance that can be utilized by
1966 first responder personnel in an emergency situation that is designed to counteract the effects of an opioid
1967 overdose.

1968

1969 Performance Measure: A numerical expression that quantitatively conveys how well the organization is
 1970 doing against an associated performance goal, objective, or standard.
 1971
 1972 Risk: Potential for an adverse outcome assessed as a function of threats, vulnerabilities, and consequences
 1973 associated with an incident, event, or occurrence.
 1974
 1975 Targeted Enforcement: The leveraging of all available assets against a specific action, area, individual, or
 1976 organization and using those deemed most appropriate to mitigate risk.
 1977
 1978 Target of Interest: A specific person, group of persons, or conveyance known to be part of, or used by
 1979 transnational criminal organizations to advance their criminal activity.
 1980
 1981 Threat: Information expressing intent to conduct illegal activity often derived from intelligence sources,
 1982 the overall context, a specific event or series of events, or observation of suspicious activity.
 1983
 1984 Tier: Tier refers to the geographical location of a municipality, county, or tribe with respect to the United
 1985 States national border, i.e., Tier 1 is a county located on the border; a Tier 2 county is a county contiguous
 1986 to a Tier 1 county; and a Tier 3 is a county not located on the physical border but is a contiguous to a Tier
 1987 2 county.
 1988
 1989 Unity of Effort: Coordination and cooperation among all organizational elements, even though they may
 1990 not be part of the same command structure, to achieve success.
 1991
 1992 Vulnerability: The protective measures in place are less than the protective measures needed to mitigate
 1993 risk.
 1994

1995 **HSGP Supplemental Material**

1996 FEMA collaborates with various subject-matter experts and acknowledges the value and expertise these
 1997 Federal partner agencies provide to help shape the development and implementation of the HSGP. This
 1998 continued partnership and collaboration helps provide recipients with the greatest number of resources
 1999 required to effectively manage and implement funds as well as promotes transparency. Therefore, FEMA
 2000 is providing hyperlinks to information on various subjects and policies that are relevant to the mission and
 2001 intent of the FEMA and its preparedness grant programs.
 2002

2003 **Chemical, Biological, Radiological, and Nuclear (CBRN) Detection**

2004 The Countering Weapons of Mass Destruction (CWMD) Office is a support component within DHS
 2005 established in December 2017 to counter attempts by terrorists or other threat actors to carry out an attack
 2006 against the United States or its interests using a weapon of mass destruction. The CWMD Office provides
 2007 guidance to improve national coordination on CBRN issues and works with federal and SLTT agencies to
 2008 ensure operators have better access to current data and subject matter expertise they need. The [National
 2009 Preparedness Assessments Division](#) at FEMA offers implementation support on the THIRA/SPR for
 2010 SLTT partners and the CWMD Office offers technical assistance to provide guidance to SLTT partners
 2011 seeking to address CBRN threats and to build or sustain CBRN detection and response capabilities. For
 2012 more information or assistance, please contact CWMD-THIRA@hq.dhs.gov.
 2013

2014 **National Information Exchange Model (NIEM)**

2015 NIEM is a common vocabulary that enables efficient information exchange across diverse public and
 2016 private organizations. NIEM can save time and money by providing consistent, reusable data terms and
 2017 definitions and repeatable processes. To support information sharing, all recipients of grants for projects

2018 implementing information exchange capabilities are required to use NIEM and to adhere to the NIEM
2019 compliance rules. Go to <https://niem.gov/> for guidance on how to utilize FEMA award funding for
2020 information sharing, exchange, and interoperability activities.

2021
2022 The NIEM Emergency Management domain supports emergency-related services (including preparing
2023 first responders and responding to disasters), information sharing, and activities such as homeland
2024 security and resource and communications management. The NIEM Emergency Management domain has
2025 an inclusive governance structure that includes federal, state, local, industry, and, where necessary,
2026 international partnerships. The NIEM Emergency Management domain is committed to community
2027 support via technical assistance and NIEM training. For more information on the NIEM Emergency
2028 Management domain, to request training or technical assistance or to just get involved, go to
2029 <https://niem.gov/EM>.

2030
2031 **Infrastructure Resilience Planning Framework (IRPF)**

2032 State, local, tribal, and territorial (SLTT) governments are faced with complex long-term decisions,
2033 limited sources of revenue, and changing populations. CISA developed the IRPF as a resource for SLTT
2034 planners. The IRPF provides a process and a series of tools and resources for incorporating critical
2035 infrastructure resilience considerations into planning activities. The IRPF can be used to support capital
2036 improvement plans, hazard mitigation plans, or other planning documents, as well as funding requests.
2037 For more information, see [Infrastructure Resilience Planning Framework \(IRPF\) \(cisa.gov\)](https://www.cisa.gov/infrastructure-resilience-planning-framework).

2038
2039 **Integrated Public Alert and Warning System (IPAWS)**

2040 The current IPAWS Supplemental Guidance on Public Alert and Warning provides guidance on eligible
2041 public alert and warning activities and equipment standards for prospective SLTT recipients. The intent of
2042 this document is to promote consistency in policy across federal grant programs and to ensure
2043 compatibility among federally funded projects. For more information on the IPAWS, go to
2044 <https://www.fema.gov/informational-materials>.

2045
2046 **Homeland Security Information Network (HSIN)**

2047 HSIN is a user-driven, web-based, information sharing platform that connects all homeland security
2048 professionals including the DHS and its federal, state, local, tribal, territorial, international, and private
2049 sector partners across all homeland security mission areas. HSIN is used to support daily operations,
2050 events, exercises, natural disasters, and incidents. To support user mission needs, HSIN provides three
2051 sets of services for secure information sharing. The first service provides a shared place for communities
2052 to securely collaborate on homeland security issues and includes core functions such as a web
2053 conferencing and instant messaging tools with white boarding, video, and chat services for real-time
2054 communication and situational awareness. The second set provides secure dissemination and sharing
2055 capabilities for homeland security alerts, reports, and products. The third set allows users to access and
2056 query a variety of shared data and services from all homeland security mission areas and trusted federal
2057 partners. Preparedness grant funds may be used to support planning, training and development costs
2058 associated with developing and managing, mission critical, HSIN communities of interest and sites. Learn
2059 more about HSIN at [HSIN HSGP Guidance | Homeland Security \(dhs.gov\)](https://www.dhs.gov/hsin-hsgp-guidance).

2060
2061 **SLTT Cybersecurity Engagement Program**

2062 CISA is responsible for enhancing the security, resilience, and reliability of the Nation’s cyber and
2063 communications infrastructure. CISA works to prevent or minimize disruptions to critical information
2064 infrastructure to protect the public, the economy, and government services. CISA leads efforts to protect
2065 the Federal “.gov” domain of civilian government networks and to collaborate with the private sector—
2066 the “.com” domain—to increase the security of critical networks.

2067

2068 The DHS SLTT Cybersecurity Engagement Program within CISA was established to help non-federal
2069 public stakeholders and associations manage cyber risk. The program provides appointed and elected
2070 SLTT government officials with cybersecurity risk briefings, information on available resources, and
2071 partnership opportunities to help protect their citizens online. Through these and related activities, the
2072 program coordinates DHS’s cybersecurity efforts with its SLTT partners to enhance and protect their
2073 cyber interests. More information on all of the CISA resources available to support SLTT governments is
2074 available at [Resources | CISA](#).

2075
2076 **Framework for Improving Critical Infrastructure Cybersecurity**
2077 When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in
2078 implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (the
2079 “Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework
2080 gathers existing international standards and practices to help organizations understand, communicate, and
2081 manage their cyber risks. For organizations that do not know where to start with developing a
2082 cybersecurity program, the Framework provides initial guidance. For organizations with more advanced
2083 practices, the Framework offers a way to improve their programs, such as better communication with
2084 their leadership and suppliers about management of cyber risks.

2085
2086 CISA’s Critical Infrastructure Cyber Community C³ Voluntary Program also provides resources to critical
2087 infrastructure owners and operators to assist in adoption of the Framework and managing cyber risks.
2088 Additional information on the Critical Infrastructure Cyber Community C³ Voluntary Program can be
2089 found at [Critical Infrastructure Cyber Community C³ Voluntary Program | CISA](#).

2090
2091 DHS’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in
2092 protecting U.S.-based public and private entities and combines key elements of capabilities under the
2093 “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the
2094 Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help
2095 U.S.-based companies and SLTT governments defend their computer systems against unauthorized
2096 access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat
2097 indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those
2098 indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to
2099 block certain types of malicious traffic from entering a company’s networks. Groups interested in
2100 subscribing to ECS must contract directly with a CSP in order to receive services. Please visit [Enhanced
2101 Cybersecurity Services \(ECS\) | CISA](#) for a current list of ECS CSP points of contact.

2102
2103 **Regional Resiliency Assessment Program (RRAP)**
2104 The RRAP is a cooperative assessment of specific critical infrastructure within a designated geographic
2105 area and a regional analysis of the surrounding infrastructure that address a range of infrastructure
2106 resilience issues that could have regionally and nationally significant consequences. These voluntary,
2107 non-regulatory RRAP projects are led by the Infrastructure Security Division and are selected each year
2108 by DHS with input and guidance from federal, state, and local partners. For additional information on the
2109 RRAP, visit [Regional Resiliency Assessment Program | CISA](#).

2110
2111 **Law Enforcement Support Office (LESO), or 1033 Program**
2112 The LESO facilitates a law enforcement support program, which originated from the National Defense
2113 Authorization Act of Fiscal Year 1997. This law allows the transfer of excess Department of Defense
2114 property that might otherwise be destroyed by law enforcement agencies across the United States and its
2115 territories.

2116

2117 No equipment is purchased for distribution. All items were excess that had been turned in by military
2118 units or had been held as part of reserve stocks until no longer needed. Requisitions cover the gamut of
2119 items used by America’s military — clothing and office supplies, tools, and rescue equipment, vehicles,
2120 small arms, and more. There is no fee for the equipment itself, however, the law enforcement agencies are
2121 responsible for the shipping costs.

2122
2123 For additional information on the LESO, please visit:
2124 <http://www.dla.mil/DispositionServices/Offers/Reutilization/LawEnforcement.aspx>.

2126 Supplemental Emergency Communications Guidance

2127 Lessons learned from recent major disasters, unplanned events, and full-scale exercises have identified a
2128 need for greater coordination of emergency communications among senior elected officials, emergency
2129 management agencies, and first responders at all levels of government. Federal responders arriving on the
2130 scene of a domestic incident are not always able to communicate with SLTT response agencies, as well as
2131 key government officials. State and local first responders sometimes experience similar problems,
2132 particularly when the incident requires a multi-agency, regional response effort or when primary
2133 communications capabilities fail. This lack of operability and interoperability between federal and SLTT
2134 agencies—further complicated by problems with communications survivability and resilience—has
2135 hindered the ability to share critical information, which can compromise the unity-of-effort required for
2136 an effective incident response.

2137
2138 Departments and agencies at all levels of government have identified a need for improvement in a number
2139 of high-priority areas, including Governance, Planning, Training and Exercises, Operational
2140 Coordination, and Technology. In addition, communications resilience and continuity should be viewed
2141 as a critical component within each of these areas. These priorities are explained in detail in Section 2 of
2142 the [SAFECOM Guidance](#). By addressing these priorities, which are reflective of proven best practices,
2143 emergency communications can be significantly improved at all levels of government. The end goal is to
2144 ensure operable, interoperable, and resilient communications that maintain a continuous flow of critical
2145 information, under all conditions, among multi-jurisdictional and multi-disciplinary emergency
2146 responders, command posts, agencies, critical infrastructure sectors, and government officials for the
2147 duration of an emergency response operation, and in accordance with NIMS and the [National Emergency
2148 Communications Plan](#), which describes goals and objectives for improving emergency communications
2149 nationwide.

2150
2151 To help meet this goal, the SAFECOM Guidance outlines requirements for grant applications, including
2152 alignment to national, regional, and state communications plans (e.g., NECP, Statewide Communication
2153 Interoperability Plan (SCIP), Tactical Interoperability Communications Plan (TICP), FEMA Regional
2154 Emergency Communications Plan (RECP)), project coordination, and technical standards for emergency
2155 communications technologies. SCIPs define the current and future direction for interoperable and
2156 emergency communications within a state or territory, while TICPs are designed to allow urban areas,
2157 counties, regions, states/territories, tribes, or federal departments/agencies to document interoperable
2158 communications governance structures, technology assets, and usage policies and procedures. In addition,
2159 FEMA’s formal planning process has produced 10 RECPs and their associated state and/or
2160 tribal/territorial annexes that identify emergency communications capability shortfalls and potential
2161 resource requirements. Grant recipients are encouraged to leverage these planning resources as a source
2162 of input and reference for all emergency communications grant applications and investment justifications.

2163
2164 In addition, FEMA formally recognizes several statewide emergency communications governance bodies
2165 (e.g., SWIC, SIGB, Statewide Interoperability Executive Committee (SIEC), FirstNet State Single Point
2166 of Contact (SPOC)), and strongly encourages grant recipients to closely coordinate with these entities

2167 when developing an emergency communications investment to ensure projects support the state or
2168 territory’s strategy to improve their communications capabilities with the goal of achieving fully operable,
2169 interoperable, and resilient communications. In addition, grant applicants should work with public and
2170 private entities, and across jurisdictions and disciplines, to demonstrate engagement with the Whole
2171 Community in accordance with [Presidential Policy Directive-8 \(PPD-8\)](#).

2172
2173 For regional, cross-border initiatives, FEMA requires applicants to coordinate projects with national level
2174 emergency communications coordination bodies, such as the National Council of Statewide
2175 Interoperability Coordinators (NCSWIC) and the Regional Emergency Communications Coordination
2176 Working Groups (RECCWGs). The NCSWIC promotes and coordinates state-level activities designed to
2177 ensure the highest level of public safety communications across the nation. RECCWGs are
2178 congressionally mandated planning and coordination bodies located in each FEMA Region and provide a
2179 collaborative forum to assess and address the survivability, sustainability, operability, and interoperability
2180 of emergency communications systems at all levels of government. Grant-funded investments that are
2181 coordinated with these bodies will help ensure that federally funded emergency communications
2182 investments are interoperable and support national policies.

2183

2184 **Resilient Communications Guidance**

2185 Nothing better demonstrates a modern nation than its ability to effectively communicate. The risk
2186 imposed by the reliance on communication systems by government and the private sector can be reduced
2187 by understanding dependencies, analyzing effects, and taking action. Entities planning to use HSGP
2188 funding for communications investments are encouraged to work with state emergency management
2189 agencies, SWICs, SIGBs, and appropriate stakeholders at the regional, state, local, territorial, and tribal
2190 levels to:

2191

- 2192 • Establish robust, resilient, reliable, and interoperable communications capabilities. Account for
2193 the mission impact of communication system disruptions in your planning;
- 2194 • Ensure mission-related communications (voice, video, data, and network security requirements)
2195 are adequately planned for and understood. It is important to maintain current documentation of
2196 your communication systems architecture and perform regular audits. Your ability to continue
2197 operations is dependent on the availability of and access to communications systems with
2198 sufficient resiliency, redundancy, and accessibility to perform essential functions and provide
2199 critical services during a disruption;
- 2200 • Ensure critical communication systems connectivity among key government leadership, internal
2201 elements, other supporting organizations, and the public under all conditions. As such,
2202 organizations should ensure current copies of vital records, including electronic files and
2203 software, are backed-up and maintained off-site;
- 2204 • Ensure all communications systems/networks are traced from end to end to identify all Single
2205 Points of Failure (SPF). In doing so, grantees should work with communication service providers
2206 to add redundancy at key critical infrastructure facilities as needed;
- 2207 • Ensure key communication systems resiliency through:
 - 2208 ○ Ensuring availability of backup systems;
 - 2209 ○ Ensuring diversity of network element components and routing;
 - 2210 ○ Ensuring geographic separation of primary and alternate transmission media;
 - 2211 ○ Ensuring availability of back-up power sources;
 - 2212 ○ Ensuring availability and access to systems that are not dependent on commercial
2213 infrastructure;
 - 2214 ○ Maintain spares for designated critical communication systems; and
 - 2215 ○ Work with commercial suppliers to remediate communication Single Points of Failure.
- 2216 • All communications system owners are encouraged to address the following issues:

- 2217 ○ Integrate communications needs into continuity planning efforts by incorporating
- 2218 mitigation options to ensure uninterrupted communications support;
- 2219 ○ Establish a cybersecurity plan that includes continuity of a communications component
- 2220 such as Radio Frequency (RF)-based communications that do not rely on public
- 2221 infrastructure;
- 2222 ○ Maintain communications capabilities to ensure their readiness when needed;
- 2223 ○ Frequently train and exercise personnel required to operate communications capabilities
- 2224 ○ Test and exercise communications capabilities; and
- 2225 ○ Consider Electromagnetic Pulse (EMP) protective measures for communications systems
- 2226 where practical.
- 2227

2228 **DHS/FEMA Communications Support Services**

2229 CISA and FEMA offer a variety of technical assistance and other support services to assist state and local
 2230 entities in their efforts to comply with the above requirements, including the SAFECOM Guidance, with
 2231 the goal of ensuring interoperable and resilient emergency communications. A summary of DHS/FEMA
 2232 support services is provided below. Grant recipients are encouraged to refer to the respective websites for
 2233 additional information.

2234

2235 **CISA Support:**

2236 CISA assists agencies through a myriad of services, including direct TA and training provided at no cost
 2237 to the jurisdiction. The TA offerings include (but are not limited to):

- 2238
- 2239 ● Coordinated statewide governance (e.g., State Mapping Tool, Interoperable Communications
- 2240 Reference Guides);
- 2241 ● Comprehensive emergency communications planning (e.g., SCIPs, TICPs, and Field Operations
- 2242 Guides);
- 2243 ● Next Generation 911 planning and implementation;
- 2244 ● Data operability and interoperability;
- 2245 ● Alerts and warnings;
- 2246 ● Broadband deployment;
- 2247 ● Cybersecurity education and awareness; and
- 2248 ● Communications Unit (COMU) planning and procedures.
- 2249

2250 Information on these services is available at <https://www.cisa.gov/safecom/ictapscip-resources> and
 2251 <https://www.cisa.gov/interoperable-communications-technical-assistance-program>.

2252

2253 **FEMA Disaster Emergency Communications Division (DEC) Support:**

2254 The DEC, within FEMA Headquarters’ Response Directorate, has developed State Communications
 2255 Annexes for all 56 states and territories. DEC provides technical assistance, coordinated through the
 2256 FEMA Region’s Regional Emergency Communications Coordinator (RECC) in scheduling with the
 2257 states and territories for major updates to the Annexes. Major updates are scheduled on a 3 to 5-year
 2258 cycle. FEMA DEC supports the major update with a team of communications and emergency
 2259 management specialists that facilitate a process of interaction with state representatives. This process is
 2260 coordinated through the SWIC or state designated representative. All documentation is the responsibility
 2261 of the FEMA support team and validated through state interaction.

2262

2263 Minor yearly updates to the State Annexes are accomplished through the RECCWG process. FEMA DEC
 2264 support staff, working in coordination with the region-specific RECC, incorporate pertinent update
 2265 information provided by state and local representatives. Additionally, operational information identified
 2266 through exercises and incident response activities is a source of update data. The FEMA RECC, with the

2267 support of the DEC team, is responsible for maintaining the State Annexes — changes and modifications
2268 to the Annexes are validated with the state through RECC coordination with the SWIC or designated state
2269 representative.

2270

2271 **FEMA National Preparedness Directorate (NPD) Support:**

2272 NPD provides training, exercises, and technical assistance to SLTT stakeholders that support operational
2273 and emergency communications. Descriptions and resources specific to operational communication are
2274 available on FEMA’s website (<https://www.fema.gov/core-capability-development-sheets>) within the
2275 Response Mission Area and include the following information to support jurisdictions:

2276

- 2277 • Description of the operational communications core capability;
- 2278 • Training for building and sustaining operational communication with specific course titles:
 - 2279 ○ Trainings can also be found at <https://www.firstrespondertraining.gov/>.
- 2280 • Example capability targets to complete a THIRA:
 - 2281 ○ Help in developing targets can be found at www.preptoolkit.fema.gov/urt or requested at
2282 FEMA-SPR@fema.dhs.gov.
- 2283 • Resource types that support operational communications:
 - 2284 ○ Additional resource types and position qualifications can be found at
2285 <https://www.fema.gov/preparedness-checklists-toolkits>.
- 2286 • Tools to validate capabilities through exercises:
 - 2287 ○ Technical assistance and support from subject matter experts can be requested through
2288 www.fema.gov/national-exercise-program.

2289

2290 **FEMA Office of National Continuity Programs (ONCP) Support:**

2291 NCP’s support services focus on holistic continuity planning, of which communications continuity is an
2292 important component. Currently, continuity communications training and technical assistance is limited to
2293 the FEMA National Radio System (FNARS) and IPAWS and is delivered either on an ad hoc basis at the
2294 request of the state entity, through a FEMA Region, or via a requirement for terms of use. Entities
2295 interested in ONCP support services should contact FEMA-CGC@fema.dhs.gov or consult ONCP’s
2296 Continuity Resources Toolkit webpage at [https://www.fema.gov/emergency-managers/national-](https://www.fema.gov/emergency-managers/national-preparedness/continuity/toolkit)
2297 [preparedness/continuity/toolkit](https://www.fema.gov/emergency-managers/national-preparedness/continuity/toolkit).

2298

2299

2300 Program Appendix B: 2301 Tribal Homeland Security Grant Program (THSGP)

2302
2303 As a reminder, while this appendix contains THSGP-specific information and requirements, the main
2304 content of this Manual (non-appendix information) contains important information relevant to **all**
2305 preparedness grant programs, including the THSGP. Please be sure to read the main content of this
2306 Manual in addition to the program-specific appendices.
2307

2308 Alignment of THSGP to the National Preparedness System

2309 The THSGP plays an important role in the implementation of the [National Preparedness Goal](#) by
2310 supporting the building, sustainment, and delivery of the core capabilities. The core capabilities are
2311 essential for the execution of critical tasks for each of the five mission areas outlined in the Goal.
2312 Delivering core capabilities requires the combined effort of the whole community, rather than the
2313 exclusive effort of any single organization or level of government. THSGP allowable costs support efforts
2314 to build and sustain core capabilities across the prevention, protection, mitigation, and response mission
2315 areas described in the Goal.

2316
2317 Particular emphasis in THSGP will be placed on capabilities that address the greatest risks to the security
2318 and resilience of tribal communities and the United States and that provide a clear nexus to preventing
2319 acts of terrorism. Funding will support deployable assets that can be utilized through automatic assistance
2320 and mutual aid agreements. THSGP supports investments that improve the ability of jurisdictions
2321 nationwide to:

- 2322
- 2323 • Prevent a threatened or an actual act of terrorism;
 - 2324 • Protect our citizens, residents, visitors, and assets against the greatest threats and hazards;
 - 2325 • Mitigate the loss of life and property by lessening the impact of future disasters;
 - 2326 • Respond quickly to save lives, protect property and the environment, and meet basic human needs
2327 in the aftermath of a catastrophic incident; and/or
- 2328

2329 To support building, sustaining, and delivering these core capabilities, recipients will use the components
2330 of the National Preparedness System, which include Identifying and Assessing Risk, Estimating
2331 Capability Requirements, Building and Sustaining Capabilities, Planning to Deliver Capabilities,
2332 Validating Capabilities, and Reviewing and Updating. Additional information on the National
2333 Preparedness System is available at: <http://www.fema.gov/national-preparedness-system>.

2334
2335 FEMA requires recipients to prioritize grant funding to demonstrate how investments support identified
2336 national priorities and building capability, closing capability gaps, or sustaining capabilities as defined by
2337 [CPG 201: THIRA/SPR Guide—3rd Edition](#). In addition to capability gaps they have identified at their
2338 level, recipients should consider areas where community capability gaps have consistently been the
2339 largest, which are outlined in the most recent [National Preparedness Report](#). They include cybersecurity,
2340 economic recovery, housing, infrastructure systems, natural and cultural resources, and supply chain
2341 integrity and security. Addressing these areas for improvement will enhance preparedness nationwide.
2342 Minimum funding amounts are not prescribed by the Department for these priorities; however, recipients
2343 are expected to support state, local, regional, and national efforts in achieving the desired outcomes of
2344 these priorities.
2345

2346 **Reporting on the Implementation of the National Preparedness System**

2347 By December 31, 2023, any new THSGP recipients during calendar year 2023 are required to complete a
2348 THIRA/SPR that addresses all 32 core capabilities and is compliant with the [Comprehensive](#)
2349 [Preparedness Guide \(CPG\) 201, Third Edition](#).

2350
2351 THSGP recipients must complete every step of the THIRA/SPR for the following eight core capabilities:
2352 Cybersecurity; Infrastructure Systems; Mass Care Services; Mass Search and Rescue Operations; On-
2353 scene Security, Protection, and Law Enforcement; Operational Communications; Operational
2354 Coordination; and Public Information and Warning. For the remaining 24 core capabilities, THSGP
2355 recipients are only required to indicate planning, organization, equipment, training, and exercise gaps in
2356 functional areas related to those capabilities. THSGP recipients may optionally complete additional
2357 portions of the THIRA/SPR for these 24 core capabilities.

2358
2359 THSGP recipients are required to respond to a series of planning-related questions as part of the
2360 THIRA/SPR. THSGP recipients are required to submit a THIRA every three years to establish a
2361 consistent baseline for assessment. While the THIRA is only required every three years, THSGP
2362 recipients are required to submit an SPR annually. For additional guidance on the THIRA/SPR, please
2363 refer to the [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#). Recipients must align
2364 THSGP grant investments in building and sustaining capabilities with closing capability gaps and/or
2365 sustaining capabilities they identified in their THIRA and SPR.

2366
2367 **Reporting Requirements**

- 2368 • THSGP recipients must submit their THIRA/SPR through the Unified Reporting Tool (URT) on
2369 [Prep Toolkit](#) no later than December 31 for the years they have open THSGP grant awards. If a
2370 recipient has completed closeout for their THSGP grant award period of performance, they do not
2371 have to submit any more THIRA/SPR updates as the requirement does not apply to closed
2372 awards. While UASIs are not required to complete a THIRA/SPR, it is encouraged.
- 2373 • Calendar year 2022 is the start of the new 3-year THIRA/SPR cycle and baseline assessment year
2374 for existing recipients. Any new grant recipients during calendar year 2023, for which the
2375 THIRA/SPR requirement applies, will start their new 3-year THIRA/SPR cycle and baseline
2376 assessment year in 2023. Please contact FEMA-SPR@fema.dhs.gov if you have questions.
- 2377 • In each THSGP recipient’s Biannual Strategy and Implementation Report (BSIR), as part of
2378 programmatic monitoring, recipients will be required to describe how investments support
2379 building capability, closing capability gaps, or sustaining capabilities identified in the
2380 THIRA/SPR. THSGP recipients will, on a project-by-project basis, check one of the following:
 - 2381 ○ Building a capability with THSGP funding; or
 - 2382 ○ Sustaining a capability with THSGP funding.

2383
2384 **National Incident Management System (NIMS) Implementation**

2385 Recipients receiving THSGP funding are required to implement the National Incident Management
2386 System (NIMS). NIMS guides all levels of government, nongovernmental organizations (NGO), and the
2387 private sector to work together to prevent, protect against, mitigate, respond to, and recover from
2388 incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems,
2389 and processes to successfully deliver the capabilities described in the National Preparedness Goal.
2390 THSGP recipients must utilize standardized resource management concepts such as typing, credentialing,
2391 and inventorying resources that facilitates the effective identification, dispatch, deployment, tracking and
2392 recovery of their resources.

2393

2394 The *NIMS Implementation Objectives for Local, State, Tribal, and Territorial Jurisdictions* clarifies the
2395 NIMS implementation requirements in FEMA preparedness grant Notices of Funding Opportunities
2396 (NOFOs). As recipients and subrecipients of federal preparedness (non-disaster) grant awards,
2397 jurisdictions and organizations must achieve, or be actively working to achieve, all of the NIMS
2398 Implementation Objectives. The objectives can be found on the NIMS webpage at [NIMS Implementation
2399 and Training | FEMA.gov](#).

2400

2401 **Reporting Requirements**

2402 Recipients report in the applicable secondary NIMS assessment portion of the URT as part of their
2403 THIRA/SPR submission, as outlined in the THSGP NOFO.

2404

2405 **Planning to Deliver Capabilities**

2406 Recipients shall develop and maintain a jurisdiction-wide, all threats and hazards Emergency Operations
2407 Plans (EOPs) consistent with CPG 101 Version 2.0 (CPG 101 v2). Recipients must submit an EOP once
2408 during the period of performance.

2409

2410 **Reporting Requirements**

2411 Recipients report EOP compliance with Developing and Maintaining Emergency Operations Plans by
2412 completing the secondary CPG 101 v2 assessment portion of the URT as part of their THIRA/SPR
2413 submission, as outlined in the THSGP NOFO.

2414

2415 **Validating Capabilities**

2416 All recipients will develop and maintain a progressive exercise program consistent with Homeland
2417 Security Exercise and Evaluation Program (HSEEP) guidance in support of the National Exercise
2418 Program (NEP). The NEP serves as the principal exercise mechanism for examining national
2419 preparedness and measuring readiness. The NEP is a two-year cycle of exercises across the nation that
2420 validates capabilities in all preparedness mission areas. The two-year NEP cycle is guided by Principals’
2421 Strategic Priorities, established by the National Security Council, and informed by preparedness data from
2422 jurisdictions across the Nation.

2423

2424 To develop and maintain a progressive exercise program consistent with HSEEP and in support of the
2425 NEP, recipients should engage senior leaders and other whole community stakeholders to identify
2426 preparedness priorities. These priorities should be informed by various factors, including jurisdiction-
2427 specific threats and hazards (i.e., the THIRA); areas for improvement identified by real-world events and
2428 exercises; external requirements such as state or national preparedness reports, homeland security policy,
2429 and industry reports; and accreditation standards, regulations, or legislative requirements. Recipients
2430 should document these priorities and use them to deploy a schedule of preparedness events in a multi-year
2431 Integrated Preparedness Plan (IPP). Information related to IPPs and Integrated Preparedness Planning
2432 Workshops (IPPWs) can be found on the HSEEP website at [Homeland Security Exercise and Evaluation
2433 Program | FEMA.gov](#) and [Welcome - Preparedness Toolkit \(fema.gov\)](#).

2434

2435 The NEP provides exercise sponsors the opportunity to receive exercise design and delivery assistance,
2436 tools and resources, enhanced coordination, and the ability to directly influence and inform policy and
2437 preparedness programs. If you have any questions or would like to request assistance through the NEP,
2438 please visit the NEP website at [Exercises | FEMA.gov](#) or reach out to the NEP directly at
2439 NEP@fema.dhs.gov.

2440 **Reporting Requirements**

- 2441 • Recipients must have a current multi-year IPP that identifies preparedness priorities and
- 2442 activities. The current multi-year IPP must be submitted to hseep@fema.dhs.gov before January
- 2443 31 of each year:
- 2444 ○ Recipients are encouraged to enter their exercise information into the Preparedness
- 2445 Toolkit at <https://preptoolkit.fema.gov/>.
- 2446 • Recipients must submit After-Action Report (AAR)/Improvement Plans (IPs) to
- 2447 hseep@fema.dhs.gov and indicate which fiscal year’s funds were used (if applicable);
- 2448 • Submission of AAR/IPs must occur within 90 days after completion of the single exercise or
- 2449 progressive series:
- 2450 ○ Recipients are encouraged to submit AAR/IPs reflecting tabletop exercises that validate
- 2451 critical plans or those reflecting large-scale functional or full-scale exercises that took
- 2452 place at the state, territorial, tribal, or UASI level. Recipients are discouraged from
- 2453 submitting AAR/IPs specific to local jurisdictions that reflect drills;
- 2454 ○ If a recipient endures a significant real-world incident during the calendar year that
- 2455 delays or prevents conduct of a grant-funded exercise, they can submit the AAR from
- 2456 that event in place of the exercise AAR. Jurisdictions submitting real world AARs should
- 2457 include an explanation with the AAR submission to hseep@fema.dhs.gov; and
- 2458 ○ Recipients can access a sample AAR/IP template at
- 2459 <https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning>.
- 2460

2461 THSGP Funding Guidelines

2462 Recipients and subrecipients must comply with all applicable requirements of the Uniform Administrative
 2463 Requirements, Cost Principles, and Audit Requirements for Federal Awards located at 2 C.F.R. Part 200.
 2464 In administering a THSGP grant award, recipients must comply with the following general requirements:
 2465

2466 THSGP Priorities

2467 See the annual THSGP NOFO.
 2468

2469 Allowable Costs

2470 Management and Administration (M&A)

2471 M&A activities are those defined as directly relating to the management and administration of THSGP
 2472 funds, such as financial management and monitoring. Recipients may use up to 5% of the amount of the
 2473 award for M&A, and where applicable, subrecipients may use up to 5% for M&A of the amount they
 2474 receive. Reasonable costs of grant management training are also allowable.
 2475

2476 Indirect Costs

2477 Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost Rates”
 2478 Section in “Pre-Submission Information” for more information.
 2479

2480 Allowable Direct Costs

2481 The following pages outline global allowable costs guidance specifically applicable to THSGP.
 2482 Allowable activities made in support of the national priorities, as well as other capability-enhancing
 2483 projects must fall into the categories of planning, organization, equipment, training, or exercises
 2484 (POETE). Additional detail about each of these allowable expense categories, as well as sections on
 2485 additional activities including explicitly unallowable costs is provided. In general, recipients should

2486 consult their FEMA Preparedness Officer prior to implementing any investment to ensure that it clearly
2487 meets the allowable expense criteria established by the guidance.

2488
2489 Recipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return
2490 on investment aligned to the relevant POETE element, and FEMA encourages grant recipients to provide
2491 the results of that analysis to FEMA.
2492

2493 **Planning**

2494 Planning efforts can include prioritizing needs; conducting risk and resilience assessments on increasingly
2495 connected cyber and physical systems, on which security depends, using the Infrastructure Resilience
2496 Planning Framework and related CISA resources; updating preparedness strategies; and allocating
2497 resources across stakeholder groups (e.g., law enforcement, fire, emergency medical services, health care
2498 systems, public health, behavioral health, public works, rural water associations, agriculture, information
2499 technology, emergency communications, and the general public, including people with disabilities) and
2500 levels of government. Planning provides a methodical way to engage the whole community in thinking
2501 through the life cycle of potential crises, determining required capabilities, and establishing a framework
2502 for roles and responsibilities. Planning must include participation from all stakeholders in the community
2503 who are able to contribute critical perspectives and may have a role in executing the plan. Planning should
2504 be flexible enough to address incidents of varying types and magnitudes.
2505

2506 Planning activities should focus on the prevention, protection, mitigation, and response mission areas
2507 outlined in the Goal. All jurisdictions are encouraged to work with Citizen Corps Whole Community
2508 Councils, nongovernmental entities, and the general public in planning activities. Whole community
2509 planning should integrate program design and delivery practices that ensure representation and services
2510 for under-represented diverse populations that may be more impacted by disasters including children,
2511 seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture
2512 and language use, individuals with lower economic capacity and other underserved populations.
2513 Recipients must use the CPG 101 v2, Third Edition in order to develop robust and effective plans.
2514

2515 For additional planning and resource information, please see:

- 2516
- 2517 • FEMA CPG 101 v.2 - http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf
- 2518 • CISA Infrastructure Resilience Planning Toolkit - <http://www.cisa.gov/idr-program>
- 2519 • FEMA Citizen Corps - <http://www.ready.gov/citizen-corps>
- 2520 • FEMA CERT - <http://www.fema.gov/community-emergency-response-teams>
- 2521 • Ready.gov - www.ready.gov/kids
- 2522 • Emergency Planning with Children - <http://www.fema.gov/media-library/assets/documents/94775>
- 2523 • National Disaster Recovery Framework - https://www.fema.gov/sites/default/files/2020-06/national_disaster_recovery_framework_2nd.pdf
- 2524
- 2525

2526 Additionally, THSGP funds may be used for planning activities related to 911 call capabilities, alert and
2527 warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).
2528

2529 **Continuity Capability**

2530 FEMA is responsible for developing, managing, and promulgating national continuity planning, guidance,
2531 training, and exercise programs for the whole community. To support this role, FEMA provides direction
2532 and guidance to assist in developing capabilities for continuing federal and state, local, tribal, and
2533 territorial (SLTT) government jurisdictions and private sector organizations' essential functions across a
2534 broad spectrum of emergencies.

2535
2536 Presidential Policy Directive 40: National Continuity Policy, Federal Continuity Directive (FCD) 1, FCD
2537 2, and Continuity Guidance Circular (CGC) outline continuity requirements for agencies and
2538 organizations and provide guidance, methodology, and checklists. For additional information on
2539 continuity programs, guidance, and directives, visit the Continuity Resource Toolkit at
2540 <https://www.fema.gov/emergency-managers/national-preparedness/continuity/toolkit>.

2541 **Organization**

2542 Recipients may use grant funds for organization activities:

- 2543 • Organizational activities may include, paying salaries and benefits for personnel, including
2544 individuals employed to serve as qualified intelligence analysts. Personnel hiring, overtime, and
2545 backfill expenses are permitted under this grant only to the extent that such expenses are for the
2546 allowable activities within the scope of the grant.
- 2547 • Other organization activities may include implementing standardized resource management
2548 concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch,
2549 deployment, and recovery of resources before, during, and after an incident.

2550 Additionally, migrating online services to the “.gov” internet domain is an allowable expense.
2551

2552 **Equipment**

2553 The 21 allowable prevention, protection, mitigation, response, and recovery equipment categories and
2554 equipment standards for THSGP are listed on the web-based version of the [Authorized Equipment List](#)
2555 (AEL). Unless otherwise stated, equipment must meet all mandatory regulatory and DHS-adopted
2556 standards to be eligible for purchase using these funds. In addition, recipients and subrecipients, as
2557 applicable, agencies will be responsible for obtaining and maintaining all necessary certifications and
2558 licenses for the requested equipment. Recipients may purchase equipment not listed on the AEL, but **only**
2559 if they first seek and obtain **prior approval** from FEMA.

2560 Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under](#)
2561 [FEMA Awards](#) and may not be used for the purchase of the following unallowable equipment: firearms,
2562 ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with
2563 weapons installed. Recipients should analyze the costs and benefits of purchasing versus leasing
2564 equipment, especially high-cost items, and those subject to rapid technical advances. Large equipment
2565 purchases must be identified and explained. For more information regarding property management
2566 standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and
2567 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and [FEMA Policy #405-143-1, Prohibitions on](#)
2568 [Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), issued May 10,
2569 2022. In addition, recipients that are using THSGP funds to support emergency communications
2570 equipment activities must comply with the SAFECOM Guidance on Emergency Communications Grants,
2571 including provisions on technical standards that ensure and enhance interoperable communications. This
2572 SAFECOM Guidance can be found at [Funding Resources | CISA](#).

2573 Additionally, THSGP funds may be used for equipment purchases related to 911 call capabilities, alert
2574 and warning capabilities, and implementation of the REAL ID Act (Pub. L. No. 109-13).

2575 **Requirements for Small Unmanned Aircraft System**

2576 All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply
2577 with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and also
2578 include a description of the policies and procedures in place to safeguard individuals’ privacy, civil rights,
2579

2585 and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment.
2586 sUAS policies are not required at the time of application but must be received and approved by FEMA prior
2587 to obligating THSGP funds. All grant-funded procurements must be executed in a manner compliant with
2588 federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use THSGP funds for
2589 sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the
2590 data the devices collect is transmitted to servers not under the control of the operator. It has been reported
2591 that some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The
2592 U.S. Department of Homeland Security’s Privacy Office suggests the recipient fully explore data
2593 transmission and storage issues with vendors to reduce the possibility of data breaches.
2594

2595 Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2023 DHS Appropriations Act
2596 further requires recipients to certify they have reviewed the [Industry Alert on Chinese Manufactured](#)
2597 [Unmanned Aircraft Systems](#), and completed a risk assessment that considers the proposed use of foreign-
2598 made sUAS to ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign-
2599 made versus domestic sUAS.
2600

2601 **Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)**

2602 In August 2020, FEMA was alerted of an advisory guidance document issued by DHS, the Department of
2603 Justice, the Federal Aviation Administration, and the Federal Communications Commission:
2604 <https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-technologies>.
2605 The purpose of the advisory guidance document is to help non-federal public and private entities better
2606 understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate
2607 threats posed by UAS operations (i.e., Counter-UAS or C-UAS).
2608

2609 The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the
2610 authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do
2611 they conduct legal reviews of commercially available product compliance with those laws. The advisory
2612 does not address state and local laws nor potential civil liability, which UAS detection and mitigation
2613 capabilities may also implicate.
2614

2615 It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection
2616 and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state
2617 criminal, surveillance, and communications laws. Entities should conduct their own legal and technical
2618 analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’
2619 representations of the systems’ legality or functionality. Please also see the DHS press release on this
2620 topic for further information: [https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft)
2621 [technology-detect-and-mitigate-unmanned-aircraft](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft).
2622

2623 **Training and Exercises**

2624 Tribes are strongly encouraged to use THSGP funds to develop or maintain a homeland security training
2625 program. Allowable training-related costs under the THSGP include the establishment, support, conduct,
2626 and attendance of training specifically identified under the THSGP or in conjunction with emergency
2627 preparedness training by other federal agencies (e.g., the Department of Health and Human Services or
2628 the Department of Transportation). Training conducted using THSGP funds should address a performance
2629 gap identified through an assessment or contribute to building a capability that will be evaluated through a
2630 formal exercise. Exercises should be used to provide the opportunity to demonstrate and validate skills
2631 learned in training, as well as to identify training gaps. Any training or training gaps evaluated through a
2632 formal exercise, including those for vulnerable populations including children, the elderly, pregnant
2633 women, and individuals with disabilities or other access and functional needs should be identified in an
2634 AAR/IP.
2635

2636 All training and exercises conducted with THSGP funds should support the development and testing of
2637 the jurisdiction’s Emergency Operations Plan (EOP), consistent with the priorities in the National
2638 Preparedness System. Recipients are encouraged to use existing training rather than developing new
2639 courses. When developing new courses, recipients are encouraged to apply the Analysis, Design,
2640 Development, Implementation, and Evaluation (ADDIE) model of instruction design, available with
2641 additional training information at [First Responder Training System](#) and [First Responder Training
2642 System](#)<https://www.firstrespondertraining.gov/frts/trdc/state/development>.

2643
2644 FEMA supports and encourages the coordination of all emergency preparedness training towards the
2645 achievement of the Goal. To this end, FEMA supports the establishment of a Tribal Training Point of
2646 Contact (TTPOC). The role of the TTPOC is to coordinate the tribes’ training needs and activities with
2647 FEMA and FEMA’s federal training partners and holds the same authority and roles that state training
2648 points of contact serve within SAAs nationwide. FEMA will coordinate with Tribal Training Officers
2649 (TTOs) as it relates to FEMA training when notified by recipients.

2650
2651 Per FEMA Grant Programs Directorate *IB 432, Review and Approval Requirements for Training Courses*
2652 *Funded Through Preparedness Grants*, issued on July 19, 2018, states, territories, tribal entities, and
2653 high-risk urban areas are no longer required to request approval from FEMA for personnel to attend non-
2654 DHS/FEMA training as long as the training is coordinated with and approved by the state, territory, tribal,
2655 or high-risk urban area TPOC and falls within the FEMA mission scope and the jurisdiction’s EOP. For
2656 additional information on review and approval requirements for training courses funded with
2657 preparedness grants, please refer to [Review and Approval Requirements for Training Courses Funded
2658 Through Preparedness Grants Policy \(fema.gov\)](#)[https://www.fema.gov/sites/default/files/2020-
2659 09/fema_gpd-review-approval-requirements-training-policy_09-10-13.pdf](https://www.fema.gov/sites/default/files/2020-09/fema_gpd-review-approval-requirements-training-policy_09-10-13.pdf).

2660 2661 **DHS/FEMA Provided Training and Education**

2662 FEMA offers tuition-free training and education programs and courses through several providers
2663 including the Center for Domestic Preparedness, the Emergency Management Institute, and the National
2664 Training and Education Division’s Training Partner Program (TPP). TPP includes the Center for
2665 Homeland Defense and Security, National Domestic Preparedness Consortium, Rural Domestic
2666 Preparedness Consortium, and training partners through the Continuing Training Grants program.

2667 2668 **FEMA’s National Preparedness Course Catalog**

2669 This online searchable catalog features a wide range of course topics in multiple delivery modes to meet
2670 FEMA’s mission scope as well as the increasing training needs of federal, state, local, territorial, and
2671 tribal audiences. The catalog can be accessed at [NTED | National Preparedness Course Catalog Home
2672 \(firstrespondertraining.gov\)](#).

2673 2674 **Training Not Provided by DHS/FEMA**

2675 These trainings include courses that are either state sponsored or federal sponsored (non-DHS/FEMA),
2676 coordinated and approved by the SAA or their designated TPOC, and fall within the FEMA mission
2677 scope to prepare SLTT personnel to prevent, protect against, mitigate, and respond to acts of terrorism or
2678 catastrophic events.

- 2679
2680 • **State Sponsored Courses.** These courses are developed for and/or delivered by institutions or
2681 organizations other than federal entities or FEMA and are sponsored by the SAA or their
2682 designated TPOC.
- 2683 • **Joint Training and Exercises with the Public and Private Sectors.** These courses are
2684 sponsored and coordinated by private sector entities to enhance public-private partnerships for
2685 training personnel to prevent, protect against, mitigate, and respond to acts of terrorism or

2686 catastrophic events. In addition, states, territories, tribes, and high-risk urban areas are
2687 encouraged to incorporate the private sector in government-sponsored training and exercises.
2688

2689 Additional information on both FEMA provided training and other federal and state training can be found
2690 at [First Responder Training System](#).
2691

2692 **Training Information Reporting System (“Web-Forms”)**

2693 Web-Forms is an electronic data management system built to assist SAAs, designated TPOCs, and federal
2694 agencies with submitting non-National Training and Education Division provided training courses for
2695 inclusion in the State/Federal-Sponsored Course Catalog through electronic forms. The information
2696 collected is used in a two-step review process to ensure the training programs adhere to the intent of the
2697 HSGP guidance and the course content is structurally sound and current. As these programs may be
2698 delivered nationwide, it is vital to ensure each training program’s viability and relevance to the Homeland
2699 Security mission. Reporting training activities through Web-Forms is not required under FY 2023
2700 THSGP. However, the system remains available and can be accessed through the [Web-Forms section of](#)
2701 [the FEMA National Preparedness Course Catalog](#) to support recipients in their own tracking of training
2702 deliveries.
2703

2704 **Exercises**

2705 For additional information on conducting exercises under THSGP, please refer to the earlier section in
2706 this appendix titled “Validating Capabilities” on page B-3.
2707

2708 **Personnel Activities**

2709 Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform
2710 allowable THSGP planning, training, exercise, and equipment activities.
2711

2712 Not more than 50% of total THSGP funds may be used for personnel activities as directed by the
2713 *Homeland Security Act of 2002*, as amended by the *Personnel Reimbursement for Intelligence*
2714 *Cooperation and Enhancement (PRICE) of Homeland Security Act* (Pub. L. No. 110-412) (6 U.S.C.
2715 §609(b)(2)(A)). This 50% cap may be waived, however, per 6 U.S.C. § 609(b)(2)(B). For further details,
2716 THSGP recipients should refer to [IB 421b](#), or contact their FEMA HQ Preparedness Officer. THSGP
2717 funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional
2718 public safety duties or to supplant traditional public safety positions and responsibilities.
2719

2720 **Construction and Renovation**

2721 Construction projects are only permitted where they will assist the recipient to achieve target capabilities
2722 related to preventing, preparing for, protecting against, or responding to acts of terrorism, including
2723 through the alteration or remodeling of existing buildings for the purpose of making them secure against
2724 acts of terrorism. THSGP funding may not be used for construction and renovation projects without prior
2725 written approval from FEMA. All recipients of THSGP funds must request and receive approval from
2726 FEMA before any THSGP funds are used for any construction or renovation. Additionally, recipients are
2727 required to submit an SF-424C Form containing budget detail citing the construction project costs and an
2728 SF-424D Form for standard assurances for the construction project. The total cost of any construction or
2729 renovation paid for using THSGP funds may not exceed the greater amount of \$1 million or 15% of the
2730 THSGP award.
2731

2732 All construction and renovation projects require Environmental Planning and Historic Preservation (EHP)
2733 review. Recipients and subrecipients are encouraged to have completed as many steps as possible for a
2734 successful EHP review in support of their proposal for funding (e.g., coordination with their State
2735 Historic Preservation Office to identify potential historic preservation issues and to discuss the potential

2736 for project effects, compliance with all state and local EHP laws and requirements). Projects for which the
2737 recipient believes an EA may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision](#)
2738 [01, FEMA Directive 108-1](#), and FEMA Instruction 108-1-1, must also be identified to the FEMA HQ
2739 Preparedness Officer within six months of the award and completed EHP review materials must be
2740 submitted no later than 12 months before the end of the period of performance. [EHP policy](#) guidance and
2741 the [EHP Screening Form](#) can both be found on FEMA.gov. EHP review materials should be sent to
2742 gpdehpinfo@fema.dhs.gov.

2743
2744 THSGP recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified
2745 as amended at 40 U.S.C. §§ 3141 *et seq.*). See 6 U.S.C. § 609(b)(4)(B) (cross-referencing 42 U.S.C. §
2746 5196(j)(9), which cross-references *Davis-Bacon*). Grant recipients must ensure that their contractors or
2747 subcontractors for construction projects pay workers no less than the prevailing wages for laborers and
2748 mechanics employed on projects of a character similar to the contract work in the civil subdivision of the
2749 state in which the work is to be performed. Additional information regarding compliance with the *Davis-*
2750 *Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following
2751 website [Davis-Bacon and Related Acts | U.S. Department of Labor \(dol.gov\)](#).

2752 2753 **Communications Towers**

2754 For the purposes of the limitations on funding levels only, communications towers are not considered
2755 construction. When applying for construction funds, including communications towers, at the time of
2756 application, recipients must submit evidence of approved zoning ordinances, architectural plans, and any
2757 other locally required planning permits.

2758
2759 When applying for funds to construct communication towers, recipients and subrecipients must submit
2760 evidence that the Federal Communication Commission’s Section 106 review process has been completed
2761 and submit all documentation resulting from that review, with a FEMA Grant Programs Directorate EHP
2762 Screening Form, to FEMA as part of the project’s EHP Review submittal. Recipients and subrecipients
2763 are encouraged to have completed as many steps as possible for a successful EHP review in support of
2764 their proposal for funding (e.g., coordination with their Tribal Historic Preservation Office to identify
2765 potential historic preservation issues and to discuss the potential for project effects; compliance with all
2766 state and local EHP laws and requirements). Projects for which an EA may be needed, as defined in [DHS](#)
2767 [Instruction Manual 023-01-001-01, Revision 01, FEMA Directive 108-1, and FEMA Instruction 108-1-1,](#)
2768 must also be identified to the FEMA HQ Preparedness Officer within six months of the recipient’s receipt
2769 of the award. Completed EHP review materials for communication tower projects must be submitted no
2770 later than 12 months before the end of the period of performance. [EHP policy](#) guidance and the [EHP](#)
2771 [Screening Form](#) can both be found on FEMA.gov. EHP review materials should be sent to
2772 gpdehpinfo@fema.dhs.gov.

2773 2774 2775 **Multiple Purpose or Dual-Use of Funds**

2776 Many activities that support the achievement of target capabilities related to terrorism preparedness may
2777 simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. See 6 U.S.C.
2778 § 609I. However, all THSGP-funded projects must assist recipients and subrecipients in achieving target
2779 capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

2780 2781 **Whole Community Preparedness**

2782 In addition to the Citizen Corps Whole Community Councils and Community Emergency Response Team
2783 (CERT) programs mentioned above, youth preparedness activities are another allowable cost. Bolstering
2784 youth preparedness across the nation is a priority for FEMA as the Agency works with state, local, tribal,
2785 and territorial partners to create a culture of preparedness in the United States. Information on youth-

2786 centric educational curricula, games, planning materials, and other relevant resources can be found at
2787 <https://www.ready.gov/kids>. Furthermore, FEMA’s Individual and Community Preparedness Division
2788 (ICPD) and regional based Community Preparedness Officers (CPOs) are available to provide grant
2789 recipients with guidance and assistance. Please email FEMA-Prepare@fema.dhs.gov to contact one of the
2790 Agency’s subject matter experts.

2791
2792 The following are examples of youth preparedness activities that grantees are encouraged to undertake as
2793 allowable costs:

- 2794
2795 • Reach out to a local school board or elementary school to encourage the adoption of the Student
2796 Tools for Emergency Planning (STEP) curriculum. STEP is a classroom-based emergency
2797 preparedness curriculum for 4th- and 5th-graders in an easy, ready-to-teach format. Students will
2798 learn about disasters, emergencies, and hazards, and how to create a disaster supply kit and family
2799 emergency communication plan. An overview of the STEP program along with the instructor
2800 guide and student activity book is available at [https://www.ready.gov/student-tools-emergency-](https://www.ready.gov/student-tools-emergency-planning-step)
2801 [planning-step](https://www.ready.gov/student-tools-emergency-planning-step); and
- 2802 • Sponsor the creation of a Teen CERT in your jurisdiction. The CERT Program is a national
2803 program of volunteers trained in disaster preparedness and emergency response. Volunteers come
2804 from all ages and all walks of life, including teenagers. Additional information, including a step-
2805 by-step guide on how to start a Teen CERT, is available at <https://www.ready.gov/teen-cert>.

2806
2807 The following tools are available to order from FEMA’s warehouse free of charge:

- 2808 • “Prepare with Pedro” is a joint product of FEMA and the American Red Cross. The “Prepare with
2809 Pedro: Disaster Preparedness Activity Book” is designed to teach young children and their
2810 families about how to stay safe during disasters and emergencies. The book follows Pedro around
2811 the United States and offers safety advice through crosswords, coloring pages, matching games,
2812 and more. Additional information, including an ordering form, is available at
2813 <https://www.ready.gov/prepare-pedro>; and
- 2814 • The Ready 2 Help card game is a fun way for kids to learn how to respond to emergencies by
2815 working with friends and using skills that will help in a real emergency. Ready 2 Help teaches
2816 five simple steps to stay safe and make a difference until help arrives:
 - 2817 ○ Stay Safe;
 - 2818 ○ Stay Calm;
 - 2819 ○ Get Help;
 - 2820 ○ Give Info; and
 - 2821 ○ Give Care.

2822
2823 Ready 2 Help was designed for children ages 8 and up. Additional information, including an ordering
2824 form, is available at <https://www.ready.gov/ready-2-help>.

2825 2826 Other Allowable Costs

2827 Maintenance and Sustainment

2828 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
2829 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
2830 noted. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
2831 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
2832 purchased incidental to the original purchase of the system or equipment as long as the original purchase
2833 of the system or equipment is consistent with that which is typically provided for, or available through,
2834 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending

2835 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
2836 may not exceed the period of performance of the award used to purchase the maintenance agreement or
2837 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.
2838

2839 Grant funds are intended to support the National Preparedness Goal and fund projects that build and
2840 sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, and respond to
2841 those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the
2842 ability to meet this objective, the policy set forth in [IB 379: Guidance to State Administrative Agencies to](#)
2843 [Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible
2844 maintenance and sustainment costs which must be in (1) direct support of existing capabilities, (2) must
2845 be an otherwise allowable expenditure under the applicable grant program, and (3) be tied to one of the
2846 core capabilities in the five mission areas outlined in the Goal. Additionally, eligible costs must also be in
2847 support of equipment, training, and critical resources that have previously been purchased with either
2848 federal grant money or any other source of funding other than FEMA preparedness grant program dollars.
2849

2850 **Critical Emergency Supplies**

2851 In furtherance of DHS's mission, critical emergency supplies, such as shelf-stable food products, water,
2852 and basic medical supplies are an allowable expense under THSGP. Prior to allocating grant funds for
2853 stockpiling purposes, each Tribe must have FEMA's approval of a five-year viable inventory
2854 management plan, an effective distribution strategy, and related sustainment costs if the planned grant
2855 expenditure is over \$100,000.
2856

2857 The inventory management plan and distribution strategy, to include sustainment costs, will be developed
2858 and monitored by FEMA. FEMA will provide program oversight and technical assistance as it relates to
2859 the purchase of critical emergency supplies under THSGP. FEMA will establish guidelines and
2860 requirements for the purchase of these supplies under THSGP and monitor development and status of the
2861 Tribe's inventory management plan and distribution strategy. Linkages between specific projects
2862 undertaken with THSGP funds and strategic goals and objectives will be highlighted through regular
2863 required reporting mechanisms. If grant expenditures exceed the minimum threshold, the five-year
2864 inventory management plan will be developed and monitored by FEMA.
2865

2866 **Secure Identification**

2867 THSGP funds may be used to support the development and production of enhanced tribal documents
2868 (e.g., Enhanced Tribal Cards) designed to meet the requirements of the Western Hemisphere Travel
2869 Initiative (WHTI). More information on the WHTI may be found at
2870 http://www.dhs.gov/files/programs/gc_1200693579776.shtm and [https://www.cbp.gov/travel/us-](https://www.cbp.gov/travel/us-citizens/western-hemisphere-travel-initiative)
2871 [citizens/western-hemisphere-travel-initiative](https://www.cbp.gov/travel/us-citizens/western-hemisphere-travel-initiative).
2872

2873 When completing the Investment Justification, refer to the National Preparedness Goal at for a list of the
2874 core capabilities that best fit the proposed activities and costs. For additional assistance in determining the
2875 core capabilities that fit the proposed WHTI project, please contact the CSID by phone at (800) 368-6498
2876 or by e-mail at askcsid@fema.gov.

2877 **Fidelity Bonds**

2878 Reasonable costs of fidelity bonds (or like insurance as provided for by applicable state or tribal laws)
2879 covering the maximum amount of THSGP funds the officer, official, or employee handles at any given
2880 time for all personnel who disburse or approve disbursement of THSGP funds may be allowable if
2881 required by the terms and conditions of the award or if generally required by the tribe in its general
2882 operations. If a fidelity bond is required by a tribe in its general operations, those costs must be charged as
2883 indirect costs. See 2 C.F.R. § 200.427.

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Framework for Improving Critical Infrastructure Cybersecurity

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (the “Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start with developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to improve their programs, such as better communication with their leadership and suppliers about management of cyber risks.

CISA’s Critical Infrastructure Cyber Community C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in adoption of the Framework and managing cyber risks. Additional information on the Critical Infrastructure Cyber Community C³ Voluntary Program can be found at <http://www.cisa.gov/ccubedvp>.

DHS’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based public and private entities and combines key elements of capabilities under the “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and SLTT governments defend their computer systems against unauthorized access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious traffic from entering a company’s networks. Groups interested in subscribing to ECS must contract directly with a CSP in order to receive services. Please visit [Enhanced Cybersecurity Services \(ECS\) | CISA](#) for a current list of ECS CSP points of contact.

THSGP Investment Modifications – Changes in Scope or Objective

Changes in scope or objective of the award—including those resulting from intended actions by the recipient or subrecipients—require FEMA’s prior written approval, in accordance with 2 C.F.R. §§ 200.308(c)(1), 200.407. THSGP is competitive, with applications recommended for funding based on threat, vulnerability, and consequence, and their mitigation of potential terrorist attacks. However, consistent with 2 C.F.R § 200.308(c)(1), Change in Scope Prior Approval, FEMA requires prior approval of any change in scope or objective of the grant-funded activity after the award is issued. *See* 2 C.F.R. § 200.308(b), (c). Scope or objective changes will be considered on a case-by-case basis, provided the change does not negatively impact the competitive process used to recommend THSGP awards.

Requests to change the scope or objective of the grant-funded activity after the award is made must be submitted via ND Grants as a Scope Change Amendment. The amendment request must include the following:

- A written request on the recipient’s letterhead, outlining the scope or objective change, including the approved projects from the IJ, the funds and relative scope or objective significance allocated to those projects, the proposed changes, and any resulting reallocations as a result of the change of scope or objective;
- An explanation why the change of scope or objective is necessary;
- How the proposed scope or objective changes to the project support the vulnerabilities and capability gaps identified in the approved IJ; and

2933 • The request must also address whether the proposed changes will impact the recipient’s ability to
2934 complete the project within the award’s period of performance.

2935

2936 Recipients may not proceed with implementing any scope or objective changes until they receive prior
2937 written approval from FEMA through ND Grants.

2938

2939 Program Appendix C: 2940 Nonprofit Security Grant Program (NSGP)

2941
2942 As a reminder, while this appendix contains NSGP-specific information and requirements, the main
2943 content of this Manual (non-appendix information) contains important information relevant to **all**
2944 preparedness grant programs, including the NSGP. Please be sure to read the main content of this Manual
2945 in addition to the program-specific appendices.

2946
2947 NSGP grant recipients (e.g., State Administrative Agencies [SAA]) and subrecipients (e.g., nonprofit
2948 organizations) may only use NSGP grant funds for the purpose set forth in the grant award and must use
2949 funding in a way that is consistent with the statutory authority for the award. Grant funds may not be used
2950 for matching funds for other federal grants or cooperative agreements, lobbying, or intervention in federal
2951 regulatory or adjudicatory proceedings. In addition, federal funds may not be used to sue the Federal
2952 Government or any other government entity.

2953
2954 Pre-award costs are allowable only with the prior written approval of FEMA and if they are included in
2955 the award agreement. To request pre-award costs a written request must be included with the application,
2956 signed by the Authorized Organizational Representative (AOR) of the entity. The letter must outline what
2957 the pre-award costs are for, including a detailed budget break-out of pre-award costs from the post-award
2958 costs, and a justification for approval. The following information outlines general allowable and
2959 unallowable NSGP costs guidance.

2960 2961 NSGP Funding Guidelines

2962 Recipients and subrecipients must comply with all applicable requirements of the Uniform Administrative
2963 Requirements, Cost Principles, and Audit Requirements for Federal Awards located at 2 C.F.R. Part 200.
2964 In administering a NSGP grant award, recipients must comply with the following general requirements:
2965

2966 NSGP Priorities

2967 See the annual NSGP NOFO.

2968

2969 Allowable Costs

2970 Management and Administration (M&A)

2971 M&A costs are for activities directly related to the management and administration of the award. M&A
2972 activities are those defined as directly relating to the management and administration of NSGP funds,
2973 such as financial management and monitoring, for that fiscal year. For example, FY 2023 M&A funding
2974 can only be used to cover administrative costs incurred in the management of FY 2023 NSGP grant
2975 awards. M&A expenses must be based on actual expenses or known contractual costs. Requests that are
2976 simple percentages of the award, without supporting justification, will not be allowed or considered for
2977 reimbursement.

2978
2979 M&A costs are not operational costs, they are the necessary costs incurred in direct support of the grant or
2980 as a result of the grant and should be allocated across the entire lifecycle of the grant. Examples include
2981 preparing and submitting required programmatic and financial reports, establishing and/or maintaining
2982 equipment inventory, documenting operational and equipment expenditures for financial accounting

2983 purposes, and responding to official informational requests from state and federal oversight authorities.
2984 M&A costs include the following categories of activities:

- 2985
- 2986 • Hiring of full-time or part-time staff or contractors/consultants responsible for activities relating
2987 to the management and administration of NSGP funds. Hiring of contractors/consultants must
2988 follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327; and
- 2989 • Meeting-related expenses directly related to M&A of NSGP funds.

2990
2991 M&A costs are allowed under this program as described below:
2992

- 2993 • **SAA (Recipient) for NSGP-Urban Area (NSGP-UA) and NSGP-State (NSGP-S) M&A:**
2994 SAAs may use and expend up to the percent noted in the relevant fiscal year (FY) NOFO for
2995 M&A purposes (5% for FY 2023) associated with their NSGP-UA and NSGP-S awards. SAAs
2996 must be able to separately account for M&A costs associated with the NSGP-UA award from
2997 those associated with the NSGP-S, and neither can exceed the percent noted in the relevant FY
2998 NOFO (5% of each award for FY 2023).
- 2999 • **Nonprofit (Subrecipient) for NSGP-UA and NSGP-S, and Community Project Funding**
3000 **M&A:** Nonprofit organizations that receive a subaward under this program may use and expend
3001 up to the percent noted in the relevant FY NOFO for M&A purposes associated with the
3002 subaward (5% of each subaward for FY 2023).

3003

3004 Indirect Costs

3005 Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost Rates”
3006 Section in “Pre-Submission Information” for more information.
3007

3008 National Incident Management System (NIMS) Implementation

3009 Recipients receiving NSGP funding are strongly encouraged to implement NIMS. NIMS guides all levels
3010 of government, nongovernmental organizations (NGO), and the private sector to work together to prevent,
3011 protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the
3012 whole community with the shared vocabulary, systems, and processes to successfully deliver the
3013 capabilities described in the National Preparedness System.
3014

3015 Incident management activities require carefully managed resources (personnel, teams, facilities,
3016 equipment, and supplies). NIMS defines a national, interoperable approach for sharing resources,
3017 coordinating, and managing incidents, and communicating information. Incident management refers to
3018 how incidents are managed across all homeland security activities, including prevention, protection,
3019 mitigation, response, and recovery.
3020

3021 Utilization of the standardized resource management concepts such as typing, credentialing, and
3022 inventorying promote a strong national mutual aid capability needed to support delivery of core
3023 capabilities. Recipients should manage resources purchased or supported with FEMA grant funding
3024 according to NIMS resource management guidance.
3025

3026 Additional information on resource management and NIMS resource typing definitions and job
3027 titles/position qualifications is on FEMA’s website at [NIMS Component-s - Guidance and Tools |](#)
3028 [FEMA.gov](#). Additional information about NIMS in general is available at [National Incident Management](#)
3029 [System | FEMA.gov](#).
3030

3031 **Allowable Direct Costs**

3032 **Planning**

3033 Funding may be used for security or emergency planning expenses and the materials required to conduct
3034 planning activities. Planning must be related to the protection of the facility and the people within the
3035 facility and should include consideration of access and functional needs as well as those with limited
3036 English proficiency. Planning efforts can also include conducting risk and resilience assessments on
3037 increasingly connected cyber and physical systems, on which security depends, using the [Infrastructure
3038 Resilience Planning Framework](#) and related CISA resources. Examples of planning activities allowable
3039 under this program include:

- 3040
- 3041 • Development and enhancement of security plans and protocols;
- 3042 • Development or further strengthening of security assessments;
- 3043 • Emergency contingency plans;
- 3044 • Evacuation/Shelter-in-place plans;
- 3045 • Coordination and information sharing with fusion centers; and
- 3046 • Other project planning activities with prior approval from FEMA.

3047
3048 **Equipment**

3049 Allowable costs are focused on facility hardening and physical security enhancements. Funding can be
3050 used for the acquisition and installation of security equipment on real property (including buildings and
3051 improvements) owned or leased by the nonprofit organization, specifically in prevention of and/or
3052 protection against the risk of a terrorist or other extremist attack. This equipment is **limited to select
3053 items** on the [Authorized Equipment List](#) (AEL):

- 3054
- 3055 • 03OE-03-MEGA System, Public Address, Handheld or Mobile
- 3056 • 04AP-05-CRED System, Credentialing
- 3057 • 04AP-09-ALRT Systems, Public Notification and Warning
- 3058 • 04AP-11-SAAS Applications, Software as a Service
- 3059 • 05AU-00-TOKN System, Remote Authentication
- 3060 • 05EN-00-ECRP Software, Encryption
- 3061 • 05HS-00-MALW Software, Malware/Anti-Virus Protection
- 3062 • 05HS-00-PFWL System, Personal Firewall
- 3063 • 05NP-00-FWAL Firewall, Network
- 3064 • 05NP-00-IDPS System, Intrusion Detection/Prevention
- 3065 • 06CP-01-PORT Radio, Portable
- 3066 • 06CC-02-PAGE Services/Systems, Paging
- 3067 • 06CP-03-ICOM Intercom
- 3068 • 06CP-03-PRAC Accessories, Portable Radio
- 3069 • 10GE-00-GENR Generators
- 3070 • 13IT-00-ALRT System, Alert/Notification
- 3071 • 14CI-00-COOP System, Information Technology Contingency Operations
- 3072 • 14EX-00-BCAN Receptacles, Trash, Blast-Resistant
- 3073 • 14EX-00-BSIR Systems, Building, Blast/Shock/Impact Resistant
- 3074 • 14SW-01-ALRM Systems/Sensors, Alarm
- 3075 • 14SW-01-DOOR Doors and Gates, Impact Resistant
- 3076 • 14SW-01-LITE Lighting, Area, Fixed
- 3077 • 14SW-01-PACS System, Physical Access Control
- 3078 • 14SW-01-SIDP Systems, Personnel Identification

- 3079 • 14SW-01-SIDV Systems, Vehicle Identification
- 3080 • 14SW-01-SNSR Sensors/Alarms, System and Infrastructure Monitoring, Standalone
- 3081 • 14SW-01-VIDA Systems, Video Assessment, Security
- 3082 • 14SW-01-WALL Barriers: Fences; Jersey Walls
- 3083 • 15SC-00-PPSS Systems, Personnel/Package Screening
- 3084 • 21GN-00-INST Installation
- 3085 • 21GN-00-TRNG Training and Awareness

3086

3087 Unless otherwise stated, equipment must meet all mandatory statutory, regulatory, and FEMA-adopted
 3088 standards to be eligible for purchase using these funds, including the Americans with Disabilities Act. In
 3089 addition, recipients will be responsible for obtaining and maintaining all necessary certifications and
 3090 licenses for the requested equipment, whether with NSGP funding or other sources of funds (see the
 3091 Maintenance and Sustainment section below for more information). In addition, subrecipients that are
 3092 using NSGP funds to support emergency communications equipment activities must comply with the
 3093 SAFECOM Guidance on Emergency Communications Grants, including provisions on technical
 3094 standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be
 3095 found at [Funding Resources | CISA](#).

3096

3097 Recipients and subrecipients may purchase equipment not listed on the AEL, but **only** if they first seek
 3098 and obtain **prior approval** from FEMA. NOTE: Nonprofits should indicate in their budget narratives if a
 3099 cost includes shipping and/or tax. It is not required to break the costs out as separate from the relevant
 3100 purchase(s).

3101

3102 Applicants and subapplicants should analyze the cost benefits of purchasing versus leasing equipment,
 3103 especially high-cost items and those subject to rapid technical advances. Large equipment purchases must
 3104 be identified and explained. For more information regarding property management standards for
 3105 equipment, please reference 2 C.F.R. Part 200, including but not limited to 2 C.F.R. §§ 200.310, 200.313,
 3106 and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and [FEMA Policy #405-143-1, Prohibitions on](#)
 3107 [Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), regarding
 3108 prohibitions on covered telecommunications equipment or services.

3109

3110 The installation of certain equipment may trigger Environmental Planning and Historic Preservation
 3111 (EHP) requirements. Please reference the EHP sections in the NOFO and this Manual for more
 3112 information. Additionally, some equipment installation may constitute construction or renovation. Please
 3113 see the Construction and Renovation section of this appendix for additional information.

3114

Exercises

3116 Funding may be used to conduct security-related exercises. This includes costs related to planning,
 3117 meeting space and other meeting costs, facilitation costs, materials and supplies, and documentation.
 3118 Exercises afford organizations the opportunity to validate plans and procedures, evaluate capabilities, and
 3119 assess progress toward meeting capability targets in a controlled, low risk setting. All shortcomings or
 3120 gaps—including those identified for children and individuals with access and functional needs—should
 3121 be identified in an improvement plan. Improvement plans should be dynamic documents with corrective
 3122 actions continually monitored and implemented as part of improving preparedness through the exercise
 3123 cycle.

3124

3125 The Homeland Security Exercise and Evaluation Program (HSEEP) provides a set of guiding principles
 3126 for exercise programs, as well as a common approach to exercise program management, design and
 3127 development, conduct, evaluation, and improvement planning. For additional information on HSEEP,
 3128 refer to [Homeland Security Exercise and Evaluation Program | FEMA.gov](#). In accordance with HSEEP

3129 guidance, subrecipients are reminded of the importance of implementing corrective actions iteratively
3130 throughout the progressive exercise cycle. This link provides access to a sample After Action Report
3131 (AAR)/Improvement Plan (IP) template: [Improvement Plannin-g - HSEEP Resource-s - Preparedness](#)
3132 [Toolkit \(fema.gov\)](#). Recipients are encouraged to enter their exercise data and AAR/IP in the
3133 [Preparedness Toolkit](#).

3134

3135 **Maintenance and Sustainment**

3136 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
3137 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
3138 noted. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
3139 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
3140 purchased incidental to the original purchase of the system or equipment as long as the original purchase
3141 of the system or equipment is consistent with that which is typically provided for, or available through,
3142 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending
3143 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
3144 may not exceed the period of performance of the award used to purchase the maintenance agreement or
3145 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.
3146 Grant funds are intended to support the National Preparedness Goal (the Goal) and fund projects that
3147 build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of,
3148 respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order
3149 to provide recipients the ability to meet this objective, the policy set forth in [IB 379: Guidance to State](#)
3150 [Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for
3151 the expansion of eligible maintenance and sustainment costs that must be in (1) direct support of existing
3152 capabilities, (2) must be an otherwise allowable expenditure under the applicable grant program, and (3)
3153 be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible
3154 costs may also support equipment, training, and critical resources that have previously been purchased
3155 with either federal grant or any other source of funding other than FEMA preparedness grant program
3156 dollars.

3157

3158 **Construction and Renovation**

3159 NSGP funding may not be used for construction and renovation projects without prior written approval
3160 from FEMA. In some cases, the installation of equipment may constitute construction and/or renovation.
3161 If you have any questions regarding whether an equipment installation project could be considered
3162 construction or renovation, please contact your Preparedness Officer. All recipients of NSGP funds must
3163 request and receive prior approval from FEMA before any NSGP funds are used for any construction or
3164 renovation. Additionally, recipients are required to submit a SF-424C Budget and budget detail citing the
3165 project costs and an SF-424D Form for standard assurances for the construction project. The total cost of
3166 any construction or renovation paid for using NSGP funds may not exceed the greater amount of \$1
3167 million or 15% of the NSGP award.

3168

3169 All construction and renovation projects require EHP review. Recipients and subrecipients are
3170 encouraged to have completed as many steps as possible for a successful EHP review in support of their
3171 proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential
3172 historic preservation issues and to discuss the potential for project effects, compliance with all state and
3173 local EHP laws and requirements). Projects for which the recipient believes an Environmental
3174 Assessment (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision 01](#),
3175 [FEMA Directive 108-1](#), and [FEMA Instruction 108-1-1](#), must also be identified to the FEMA HQ
3176 Preparedness Officer within six months of the award and completed EHP review materials must be
3177 submitted no later than 12 months before the end of the period of performance. Additional information on
3178 EHP policy and EHP review can be found online at [Environmental & Historic Preservation Grant](#)
3179 [Preparation Resources | FEMA.gov](#). EHP review packets should be sent to gpdehpinfo@fema.gov.

3180
3181 NSGP recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified
3182 as amended at 40 U.S.C. §§ 3141 *et seq.*). See 6 U.S.C. § 609(b)(4)(B) (cross-referencing 42 U.S.C. §
3183 5196(j)(9), which cross-references *Davis-Bacon*). Grant recipients must ensure that their contractors or
3184 subcontractors for construction projects pay workers no less than the prevailing wages for laborers and
3185 mechanics employed on projects of a character similar to the contract work in the civil subdivision of the
3186 state in which the work is to be performed. Additional information regarding compliance with the *Davis-*
3187 *Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following
3188 website: <https://www.dol.gov/whd/govcontracts/dbra.htm>.
3189

3190 **Training**

3191 Nonprofit organizations may use NSGP funds for the following training-related costs:

- 3192
- 3193 • Employed or volunteer security staff to attend security-related training within the United States;
- 3194 • Employed or volunteer staff to attend security-related training within the United States with the
3195 intent of training other employees or members/congregants upon completing the training (i.e.,
3196 “train-the-trainer” type courses); and
- 3197 • Nonprofit organization’s employees, or members/congregants to receive on-site security training.
- 3198

3199 Allowable training-related costs under the NSGP are limited to attendance fees for training and related
3200 expenses, such as materials, supplies, and/or equipment. Overtime, backfill, and travel expenses are not
3201 allowable costs.

3202

3203 Allowable training topics are limited to the protection of critical infrastructure key resources, including
3204 physical and cybersecurity, facility hardening, and terrorism/other extremism awareness/employee
3205 preparedness such as Community Emergency Response Team (CERT) training, indicators and behaviors
3206 indicative of terrorist/other extremist threats, Active Shooter training, and emergency first aid
3207 training. Additional examples of allowable training courses include: “Stop The Bleed” training,
3208 kits/equipment, and training aids; First Aid and other novice level “you are the help until help arrives”
3209 training, kits/equipment, and training aids; and Automatic External Defibrillator (AED) and AED/Basic
3210 Life Support training, kits/equipment, and training aids.

3211

3212 Training conducted using NSGP funds must address a specific threat and/or vulnerability, as identified in
3213 the nonprofit organization’s Investment Justification (IJ). Training should provide the opportunity to
3214 demonstrate and validate skills learned as well as to identify any gaps in these skills. ***Proposed***
3215 ***attendance at training courses and all associated costs using the NSGP must be included in the***
3216 ***nonprofit organization’s IJ.***

3217 **Contracted Security Personnel**

3218

3219 Contracted security personnel are allowed under this program only as described in the NOFO and Manual
3220 and comply with guidance set forth in [IB 421b](#) and [IB 441](#). NSGP funds may not be used to purchase
3221 equipment for contracted security. The subrecipient must be able to sustain this capability in future years
3222 without NSGP funding, and a sustainment plan will be required as part of the closeout package for any
3223 award funding this capability.

3224

3225 Additionally, NSGP recipients and subrecipients may not use more than 50% of their awards to pay for
3226 personnel activities unless a waiver is approved by FEMA. For more information on the 50% personnel
3227 cap and applicable procedures for seeking a waiver, please see [IB 421b, Clarification on the Personnel](#)
3228 [Reimbursement for Intelligence Cooperation and Enhancement of Homeland Security Act of 2008 \(Public](#)
3229 [Law 110-412 – the PRICE Act\).](#)

3230

3231 **Unallowable Costs**

3232 The following projects and costs are considered **ineligible** for award consideration:

3233

- 3234 • Organization costs, and operational overtime costs;
- 3235 • Hiring of public safety personnel;
- 3236 • General-use expenditures;
- 3237 • Overtime and backfill;
- 3238 • Initiatives that do not address the implementation of programs/initiatives to build prevention and
- 3239 protection-focused capabilities directed at identified facilities and/or the surrounding
- 3240 communities;
- 3241 • The development of risk/vulnerability assessment models;
- 3242 • Initiatives that fund risk or vulnerability security assessments or the development of the IJ;
- 3243 • Initiatives in which federal agencies are the beneficiary or that enhance federal property;
- 3244 • Initiatives which study technology development;
- 3245 • Proof-of-concept initiatives;
- 3246 • Initiatives that duplicate capabilities being provided by the Federal Government;
- 3247 • Organizational operating expenses;
- 3248 • Reimbursement of pre-award security expenses;
- 3249 • Cameras for license plate readers/license plate reader software;
- 3250 • Cameras for facial recognition software;
- 3251 • Weapons or weapons-related training; and
- 3252 • Knox boxes.

3253

3254 **NSGP Investment Modifications – Changes in Scope or Objective**

3255 Changes in scope or objective of the award—whether as a result of intended actions by the recipient or
3256 subrecipients—require FEMA’s prior written approval, in accordance with 2 C.F.R. §§ 200.308(c)(1),
3257 200.407. NSGP is competitive, with applications recommended for funding based on threat, vulnerability,
3258 consequence, and their mitigation to a specific facility/location. However, consistent with 2 C.F.R §
3259 200.308(c)(1), Change in Scope Notification, FEMA requires prior written approval of any change in
3260 scope/objective of the grant-funded activity after the award is issued. *See* 2 C.F.R. § 200.308(b), (c).
3261 Scope/objective changes will be considered on a case-by-case basis, provided the change does not
3262 negatively impact the competitive process used to recommend NSGP awards. Requests to change the
3263 scope or objective of the grant-funded activity after the award is made must be submitted by the SAA via
3264 ND Grants as a Scope Change Amendment. The amendment request must include the following:

3265

- 3266 • A written request from the NSGP subrecipient on its letterhead, outlining the scope or objective
3267 change, including the approved projects from the subrecipient’s IJ, the funds and relative scope or
3268 objective significance allocated to those projects, the proposed changes, and any resulting
3269 reallocations as a result of the change of scope or objective;
- 3270 • An explanation why the change of scope or objective is necessary;
- 3271 • Validation from the SAA that any deviations from the approved IJ are addressed in the
3272 vulnerability assessment submitted by the subrecipient at the time of application; and
- 3273 • The subrecipient request must also address whether the proposed changes will impact its ability to
3274 complete the project within the award’s period of performance.

3275

3276 FEMA will generally not approve NSGP change-of-scope requests resulting from the following
3277 situations:

- 3278
- 3279
- 3280
- 3281
- 3282
- Subrecipients that relocate their facilities after submitting their application who are requesting a change of scope to allow them to use NSGP funds towards projects at the new facility; or
 - Subrecipients that renovate their facilities after submitting their application in cases where the subsequent renovations would affect the vulnerability/risk assessment upon which the IJ is based.

3283 NSGP project funding is based on the ability of the proposed project to mitigate the risk factors identified

3284 in the IJ. For this reason, FEMA may reject requests to significantly change the physical security

3285 enhancements that are purchased with NSGP funding where FEMA believes approval of the request

3286 would change or exceed the scope of the originally approved project. FEMA will consider all requests to

3287 deviate from the security project as originally proposed on a case-by-case basis, *consistent with 2 C.F.R. §*

3288 *200.308(c)(1)*.

3289

3290 Subrecipients may not proceed with implementing any scope/objective changes until the SAA receives

3291 written approval from FEMA through ND Grants and until the SAA has made any required subaward

3292 modifications.

3293 If a subrecipient is simply making changes to its own budget without impacting the scope or objective of

3294 the subaward, and where the budget changes do not involve other prior approval requirements listed in 2

3295 C.F.R. § 200.407, then the subrecipient does not need the prior approval of the SAA or FEMA. *See 2*

3296 *C.F.R. § 200.308*. Instead, the subrecipient is only required to report to the SAA the budget changes.

3297 Similarly, the SAA should report those budget changes to FEMA.

3298

3299 Pass-Through Requirements

3300 **Pass-through funding is required under this program.** Awards made to the SAA for the NSGP carry

3301 additional pass-through requirements. Pass-through is defined as an obligation on the part of the state to

3302 make subawards to selected nonprofit organizations. The SAA must provide funds awarded under NSGP

3303 to successful nonprofit applicants within 45 days of receipt of the funds. A letter of intent (or equivalent)

3304 to distribute funds is not sufficient. Award subrecipients that are selected for funding under this program

3305 must be provided with funding within 45 days from the date the funds are first made available to the

3306 recipient so that they can initiate implementation of approved investments.

3307

3308 For the SAA to successfully meet the pass-through requirement and provide funding to the subrecipients,

3309 the SAA must meet the following four requirements:

- 3310
- There must be some action by the SAA to establish a firm commitment to award the funds to the selected nonprofit organization;
 - The action must be unconditional on the part of the SAA (i.e., no contingencies for availability of SAA funds);
 - There must be documentary evidence of the commitment of the award of funding to the selected nonprofit organization; and
 - The SAA must communicate the terms of the subaward to the selected nonprofit organization.

3318

3319 If a nonprofit organization is selected for an NSGP award and elects to decline the award, the SAA must

3320 notify their FEMA Preparedness Officer. The SAA may not re-obligate to another subrecipient without

3321 prior approval. “Receipt of the funds” occurs either when the SAA accepts the award or 15 calendar days

3322 after the SAA receives notice of the award, whichever is earlier. SAAs are sent notification of NSGP

3323 awards via the ND Grants system. If an SAA accepts its award within 15 calendar days of receiving

3324 notice of the award in the ND Grants system, the 45-calendar day pass-through period will start on the

3325 date the SAA accepted the award. Should an SAA not accept the NSGP award within 15 calendar days of

3326 receiving notice of the award in the ND Grants system, the 45-calendar days pass-through period will
3327 begin 15 calendar days after the award notification is sent to the SAA via the ND Grants system.

3328

3329 It is important to note that the period of performance start date does not directly affect the start of the 45-
3330 calendar day pass-through period. For example, an SAA may receive notice of the NSGP award on
3331 August 20, 2023, while the period of performance dates for that award are September 1, 2023, through
3332 August 31, 2026. In this example, the 45-day pass-through period will begin on the date the SAA accepts
3333 the NSGP award or September 4, 2023 (15 calendar days after the SAA was notified of the award),
3334 whichever date occurs first. The period of performance start date of September 1, 2023 would not affect
3335 the timing of meeting the 45-calendar day pass-through requirement.

3336

3337 **SAM/UEI Requirements for Recipients and Subrecipients**

3338 As the direct applicant and recipient of NSGP funding, the SAA is required to have a Unique Entity
3339 Identifier (UEI) number and be registered in the System for Award Management (SAM) and must
3340 maintain the currency of the 'AA's information in SAM until the SAA submits the final financial report
3341 required under the award or receives final payment, whichever is later. First tier subrecipients, including
3342 nonprofit organizations under the NSGP, will only be required to register in SAM.gov to obtain the UEI,
3343 **but will not be required to maintain an active registration in SAM.gov.** Further guidance on obtaining
3344 a UEI in SAM.gov can be found at [GSA UEI Update](#) and here [SAM.gov Update](#).

3345 Program Appendix D: 3346 Transit Security Grant Program (TSGP)

3347
3348 As a reminder, while this appendix contains TSGP-specific information and requirements, the main
3349 content of this Manual (non-appendix information) contains important information relevant to **all**
3350 preparedness grant programs, including the TSGP. Please be sure to read the main content of this Manual
3351 in addition to the program-specific appendices.

3352
3353 TSGP grant recipients may only use TSGP grant funds for the purpose set forth in the Notice of Funding
3354 Opportunity (NOFO), and all investments must be consistent with the statutory authority for the award.
3355 Grant funds may not be used for matching funds for other federal awards, lobbying, or intervention in
3356 federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used to sue the
3357 Federal Government or any other government entity.

3359 TSGP Funding Guidelines

3360 Costs charged to a TSGP award must be consistent with the Uniform Administrative Requirements, Cost
3361 Principles, and Audit Requirements for Federal Awards, located at 2 C.F.R. Part 200. For more
3362 information on 2 C.F.R. Part 200, please see [Information Bulletin \(IB\) 400, FEMA's Implementation of 2](#)
3363 [C.F.R. Part 200, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for](#)
3364 [Federal Awards \("Super Circular" or "Omni Circular"\), dated December 23, 2014](#), regarding FEMA's
3365 implementation of these provisions prior to the recent 2020 revisions. For information on the recent
3366 revisions to these regulations, see [2 CFR Grants Management Policy Updates](#).

3368 Pre-Award Costs

3369 Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from
3370 pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500.00.
3371 See below for more information on these costs.

3373 TSGP Priorities

3374 See the annual TSGP NOFO.

3376 Security Plan Requirements

3377 The following information regarding security plan requirements is provided in 6 U.S.C. § 1134(c)(2):

3378 Security plans should include the following, as appropriate:

- 3379
- 3380 • A prioritized list of all items included in the public transportation agency's security assessment
3381 that have not yet been addressed;
 - 3382 • A detailed list of any additional capital and operational improvements identified by DHS or the
3383 public transportation agency and a certification of the public transportation agency's technical
3384 capacity for operating and maintaining any security equipment that may be identified in such list;

- 3384 • Specific procedures to be implemented or used by the public transportation agency in response to
- 3385 a terrorist attack, including evacuation and passenger communication plans and appropriate
- 3386 evacuation and communication measures for the elderly and individuals with disabilities;
- 3387 • A coordinated response plan that establishes procedures for appropriate interaction with state and
- 3388 local law enforcement agencies, emergency responders, and federal officials in order to
- 3389 coordinate security measures and plans for response in the event of a terrorist attack or other
- 3390 major incident;
- 3391 • A strategy and timeline for conducting training under 49 C.F.R. § 1570.109(b) and 49 C.F.R. Part
- 3392 1582;
- 3393 • Plans for providing redundant and other appropriate backup systems necessary to ensure the
- 3394 continued operation of critical elements of the public transportation system in the event of a
- 3395 terrorist attack or other major incident;
- 3396 • Plans for providing service capabilities throughout the system in the event of a terrorist attack or
- 3397 other major incident in the city or region which the public transportation system serves;
- 3398 • Methods to mitigate damage within a public transportation system in case of an attack on the
- 3399 system, including a plan for communication and coordination with emergency responders; and
- 3400 • Other actions or procedures as the Secretary of Homeland Security determines are appropriate to
- 3401 address the security of the public transportation system.
- 3402

3403 Allowable Direct Costs

3404 Specific investments made in support of the funding priorities in the annual TSGP NOFO generally fall
 3405 into one of the following six allowable expense categories:

- 3406
- 3407 • Planning;
- 3408 • Operational Activities;
- 3409 • Equipment and Capital Projects;
- 3410 • Training and Awareness Campaigns;
- 3411 • Exercises; and
- 3412 • Management and Administration.
- 3413

3414 The following provides guidance on allowable costs within each of these areas:

3416 Planning

3417 *Planning activities address the Soft Targets/Crowded Places; Cybersecurity; and Planning Priorities.*

3418

3419 TSGP funds may be used for the following types of planning activities:

- 3420
- 3421 • Development and enhancement of system-wide security risk management plans that ensure the
- 3422 continuity of essential functions, to include cyber;
- 3423 • Development or further strengthening of continuity plans, response plans, station action plans,
- 3424 risk assessments, and asset-specific remediation plans;
- 3425 • Development or further strengthening of security assessments, including multi-agency and multi-
- 3426 jurisdictional partnerships and conferences to facilitate planning activities;
- 3427 • Hiring of full or part-time staff and contractors or consultants to assist with planning activities
- 3428 only to the extent that such expenses are for the allowable activities within the scope of the grant
- 3429 (not for the purpose of hiring public safety personnel); hiring of contractors/consultants must
- 3430 follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327;
- 3431 • Materials required to conduct planning activities;

- 3432 • Conducting risk and resilience assessments on increasingly connected cyber and physical
3433 systems, on which security depends, using the [Infrastructure Resilience Planning Framework](#) and
3434 related CISA resources;
- 3435 • Planning activities related to alert and warning capabilities; and
- 3436 • Other project planning activities with prior approval from FEMA.

3437

3438 Operational Activities

3439 *Operational Activities address the Soft Targets/Crowded Places Priority.*

3440

3441 FEMA encourages applicants to develop innovative operational approaches to enhance the security of
3442 transit systems. Projects that use visible, unpredictable deterrence, to include operational packages
3443 dealing with explosive detection canine teams, mobile screening teams, and anti-terrorism teams, directly
3444 support enhancing the protection of soft targets and crowded places. Implementation of one of the three
3445 Operational Package (OPack) models discussed below complements existing security systems and
3446 provides an appropriate, practical, and cost-effective means of protecting assets.

3447

3448 Agencies may submit Investment Justifications (IJ) to fund transit security police forces/law enforcement
3449 providers for patrols and activities on overtime, such as directed patrols, additional canine teams, mobile
3450 screening teams, or anti-terrorism team patrols. These activities must be dedicated to the transit
3451 environment and must be anti-terrorism in nature. Agencies must identify the type of activity, length of
3452 operation (hours), number of personnel, and cost based on length of operation and personnel. Agencies
3453 should also provide a risk-based justification for the request, to include linkage to a known event, such as
3454 hosting a significant regional sporting or political event; or a period of heightened awareness, such as a
3455 national holiday. Three OPack types have been developed to support operational activities and are
3456 available for funding under the TSGP:

3457

- 3458 • **Explosives Detection Canine Teams (EDCTs).** When combined with the existing capability of a
3459 transit security/police force, the added value provided through the addition of an EDCT is
3460 significant. EDCTs are a proven, reliable resource to detect explosives and are a key component
3461 in a balanced counter-sabotage program. The TSGP will provide funds to establish dedicated
3462 security/police force canine teams. Each canine team will be composed of one dog and one
3463 handler.
- 3464 • **Anti-Terrorism Teams (ATTs).** The ATT capability provided through TSGP funding is for
3465 uniformed, dedicated transit patrols on a normal operational basis, rather than using teams only
3466 for a surge capacity as provided by FEMA in the past. ATTs do not supersede other local transit
3467 security forces; rather, they augment current capabilities. Each ATT will consist of four
3468 individuals, including two overt elements (*e.g.*, uniformed transit sector law enforcement officer,
3469 canine team, mobile explosive screeners), and two discreet observer elements.
- 3470 • **Mobile Explosive Screening Teams (MESTs).** The MEST OPack will allow recipients the
3471 flexibility to deploy combinations of certified explosive ordinance technicians with mobile
3472 explosive screening technologies, including during local National Special Security Events. This
3473 screening technology will be coupled with mobile explosive screening technologies. Each MEST
3474 should have a minimum of two members and one mobile explosive screening apparatus.

3475

3476 *Note: Funds for canine teams may not be used to fund drug detection and apprehension technique*
3477 *training. Only explosives detection training for the canine teams will be funded.*

3478

Five-Year Security Capital Plan and Operational Sustainment

Applicant requests for OPack funding must include the submission of a Five-Year Security Capital and Operational Sustainment Plan in ND Grants. This plan must include how the agency proposes to implement capital projects and demonstrate how the agency will sustain the operational investments (including officers hired with federal funding) and capabilities after grant funding has been expended. ***Requests for OPacks will not be funded if the applicant does not have a Security Capital and Operational Sustainment Plan.***

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Funding Availability for OPacks

OPacks have the potential to be funded for up to a 36-month period from the award date. The monetary figures presented below are stated in terms of cost per period of performance (which indicates actual/complete funding for the 36-month period). Additionally, any OPack costs after the 36-month period of performance (including expenses related to the maintenance, personnel, equipment, etc.) are the responsibility of the applicable transit system. If these positions are not sustained, the public transportation agency may not be eligible for this personnel support in the future. The table below identifies the maximum funding available for the different OPack types.

Available Funding for OPacks

Operational Package	Maximum Funding per Year (12 months)	Maximum Funding per Period of Performance (36 months)
EDCT	\$150,000 per team	\$450,000 per team
ATT	\$500,000 per team	\$1,500,000 per team
MEST	\$600,000 per team	\$1,800,000 per team

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OPack Requirements

TSGp OPack funds may be used for new positions or to sustain existing capabilities/programs (e.g., canine teams) already supported by the recipient. Applicants submitting IJs for both new OPacks and sustainment funding for existing OPacks must clearly indicate which is their highest priority if funding is available for only one of the IJs. Additionally, applicants must provide the number of existing teams (EDCT, ATT, and MEST) already in place with either in-house funding or TSGP funding. The table below identifies specific OPack requirements.

OPack Requirements

Operational Package	Requirements
Explosives Detection Canine Teams	Please refer to the pages below for detailed information regarding EDCTs under the TSGP.

Operational Package	Requirements
Anti-Terrorism Teams	<p>Specific for the Canine Team within the ATT:</p> <ul style="list-style-type: none"> • Each canine team, composed of one dog and one handler, must be certified by an appropriate, qualified organization; • Canines should receive an initial basic training course and also weekly maintenance training sessions thereafter to maintain the certification; • The basic training averages 10 weeks for the team, with weekly training and daily exercising (comparable training and certification standards, such as those promulgated by the Transportation Security Administration (TSA) Explosive Detection Canine Program), the National Police Canine Association (NPCA), the United States Police Canine Association (USPCA), or the International Explosive Detection Dog Association (IEDDA) may be used to meet this requirement; • The individuals hired for the covert and overt elements must be properly trained law enforcement officers; and • Certifications should be on file with the recipient and must be made available to FEMA upon request
Mobile Explosives Screening Team	Certifications should be on file with the recipient and must be made available to FEMA upon request.

3500

3501 **Allowable Expenses for OPacks**

3502 The below table identifies allowable expenses for the various OPacks. Please see the inserted notes for
 3503 clarification of certain allowable costs.

3504

Allowable Expenses for OPacks

Operational Package		Salary and Fringe Benefits	Training and Certification	Equipment Costs	Purchase and Train a Canine	Canine Costs ^b
1)	EDCT ^a	✓	✓	✓	✓ ^c	✓
2)	ATT	✓	✓	✓	✓	✓
3)	MEST	✓		✓ ^d		
^a Travel costs associated with training for personnel, handlers, and canines are allowable ^b Canine costs include but are not limited to veterinary, housing, and feeding costs ^c One type of allowable training is training specific to the detection of common explosives odors. ^d Equipment and other costs can include but are not limited to explosives detection; stainless steel search tables; consumables such as gloves, swabs, and alcohol; and land mobile radios						

3505

3506 **Specific Guidance on EDCTs**

3507 **EDCT Certification.** Each EDCT, composed of one dog and one handler, must be certified by an
 3508 appropriate, qualified organization. TSA-certified EDCTs will meet or exceed certification standards set
 3509 by the TSA National Explosives Detection Canine Team Program (NEDCTP). Recipient EDCTs that do
 3510 not participate in the NEDCTP will be required to certify annually under their respective agency, local

3511 and state regulations. The recipient (i.e., TSGP-grant supported) will maintain certification, utilization,
3512 and training data to show their compliance in meeting or exceeding those guidelines set forth by the
3513 Scientific Working Group on Dog and Orthogonal Detection Guidelines (SWGDOG), as of September
3514 14, 2007, in addition to requirements set forth in the NOFO.

3515

3516 **EDCT Submission Requirements**

- 3517 1) The recipient will ensure that a written security procedure plan exists for the safekeeping of all
3518 explosive training aids, including safe transportation. The recipient will document the removal,
3519 use, and return of explosive training aids used during training exercises or for any other reason.
3520 The plan and all documentation must be made available to FEMA upon request;
- 3521 2) The recipient will comply with requirements for the proper storage, handling, and transportation
3522 of all explosive training aids in accordance with the Bureau of Alcohol, Tobacco, Firearms and
3523 Explosives' Publication 5400.7 (ATF P 5400.7) (09/00), Federal Explosive Law and Regulation;
- 3524 3) The recipient will ensure that certified EDCTs are available to respond to situations 24 hours a
3525 day, seven days per week on an on-duty or off-duty on call basis. If TSGP-funded EDCTs are not
3526 available, other non-TSGP-funded EDCTs may be utilized for this response. The intent is to
3527 provide maximum coverage during peak operating hours and to maintain the ability to promptly
3528 respond to threats that affect public safety or mass transit operations;
- 3529 4) EDCTs under this grant are single purpose and will be trained to detect "live" explosives only not
3530 "simulated" explosives. EDCTs must not have received previous training to detect any other
3531 substances;
- 3532 5) Recipient EDCTs will ensure that each EDCT receives on-site proficiency training at a minimum
3533 of four hours per week per duty cycle. This training shall include, but not be limited to mass
3534 transit passenger cars, terminal/platform, luggage, freight/warehouse, and vehicles. Complete,
3535 detailed, and accurate training records must be maintained for all proficiency training conducted
3536 by each EDCT. These records must be made available to FEMA upon request;
- 3537 6) The TSGP grant recipient will conduct appropriate training or other canine activities, within view
3538 of the public, to increase public awareness of EDCTs and provide a noticeable deterrent to acts
3539 which affect public safety or mass transit operations. Recipient EDCTs will also ensure that such
3540 activities include, over a period of time, a presence in operational areas of the mass transit system
3541 during peak and off-peak hours. The recipient agrees that EDCTs will be utilized in the field at
3542 least 80% of their duty time, annually;
- 3543 7) Recipient EDCTs will provide safe and sanitary kennel facilities for program canines, and these
3544 costs may be allowable with prior approval by FEMA. This applies to kenneling canines at the
3545 mass transit system, handlers' residences, or commercial boarding facilities. Canines must not be
3546 left in makeshift accommodations or without proper supervision, protection, and care. The
3547 recipient will ensure that canines are transported on-duty and off-duty in vehicles configured with
3548 adequate temperature control, padding and screening to ensure proper health, safety, and security;
3549 and
- 3550 8) Recipient EDCTs will ensure that adequate routine and emergency veterinary care are provided
3551 for all canines.

3552

3553 *Note:* FEMA reserves the right to conduct an on-site operational and record review upon 48-hour notice
3554 to ensure compliance with applicable federal regulations.

3555

3556 **Equipment and Capital Projects**

3557 *Equipment and Capital Projects address the Soft Targets/Crowded Places; Cybersecurity; and*
3558 *Equipment/Capital Projects Priorities.*

3559

3560 Priority projects include Top Transit Asset List (TTAL) risk remediation and protection of other high-
3561 risk, high-consequence areas or systems that have been identified through system-wide risk assessments.
3562 These costs include:

- 3563
- 3564 • Projects related to physical security enhancements at rail and bus stations in Urban Area Security
3565 Initiative (UASI) jurisdictions including security cameras, security screening equipment for
3566 people and baggage, and access control (e.g., fences, gates, barriers, etc.); and
- 3567 • Projects related to cybersecurity of access control, sensors, security cameras, badge/ID readers,
3568 Industrial Control System (ICS)/Supervisory Control and Data Acquisition (SCADA) systems,
3569 process monitors and controls, etc. or passenger/vehicle/cargo security screening equipment
3570 support. Cybersecurity assessments are allowable.

3571

3572 **Equipment Acquisition**

3573 TSGP funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under](#)
3574 [FEMA Awards](#). TSGP funds may be used for the following categories of equipment. A comprehensive
3575 listing of allowable equipment categories and types is found in the [Authorized Equipment List \(AEL\)](#).
3576 These costs include:

- 3577
- 3578 • Personal protection equipment;
- 3579 • Explosive device mitigation and remediation equipment;
- 3580 • Chemical, biological, radiological, nuclear, and explosive (CBRNE) operational search and
3581 rescue equipment, logistical support equipment, reference materials, or incident response vehicles
- 3582 • Interoperable communications equipment, including alert and warning capabilities;
- 3583 • Components or systems needed to address flaws in the computerized systems that control
3584 generators, switching stations, and electrical substations as well as other threats to infrastructure
3585 critical to the U.S. economy;
- 3586 • Detection Equipment;
- 3587 • Power equipment;
- 3588 • Terrorism incident prevention equipment; and
- 3589 • Physical security enhancement equipment.

3590

3591 Recipients and subrecipients may purchase equipment not listed on the AEL, but **only** if they first seek
3592 and obtain **prior approval** from FEMA.

3593

3594 Unless otherwise noted, equipment must be certified as meeting required regulatory and FEMA-adopted
3595 standards to be eligible for purchase using TSGP funds. Equipment must comply with the *Occupational*
3596 *Safety and Health Act* requirement for certification of electrical equipment by a nationally recognized
3597 testing laboratory and demonstrate compliance with relevant FEMA-adopted standards through a
3598 supplier’s declaration of conformity with appropriate supporting data and documentation per International
3599 Organization for Standardization/International Electro-technical Commission (ISO/IEC) 17050, Parts One
3600 and Two. Agencies must have all necessary certifications and licenses for the requested equipment, as
3601 appropriate, prior its purchase. DHS adopted standards are found at [DHS Implementation Statement](#)
3602 [Regarding Standard Terms and Conditions for Research Grants | Homeland Security](#). In addition,
3603 recipients that are using TSGP funds to support emergency communications equipment activities must
3604 comply with the SAFECOM Guidance on Emergency Communications Grants, including provisions on
3605 technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance
3606 can be found at <https://www.cisa.gov/safecom/funding>.

3607

3608 **Equipment: Requirements for Small Unmanned Aircraft Systems**

3609 All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply
3610 with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and also
3611 include a description of the policies and procedures in place to safeguard individuals’ privacy, civil rights,
3612 and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment.
3613 sUAS policies are not required at the time of application but must be received and approved by FEMA prior
3614 to obligating TSGP funds. All grant-funded procurements must be executed in a manner compliant with
3615 federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use TSGP funds for
3616 sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the
3617 data the devices collect is transmitted to servers not under the control of the operator. It has been reported
3618 that some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The
3619 U.S. Department of Homeland Security’s Privacy Office suggests the recipient fully explore data
3620 transmission and storage issues with vendors to reduce the possibility of data breaches.

3621
3622 Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2023 DHS Appropriations Act
3623 further requires recipients to certify they have reviewed the [Industry Alert on Chinese Manufactured](#)
3624 [Unmanned Aircraft Systems](#), and completed a risk assessment that considers the proposed use of foreign-
3625 made sUAS to ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign-
3626 made versus domestic sUAS.

3627
3628 **Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)**

3629 In August 2020, FEMA alerted of an advisory guidance document issued by DHS, the Department of
3630 Justice, the Federal Aviation Administration, and the Federal Communications Commission:
3631 <https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-technologies>.
3632 The purpose of the advisory guidance document is to help non-federal public and private entities better
3633 understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate
3634 threats posed by UAS operations (i.e., Counter-UAS or C-UAS).

3635
3636 The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the
3637 authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do
3638 they conduct legal reviews of commercially available product compliance with those laws. The advisory
3639 does not address state and local laws nor potential civil liability, which UAS detection and mitigation
3640 capabilities may also implicate.

3641
3642 It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection
3643 and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state
3644 criminal, surveillance, and communications laws. Entities should conduct their own legal and technical
3645 analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’
3646 representations of the systems’ legality or functionality. Please also see the DHS press release on this
3647 topic for further information: [https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft)
3648 [technology-detect-and-mitigate-unmanned-aircraft](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft).

3650 **Cybersecurity Projects**

3651 TSGP funds may be used for projects that enhance the cybersecurity of:

- 3652
- 3653 • Access controls, sensors, security cameras, badge/ID readers, ICS/SCADA systems, process
3654 monitors and controls (such as firewalls, network segmentation, predictive security cloud, etc.);
3655 and
 - 3656 • Passenger/vehicle/cargo security screening equipment (cybersecurity assessments are allowable).
- 3657

3658 When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in
3659 implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (the
3660 “Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework
3661 gathers existing international standards and practices to help organizations understand, communicate, and
3662 manage their cyber risks. For organizations that do not know where to start with developing a
3663 cybersecurity program, the Framework provides initial guidance. For organizations with more advanced
3664 practices, the Framework offers a way to improve their programs, such as better communication with
3665 their leadership and suppliers about management of cyber risks.

3666
3667 The Cybersecurity and Infrastructure Security Agency’s (CISA) Critical Infrastructure Cyber Community
3668 C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in
3669 adoption of the Framework and managing cyber risks. Additional information on the Critical
3670 Infrastructure Cyber Community C³ Voluntary Program can be found at <http://www.cisa.gov/ccubedvp>.

3671
3672 DHS’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in
3673 protecting U.S.-based public and private entities and combines key elements of capabilities under the
3674 “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the
3675 Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help
3676 U.S.-based companies and SLTT governments defend their computer systems against unauthorized
3677 access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat
3678 indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those
3679 indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to
3680 block certain types of malicious traffic from entering a company’s networks. Groups interested in
3681 subscribing to ECS must contract directly with a CSP in order to receive services. Please visit
3682 <http://www.cisa.gov/enhanced-cybersecurity-services-ecs> for a current list of ECS CSP points of contact.

3683 3684 **Capital (Construction) Projects Guidance**

3685 Capital expenditures are defined in [2 CFR 200.1 Definitions](#) as expenditures to acquire capital assets or
3686 expenditures to make additions, improvements, modifications, replacements, rearrangements,
3687 reinstallations, renovations, or alterations to capital assets that materially increase their value or useful
3688 life. Use of capital expenditures must comply with [2 CFR 200.439](#).

3689
3690 Recipients must obtain written approval from FEMA prior to the use of any TSGP funds for construction
3691 or renovation projects. When applying for construction funds, including communications towers, at the
3692 time of application, recipients must submit evidence of approved zoning ordinances, architectural plans,
3693 and any other locally required planning permits. Additionally, recipients are required to submit a SF-424C
3694 and budget detail citing the project costs and an SF-424D Form for standard assurances for the
3695 construction project.

3696
3697 All construction and renovation projects require Environmental Planning and Historic Preservation (EHP)
3698 review. Recipients are also encouraged to have completed as many steps as possible for a successful EHP
3699 review in support of their proposal for funding (e.g., coordination with their State Historic Preservation
3700 Office to identify potential historic preservation issues and to discuss the potential for project effects;
3701 compliance with all state and local EHP laws and requirements).

3702
3703 Projects for which the recipient believes an Environmental Assessment (EA) may be needed, as defined in
3704 [DHS Instruction Manual 023-01-001-01, Revision 01](#), [FEMA Directive 108-1](#) and [FEMA Instruction](#)
3705 [108-1-1](#), instances must also be identified to the FEMA HQ Preparedness Officer within the first six
3706 months of the award, regardless of the period of performance. Completed EHP review materials for
3707 construction and communication tower projects must be submitted no later than 12 months before the end

3708 of the period of performance. [EHP policy guidance](#) and the [EHP Screening Form](#) can both be found on
3709 FEMA.gov. EHP review materials should be sent to gpdehpinfo@fema.dhs.gov.

3710

3711 **Training and Awareness Campaigns**

3712 *Training and Awareness Campaigns address the Soft Targets/Crowded Places; Cybersecurity; and*
3713 *Training and Awareness Campaign Priorities.*

3714

3715 **Training**

3716 TSGP funds may be used for the following training activities:

3717

- 3718 • **Training Topics.** Priority topics include active shooter training, security training for employees,
3719 and public awareness/preparedness campaigns.
- 3720 • **Training Workshops.** Grant funds may be used to plan and conduct training workshops to
3721 include costs related to planning, meeting space and other meeting costs, facilitation costs,
3722 materials and supplies, travel, and training plan development. Recipients are strongly encouraged
3723 to use free public space/locations/facilities, whenever available, prior to the rental of
3724 space/locations/facilities. Training should provide the opportunity to demonstrate and validate
3725 skills learned, as well as to identify any gaps in these skills. Any training or training gaps,
3726 including those for children and individuals with disabilities or other access and functional needs,
3727 should be identified in an After-Action Report/Improvement Plan (AAR/IP) and addressed in the
3728 training cycle.
- 3729 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff or
3730 contractors/consultants may be hired to support training-related activities. Hiring of
3731 contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R.
3732 §§ 200.317-200.327. Reimbursement of these costs should conform with the policies of the state
3733 or local unit of government or the awarding agency, whichever is applicable. Such costs must be
3734 included within the funding allowed for program management personnel expenses, which must
3735 not exceed 10% of the total allocation. Dual compensation is unallowable. That is, an employee
3736 of a unit of government may not receive compensation from their unit or agency of government
3737 and from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such
3738 work may benefit both activities. Personnel hiring, overtime, and backfill expenses are permitted
3739 under this grant only to the extent that such expenses are for the allowable activities within the
3740 scope of the grant.
- 3741 • **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related
3742 to backfilling personnel, that are the direct result of attendance at FEMA and approved training
3743 courses and programs are allowable. Reimbursement of these costs should follow the policies of
3744 the state or local u\$(s) of government or the awarding agency, whichever is applicable. In no case
3745 is dual compensation allowable.
- 3746 • **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as
3747 expenses by employees who are on travel status for official business related, approved training,
3748 subject to the restrictions at 2 C.F.R. Part 200. International travel is not an allowable expense.
- 3749 • **Supplies.** Supplies, items that are expended or consumed during the course of the planning and
3750 conduct of the training p\$ect(s) (e.g., gloves and non-sterile masks), are allowable expenses.
- 3751 • **Funds Used to Develop, Deliver, and Evaluate Training,** including costs related to
3752 administering the training, planning, scheduling, facilities, materials and supplies, reproduction of
3753 materials, and equipment are allowable expenses. Training should provide the opportunity to
3754 demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any
3755 training or training gaps, including those for children and individuals with disabilities or other
3756 access and functional needs, should be identified in the AAR/IP and addressed in the training
3757 cycle.

3758
3759 Recipients are encouraged to use existing training rather than developing new courses. When developing
3760 new courses, recipients are encouraged to apply the Analysis, Design, Development, Implementation, and
3761 Evaluation (ADDIE) model of instruction design. Information on FEMA-approved training can found at
3762 <http://www.firstrespondertraining.gov/>.

3763 3764 **Awareness Campaigns**

3765 TSGP funds may be used for the development and implementation of awareness campaigns to raise
3766 public awareness of indicators of terrorism and terrorism-related crime, and for associated efforts to
3767 increase the sharing of information with public and private sector partners, including nonprofit
3768 organizations. DHS currently sponsors or supports a number of awareness campaigns. Please review
3769 materials, strategies, and resources at <https://www.dhs.gov/dhs-campaigns> before embarking on the
3770 development of an awareness campaign for local constituencies and stakeholders.

3771
3772 Note: DHS requires that all public and private sector partners wanting to implement and/or expand the
3773 DHS “If You See Something, Say Something®” campaign using grant funds work directly with the DHS
3774 Office of Partnership and Engagement (OPE). This will help ensure that the awareness materials (e.g.,
3775 videos, posters, trifold, etc.) remain consistent with DHS’s messaging and strategy for the campaign and
3776 compliant with the initiative’s trademark, which is licensed to DHS by the New York Metropolitan
3777 Transportation Authority. Coordination with OPE, through the Campaign’s Office (seesay@hq.dhs.gov),
3778 must be facilitated by the FEMA HQ Preparedness Officer.

3779 3780 **Exercises**

3781 *Exercise activities address the Soft Targets/Crowded Places; Cybersecurity; and Exercises Priorities.*

3782
3783 TSGP funds may be used for the following exercise activities:

- 3784
3785 • **Funds Used to Design, Develop, Conduct and Evaluate an Exercise.** This includes costs
3786 related to planning, meeting space, and other meeting costs, facilitation costs, materials and
3787 supplies, travel, and documentation. Exercises afford organizations the opportunity to validate
3788 plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets
3789 in a controlled, low risk setting. Any shortcoming or gap identified, including those for children
3790 and individuals with disabilities or other access and functional needs, should be identified in an
3791 effective corrective action program that includes development of improvement plans that are
3792 dynamic documents, with corrective actions continually monitored and implemented as part of
3793 improving preparedness through the exercise cycle.
- 3794 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be
3795 hired to support exercise-related activities. In order to be eligible for reimbursement, the costs for
3796 hiring staff must conform to the policies of the non-federal entity and federal statutes, where
3797 applicable. *See, e.g.,* 2 C.F.R. § 200.430(a). The costs for hiring contractors or consultants must
3798 comply with the applicable federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. The
3799 costs for hiring staff, consultants, or contractors to support exercise-related activities costs must
3800 be included within the funding allowed for program management personnel expenses, which must
3801 not exceed 10% of the total allocation. Dual compensation is never allowable, meaning, in other
3802 words, that an employee of a unit of government may not receive compensation from their unit or
3803 agency of government and from an award for a single period of time (*e.g.,* 1:00 p.m. to 5:00
3804 p.m.), even though their work may benefit both entities. Personnel hiring, overtime, and backfill
3805 expenses are permitted under this grant only to the extent that such expenses are for the allowable
3806 activities within the scope of the grant.

- 3807 • **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related
3808 to backfilling personnel, which are the direct result of time spent on the design, development and
3809 conduct of exercises are allowable expenses. These costs are allowed only to the extent the
3810 payment for such services is in accordance with the policies of the state or unit§ of local
3811 government and has the approval of the state or the awarding agency, whichever is applicable.
3812 Dual compensation is never allowable.
- 3813 • **Travel.** Domestic travel costs are allowable as expenses by employees who are on travel status
3814 for official business related to the planning and conduct of exercise proj§(s), subject to the
3815 restrictions at 2 C.F.R. Part 200. International travel is not an allowable expense.
- 3816 • **Supplies.** Supplies are items that are expended or consumed during the course of the planning
3817 and conduct of the exercise p§ect(s) (e.g., gloves, non-sterile masks, and disposable protective
3818 equipment).
- 3819 • **Other Items.** These costs include the rental of space/locations for exercise planning and
3820 executing, rental of equipment, etc. Recipients are encouraged to use free public
3821 space/locations/facilities, whenever available, prior to the rental of space/locations/facilities.
3822 These also include costs that may be associated with inclusive practices and the provision of
3823 reasonable accommodations and modifications to provide full access for children and adults with
3824 disabilities.

3825 **Management and Administration (M&A)**

3826 Management and administration costs are allowed under this program. M&A costs are activities directly
3827 related to managing and administering the award. Recipients may use up to 5% of the amount of the
3828 award for their M&A.

3829
3830
3831 FY 2023 TSGP funds may be used for the following M&A costs:

- 3832 • Hiring of full-time or part-time staff, including contractors and consultants, to execute the
3833 following:
3834
 - 3835 ○ Management of the current fiscal year TSGP Award;
 - 3836 ○ Design and implementation of the current fiscal year TSGP submission meeting
3837 compliance with reporting/data collection requirements, including data calls;
 - 3838 ○ Information collection and processing necessary to respond to FEMA data calls;
 - 3839 ○ Domestic-only travel expenses related to TSGP grant administration, in compliance with
3840 2 C.F.R. Part 200; and
 - 3841 ○ Acquisition of authorized office equipment, including personal computers or laptops for
3842 TSGP M&A purposes.

3843 **Allowable Indirect Costs**

3844 Indirect costs are allowable under this. See the “Procedures for Establishing Indirect Cost Rates” Section
3845 in “Pre-Submission Information” for more information.

3846 **Unallowable Costs**

3847 Specific unallowable costs include:

- 3848 • **Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment](#)**
3849 **[Under FEMA Awards](#), and may not be used for the purchase of the following equipment:**
3850 ***firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles***
3851 ***of any kind with weapons installed.*** Additional prohibited equipment expenditures include items

- 3855 unrelated to grant allowable activities, such as general-use software, general-use computers, and
3856 related equipment (other than for allowable M&A activities or otherwise associated preparedness or
3857 response functions), general-use vehicles, and licensing fees;
- 3858 • Personnel costs (except as detailed above);
 - 3859 • Activities unrelated to the completion and implementation of the TSGP; and
 - 3860 • Other items not in accordance with the AEL or not previously listed as allowable costs.
- 3861

3862 Maintenance and Sustainment Costs

3863 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
3864 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
3865 noted. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
3866 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
3867 purchased incidental to the original purchase of the system or equipment as long as the original purchase
3868 of the system or equipment is consistent with that which is typically provided for, or available through,
3869 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending
3870 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
3871 may not exceed the period of performance of the award used to purchase the maintenance agreement or
3872 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.

3873
3874 Grant funds are intended to support the National Preparedness Goal and fund projects that build and
3875 sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and
3876 recover from those threats that pose the greatest risk to the security of the Nation. In order to provide
3877 recipients the ability to meet this objective, the policy set forth in [IB 379: Guidance to State](#)
3878 [Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for
3879 the expansion of eligible maintenance and sustainment costs that must be in (1) direct support of existing
3880 capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program, and (3)
3881 be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible
3882 costs may also be in support of equipment, training, and critical resources that have previously been
3883 purchased with either federal grant or any other source of funding other than FEMA preparedness grant
3884 program dollars.

3886 Encouraged Use of Certain Products Produced in the United States

3887 Pursuant to [Executive Order 13858, “Strengthening Buy-American Preferences for Infrastructure](#)
3888 [Projects,”](#) FEMA encourages non-federal entities under this grant program to use, to the greatest extent
3889 practicable and consistent with the law, iron and aluminum as well as steel, cement, and other
3890 manufactured products produced in the United States, in projects funded by an award under this grant
3891 program affecting surface transportation, including roadways, bridges, railroads, and transit; aviation;
3892 ports, including navigational channels; water resources projects; energy production, generation, and
3893 storage, including from fossil-fuels, renewable, nuclear, and hydroelectric sources; electricity
3894 transmission; gas, oil, and propane storage and transmission; electric, oil, natural gas, and propane
3895 distribution systems; broadband internet; pipelines; stormwater and sewer infrastructure; drinking water
3896 infrastructure; and cybersecurity. Notwithstanding this encouragement, non-federal entities must take care
3897 that all procurements and contract actions are consistent with law, the Preparedness Grants Manual and
3898 applicable appendices, the grant program’s NOFO, and the federal procurement standards at 2 C.F.R. §§
3899 200.317-200.326.

3900
3901

3902 **Program Appendix E:**
3903 **Intercity Bus Security Grant Program (IBSGP)**

3904
3905 As a reminder, while this appendix contains IBSGP-specific information and requirements, the main
3906 content of this Manual (non-appendix information) contains important information relevant to **all**
3907 preparedness grant programs, including the IBSGP. Please be sure to read the main content of this Manual
3908 in addition to the program-specific appendices.

3909
3910 IBSGP grant recipients may only use IBSGP grant funds for the purpose set forth in the Notice of
3911 Funding Opportunity (NOFO), and all investments must be consistent with the statutory authority for the
3912 award. Grant funds may not be used for matching funds for other federal awards, lobbying, or
3913 intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used
3914 to sue the Federal Government or any other government entity.

3915
3916 **IBSGP Funding Guidelines**

3917 Costs charged to an IBSGP award must be consistent with the Uniform Administrative Requirements,
3918 Cost Principles, and Audit Requirements for Federal Awards, located at 2 C.F.R. Part 200. For more
3919 information on 2 C.F.R. Part 200, please see [IB 400](#) regarding FEMA’s implementation of these
3920 provisions prior to the recent 2020 revisions. For information on the recent revisions to these regulations,
3921 see [2 CFR Grants Management Policy Updates](#).

3922
3923 **IBSGP Priorities**

3924 See the annual IBSGP NOFO.

3925
3926 **Pre-Award Costs**

3927 Pre-award costs are not allowable and will not be approved, with the exception of costs resulting from
3928 pre-award grant writing services provided by an independent contractor that shall not exceed \$1,500. See
3929 the IBSGP NOFO for more information.

3930
3931 **Allowable Direct Costs**

3932 Specific investments made in support of the funding priorities discussed in the annual IBSGP NOFO
3933 generally fall into one of the following six allowable expense categories:

- 3934
3935 1. Planning;
3936 2. Operational Activities;
3937 3. Equipment and Capital Projects;
3938 4. Training and Awareness Campaigns;
3939 5. Exercises; and
3940 6. Management and Administration.

3941
3942 The following provides guidance on allowable costs within each of these areas.

3943

3944 **Planning**

3945 *Planning activities should address the Soft Targets/Crowded Places; Cybersecurity; and Planning*
3946 *Priorities.*

3947
3948 IBSGP funds may be used for the following types of planning activities:
3949

- 3950 • Development and enhancement of system-wide security risk management plans, to include cyber;
- 3951 • Development or further strengthening of continuity of operations plans, response plans, station
3952 action plans, risk assessments, and asset-specific remediation plans;
- 3953 • Development or further strengthening of security assessments, including multi-agency and multi-
3954 jurisdictional partnerships and conferences to facilitate planning activities;
- 3955 • Hiring of full- or part-time staff and contractors or consultants to assist with planning activities
3956 only to the extent that such expenses are for the allowable activities within the scope of the grant
3957 (not for the purpose of hiring public safety personnel); hiring of contractors/consultants must
3958 follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327;
- 3959 • Materials required to conduct planning activities;
- 3960 • Conducting risk and resilience assessments on increasingly connected cyber and physical
3961 systems, on which security depends, using the [Infrastructure Resilience Planning Framework](#) and
3962 related CISA resources;
- 3963 • Planning activities related to alert and warning capabilities; and
- 3964 • Other project planning activities with prior approval from FEMA.
3965

3966 **Operational Activities**

3967 *Operational Activities should address the Soft Targets/Crowded Places Priority.*
3968

3969 FEMA encourages applicants to develop innovative operational approaches to enhance the security of
3970 transportation systems. Examples include:

- 3971
- 3972 • Establishing or improving emergency communication systems linking drivers and over-the-road
3973 buses to company operation centers, law enforcement agencies or emergency response personnel;
- 3974 • Acquiring and installing equipment or systems that collect, store or exchange passenger and/or
3975 driver information with established government databases for security purposes; and
- 3976 • Implementing and operating established methodologies for screening passengers, their carry-on
3977 baggage, and/or their checked baggage, for weapons and/or explosives.
3978

3979 **Equipment and Capital Projects**

3980 *Equipment and Capital Projects should address the Soft Targets/Crowded Places; Cybersecurity; and*
3981 *Equipment/Capital Projects Priorities.*
3982

3983 **Equipment – Vehicle/Driver Security Enhancements**

3984 Vehicle Security Enhancements focus on vehicle disabling and anti-theft devices, real-time bus inventory
3985 and inventory control, tracking, monitoring, alert and warning capabilities, and locating technologies.
3986 Driver security enhancements focus on protection for the bus driver to prevent would-be terrorists from
3987 immobilizing the driver and/or hijacking the bus. Applicants are discouraged from submitting projects
3988 that propose the use of closed-circuit television (CCTV) alone as an on-board deterrent to terrorism.
3989 Rather, any cameras should have the capability and protocols in place for incident-based real-time
3990 monitoring. CCTV Systems that are primarily archival, and do not clearly specify the ability for live
3991 monitoring in the Investment Justification (IJ) will not be funded.
3992

3993 **Capital Projects – Facility Security Enhancements**

- 3994 • Projects related to physical security enhancements at bus stations, or operator-owned facilities
3995 including but not limited to lighting, security cameras, security screening equipment for people
3996 and baggage, and access control (e.g., fences, gates, barriers);
- 3997 • Projects related to cybersecurity of access control, sensors, security cameras, badge/ID readers,
3998 Industrial Control System (ICS)/Supervisory Control and Data Acquisition (SCADA) systems,
3999 process monitors and controls, etc. or passenger/vehicle/cargo security screening equipment
4000 support. Cybersecurity assessments are allowable; and
- 4001 • Full or Part-Time Staff or Contractors/Consultants. Full or part-time staff or
4002 contractors/consultants may be hired to support security enhancement-related activities. Personnel
4003 hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such
4004 expenses are for the allowable activities within the scope of the grant. Hiring of
4005 contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R.
4006 §§ 200.317-200.327.

4007
4008 Note: All Capital and Vehicle/Driver security enhancement projects that include cameras, video
4009 surveillance, or alarm systems MUST either be live monitored 24/7 or have the capability for real-time
4010 incident-based monitoring. CCTV Systems that are primarily archival and do not clearly specify the
4011 ability for live monitoring in the IJ will not be funded.
4012

4013 **Equipment Acquisition**

4014 IBSGP funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under](#)
4015 [FEMA Awards](#), and may be used for the following categories of equipment. A comprehensive listing of
4016 allowable equipment categories and types is found in the [Authorized Equipment List \(AEL\)](#). These costs
4017 include:

- 4018 • Personal protection equipment;
- 4019 • Explosive device mitigation and remediation equipment;
- 4020 • Chemical, biological, radiological, nuclear, and explosive (CBRNE) operational search and
4021 rescue equipment, or logistical support equipment;
- 4022 • Interoperable emergency communications equipment;
- 4023 • Detection equipment;
- 4024 • Terrorism incident prevention equipment; and
- 4025 • Physical security enhancement equipment.

4026
4027
4028 Recipients may purchase equipment not listed on the AEL, but **only** if they first seek and obtain **prior**
4029 **approval** from FEMA.

4030
4031 Unless otherwise noted, equipment must be certified as meeting required regulatory and DHS- adopted
4032 standards to be eligible for purchase using these funds. Equipment must comply with the *Occupational*
4033 *Safety and Health Act* requirement for certification of electrical equipment by a nationally recognized
4034 testing laboratory and demonstrate compliance with relevant DHS-adopted standards through a supplier’s
4035 declaration of conformity with appropriate supporting data and documentation per International
4036 Organization for Standardization/International Electro-technical Commission (ISO/IEC) 17050, Parts One
4037 and Two. Agencies must have all necessary certifications and licenses for the requested equipment, as
4038 appropriate, prior to the request. In addition, recipients that are using IBSGP funds to support emergency
4039 communications equipment activities must comply with the SAFECOM Guidance on Emergency
4040 Communications Grants, including provisions on technical standards that ensure and enhance
4041 interoperable communications. SAFECOM Guidance can be found at:
4042 <https://www.cisa.gov/safecom/funding>.

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Cybersecurity Projects

IBSGP funds may be used for projects that enhance the cybersecurity of:

- Access controls; sensors; security cameras; badge/ID readers; ICS/SCADA systems; process monitors and controls (such as firewalls, network segmentation, predictive security cloud, etc.). CCTV Systems that are primarily archival, and do not clearly specify the ability for live monitoring in the IJ will not be funded; and
- Passenger/vehicle/cargo security screening equipment (cybersecurity assessments are allowable).

When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (“The Framework”) developed by the National Institute of Standards and Technology (NIST). The Framework gathers existing international standards and practices to help organizations understand, communicate, and manage their cyber risks. For organizations that do not know where to start with developing a cybersecurity program, the Framework provides initial guidance. For organizations with more advanced practices, the Framework offers a way to improve their programs, such as better communication with their leadership and suppliers about management of cyber risks.

The Cybersecurity and Infrastructure Security Agency’s (CISA) Critical Infrastructure Cyber Community C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in adoption of the Framework and managing cyber risks. Additional information on the Critical Infrastructure Cyber Community C³ Voluntary Program can be found at <http://www.cisa.gov/ccubedvp>.

DHS’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based public and private entities and combines key elements of capabilities under the “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework. Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and state, local, tribal, and territorial (SLTT) governments defend their computer systems against unauthorized access, exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious traffic from entering a company’s networks. Groups interested in subscribing to ECS must contract directly with a CSP in order to receive services. Please visit [Enhanced Cybersecurity Services \(ECS\) | CISA](#) for a current list of ECS CSP points of contact.

Capital (Construction) Projects Guidance

Recipients must obtain written approval from FEMA prior to the use of any IBSGP funds for construction or renovation projects. When applying for construction funds, including communications towers, at the time of application, recipients must submit evidence of approved zoning ordinances, architectural plans, any other locally required planning permits. Additionally, recipients are required to submit a [SF-424C](#) and budget detail citing the project costs and an SF-424D Form for standard assurances for the construction project.

All Capital (Construction) projects require Environmental Planning and Historic Preservation (EHP) review. Recipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects; compliance with all state and EHP laws and requirements).

4093
4094 Projects for which the recipient believes an Environmental Assessment (EA) may be needed, as defined in
4095 [DHS Instruction Manual 023-01-001-01, Revision 01, FEMA Directive 108-1 and FEMA Instruction](#)
4096 [108-1-1](#), instances must also be identified to the FEMA HQ Preparedness Officer within the first six
4097 months of the award. Completed EHP review materials for construction and communication tower
4098 projects must be submitted no later than 12 months before the end of the period of performance. [EHP](#)
4099 [policy guidance](#) and the [EHP Screening Form](#) can both be found on FEMA.gov. EHP review materials
4100 should be sent to gpdehpinfo@fema.gov.
4101

4102 **Training and Awareness Campaigns**

4103 *Training and Awareness Campaigns address the Soft Targets/Crowded Places; Cybersecurity; and*
4104 *Training and Awareness Campaign Priorities.*

4105 **Training**

4106 IBSGP funds may be used for the following training activities:

- 4107
- 4108
- 4109 • **Training Topics.** Priority topics include active shooter training, security training for employees,
4110 and public awareness/preparedness campaigns. The IJ narrative for Training should include:
 - 4111 ○ A course syllabus, curriculum, or topic plan identifying the proposed course material and
 - 4112 contents; and
 - 4113 ○ Provide the total cost of the training course, the number of participants, and the cost per
 - 4114 participant breakdown.
- 4115 • **Training Workshops.** Grant funds may be used to plan and conduct training workshops or
- 4116 conferences including costs related to planning, meeting space and other meeting costs,
- 4117 facilitation costs, materials and supplies, travel, and training plan development.
- 4118 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be
- 4119 hired to support training-related activities. Hiring of contractors/consultants must follow the
- 4120 applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. The services of
- 4121 contractors/consultants may also be procured in the design, development, conduct, and evaluation
- 4122 of CBRNE training. Personnel hiring, overtime, and backfill expenses are permitted under this
- 4123 grant only to the extent that such expenses are for the allowable activities within the scope of the
- 4124 grant.
- 4125 • **Overtime and Backfill Costs.** Overtime and backfill costs associated with the design,
- 4126 development, and conduct of training are allowable expenses. Payment of overtime expenses will
- 4127 be for work performed by recipient or subrecipient employees in excess of the established work
- 4128 week related to the planning and conduct of the training project(s). Furthermore, overtime
- 4129 payments and backfill costs associated with sending personnel to training are allowable. Grant
- 4130 funds cannot be used for personnel or direct salary costs for employees to attend training sessions.
- 4131 Recipients seeking to claim overtime or backfill costs will be required to submit verification.
- 4132 Straight time costs are not eligible expenses.
- 4133 • **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, hotel, etc.) are allowable as
- 4134 expenses by employees who are on travel status for official business related to the planning and
- 4135 conduct of the training project(s) or for attending courses. These costs must be in accordance with
- 4136 applicable state law and regulations as well as the principles at 2 C.F.R. Part 200. International
- 4137 travel is not an allowable cost under IBSGP.
- 4138 • **Supplies.** Supplies are items that are expended or consumed during the course of the planning
- 4139 and conduct of the training project(s) (e.g., copying paper, gloves, tape, and non-sterile masks).
- 4140 • **Funds Used to Develop, Deliver, and Evaluate Training,** including costs related to
- 4141 administering the training, planning, scheduling, facilities, materials and supplies, reproduction of
- 4142 materials, and equipment are allowable expenses. Training should provide the opportunity to

4143 demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any
4144 training or training gaps, including those for individuals with disabilities or other access and
4145 functional needs, should be identified in the AAR/IP and addressed in the training cycle.
4146 • **Developing New Courses.** Recipients are encouraged to use existing training rather than
4147 developing new courses. When developing new courses, recipients are encouraged to apply the
4148 Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model of instructional
4149 design. Information on FEMA-approved training can found at [First Responder Training System](#).
4150 • **Other Items.** These costs include the rental of space/locations for planning and conducting
4151 training, badges, etc. Recipients are encouraged to use free public space/locations, whenever
4152 available, prior to the rental of space/locations.
4153

4154 **Awareness Campaigns**

4155 IBSGP funds may be used for the development and implementation of awareness campaigns to raise
4156 public awareness of indicators of terrorism and terrorism-related crime, and associated efforts to increase
4157 the sharing of information with public and private sector partners, including nonprofit organizations. DHS
4158 currently sponsors or supports a number of awareness campaigns. Please review materials, strategies, and
4159 resources at <https://www.dhs.gov/dhs-campaigns> before embarking on the development of an awareness
4160 campaign for your local constituencies and stakeholders.
4161

4162 Note: DHS requires that all public and private sector partners wanting to implement and/or expand the
4163 DHS “If You See Something, Say Something®” campaign using grant funds work directly with the DHS
4164 Office of Partnership and Engagement (OPE). This will help ensure that the awareness materials (e.g.,
4165 videos, posters, trifold, etc.) remain consistent with the Department’s messaging and strategy for the
4166 campaign and compliant with the initiative’s trademark, which is licensed to DHS by the New York
4167 Metropolitan Transportation Authority. Coordination with OPE, through the Campaign’s Office
4168 (seesay@hq.dhs.gov), must be facilitated by the FEMA HQ Preparedness Officer.
4169

4170 **Exercises**

4171 *Exercise activities should address the Soft Targets/Crowded Places; Cybersecurity; and Exercises*
4172 *Priorities.*
4173

4174 IBSGP funds may be used for the following exercise activities:
4175

- 4176 • **Funds Used to Design, Develop, Conduct, and Evaluate an Exercise.** This includes costs
4177 related to planning, meeting space, and other meeting costs, facilitation costs, materials and
4178 supplies, travel, and documentation. Exercises afford organizations the opportunity to validate
4179 plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets
4180 in a controlled, low risk setting. Any shortcoming or gap identified, including those for children
4181 and individuals with disabilities or other access and functional needs, should be identified in an
4182 effective corrective action program that includes development of improvement plans that are
4183 dynamic documents, with corrective actions continually monitored and implemented as part of
4184 improving preparedness through the exercise cycle.
- 4185 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be
4186 hired to support exercise-related activities. The services of contractor/consultant staff may be
4187 procured to support exercise-related activities. The services of contractors/consultants may also
4188 be procured to support the design, development, conduct, and evaluation of terrorism exercises.
4189 Hiring of contractors/consultants must follow the applicable federal procurement requirements at
4190 2 C.F.R. §§ 200.317-200.327.
- 4191 • **Overtime and Backfill Costs.** Overtime and backfill costs associated with the design,
4192 development, and conduct of terrorism exercises are allowable expenses. Payment of overtime

4193 expenses will be for work performed in excess of the established work week related to the
4194 planning and conduct of the exercise project(s). Further, overtime payments and backfill costs
4195 associated with sending personnel to exercises are allowable, provided that the event being
4196 attended is a DHS sponsored exercise. For positions not funded by the grant award, grant funds
4197 cannot be used for personnel or straight salary costs for employees to attend exercises, meaning
4198 straight time costs for non-grant funded employees to attend exercise are not allowable. Instead,
4199 for positions not funded by the grant award, only overtime and backfill costs will be allowable for
4200 those employees to attend exercises. Recipients seeking to claim overtime or backfill costs will be
4201 required to submit verification.

- 4202 • **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, hotel, etc.) are allowable as
4203 expenses by employees who are on travel status for official business related to the planning and
4204 conduct of the exercise project(s). International travel is not allowable under this program.
- 4205 • **Supplies.** Supplies are items that are expended or consumed during the course of the planning
4206 and conduct of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective
4207 equipment).
- 4208 • **Other Items.** These costs include the rental of space/locations for exercise planning and
4209 executing, rental of equipment, etc. Recipients are encouraged to use free public
4210 space/locations/facilities, whenever available, prior to the rental of space/locations/facilities.
4211 These also include costs that may be associated with inclusive practices and the provision of
4212 reasonable accommodations and modifications to provide full access for children and adults with
4213 disabilities.

4214 **Management and Administration (M&A)**

4215 Management and administration costs are allowed under this program. M&A costs are activities directly
4216 related to managing and administering the award. Recipients may use up to 5% of the amount of the
4217 award for their M&A.

4218
4219
4220 FY 2023 IBSGP funds may be used for the following M&A costs:

- 4221
- 4222 • Hiring of full-time or part-time staff including contractors and consultants, to execute the
4223 following:
 - 4224 ○ Management of the current fiscal year IBSGP award; and
 - 4225 ○ Design and implementation of the current fiscal year IBSGP submission meeting
4226 compliance with reporting/data collection requirements, including data calls.
- 4227 • Information collection and processing necessary to respond to FEMA data calls; and
- 4228 • Domestic travel expenses related to IBSGP grant administration.
- 4229

4230 **Indirect Costs**

4231 Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost
4232 Rates” Section in “Pre-Submission Information” for more information.

4233 **Unallowable Costs**

4234 Specific unallowable costs include:

- 4235
- 4236
- 4237 • **Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled](#)**
4238 **[Equipment Under FEMA Awards](#), and may not be used for the purchase of the following**
4239 ***equipment: firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft,***
4240 ***vessels, or vehicles of any kind with weapons installed;***

- 4241 • General-use facility expenditures, to include, but not limited to ordinary facility maintenance,
 4242 contracts for maintenance, and specifically backup or emergency generators;
- 4243 • General vehicle maintenance, service contracts, or warranties. This is different from maintenance
 4244 and sustainment costs that are allowable, but only for projects funded under a grant award. For
 4245 projects or equipment not funded by the grant award, general maintenance, service contracts, and
 4246 warranties are not allowable;
- 4247 • Expenditures for items such as general-use software (word processing, spreadsheet, graphics,
 4248 etc.), general-use computers and related equipment (other than for allowable M&A activities, or
 4249 otherwise associated preparedness or response functions), general-use vehicles, licensing fees,
 4250 recurring operating costs (e.g., cell phone services, maintenance contracts);
- 4251 • Organizational operating expenses;
- 4252 • Personnel costs, to include, but not limited to, overtime and backfill (except as detailed above);
- 4253 • Activities unrelated to the completion and implementation of the IBSGP;
- 4254 • Other indirect costs (meaning property purchase, depreciation, or amortization expenses);
- 4255 • Initiatives in which federal agencies are the beneficiary or that enhance federal property;
- 4256 • Initiatives which study technology development;
- 4257 • Proof-of-concept initiatives;
- 4258 • Initiatives that duplicate capabilities being provided by the Federal Government;
- 4259 • Other items not in accordance with the AEL, in accordance with [FEMA Policy 207-22-0002,](#)
 4260 [Prohibited or Controlled Equipment Under FEMA Awards](#), or not previously listed as allowable
 4261 costs; and
- 4262 • Pre-award costs are not allowable and will not be approved, with the exception of costs resulting
 4263 from pre-award grant writing services provided by an independent contractor that shall not
 4264 exceed \$1,500, as detailed in “Pre-Award Costs” above and in the IBSGP NOFO.
 4265

4266 Other Allowable Costs

4267 Maintenance and Sustainment Costs

4268 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
 4269 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
 4270 noted. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
 4271 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
 4272 purchased incidental to the original purchase of the system or equipment as long as the original purchase
 4273 of the system or equipment is consistent with that which is typically provided for, or available through,
 4274 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending
 4275 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
 4276 may not exceed the period of performance of the award used to purchase the maintenance agreement or
 4277 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.

4278
 4279 Grant funds are intended to support the National Preparedness Goal (the Goal) and fund projects that
 4280 build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of,
 4281 respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order
 4282 to provide recipients the ability to meet this objective, the policy set forth in [IB 379: Guidance to State](#)
 4283 [Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for
 4284 the expansion of eligible maintenance and sustainment costs which must be in (1) direct support of
 4285 existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program,
 4286 and (3) be tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally,
 4287 eligible costs may also be in support of equipment, training, and critical resources that have previously
 4288 been purchased with either federal grant or any other source of funding other than FEMA preparedness
 4289 grant program dollars.

4290

4291 **Bonds**

4292 Financial markets are not always predictable, and commercial suppliers are not always reliable; but there
4293 are options to provide resource contingencies to support an IBSGP award.

4294 • **Prepayment Bond:** Prepayment Bonds provide a measure of economic security for an
4295 organization that is going to advance funds to a vendor(s). The prepayment bond generally may
4296 be obtained through the vendor or bank. The prepayment bond protects funds in the event a
4297 vendor fails to perform (e.g., not finishing/delivering contracted service/equipment, or going out
4298 of business). Prepayment bonds are chargeable to an award.

4299 ○ **Encouraged Prepayment Bond:** Recipients are strongly recommended, but not
4300 required, to obtain a prepayment bond for awarded acquisition activities that exceed the
4301 Simplified Acquisition Threshold (SAT) (currently \$250,000, but the applicable dollar
4302 threshold will be the SAT amount in place at the time of procurement) when recipients
4303 are contractually required to advance a down payment and when such advances contain
4304 no federal funds (only local funds).

4305 ○ **Required Prepayment Bond:** Per 2 C.F.R. § 200.304(b), recipients are required to
4306 obtain a prepayment bond for awarded acquisition activities that exceed the SAT; a
4307 prepayment bond is required when recipients are contractually required to advance a
4308 down payment and when such advances contain only federal funds or a combination of
4309 federal and local funds.

4310 • **Fidelity Bond:** Reasonable costs of fidelity bonds (or like insurance as provided for by applicable
4311 state or tribal laws) covering the maximum amount of IBSGP funds the officer, official, or
4312 employee handles at any given time for all personnel who disburse or approve disbursement of
4313 IBSGP funds may be allowable if required by the terms and conditions of the award or if
4314 generally required by the tribe in its general operations. If a fidelity bond is required by a
4315 recipient in its general operations, those costs must be charged as indirect costs. *See* 2 C.F.R. §
4316 200.427.

4317 **Encouraged Use of Certain Products Produced in the United States**

4318 Pursuant to Executive Order 13858 “[Strengthening Buy-American Preferences for Infrastructure](#)
4319 [Projects](#),” FEMA encourages non-federal entities under this grant program to use, to the greatest extent
4320 practicable and consistent with the law, iron and aluminum as well as steel, cement, and other
4321 manufactured products produced in the United States, in projects funded by an award under this grant
4322 program affecting surface transportation, including roadways, bridges, railroads, and transit; aviation;
4323 ports, including navigational channels; water resources projects; energy production, generation, and
4324 storage, including from fossil-fuels, renewable, nuclear, and hydroelectric sources; electricity
4325 transmission; gas, oil, and propane storage and transmission; electric, oil, natural gas, and propane
4326 distribution systems; broadband internet; pipelines; stormwater and sewer infrastructure; drinking water
4327 infrastructure; and cybersecurity. Notwithstanding this encouragement, non-federal entities must take care
4328 that all procurements and contract actions are consistent with law, this Manual and applicable appendices,
4329 the grant program’s NOFO, and the federal procurement standards at 2 C.F.R. §§ 200.317-200.326.

4330 Program Appendix F: 4331 Intercity Passenger Rail (IPR) Program

4332
4333 As a reminder, while this appendix contains IPR-specific information and requirements, the main content
4334 of this Manual (non-appendix information) contains important information relevant to **all** preparedness
4335 grant programs, including the IPR. Please be sure to read the main content of this Manual in addition to
4336 the program-specific appendices.

4337
4338 The IPR grant recipient may only use IPR grant funds for the purposes set forth in the Notice of Funding
4339 Opportunity (NOFO), and all investments must be consistent with the statutory authority for the award.
4340 Grant funds may not be used for matching funds for other federal awards, lobbying, or intervention in
4341 federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used to sue the
4342 Federal Government or any other government entity.

4343 4344 IPR Funding Guidelines

4345 Costs charged to a an IPR award must be consistent with the uniform administrative requirements and
4346 audit requirements for federal awards, located at 2 C.F.R. Part 200, Subparts A-D and F. For more
4347 information on 2 C.F.R. Part 200, please see [Information Bulletin \(IB\) 400](#) regarding FEMA’s
4348 implementation of these provisions prior to the recent 2020 revisions. For information on the recent
4349 revisions to these regulations, see [2 CFR Grants Management Policy Updates | FEMA.gov](#). Costs charged
4350 to an IPR award must also be consistent with the cost principles in the Federal Acquisition Regulation
4351 (FAR) Part 31.2 in lieu of 2 C.F.R. Part 200, Subpart E. Any conflicts between FAR 31.2 and 2 C.F.R.
4352 Part 200, Subpart E shall be resolved in favor of the applicable provision in FAR 31.2.

4353 4354 IPR Priorities

4355 See the annual IPR NOFO.

4356 4357 Security Plan Requirements

4358 The following information regarding security plan requirements is provided in 6 U.S.C. § 1134(c)(2):

4359 Security plans should include the following, as appropriate:

- 4360 • A prioritized list of all items included in the public transportation agency’s security assessment
4361 that have not yet been addressed;
- 4362 • A detailed list of any additional capital and operational improvements identified by DHS or the
4363 public transportation agency and a certification of the public transportation agency’s technical
4364 capacity for operating and maintaining any security equipment that may be identified in such list;
- 4365 • Specific procedures to be implemented or used by the public transportation agency in response to
4366 a terrorist attack, including evacuation and passenger communication plans and appropriate
4367 evacuation and communication measures for the elderly and individuals with disabilities;
- 4368 • A coordinated response plan that establishes procedures for appropriate interaction with state and
4369 local law enforcement agencies, emergency responders, and federal officials in order to
4370 coordinate security measures and plans for response in the event of a terrorist attack or other
4371 major incident;

- 4372 • A strategy and timeline for conducting training under 49 C.F.R. § 1570.109(b) and 49 C.F.R. Part
4373 1580;
- 4374 • Plans for providing redundant and other appropriate backup systems necessary to ensure the
4375 continued operation of critical elements of the public transportation system in the event of a
4376 terrorist attack or other major incident;
- 4377 • Plans for providing service capabilities throughout the system in the event of a terrorist attack or
4378 other major incident in the city or region which the public transportation system serves;
- 4379 • Methods to mitigate damage within a public transportation system in case of an attack on the
4380 system, including a plan for communication and coordination with emergency responders; and
- 4381 • Other actions or procedures as the Secretary of Homeland Security determines are appropriate to
4382 address the security of the system.
4383

4384 Allowable Costs

4385 Specific investments made in support of the funding priorities discussed in the annual IPR NOFO
4386 generally fall into one of the following six allowable expense categories:

- 4387
- 4388 1) Planning;
- 4389 2) Operational Activities;
- 4390 3) Equipment and Capital Projects;
- 4391 4) Training and Awareness Campaigns;
- 4392 5) Exercises; and
- 4393 6) Management and Administration.
4394

4395 The following provides guidance on allowable costs within each of these areas.

4396 Planning

4397 *Planning activities that address the Soft Targets/Crowded Places Priority.*

4398 IPR funds may be used for the following types of planning activities:

- 4399
- 4400 • Development and enhancement of system-wide security risk management plans that ensure the
4401 continuity of essential functions, to include cyber;
- 4402 • Development or further strengthening of continuity plans, response plans, station action plans,
4403 risk assessments, and asset-specific remediation plans;
- 4404 • Development or further strengthening of security assessments, including multi-agency and multi-
4405 jurisdictional partnerships and conferences to facilitate planning activities;
- 4406 • Hiring of full or part-time staff and contractors or consultants to assist with planning activities
4407 only to the extent that such expenses are for the allowable activities within the scope of this grant
4408 (not for the purpose of hiring public safety personnel); hiring of contractors/consultants must
4409 follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327
- 4410 • Materials required to conduct planning activities;
- 4411 • Conducting risk and resilience assessments on increasingly connected cyber and physical
4412 systems, on which security depends, using the [Infrastructure Resilience Planning Framework](#) and
4413 related CISA resources;
- 4414 • Planning activities related to alert and warning capabilities; and
- 4415 • Other project planning activities, with prior approval from FEMA.
4416

4417 **Operational Activities**

4418 *Operational Activities that address the Soft Targets/Crowded Places Priority.*

4419
4420 FEMA encourages applicants to develop innovative operational approaches to enhance the security of
4421 transit systems. Projects that use visible, unpredictable deterrence, including operational packages dealing
4422 with explosive detection canine teams, mobile screening teams, and anti-terrorism teams, directly support
4423 enhancing the protection of soft targets and crowded places. Implementation of one of the three
4424 Operational Package (OPack) models discussed below complements existing security systems and
4425 provides an appropriate, practical, and cost-effective means of protecting assets.

4426
4427 Agencies may submit IJs to fund transit security police forces/law enforcement providers for patrols and
4428 activities on overtime, such as directed patrols, additional canine teams, mobile screening teams, or anti-
4429 terrorism team patrols. These activities must be dedicated to the transit environment and must be anti-
4430 terrorism in nature. Agencies must identify the type of activity, length of operation (hours), number of
4431 personnel, and cost based on length of operation and personnel. Agencies should also provide a risk-based
4432 justification for the request, including linkage to a known event, such as hosting a significant regional
4433 sporting or political event; or a period of heightened awareness, such as a national holiday. Three OPack
4434 types have been developed to support operational activities and are available for funding under the IPR:

- 4435
- 4436 • **Explosives Detection Canine Teams (EDCTs).** When combined with the existing capability of a
- 4437 transit security/police force, the added value provided through the addition of an EDCT is
- 4438 significant. EDCTs are a proven, reliable resource to detect explosives and are a key component
- 4439 in a balanced counter-sabotage program. The TSGP will provide funds to establish dedicated
- 4440 security/police force canine teams. Each canine team will be composed of one dog and one
- 4441 handler.
- 4442 • **Anti-Terrorism Teams (ATTs).** The ATT capability provided through TSGP funding is for
- 4443 uniformed, dedicated transit patrols on a normal operational basis, rather than using teams only
- 4444 for a surge capacity as provided by FEMA in the past. ATTs do not supersede other local transit
- 4445 security forces; rather, they augment current capabilities. Each ATT will consist of four
- 4446 individuals, including two overt elements (*e.g.*, uniformed transit sector law enforcement officer,
- 4447 canine team, mobile explosive screeners), and two discreet observer elements.
- 4448 • **Mobile Explosive Screening Teams (MESTs).** The MEST OPack will allow recipients the
- 4449 flexibility to deploy combinations of certified explosive ordinance technicians with mobile
- 4450 explosive screening technologies, including during local National Special Security Events. This
- 4451 screening technology will be coupled with mobile explosive screening technologies. Each MEST
- 4452 should have a minimum of two members and one mobile explosive screening apparatus.

4453
4454 *Note: Funds for canine teams may not be used to fund drug detection and apprehension technique*
4455 *training. Only explosives detection training for the canine teams will be funded.*
4456

Five-Year Security Capital Plan and Operational Sustainment

Applicant requests for OPack funding must include the submission of a Five-Year Security Capital and Operational Sustainment Plan in ND Grants. This plan must include how the agency proposes to implement capital projects and demonstrate how the agency will sustain the operational investments (including officers hired with federal funding) and capabilities after grant funding has been expended. ***Requests for OPacks will not be funded if the applicant does not have and submit a Security Capital and Operational Sustainment Plan.***

4457

4458 **Funding Availability for OPacks**

4459 OPacks have the potential to be funded for up to a 36-month period from the award date. The monetary
 4460 figures presented below are stated in terms of cost per period of performance (which indicates
 4461 actual/complete funding for a 36-month period). Additionally, any OPack costs after the period of
 4462 performance (including expenses related to the maintenance, personnel, equipment, etc.) are the
 4463 responsibility of the applicable transit system. Additional funding may be applied for in future grant
 4464 cycles to maintain this operational capability, but future funding is not guaranteed and requires approval.
 4465 If these positions are not sustained, the public transportation agency may not be eligible for this personnel
 4466 support in the future. The table below identifies the maximum funding available for the different OPack
 4467 types.

4468 **Available Funding for OPacks**

Operational Package	Maximum Funding per Year (12 months)	Maximum Funding per Period of Performance (36 months)
EDCT	\$150,000 per team	\$450,000 per team
ATT	\$500,000 per team	\$1,500,000 per team
MEST	\$600,000 per team	\$1,800,000 per team

4469 **OPack Requirements**

4470 IPR OPack funds may be used for new positions or to sustain existing capabilities/programs (e.g., canine
 4471 teams) already supported by the recipient. Applicants pursuing both new OPacks and sustainment funding
 4472 for existing OPacks must indicate in their IJs which funding the higher priority for their agency is.
 4473 Additionally, applicants must provide the number of existing teams (EDCT, ATT, and MEST) already in
 4474 place, regardless of how they are funded. The below table identifies specific OPack requirements.

4475 **OPack Requirements**

Operational	Requirements
EDCT	Please refer to the pages below for detailed information regarding EDCTs under the IPR
ATT	Specific for the Canine Team within the ATT: <ul style="list-style-type: none"> • Each canine team, composed of one dog and one handler, must be certified by an appropriate, qualified organization • Canines should receive an initial basic training course and also weekly maintenance training sessions thereafter to maintain the certification • The basic training averages 10 weeks for the team, with weekly training and daily exercising (comparable training and certification standards, such as those promulgated by the Transportation Security Administration (TSA) Explosive Detection Canine Program), the National Police Canine Association (NPCA), the United States Police Canine Association (USPCA), or the International Explosive Detection Dog Association (IEDDA) may be used to meet this requirement • The individuals hired for the covert and overt elements must be properly trained law enforcement officers • Certifications should be on file with the recipient and must be made available to FEMA upon request
MEST	Certifications should be on file with the recipient and must be made available to FEMA upon request

4476

4477 **Allowable Expenses for OPacks**

4478 The table below identifies allowable expenses for the various OPacks. Please see the accompanying notes
 4479 for clarification of certain allowable costs.

4480 **Allowable Expenses for OPacks**

Operational Package		Salary and Fringe Benefits	Training and Certification	Equipment Costs	Purchase and Train a Canine	Canine Costs ^b
1)	EDCT ^a	✓	✓	✓	✓ ^c	✓
2)	ATT	✓	✓	✓	✓	✓
3)	MEST	✓		✓ ^d		
^a Travel costs associated with training for personnel, handlers, and canines are allowable ^b Canine costs include but are not limited to a canine’s veterinary, housing, and feeding costs ^c One type of allowable training is training specific to the detection of common explosives odors ^d Equipment and other costs can include but are not limited to explosives detection; stainless steel search tables; consumables such as gloves, swabs, and alcohol; and land mobile radios						

4481

4482 **Specific Guidance on EDCT**

4483 **EDCT Certification**

4484 Each EDCT, composed of one dog and one handler, must be certified by an appropriate, qualified
 4485 organization. TSA-certified EDCTs will meet or exceed certification standards set by the TSA National
 4486 Explosives Detection Canine Team Program (NEDCTP). Recipient EDCTs that do not participate in the
 4487 NEDCTP will be required to certify annually under their respective agency, local, and state regulations.
 4488 The recipient will maintain certification, utilization, and training data to show compliance in meeting or
 4489 exceeding those guidelines set forth by the Scientific Working Group on Dog and Orthogonal Detection
 4490 Guidelines (SWGDOG), as of September 14, 2007, in addition to the requirements set forth in the NOFO.
 4491

4492 **EDCT Submission Requirements**

- 4493 1) The recipient will ensure that a written security procedure plan exists for the safekeeping of all
 4494 explosive training aids, including safe transportation. The recipient will document the removal,
 4495 use, and return of explosive training aids used during training exercises or for any other reason.
 4496 The plan and all documentation must be made available to FEMA upon request;
 4497 2) The recipient will comply with requirements for the proper storage, handling, and transportation
 4498 of all explosive training aids in accordance with the Bureau of Alcohol, Tobacco, Firearms and
 4499 Explosives’ Publication 5400.7 (ATF P 5400.7) (09/00), *Federal Explosive Law and Regulation*;
 4500 3) The recipient will ensure that certified EDCTs are available to respond to situations 24 hours a
 4501 day, 7 days per week on an on-duty or off-duty on-call basis. If IPR-funded EDCTs are not
 4502 available, other, non-IPR funded EDCTs may be utilized for this response. The intent is to
 4503 provide maximum coverage during peak operating hours and to maintain the ability to promptly
 4504 respond to threats that affect public safety or mass transit operations;

- 4505 4) EDCTs under this grant are single purpose and will be trained to detect “live” explosives only,
4506 not “simulated” explosives. EDCTs must not have received previous training to detect any other
4507 substances;
- 4508 5) The recipient will ensure that each EDCT receives on-site proficiency training at a minimum of 4
4509 hours per week per duty cycle. This training shall include, but not be limited to, mass transit
4510 passenger cars, terminals/platforms, luggage, freight/warehouses, and vehicles. Complete,
4511 detailed, and accurate training records must be maintained for all proficiency training conducted
4512 by each EDCT. These records must be made available to FEMA upon request;
- 4513 6) The recipient will conduct appropriate training or other canine activities, within view of the
4514 public, to increase public awareness of EDCTs and provide a noticeable deterrent to acts which
4515 affect public safety or mass transit operations. The recipient will also ensure that such activities
4516 include, over a period of time, a presence in operational areas of the mass transit system during
4517 peak and off-peak hours. The recipient agrees that EDCTs will be utilized in the field at least 80%
4518 of their duty time, annually;
- 4519 7) The recipient will provide safe and sanitary kennel facilities for program canines, and these costs
4520 may be allowable with prior approval by FEMA. This applies to kenneling canines at a mass
4521 transit system, handlers’ residences, or commercial boarding facilities. Canines must not be left in
4522 makeshift accommodations or without proper supervision, protection, and care. The recipient will
4523 ensure that canines are transported on-duty and off-duty in vehicles configured with adequate
4524 temperature control, padding, and screening to ensure proper health, safety, and security; and
- 4525 8) The recipient will ensure that adequate routine and emergency veterinary care are provided for all
4526 canines.

4527
4528 *Note: FEMA reserves the right to conduct an on-site operational and record review upon 48-hour notice*
4529 *to ensure compliance with applicable federal regulations.*
4530

4531 **Equipment and Capital Projects**

4532 *Equipment and Capital Projects that address the Soft Targets/Crowded Places and Cybersecurity*
4533 *Priorities.*
4534

4535 Priority projects include Top Transit Asset List (TTAL) risk remediation and protection of other high-
4536 risk, high-consequence areas or systems that have been identified through system-wide risk assessments:
4537

- 4538 • Projects related to physical security enhancements at rail and bus stations in Urban Area Security
4539 Initiative (UASI) jurisdictions, including security cameras, security screening equipment for
4540 people and baggage, and access control (*e.g.*, fences, gates, barriers, etc.); and
- 4541 • Projects related to cybersecurity of access control, sensors, security cameras, badge/ID readers,
4542 Industrial Control System (ICS)/Supervisory Control and Data Acquisition (SCADA) systems,
4543 process monitors and controls, etc. or passenger/vehicle/cargo security screening equipment
4544 support. Cybersecurity assessments are allowable.

4545 **Equipment Acquisition**

4546 IPR funds may be used for the following categories of equipment. A comprehensive listing of allowable
4548 equipment categories and types is found in the [Authorized Equipment List \(AEL\)](#). These costs include:
4549

- 4550 • Personal protection equipment;
- 4551 • Explosive device mitigation and remediation equipment;

- 4552 • Chemical, biological, radiological, nuclear, and high explosive (CBRNE) operational search and
- 4553 rescue equipment, logistical support equipment, reference materials, or incident response
- 4554 vehicles;
- 4555 • Interoperable communications equipment, including for alert and warning capabilities;
- 4556 • Components or systems needed to address flaws in the computerized systems that control
- 4557 generators, switching stations, and electrical substations as well as other threats to infrastructure
- 4558 critical to the U.S. economy;
- 4559 • Detection Equipment;
- 4560 • Power equipment;
- 4561 • Terrorism incident prevention equipment; and
- 4562 • Physical security enhancement equipment.

4563
4564 Recipients may purchase equipment not listed on the AEL, but **only** if they first seek and obtain **prior**

4565 **approval** from FEMA.

4566
4567 Unless otherwise noted, equipment must be certified as meeting required regulatory and FEMA-adopted

4568 standards to be eligible for purchase using IPR funds. Equipment must comply with the *Occupational*

4569 *Safety and Health Act* requirement for certification of electrical equipment by a nationally recognized

4570 testing laboratory and demonstrate compliance with relevant FEMA-adopted standards through a

4571 supplier’s declaration of conformity with appropriate supporting data and documentation per International

4572 Organization for Standardization/International Electro-technical Commission (ISO/IEC) 17050, Parts One

4573 and Two. The recipient must have all necessary certifications and licenses for the requested equipment, as

4574 appropriate, prior its purchase. In addition, recipients that are using IPR funds to support emergency

4575 communications equipment activities must comply with the SAFECOM Guidance on Emergency

4576 Communications Grants, including provisions on technical standards that ensure and enhance

4577 interoperable communications. This SAFECOM Guidance can be found at:

4578 <https://www.cisa.gov/safecom/funding>.

4579 4580 **Requirements for Small Unmanned Aircraft Systems**

4581 All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply

4582 with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and also

4583 include a description of the policies and procedures in place to safeguard individuals’ privacy, civil rights,

4584 and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment.

4585 sUAS policies are not required at the time of application but must be received and approved by FEMA prior

4586 to obligating IPR funds. All grant-funded procurements must be executed in a manner compliant with

4587 federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use IPR funds for

4588 sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the

4589 data the devices collect is transmitted to servers not under the control of the operator. It has been reported

4590 that some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The

4591 U.S. Department of Homeland Security’s Privacy Office suggests the recipient fully explore data

4592 transmission and storage issues with vendors to reduce the possibility of data breaches.

4593
4594 Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2023 DHS Appropriations

4595 further requires recipients to certify they have reviewed the [Industry Alert on Chinese Manufactured](#)

4596 [Unmanned Aircraft Systems](#), and completed a risk assessment that considers the proposed use of foreign-

4597 made sUAS to ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign-

4598 made versus domestic sUAS.

4599

4600 **Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)**
4601 In August 2020, FEMA was alerted you of an advisory guidance document issued by DHS, the
4602 Department of Justice, the Federal Aviation Administration, and the Federal Communications
4603 Commission: [https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-](https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-technologies)
4604 [technologies](https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-technologies). The purpose of the advisory guidance document is to help non-federal public and private
4605 entities better understand the federal laws and regulations that may apply to the use of capabilities to
4606 detect and mitigate threats posed by UAS operations (i.e., Counter-UAS or C-UAS).

4607
4608 The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the
4609 authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do
4610 they conduct legal reviews of commercially available product compliance with those laws. The advisory
4611 does not address state and local laws nor potential civil liability, which UAS detection and mitigation
4612 capabilities may also implicate.

4613
4614 It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection
4615 and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state
4616 criminal, surveillance, and communications laws. Entities should conduct their own legal and technical
4617 analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’
4618 representations of the systems’ legality or functionality. Please also see the DHS press release on this
4619 topic for further information: [https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft)
4620 [technology-detect-and-mitigate-unmanned-aircraft](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft).

4622 **Cybersecurity Projects**

4623 IPR funds may be used for projects that enhance the cybersecurity of:

- 4624
- 4625 • Access controls, sensors; security cameras, badge/ID readers, ICS/SCADA systems, process
4626 monitors and controls (such as firewalls, network segmentation, predictive security cloud, etc.);
4627 and
- 4628 • Passenger/vehicle/cargo security screening equipment (cybersecurity assessments are allowable).

4629
4630 When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in
4631 implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (the
4632 “Framework”), developed by the National Institute of Standards and Technology (NIST). The Framework
4633 gathers existing international standards and practices to help organizations understand, communicate, and
4634 manage their cyber risks. For organizations that do not know where to start with developing a
4635 cybersecurity program, the Framework provides initial guidance. For organizations with more advanced
4636 practices, the Framework offers ways to improve their programs, such as through better communication
4637 with their leadership and suppliers about management of cyber risks.

4638
4639 The Cybersecurity and Infrastructure Security Agency’s (CISA) Critical Infrastructure Cyber Community
4640 C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in
4641 adoption of the Framework and managing cyber risks. Additional information on the Critical
4642 Infrastructure Cyber Community C³ Voluntary Program can be found at www.cisa.gov/ccubedvp.

4643
4644 DHS’s Enhanced Cybersecurity Services (ECS) program is an example of a resource that assists in
4645 protecting U.S.-based public and private entities and combines key elements of capabilities under the
4646 “Detect” and “Protect” functions to deliver an impactful solution relative to the outcomes of the
4647 Framework. Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based
4648 companies and SLTT governments defend their computer systems against unauthorized access,
4649 exploitation, and data exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from

4650 sensitive and classified Government Furnished Information. DHS then shares those indicators with
4651 accredited Commercial Service Providers (CSPs). Those CSPs in turn use the indicators to block certain
4652 types of malicious traffic from entering a company's networks. Groups interested in subscribing to ECS
4653 must contract directly with a CSP in order to receive services. Please visit [http://www.cisa.gov/enhanced-](http://www.cisa.gov/enhanced-cybersecurity-services-ecs)
4654 [cybersecurity-services-ecs](http://www.cisa.gov/enhanced-cybersecurity-services-ecs) for a current list of ECS CSP points of contact.
4655

4656 **Capital (Construction) Projects Guidance**

4657 The recipient must obtain written approval from FEMA prior to the use of any IPR funds for construction
4658 or renovation projects. When applying for construction funds, including communications towers, the
4659 recipient must submit evidence of approved zoning ordinances, architectural plans, any other locally
4660 required planning permits. Additionally, the recipient is required to submit a SF-424C and budget detail
4661 citing the project costs and an SF-424D Form for standard assurances for the construction project.
4662

4663 All construction or renovation projects require Environmental Planning and Historic Preservation (EHP)
4664 review. The recipient is also encouraged to have completed as many steps as possible for a successful
4665 EHP review in support of their proposal for funding (*e.g.*, coordination with the relevant Historic
4666 Preservation Office to identify potential historic preservation issues and to discuss the potential for project
4667 effects; compliance with all state and local EHP laws and requirements).
4668

4669 Projects for which the recipient believes an Environmental Assessment (EA) may be needed, as defined in
4670 [DHS Instruction Manual 023-01-001-01, Revision 01](#), EHP Directive and Instruction, [FEMA Directive](#)
4671 [108-1, and FEMA Instruction 108-1-1](#), must also be identified to the FEMA HQ Preparedness Officer
4672 within the first six months of the award, regardless of the length of the period of performance. Completed
4673 EHP review materials for construction and communication tower projects must be submitted no later than
4674 12 months before the end of the period of performance. [EHP policy guidance](#) and the [EHP Screening](#)
4675 [Form](#) can both be found on FEMA.gov. EHP review materials should be sent to
4676 gpdehpinfo@fema.dhs.gov.
4677

4678 If the recipient uses funds for construction projects, it must comply with the *Davis-Bacon Act* (codified as
4679 amended at 40 U.S.C. §§ 3141 *et seq.*). See 6 U.S.C. § 1163(h) (cross-referencing 49 U.S.C. § 24312,
4680 which cross-references *Davis-Bacon*). It must ensure that its contractors or subcontractors for
4681 construction projects pay workers no less than the prevailing wages for laborers and mechanics employed
4682 on projects of a character similar to the contract work in the civil subdivision of the state in which the
4683 work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*,
4684 including the Department of Labor (DOL) wage determinations, is available at
4685 <https://www.dol.gov/whd/govcontracts/dbra.htm>.
4686

4687 **Training and Awareness Campaigns**

4688 *Training and Awareness Campaigns that address the Soft Targets/Crowded Places and Cybersecurity*
4689 *Priorities.*

4690 **Training**

4691 IPR funds may be used for the following training activities:
4692

- 4693 • **Training Topics.** Priority topics include active shooter training, security training for employees,
4694 and public awareness/preparedness campaigns.
- 4695 • **Training Workshops.** Grant funds may be used to plan and conduct training workshops,
4696 including costs related to planning, meeting space and other meeting costs, facilitation costs,
4697 materials and supplies, travel, and training plan development. The recipient is strongly

4698 encouraged to use free public space, locations, or facilities, whenever available, prior to the rental
4699 of space, locations, or facilities. Training should provide the opportunity to demonstrate and
4700 validate skills learned as well as to identify any gaps in these skills. Any training or training gaps,
4701 including those for children and individuals with disabilities or other access and functional needs,
4702 should be identified in an After-Action Report/Improvement Plan (AAR/IP) and addressed in the
4703 training cycle.

- 4704 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff or
4705 contractors/consultants may be hired to support training-related activities. Reimbursement of
4706 these costs should conform with the policies of recipient, as well as any applicable federal and
4707 FEMA policies, rules, and regulations. Hiring of contractors/consultants must follow the
4708 applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. Dual compensation
4709 is unallowable, in other words, an employee of a unit of government may not receive
4710 compensation from their unit or agency of government and from an award for a single period of
4711 time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities. Personnel
4712 hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such
4713 expenses are for allowable activities within the scope of the grant.
- 4714 • **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related
4715 to backfilling personnel, that are the direct result of attendance at FEMA and approved training
4716 courses and programs are allowable. Reimbursement of these costs should follow the policies of
4717 the recipient, as well as any applicable federal and FEMA policies, rules, and regulations. state.
4718 Dual compensation is never allowable.
- 4719 • **Travel.** Domestic travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as
4720 expenses by employees who are on travel status for official business related, approved training,
4721 subject to the restrictions at 2 C.F.R. Part 200. International travel is not an allowable expense.
- 4722 • **Supplies.** Supplies, items that are expended or consumed during the course of the planning and
4723 conduct of the training project(s) (e.g., gloves and non-sterile masks), are allowable expenses.
- 4724 • **Funds Used to Develop, Deliver, and Evaluate Training.** Funds used to develop, deliver, and
4725 evaluate training, including costs related to administering the training, planning, scheduling,
4726 facilities, materials and supplies, reproduction of materials, and equipment are allowable
4727 expenses. Training should provide the opportunity to demonstrate and validate skills learned as
4728 well as to identify any gaps in these skills. Any training or training gaps, including those for
4729 children and individuals with disabilities or other access and functional needs, should be
4730 identified in the AAR/IP and addressed in the training cycle.

4731
4732 Recipients are encouraged to use existing training rather than developing new courses. When developing
4733 new courses, recipients are encouraged to apply the Analysis, Design, Development, Implementation, and
4734 Evaluation (ADDIE) model of instructional design. Information on FEMA-approved training can found at
4735 <http://www.firstrespondertraining.gov/>.

4736 4737 **Awareness Campaigns**

4738 IPR funds may be used for the development and implementation of awareness campaigns to raise public
4739 awareness of indicators of terrorism and terrorism-related crime and for associated efforts to increase the
4740 sharing of information with public and private sector partners, including nonprofit organizations. DHS
4741 currently sponsors or supports a number of awareness campaigns. Please review materials, strategies, and
4742 resources at <https://www.dhs.gov/dhs-campaigns> before embarking on the development of an awareness
4743 campaign for local constituencies and stakeholders.

4744
4745 Note: DHS requires that all public and private sector partners wanting to implement and/or expand the
4746 DHS “If You See Something, Say Something®” campaign (“campaign”) using grant funds work directly
4747 with the DHS Office of Partnership and Engagement (OPE). This will help ensure that the awareness

4748 materials (e.g., videos, posters, trifolds, etc.) remain consistent with DHS’s messaging and strategy for the
4749 campaign and compliant with the initiative’s trademark, which is licensed to DHS by the New York
4750 Metropolitan Transportation Authority. Coordination with OPE, through the campaign’s office
4751 (seesay@hq.dhs.gov), must be facilitated by the FEMA Preparedness Officer.
4752

4753 Exercises

4754 *Exercise activities that address the Soft Targets/Crowded Places and Cybersecurity Priorities.*
4755

4756 IPR funds may be used for the following exercise activities:
4757

- 4758 • **Funds Used to Design, Develop, Conduct and Evaluate an Exercise.** This includes costs
4759 related to planning, meeting space and other meeting costs, facilitation costs, materials and
4760 supplies, travel, and documentation. Exercises afford organizations the opportunity to validate
4761 plans and procedures, evaluate capabilities, and assess progress toward meeting capability targets
4762 in a controlled, low risk setting. Any shortcomings or gaps identified, including those for children
4763 and individuals with disabilities or other access and functional needs, should be identified in an
4764 effective corrective action program that includes development of improvement plans that are
4765 dynamic documents, with corrective actions continually monitored and implemented as part of
4766 improving preparedness through the exercise cycle.
- 4767 • **Hiring of Full or Part-Time Staff or Contractors/Consultants.** Full or part-time staff may be
4768 hired to support exercise-related activities. Reimbursement of these costs should conform with
4769 the policies of the recipient, as well as any applicable federal and FEMA policies, rules, and
4770 regulations. Dual compensation is not allowable, meaning, in other words, that an employee of a
4771 unit of government may not receive compensation from their unit or agency of government and
4772 from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though their work
4773 may benefit both entities. Personnel hiring, overtime, and backfill expenses are permitted under
4774 this grant only to the extent that such expenses are for the allowable activities within the scope of
4775 the grant. The recipient must follow all applicable procurement regulations at 2 C.F.R. Part 200
4776 when procuring contractor services.
- 4777 • **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related
4778 to backfilling personnel, which are the direct result of time spent on designing, developing, and
4779 conducting exercises are allowable expenses. These costs are allowed only to the extent the
4780 payment for such services is in accordance with the policies of the recipient and has the approval
4781 of the awarding agency, if applicable. Dual compensation is never allowable.
- 4782 • **Travel.** Domestic travel costs are allowable as expenses by employees who are on travel status
4783 for official business related to the planning and conduct of exercise project(s), subject to the
4784 restrictions at 2 C.F.R. Part 200. International travel costs are not allowable expenses.
- 4785 • **Supplies.** Supplies are items that are expended or consumed during the course of the planning
4786 and conduct of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective
4787 equipment).
- 4788 • **Other Items.** These costs include the rental of space or locations for exercise planning and
4789 executing, rental of equipment, etc. The recipient is encouraged to use free public space,
4790 locations, or facilities, whenever available, prior to the rental of space, locations, or facilities.
4791 These also include costs that may be associated with inclusive practices and the provision of
4792 reasonable accommodations and modifications to provide full access for children and adults with
4793 disabilities.
4794

4795 **Management and Administration (M&A)**

4796 Management and administration costs are allowed under this program. M&A costs are activities directly
4797 related to managing and administering the award. The recipient may use up to 5% of the amount of the
4798 award for its M&A costs.

4799

4800 Fiscal Year 2023 IPR funds may be used for the following M&A costs:

4801

- 4802 • Hiring of full-time or part-time staff, including contractors and consultants, to execute the
4803 following:
 - 4804 ○ Management of the current fiscal year IPR Award; and
 - 4805 ○ Design and implementation of the current fiscal year IPR submission meeting compliance
4806 with reporting/data collection requirements, including data calls.
- 4807 • Information collection and processing necessary to respond to FEMA data calls;
- 4808 • Domestic travel expenses related to IPR grant administration, in compliance with the Super
4809 Circular, 2 C.F.R. Part 200; and
- 4810 • Acquisition of authorized office equipment, including personal computers or laptops for IPR
4811 M&A purposes.

4812

4813 **Indirect Costs**

4814 Indirect costs are allowable under this program as described in the Federal Acquisition Regulation (FAR).
4815 See the “Procedures for Establishing Indirect Cost Rates” Section in “Pre-Submission Information” for
4816 more information.

4817

4818 **Unallowable Costs**

4819 Specific unallowable costs include:

4820

- 4821 • *Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled](#)*
4822 *[Equipment Under FEMA Awards](#), and may not be used for the purchase of the following*
4823 *prohibited equipment: firearms, ammunition, grenade launchers, bayonets, or weaponized*
4824 *aircraft, vessels, or vehicles of any kind with weapons installed.* Expenditures for items
4825 unrelated to grant allowable activities, such as general-use software, general-use computers, and
4826 related equipment (other than for allowable M&A activities or for other associated preparedness
4827 or response functions), general-use vehicles, licensing fees, weapons systems, and ammunition
4828 are also prohibited;
- 4829 • Personnel costs (except as detailed above or otherwise allowed by statute);
- 4830 • Activities unrelated to the completion and implementation of the IPR program;
- 4831 • Other items not in accordance with the AEL or not previously listed as allowable costs;
- 4832 • Costs related to any matching or cost share requirement for any other federal award;
- 4833 • Costs related to lobbying or intervention in federal regulatory proceedings;
- 4834 • Costs related to suing the Federal Government or any other government entity;
- 4835 • Pre-award costs, unless approved in writing by FEMA and included in the grant award; and
- 4836 • Costs that are not consistent with the Cost Principles located in FAR 31.2, as applicable.

4837

4838 **Maintenance and Sustainment Costs**

4839 The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement
4840 costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise
4841 noted. Preparedness grant funds may be used to purchase maintenance contracts or agreements, warranty
4842 coverage, licenses, and user fees. These contracts may exceed the period of performance if they are
4843 purchased incidental to the original purchase of the system or equipment as long as the original purchase

4844 of the system or equipment is consistent with that which is typically provided for, or available through,
4845 these types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending
4846 an existing maintenance contract on an already-owned piece of equipment system, coverage purchased
4847 may not exceed the period of performance of the award used to purchase the maintenance agreement or
4848 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.
4849

4850 Grant funds are intended to support the National Preparedness Goal and to fund projects that build and
4851 sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and
4852 recover from those threats that pose the greatest risk to the security of the Nation. In order to provide
4853 recipients with the ability to meet this objective, the policy set forth originally in [IB 379: Guidance to](#)
4854 [State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows
4855 for the expansion of eligible maintenance and sustainment costs that must be (1) in direct support of
4856 existing capabilities, (2) an otherwise allowable expenditure under the applicable grant program, and (3)
4857 tied to one of the core capabilities in the five mission areas outlined in the Goal. Additionally, eligible
4858 costs may also be in support of equipment, training, and critical resources that have previously been
4859 purchased with either federal grant or any other source of funding other than FEMA preparedness grant
4860 program dollars.
4861

4862 **Encouraged Use of Certain Products Produced in the United States**

4863 Pursuant to Executive Order 13858 “[Strengthening Buy-American Preferences for Infrastructure](#)
4864 [Projects](#),” FEMA encourages non-federal entities under this grant program to use, to the greatest extent
4865 practicable and consistent with the law, iron and aluminum as well as steel, cement, and other
4866 manufactured products produced in the United States, in projects funded by an award under this grant
4867 program affecting surface transportation, including roadways, bridges, railroads, and transit; aviation;
4868 ports, including navigational channels; water resources projects; energy production, generation, and
4869 storage, including from fossil-fuels, renewable, nuclear, and hydroelectric sources; electricity
4870 transmission; gas, oil, and propane storage and transmission; electric, oil, natural gas, and propane
4871 distribution systems; broadband internet; pipelines; stormwater and sewer infrastructure; drinking water
4872 infrastructure; and cybersecurity. Notwithstanding this encouragement, non-federal entities must take care
4873 that all procurements and contract actions are consistent with law, this Manual and applicable appendices,
4874 the grant program’s NOFO, and the federal procurement standards at 2 C.F.R. §§ 200.317-200.326.
4875
4876

4877 **Program Appendix G:**
4878 **Port Security Grant Program (PSGP)**
4879

4880 As a reminder, while this appendix contains PSGP-specific information and requirements, the main content
4881 of this Manual (non-appendix information) contains important information relevant to **all** preparedness
4882 grant programs, including the PSGP. Please be sure to read the main content of this Manual in addition to
4883 the program-specific appendices.
4884

4885 PSGP grant recipients and subrecipients may only use PSGP grant funds for the purposes set forth in the
4886 Notice of Funding Opportunity (NOFO), and all investments must be consistent with the statutory authority
4887 for the award. These grant funds may not be used for matching funds for other federal awards, lobbying, or
4888 intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used to
4889 sue the Federal Government or any other government entity.
4890

4891 **PSGP Funding Guidelines**

4892 Costs charged to a PSGP award must be consistent with the Uniform Administrative Requirements, Cost
4893 Principles, and Audit Requirements for Federal Awards, located at 2 C.F.R. Part 200. For more information
4894 on 2 C.F.R. Part 200, please visit [Information Bulletin \(IB\) 400](#) regarding FEMA’s implementation of these
4895 provisions prior to the recent 2020 revisions. For information on the recent revisions to these regulations,
4896 see [2 CFR Grants Management Policy Updates | FEMA.gov](#).

4897

4898 **PSGP Priorities**

4899 See the annual PSGP NOFO.
4900

4901 **Limitations on Funding**

4902 As part of the PSGP application process, applicants must complete the approved [Investment Justification](#)
4903 [\(IJ\) template](#) and included detailed budget sheets (incorporated into the IJ) provided addressing each
4904 initiative being proposed for funding. A single IJ should be submitted with each application. Each IJ should
4905 include all proposed projects in separate tabs within the IJ. Altered IJs or IJs that have been separated into
4906 multiple attachments will not be considered for funding. A corresponding detailed budget tab is included
4907 within the IJ and must be completed for each project, including the budget summary at the bottom of the
4908 form. Each project should represent the complete scope of work and materials required to achieve a single
4909 overall capability. For example, a project could be to procure a boat specifically designed and equipped as
4910 chemical, biological, radiological, nuclear and explosives (CBRNE) detection, prevention, response, and/or
4911 recovery platform. The IJ for this example project should include the CBRNE equipment in the same IJ as
4912 the vessel. The corresponding detailed budget should include a description of the equipment (i.e., 24’
4913 Response Vessel) and computation (i.e., 1 x \$375,000, total \$375,000; Vessel mounted Rad/Nuke detection
4914 device, 1 x \$25,000, total \$25,000). Additionally, the total computation for the Total Project Cost, Federal
4915 Share, and non-Federal Share must be included in the detailed budget (i.e., Total \$400,000; Federal Share
4916 \$300,000; non-Federal Share \$100,000). This demonstrates that the applicant and FEMA understand the
4917 level of Federal funding requested, as well as a commitment to the Cost Share required by the applicant to
4918 complete the project. (see “Cost-Share or Match” in the PSGP NOFO).
4919

4920 In accordance with 46 U.S.C. § 70107(b)(2), PSGP funding for projects for the cost of acquisition,
4921 operation, and maintenance of security equipment or facilities to be used for security monitoring and
4922 recording, security gates and fencing, marine barriers for designated security zones, security-related lighting
4923 systems, remote surveillance, concealed video systems, security vessels, and other security-related
4924 infrastructure or equipment that contributes to the overall security of passengers, cargo, or crewmembers
4925 **cannot exceed \$1 million federal share per project.**
4926

4927 The \$1 million per project limitation applies only to those projects funded under 46 U.S.C. § 70107(b)(2)
4928 and does not apply to projects funded under other provisions of Section 70107.
4929

4930 Allowable Direct Costs

4931 Specific investments made in support of the funding priorities discussed in the annual PSGP NOFO
4932 generally fall into one of the following six allowable expense categories:
4933

- 4934 • Planning;
- 4935 • Operational Activities;
- 4936 • Equipment and Capital Projects;
- 4937 • Training and Awareness Campaigns;
- 4938 • Exercises; and
- 4939 • Management and Administration.

4940
4941 The following provides guidance on allowable costs within each of these areas.
4942

4943 Planning

4944 *Planning activities address the Soft Targets/Crowded Places; Cybersecurity; and Planning Priorities.*
4945

4946 PSGP funds may be used for the following types of planning activities:
4947

- 4948 • Development or updating of port wide risk mitigation plan (PRMP), including the conduct of port
4949 security vulnerability assessments as necessary to support plan update/development;
- 4950 • Development and enhancement of security plans and protocols within the Area Maritime Security
4951 Plan (AMSP), PRMP, and the Business Continuity and Resumption of Trade Plans (BCRTP) in
4952 support of maritime security and risk mitigation planning;
- 4953 • Materials required to conduct planning activities noted in this section;
- 4954 • Travel and per diem related to the professional planning activities noted in this section;
- 4955 • Coordination and information sharing with fusion centers;
- 4956 • Planning activities related to alert and warning capabilities;
- 4957 • Conducting risk and resilience assessments on increasingly connected cyber and physical systems,
4958 on which security depends, using the [Infrastructure Resilience Planning Framework](#) and related
4959 CISA resources;
- 4960 • Other port wide maritime security project planning activities, which emphasize the ability to adapt
4961 to changing conditions and be prepared to withstand, and recover from, disruptions due to
4962 emergencies with prior approval from FEMA; and
- 4963 • Backfill, overtime, hiring of part-time temporary personnel, and contractors or consultants to assist
4964 with planning activities. Copies of PSGP-funded plans must be made available to FEMA and the U.
4965 S. Coast Guard (USCG) upon request.
4966

4967 **Operational Activities**

4968 *Operational Activities address the Soft Targets/Crowded Places Priority.*

4969

4970 **Explosive Detection Canine Teams (EDCTs)**

4971 Use of canines (K-9) for explosive detection is one of the most effective solutions for the detection of
4972 vehicle-borne IEDs. When combined with the existing capability of a port or ferry security/police force, the
4973 added value provided through the addition of a canine team is significant. EDCTs are a proven, reliable
4974 resource to detect explosives and are a key component in a balanced counter-sabotage program.

4975 Eligibility for funding of EDCTs is restricted to:

4976

- 4977 • U.S. Ferry Systems regulated under 33 C.F.R. Parts 101, 103, 104, and the passenger terminals
4978 these specific ferries service under 33 C.F.R. Part 105;
- 4979 • Maritime Transportation Security Act (MTSA) regulated facilities; and
- 4980 • Port authorities, port police, and local law enforcement agencies that provide direct layered security
4981 for these U. S. Ferry Systems and MTSA-regulated facilities, and are defined in an AMSP, Facility
4982 Security Plan (FSP), or Vessel Security Plan (VSP).

4983

4984 Applicants may apply for up to \$450,000 (\$150,000/year for three years) per award to support this
4985 endeavor. At the end of the grant period (36 months), recipients will still be responsible for continuing the
4986 heightened level of capability provided by the EDCT. **A sustainment plan must be submitted with the**
4987 **applicant's IJ to address the 12-month period beyond the period of performance of the award.**

4988

4989 **Eligible EDCT Costs**

4990 Funds for these EDCTs may **not** be used to fund drug detection and apprehension technique training. Only
4991 explosives detection training for EDCTs will be funded. The PSGP EDCT funds may only be used for **new**
4992 **or expanded** capabilities/programs and cannot be used to pay for existing K-9 teams, personnel, or K-9
4993 training costs already supported by the port area. Repair and replacement of existing EDCT equipment is
4994 allowed. Eligible costs include:

4995

- 4996 • Contracted K-9 and handler providing services in accordance with PSGP guidance;
- 4997 • Salary and fringe benefits of new full- or part-time K-9 handler positions;
- 4998 • Training and certifications (travel costs associated with training for new or expanded full or part
4999 time agency handlers, and canines are allowable);
- 5000 • K-9 and handler equipment costs;
- 5001 • Purchase and train a new K-9 and handler for CBRNE detection; and
- 5002 • K-9 maintenance costs including but not limited to veterinary, housing, and feeding costs.

5003

5004 Ineligible EDCT costs include, but are not limited to:

5005

- 5006 • Hiring costs, including costs associated with initial police academy training of new officers;
- 5007 • Meals and incidentals associated with travel for initial certification;
- 5008 • Vehicles modified to be used solely to transport canines; and
- 5009 • Repair or replacement of unallowable equipment.

5010

5011 **EDCT Certification**

5012 Each EDCT, composed of one dog and one handler, must be certified by an appropriate, qualified
5013 organization. K-9 and handler should receive an initial basic training course and weekly maintenance
5014 training sessions thereafter to maintain the certification. The basic training averages ten weeks for the
5015 canine team (K-9 and handler together) with weekly training and daily exercising. Comparable training and

5016 certification standards, such as those promulgated by the Transportation Security Administration (TSA)
5017 Explosive detection canine program, the National Police Canine Association (NPCA), the U.S. Police
5018 Canine Association (USPCA), or the International Explosive Detection Dog Association (IEDDA) may be
5019 used to meet this requirement. Certifications and training records will be kept on file with the recipient and
5020 made available to FEMA upon request.
5021

5022 **EDCT Submission Requirements**

5023 Successful applicants will be required to submit an amendment to their approved VSP or FSP per 33 C.F.R.
5024 Parts 104 and/or 105 detailing the inclusion of a K-9 explosive detection program into their security
5025 measures. The recipient will ensure that a written plan or standard operating procedures (SOPs) exist that
5026 describe EDCT deployment policy to include visible and unpredictable deterrent efforts and on-call EDCTs
5027 rapid response times as dictated by the agency's FSP or VSP. The plan or SOPs must be made available to
5028 FEMA and USCG upon request.
5029

5030 The recipient will comply with requirements for the proper storage, handling, and transportation of all
5031 explosive training aids in accordance with the Bureau of Alcohol, Tobacco, Firearms and Explosives'
5032 Publication 5400.7 (ATF P 5400.7) (09/00), *Federal Explosive Law and Regulations*.
5033

5034 **Additional EDCT Resources Available for K-9 Costs**

5035 The PSGP, while providing the ability to defray some start-up costs, does not cover any recurring costs
5036 associated with EDCT programs. FEMA strongly encourages applicants to investigate their eligibility under
5037 other programs, and potential exclusions, when developing their K-9 programs.
5038

5039 **Organization Costs**

5040 Allowable organization-related costs are limited to those activities associated with new and ongoing
5041 maritime security operations essential to the national priorities. All such activities must be focused
5042 exclusively on maritime security and coordinated with the local Captain of the Port (COTP). PSGP funding
5043 used for organizational costs will only fund immediate needs for personnel that will be directly engaged in
5044 maritime security activities. Allowable organization personnel costs include:
5045

- 5046 • **Backfill, Overtime, Hiring of Full or Part-Time Personnel or Contractors/Consultants.** Full or
5047 part-time staff or contractors/consultants may be hired to support maritime-security-related
5048 activities and/or training conducted under this grant only to the extent that such expenses are for the
5049 allowable activities within the scope of the grant. Hiring of contractors/consultants must follow the
5050 applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. Salary and fringe
5051 benefit payments must be in accordance with the policies of the state or unit(s) of local government
5052 and have the approval of the state or awarding agency. Dual compensation is not allowable. That is,
5053 an employee of a unit of government may not receive compensation from their unit or agency of
5054 government AND from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even
5055 though such work may benefit both activities. Limitations may apply for grant related activities.
5056 See specific guidance provided within this Manual for additional details on allowable organization
5057 costs (i.e., Training – Personnel costs are limited to backfill and overtime).
- 5058 • **Hiring new, full-time personnel to:**
 - 5059 ○ Operate maritime security patrol vessels (first response agencies only);
 - 5060 ○ Staff a new or expanded interagency maritime security operation center;
 - 5061 ○ Support maritime security/counterterrorism efforts in the local Joint Terrorism Task Force
5062 (JTTF) and/or fusion center; and
 - 5063 ○ Support credentialing access to a MTSA facility.
- 5064 • **Backfill and Overtime costs for existing personnel to:**

- 5065 ○ Operate patrol vessels in support of pre-planned, mission critical activities, as identified by
- 5066 the local COTP (not including routine patrol); and
- 5067 ○ Attend approved maritime security training courses.
- 5068 ● **Personnel or contracted costs to:**
- 5069 ○ Install, repair, and replace port security equipment acquired with FEMA preparedness grant
- 5070 funds. Note this does not include routine maintenance, such as oil changes and
- 5071 daily/weekly systems tests; and
- 5072 ○ Management and administration (M&A) of projects funded under this program.
- 5073 ● **Contracted costs to:**
- 5074 ○ Provide approved training courses; and
- 5075 ○ Provide warranty, maintenance, and service agreements for equipment purchased under this
- 5076 grant.
- 5077

5078 Organization costs will only be funded to address port (or facility) security needs as outlined in the NOFO
 5079 and this appendix. PSGP funding for new permanent or part-time personnel will not exceed the 36-month
 5080 period of performance. Applicants must provide reasonable assurance that personnel costs can be sustained
 5081 beyond the 36-month award period. **A sustainment plan must be submitted with the applicant's IJ to**
 5082 **address the 12-month period beyond the period of performance of the award.**
 5083

5084 **Equipment and Capital Projects**

5085 *Equipment and Capital Projects address the Soft Targets/Crowded Places; Cybersecurity; and*
 5086 *Equipment/Capital Projects Priorities.*
 5087

5088 **Equipment Acquisition**

5089 PSGP funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under](#)
 5090 [FEMA Awards](#). PSGP funds may be used for the following categories of equipment. A comprehensive
 5091 listing of allowable equipment categories and types is found in the [Authorized Equipment List \(AEL\)](#).
 5092 Requests for vehicles of any type are subject to secondary review and approval by the National Review
 5093 Panel. These costs include:
 5094

- 5095 ● Personal Protective Equipment (PPE) for maritime security providers, such as ballistic protective
- 5096 body armor (not including uniforms);
- 5097 ● CBRNE response and remediation equipment for maritime security providers;
- 5098 ● CBRNE decontamination equipment for direct maritime security providers and MTSA-regulated
- 5099 industry;
- 5100 ● CBRNE detection-equipped patrol vehicles (**not including armored personnel carriers or tow**
- 5101 **trucks**), provided they will be used **exclusively for port/facility CBRNE detection** security
- 5102 operations. A CBRNE detection equipped patrol vehicle must include specifically identified,
- 5103 permanently mounted detection equipment;
- 5104 ● Trailers (not vehicles) designed to carry maritime security equipment essential to maritime security,
- 5105 mitigation, and response (such as boat trailers, dive trailers, or mobile command trailers);
- 5106 ● Mobile Command Centers **only when validated by the COTP as essential to address a**
- 5107 **specifically required capability outlined in the approved AMSP**. This does not include prime
- 5108 movers (tow-trucks), personnel carriers, or equipment transport vehicles;
- 5109 ● CBRNE detection-equipped and patrol watercraft vessel/small boat used to directly support
- 5110 maritime security for a facility or within a Port Area on a routine basis (CBRNE detection
- 5111 equipment requested with the watercraft/small boat in the IJ must be listed and also detailed in the
- 5112 budget). However, a vessel is not required to be CBRNE equipped;

- 5113 • Marine firefighting vessels, provided they are outfitted with CBRNE detection equipment and are
- 5114 designed and equipped to meet NFPA 1925: Standard on Marine Fire-Fighting Vessels;
- 5115 • Firefighting foam and Purple-K Powder (PKP) may be purchased by public fire departments that
- 5116 have jurisdictions in a port area and would respond to an incident at an MTSA regulated facility;
- 5117 MTSA facilities may also receive funding for this purpose. Funding will be limited to a one-time
- 5118 purchase based on a worst-case incident at the facility or facilities;
- 5119 • Information-sharing technology; components or equipment designed to share maritime security risk
- 5120 information and maritime all-hazards risk information with other agencies (equipment must be
- 5121 compatible with generally used equipment);
- 5122 • Maritime security risk mitigation interoperable communications equipment, including alert and
- 5123 warning capabilities;
- 5124 • Terrorism incident prevention and response equipment for maritime security risk mitigation;
- 5125 • Physical security enhancements, to include TWIC projects (e.g., card readers, fences, blast resistant
- 5126 glass, turnstiles, hardened doors, and vehicle gates) at maritime facilities;
- 5127 • Portable fencing, closed-circuit televisions (CCTVs), passenger vans, minibuses, etc. to support
- 5128 secure passage of vessel crewmembers through a MTSA regulated facility;
- 5129 • Equipment that enhances continuity capabilities, such as interoperable communications, intrusion
- 5130 prevention/detection, physical security enhancements, software and other equipment needed to
- 5131 support essential functions during a disruption to normal operations;
- 5132 • Generators with appropriate capability (size) to provide back-up power to security systems and
- 5133 equipment that support Maritime Domain Awareness (not including routine operational
- 5134 capabilities):
 - 5135 ○ Access control equipment and systems;
 - 5136 ○ Detection and security surveillance equipment; and
 - 5137 ○ Enhancement of Command-and-Control facilities.
- 5138 • Equipment for new personnel, such as personal protective equipment, is an allowable expense.
- 5139 Weapons and equipment associated with weapons maintenance/security (e.g., firearms,
- 5140 ammunition, and gun lockers) are not allowable.

5141
 5142 Recipients may purchase maritime security equipment not listed on the AEL, but **only** if they first seek and
 5143 obtain **prior approval** from FEMA. In addition, recipients that are using PSGP funds to support emergency
 5144 communications equipment activities must comply with the SAFECOM Guidance on Emergency
 5145 Communications Grants, including provisions on technical standards that ensure and enhance interoperable
 5146 communications. This SAFECOM Guidance can be found at <https://www.cisa.gov/safecom/funding>.

5147
 5148 **Requirements for Small Unmanned Aircraft Systems**

5149 All requests to purchase Small Unmanned Aircraft Systems (sUAS) with FEMA grant funding must comply
 5150 with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and also
 5151 include a description of the policies and procedures in place to safeguard individuals’ privacy, civil rights, and
 5152 civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment. sUAS
 5153 policies are not required at the time of application but must be received and approved by FEMA prior to
 5154 obligating PSGP funds. All grant-funded procurements must be executed in a manner compliant with
 5155 federal procurement standards at 2 C.F.R. §§ 200.317 – 200.327. For recipients that use PSGP funds for
 5156 sUAS, FEMA advises that there is a general privacy concern related to the use of this equipment if the data
 5157 the devices collect is transmitted to servers not under the control of the operator. It has been reported that
 5158 some manufacturers of sUAS encrypt data and send that data to servers outside the United States. The U.S.
 5159 Department of Homeland Security’s Privacy Office suggests the recipient fully explore data transmission
 5160 and storage issues with vendors to reduce the possibility of data breaches.

5161

5162 Additionally, the Joint Explanatory Statement (JES) accompanying the FY 2023 DHS Appropriations further
5163 requires recipients to certify they have reviewed the [Industry Alert on Chinese Manufactured Unmanned](#)
5164 [Aircraft Systems](#), and completed a risk assessment that considers the proposed use of foreign-made sUAS to
5165 ascertain potential risks (e.g., privacy, data breaches, cybersecurity, etc.) related to foreign-made versus
5166 domestic sUAS.

5167
5168

5169 **Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)**

5170 In August 2020, FEMA was alerted of an advisory guidance document issued by DHS, the Department of
5171 Justice, the Federal Aviation Administration, and the Federal Communications Commission:

5172 <https://www.dhs.gov/publication/interagency-legal-advisory-uas-detection-and-mitigation-technologies>.

5173 The purpose of the advisory guidance document is to help non-federal public and private entities better
5174 understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate
5175 threats posed by UAS operations (i.e., Counter-UAS or C-UAS).

5176

5177 The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the
5178 authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do
5179 they conduct legal reviews of commercially available product compliance with those laws. The advisory
5180 does not address state and local laws nor potential civil liability, which UAS detection and mitigation
5181 capabilities may also implicate.

5182

5183 It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection
5184 and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state
5185 criminal, surveillance, and communications laws. Entities should conduct their own legal and technical
5186 analysis of each UAS detection and/or mitigation system and should not rely solely on vendors’
5187 representations of the systems’ legality or functionality. Please also see the DHS press release on this topic
5188 for further information: [https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft)
5189 [detect-and-mitigate-unmanned-aircraft](https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft).

5190

5191 **Sonar Devices**

5192 The four types of allowable sonar devices are: imaging sonar, scanning sonar, side scan sonar, and three-
5193 dimensional sonar. These types of sonar devices are intended to support the detection of underwater
5194 improvised explosive devices and enhance maritime domain awareness. The eligible types of sonar, and
5195 short descriptions of their capabilities, are provided below:

5196

- 5197 1) **Imaging Sonar:** A high-frequency sonar that produces “video-like” imagery using a narrow field
5198 of view. The sonar system can be pole-mounted over the side of a craft or hand-carried by a diver.
- 5199 2) **Scanning Sonar:** Consists of smaller sonar systems that can be mounted on tripods and lowered to
5200 the bottom of the waterway. Scanning sonar produces a panoramic view of the surrounding area
5201 and can cover up to 360 degrees.
- 5202 3) **Side Scan Sonar:** Placed inside a shell and towed behind a vessel. Side scan sonar produces strip-
5203 like images from both sides of the device.
- 5204 4) **Three-Dimensional Sonar:** Produces 3-dimensional imagery of objects using an array receiver.

5205

5206 **Maritime Domain Awareness**

5207 Maritime domain is defined as “all areas and things of, on, under, relating to, adjacent to, or bordering on a
5208 sea, ocean, or other navigable waterway, including all maritime-related activities, infrastructure, people,
5209 cargo, and vessels and other conveyances.” Homeland Security Presidential Directive-13 (NSPD-41/HSPD-
5210 13) (Maritime Security Policy, December 21, 2004). According to the [National Plan to Achieve Maritime](#)
5211 [Domain Awareness for the National Strategy for Maritime Security \(Oct. 2005\)](#), “Maritime Domain

5212 Awareness (MDA) is the effective understanding of anything associated with the global maritime domain
5213 that could impact the security, safety, economy, or environment of the United States. MDA is a key
5214 component of an active, layered maritime defense in depth. It will be achieved by improving our ability to
5215 collect, fuse, analyze, display, and disseminate actionable information and intelligence to operational
5216 commanders.” *Id.* at ii. Applicants are encouraged to familiarize themselves with this National Strategy.
5217

5218 **Improvised Explosive Device (IED) and CBRNE Prevention, Protection, Response, Recovery** 5219 **Capabilities**

5220 Port areas should continue to enhance their capabilities to prevent, detect, respond to, and recover from
5221 terrorist attacks employing IEDs, CBRNE devices, and other non-conventional weapons. Please refer to
5222 DHS [Small Vessel Security Strategy \(Apr. 2008\)](#).
5223

5224 **Physical Security**

5225 Physical security is security measures that are designed to deny unauthorized access to facilities, equipment,
5226 and resources and to protect personnel and property from damage or harm (such as espionage, theft, or
5227 terrorist attacks). Physical security involves the use of multiple layers of interdependent systems and
5228 techniques. Physical security has been a focus of PSGP since the program’s inception in 2002. Primarily,
5229 physical security is intended to harden MTSA-regulated facilities against attacks. Law enforcement may
5230 contribute to physical security through patrols; however, patrol vessels generally enhance multiple core
5231 capabilities with a focus on CBRNE detection, deterrence, and response. Funding through PSGP for
5232 physical security projects should be only directed toward those projects that address identified MTSA
5233 required activities and identified in the entity FSP and/or the port area AMSP. Some examples of funded
5234 projects include TWIC-related equipment, fencing, lighting, gates, and CCTV. Physical security projects
5235 typically require EHP review prior to obligating PSGP funds.
5236

5237 **Cybersecurity Projects**

5238 PSGP funds may be used for projects that enhance the cybersecurity of:

- 5239 • Access controls;
- 5240 • Sensors;
- 5241 • Security cameras;
- 5242 • Badge/ID readers;
- 5243 • Industrial Control System (ICS)/Supervisory Control and Data Acquisition (SCADA) systems;
- 5244 • Process monitors and controls (such as firewalls, network segmentation, predictive security cloud,
5245 etc.); and
- 5246 • Passenger/vehicle/cargo security screening equipment (cybersecurity assessments are allowable).
5247

5248 When requesting funds for cybersecurity, applicants are encouraged to propose projects that would aid in
5249 implementation of all or part of the [Framework for Improving Critical Infrastructure Cybersecurity](#) (the
5250 “Framework”) developed by the National Institute of Standards and Technology (NIST), or other similar
5251 sources. The Framework gathers existing international standards and practices to help organizations
5252 understand, communicate, and manage their cyber risks. For organizations that do not know where to start
5253 with developing a cybersecurity program, the Framework provides initial guidance. For organizations with
5254 more advanced practices, the Framework offers a way to improve their programs, such as better
5255 communication with their leadership and suppliers about management of cyber risks.
5256

5257 The Cybersecurity and Infrastructure Security Agency’s (CISA) Critical Infrastructure Cyber Community
5258 C³ Voluntary Program also provides resources to critical infrastructure owners and operators to assist in
5259 adoption of the Framework and managing cyber risks. Additional information on the Critical Infrastructure
5260 Cyber Community C³ Voluntary Program can be found at <http://www.cisa.gov/ccubedvp>. DHS’s Enhanced
5261 Cybersecurity Services (ECS) program is an example of a resource that assists in protecting U.S.-based

5262 public and private entities and combines key elements of capabilities under the “Detect” and “Protect”
5263 functions to deliver an impactful solution relative to the outcomes of the Cybersecurity Framework.
5264 Specifically, ECS offers intrusion prevention and analysis services that help U.S.-based companies and
5265 SLTT governments defend their computer systems against unauthorized access, exploitation, and data
5266 exfiltration. ECS works by sourcing timely, actionable cyber threat indicators from sensitive and classified
5267 Government Furnished Information (GFI). DHS then shares those indicators with accredited Commercial
5268 Service Providers (CSPs). Those CSPs in turn use the indicators to block certain types of malicious traffic
5269 from entering a company’s networks. Groups interested in subscribing to ECS must contract directly with a
5270 CSP in order to receive services. Please visit <http://www.cisa.gov/enhanced-cybersecurity-services-ecs> for a
5271 current list of ECS CSP points of contact.

5272
5273 “Hub and spoke” cybersecurity projects are allowable under PSGP for cybersecurity projects that span
5274 multiple port area facilities. Hub and spoke cybersecurity projects may affect a parent organization’s
5275 multiple eligible entities, and maritime security partners, in multiple port areas to provide a port-wide
5276 benefit. Such projects may be submitted within a primary Port Area for the project implementation. For
5277 example, an applicant in the Port of Houston may submit a hub and spoke project within the
5278 Houston/Galveston port area which includes system hardening throughout the organization’s facilities in
5279 Houston, Port Lavaca, and Corpus Christi. Proportionally, costs associated with entities or subcomponents
5280 that are not covered under an AMSP and are not instrumental to enhancing maritime security must not be
5281 included in the detailed budget worksheet or investment justification and thereby prorating the cost of the
5282 project only to those facilities that are covered by the AMSP. Following the example noted above, the
5283 applicant may not include costs associated with cybersecurity of their non-maritime facilities, such as a
5284 non-MTSA regulated facility located in San Antonio. Hub and spoke projects are limited only to the
5285 enhancement of maritime security as outlined in this section and may not include non-maritime systems or
5286 facilities. Please clearly identify hub and spoke projects as such within your IJ and consult your COTP to
5287 verify project applicability to enhancing maritime security.

5288
5289 ***Cybersecurity projects should address risks to the marine transportation system and/or Transportation***
5290 ***Security Incidents (TSIs) outlined in the applicable AMSP, or priorities prescribed under applicable FSP***
5291 ***or VSP, as mandated under the MTSA or the PRMPs. At the port level, examples of cybersecurity***
5292 ***projects include but are not limited to projects that enhance the cybersecurity of access control, sensors,***
5293 ***security cameras, badge/ID readers, ICS/SCADA systems, process monitors and controls (such as those***
5294 ***that monitor flow rates, valve positions, tank levels, etc.), security/safety of the ship-to-port-to-facility-to-***
5295 ***intermodal interface, and systems that control vital cargo machinery at the ship/shore interface (such as***
5296 ***cranes, manifolds, loading arms, etc.), and passenger/vehicle/cargo security screening equipment.***

5297
5298 Vulnerability assessments are generally not funded under PSGP. However, considering the evolving
5299 malicious cyber activity, the relative novelty of cybersecurity as a priority within the program, and the need
5300 to adopt best practices included in the voluntary Cybersecurity Framework, vulnerability assessments may
5301 be funded as contracted costs. Port-wide assessments are eligible and must demonstrate that the assessment
5302 includes port area partners and are necessary to be completed as a single project to ensure a comprehensive
5303 evaluation of port area cyber security vulnerabilities. Personnel costs (other than M&A) are not an
5304 allowable expense for conducting these assessments.

5305
5306 CISA offers free resources to assist with initial assessments, please see [https://www.cisa.gov/cyber-](https://www.cisa.gov/cyber-resource-hub)
5307 [resource-hub](https://www.cisa.gov/cyber-resource-hub) for additional information. Applicants are encouraged to utilize free resources prior to
5308 requesting funds under this program.

5309
5310 ***Copies of completed cybersecurity assessments funded under PSGP that impact the maritime***
5311 ***transportation system, lead to a “transportation security incident” (as that term is defined under 46***
5312 ***U.S.C. § 70101(6)), or are otherwise related to systems, personnel, and procedures addressed by the***

5313 *facility and vessel plan shall be made available to FEMA and/or the local COTP upon request. The*
5314 *results of these cybersecurity assessments may be designated as Sensitive Security Information (SSI) and*
5315 *may be used to inform national maritime cybersecurity assessments.*
5316

5317 Where a vulnerability assessment has been completed either through contracts or qualified personnel to
5318 identify existing gaps and required mitigation efforts, mitigating projects may be funded that include
5319 purchase of equipment, software, and infrastructure designed to harden cybersecurity. Specific questions on
5320 conducting vulnerability assessments should be referred to the respective FEMA Preparedness Officer.
5321

5322 **Capital (Construction) Projects Guidance**

5323 Recipients must obtain written approval from FEMA prior to the use of any PSGP funds for construction or
5324 renovation projects. Additionally, PSGP funding may not be used to construct buildings or other physical
5325 facilities that are not constructed under terms and conditions consistent with the requirements of section
5326 611(j)(9) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5196(j)(9))
5327 (the *Stafford Act*),³ which requires compliance with the *Davis-Bacon Act* (codified as amended at 40 U.S.C.
5328 §§ 3141 *et seq.*) for PSGP funded projects. Grant recipients must ensure that their contractors or
5329 subcontractors for construction projects pay workers no less than the prevailing wages for laborers and
5330 mechanics employed on projects of a character similar to the contract work in the civil subdivision of the
5331 state in which the work is to be performed. Additional information regarding compliance with the *Davis-*
5332 *Bacon Act*, including Department of Labor wage determinations, is available at
5333 <http://www.dol.gov/whd/govcontracts/dbra.htm>.
5334

5335 The following types of construction and renovation projects are allowable under PSGP, provided they
5336 address a specific vulnerability or need identified in AMSP or otherwise support the
5337 maintenance/sustainment of capabilities and equipment acquired through PSGP funding:
5338

- 5339 • Maritime Command and Control Centers;
- 5340 • Interagency Operations Centers (IOCs) for maritime security;
- 5341 • Port Security Emergency Communications Centers;
- 5342 • Buildings to house generators that support maritime security risk mitigation;
- 5343 • Maritime security risk mitigation facilities (e.g., dock house, ramps, and docks for existing port
5344 security assets);
- 5345 • Hardened security fences/barriers at access points;
- 5346 • Any other building or physical facility that enhances access control to the port/MTSA facility area;
5347 and
- 5348 • PSGP funding may be used to purchase and/or upgrade a barge to support a staging area for
5349 maritime/port security patrols or maritime security risk mitigation responses. (Certain areas
5350 throughout the Nation may require a barge that can be permanently anchored or moored in certain
5351 areas to support maritime security risk mitigation activities.).
5352

5353 To be considered eligible for funding, the construction of fusion centers, operations centers, or
5354 communications centers must offer a port wide benefit and support information sharing and operational
5355 coordination among regional interagency and other port security partners. Applicants are reminded that the
5356 period of performance is 36 months. Eligible costs for construction or renovation projects may not exceed
5357 \$1 million (federal share) per project, which may not exceed 10% of the total amount of the award, as stated

³ While the *Maritime Transportation Security Act of 2002*, as amended at 46 U.S.C. § 70107(b)(2), requires that such activities are carried out consistent with Section 611(j)(8) of the *Stafford Act*, a subsequent amendment to the *Stafford Act* by section 3 of Pub. L. No. 109-308 in 2006 redesignated the text of Section 611(j)(8) to 611(j)(9). The cross-reference in the *Maritime Transportation Security Act of 2002* has not been updated.

5358 in 46 U.S.C. § 70107(b)(2)(A) and (B) (Section 102 of the *Maritime Transportation Security Act of 2002*,
5359 Pub. L. 107-295, as amended). Grant recipients are not permitted to use PSGP funds for construction
5360 projects that are eligible for funding under other federal grant programs. PSGP funds may only be used for
5361 construction activities directly related to maritime security risk mitigation enhancements.

5362
5363 All construction or renovation projects require Environmental Planning and Historic Preservation (EHP)
5364 review. The recipient is also encouraged to have completed as many steps as possible for a successful EHP
5365 review in support of their proposal for funding (*e.g.*, coordination with the relevant Historic Preservation
5366 Office to identify potential historic preservation issues and to discuss the potential for project effects;
5367 compliance with all state and local EHP laws and requirements). Projects for which the recipient believes an
5368 Environmental Assessment (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01](#),
5369 [Revision 01](#), EHP Directive and Instruction, [FEMA Directive 108-1](#), and [FEMA Instruction 108-1-1](#), must
5370 also be identified to the FEMA HQ Preparedness Officer within the first six months of the award, regardless
5371 of the length of the period of performance. Completed EHP review materials for construction and
5372 renovation projects must be submitted no later than 12 months before the end of the period of performance.
5373 [EHP policy guidance](#) and the [EHP Screening Form](#) can both be found on FEMA.gov. EHP review materials
5374 should be sent to gpdehpinfo@fema.dhs.gov.

5375

5376 **Training and Awareness Campaigns**

5377 *Training and Awareness Campaigns address the Soft Targets/Crowded Places; Cybersecurity; and*
5378 *Training and Awareness Campaign Priorities.*

5379

5380 **Training**

5381 Port areas should assess their training and qualification requirements and coordinate training needs and
5382 qualification requirements of incident response personnel. Funding for personnel training is limited to those
5383 courses that are **essential to enhance *maritime* security**. A listing of courses that are currently approved for
5384 PSGP funding is included in the table below.

5385

5386 Some training activities require EHP Review, including exercises, drills or trainings that require any type of
5387 land, water, or vegetation disturbance or building of temporary structures or that are not located at facilities
5388 designed to conduct training and exercises. Additional information on training requirements and EHP review
5389 can be found online at [Environmental & Historic Preservation Grant Preparation Resources | FEMA.gov](#).

5390

5391 Funding for training courses not listed in Table 3 may be permitted on a case-by-case basis depending on
5392 the specific maritime security risk mitigation training needs of the eligible PSGP applicant. In such cases,
5393 an applicant will be required to explain in the IJ why none of the approved courses referenced in Table 3
5394 satisfy the identified training need and must submit detailed course information for review and
5395 consideration by the local COTP field review team and the Nation Review Panel.

5396

5397 Further, in accordance with 46 U.S.C. § 70107(c)(2)(C), no cost share is required to train public safety
5398 personnel in the enforcement of security zones under section 46 U.S.C. § 70132 or assisting the
5399 enforcement of such security zones. Per 46 U.S.C. § 70132(d), the term “public safety personnel” includes
5400 any federal, state (or political subdivision thereof), territorial, or tribal law enforcement officer, firefighter,
5401 or emergency response provider

5402

5403 Training denoted with an asterisk (*) in the table below is exempt from cost share only to train public safety
5404 personnel who enforce security zones. Additional training of public safety personnel may be exempt if
5405 specifically identified by the COTP as exempt and necessary for enforcement or the assistance of
5406 enforcement of security zones as specified by 46 U.S.C. § 70132. **Requests that fail to include a cost**
5407 **share for training that is not exempt from cost share requirements as outlined in 46 U.S.C. § 70132**

5408 **will not be considered for funding.** Training for public safety personnel who do not provide enforcement
 5409 of security zones are not exempt from cost share. Training rosters and certificates must be provided to
 5410 FEMA upon request. Please consult your COTP prior to requesting cost share exempt training for
 5411 enforcement of security zones. Refer to Section C.4 of the NOFO for more specific cost share information
 5412 for that specific year’s requirements.

5413
 5414 Seminars and workshops are not considered “Training”, however applicants wishing to host seminars or
 5415 workshops with PSGP funding may be eligible for funding following the criteria set forth in the “Exercise”
 5416 section of this guidance.

5417
 5418

Table 3: Approved PSGP Training Courses

National Training and Education Division	
Course Number	Course Name
AWR-144	Port and Vessel Security for Public Safety and Maritime Personnel
AWR-213	Critical Infrastructure Security and Resilience Awareness
AWR-366-W	Developing a Cyber Security Annex for Incident Response
MGT-335	Event Security Planning for Public Professionals
MGT-335-W	Event Security Planning for Public Professionals, Web Based
MGT-400	Master of Arts Degree in Homeland Security
MGT-425	Homeland Security Executive Leaders Program (ELP)
MGT-452	Physical and Cybersecurity for Critical Infrastructure
MGT-456	Integration of Cybersecurity Personnel into the Emergency Management Operations Center for Cyber Incidents
PER-330	The Surface Transportation Emergency Preparedness and Security for Mass Transit and Passenger Rail (STEPS-PT)
PER-331	Surface Transportation Emergency Preparedness and Security for Senior Officials or Administrators (STEPS Sr)
Federal-Sponsored	
Course Number	Course Name
DHS-006-PREV	Seaport Security Anti-Terrorism Training Program (SSATP)
DHS-011-PREV	Maritime PRND Operations Course
DHS-016-PREV	Protective Measures Training for Security Officers, Mid-Level Safety/Security Supervisors, and Property Managers
*DHS-011-PROT	NASBLA BOAT Tactical Operators Course
*DHS-009-PROT	Boat Operator’s Anti-Terrorism Training
DHS-126-RESP	NASBLA BOAT Crew Member Course
*DHS-128-RESP	NASBLA - Pursuit and Stop Course
State-Sponsored	
Course Number	Course Name
CA-006-PREV	Maritime Company, Vessel, and Facility Security Officer
CA-007-PREV	Basic Maritime Security Awareness
CA-008-PREV	Basic First Responder Operational Maritime Security (FROMS)
CA-015-RESP	Maritime Facility Security Officer
CA-020-RESP	WMD & Terrorism Awareness for Security Professionals
ME-001-PROT	Maritime Security Awareness for Military, First Responder and Law Enforcement Personnel
ME-002-PROT	Command Strategies and Tactics for Marine Emergencies
*ME-003-PROT	Tactical Boat Operations for Maritime Security and LE Personnel
ME-002-RESP	Emergency Medical Operations in the Maritime Domain
NJ-003-PREV	Government Agency Maritime Security Awareness Program (GAMSAP)

NJ-015-PREV	Security Awareness & Vigilance for Everyone
NY-001-PREV	Maritime Infrastructure Protection
NY-001-PROT	Safe Boat Operators
*NY-002-PREV	Tactical Escorts and Security Zones
NY-002-PROT	Pattern Line Search/Recovery Course
NY-004-RESP	Vehicle Borne Improvised Explosive Device Security Checkpoint
Federal Law Enforcement Training Center (FLETC)	
Course Number	Course Name
*MTOTP	Marine Law Enforcement Training Program
IBOT	Inland Boat Operator's Training
ENTP	Electronic Navigation Training Program
*BOAT	Boat Operator's Anti-Terrorism Training Program
*MLETP	Marine Law Enforcement Training Program
*CVBTP	Commercial Vessel Boarding Training Program
*SSATP	Seaport Security Anti-Terrorism Training Program

5419

5420 **Exercises**

5421 *Exercise activities address the Soft Targets/Crowded Places; Cybersecurity; and Exercises Priorities.*

5422

5423 Exercises funded under the PSGP typically include Seminars, Workshops, Tabletop, Functional, Drills, and
 5424 Full-Scale exercises. PSGP-funded exercises must have a maritime security focus and include applicable
 5425 documentation, after action reports, and improvement plans. See below for additional information.

5426

5427 Maritime entity training needs and qualification requirements of incident response personnel should be
 5428 regularly tested through emergency exercises and drills. Exercises must test operational protocols that
 5429 would be implemented in the event of a terrorist attack in the maritime environment in accordance with the
 5430 Area Maritime Security Training Exercise Program (AMSTEP) or the TSA Intermodal Security Training
 5431 Exercise Program (I-STEP) guidelines. AMSTEP or I-STEP exercises will follow the latest change in
 5432 requirements contained in the Navigation and Inspection Circular (NVIC) 09-02. Exercises must be
 5433 designed, developed and conducted consistent with the [Homeland Security Exercise and Evaluation
 5434 Program \(HSEEP\)](#). Funding used for exercises will only be permitted for those exercises that are in direct
 5435 support of a MTSA-regulated facility or a port area's MTSA-required exercises (*see* 33 C.F.R. § 105.220
 5436 for a facility and 33 C.F.R. § 103.515 for the AMSP). These exercises must be coordinated with the COTP
 5437 and AMSC and be consistent with HSEEP. More information on HSEEP may be found at
 5438 <https://www.fema.gov/emergency-managers/national-preparedness/exercises/hseep>.

5439

5440 Some exercise activities require EHP Review, including exercises, drills or trainings that require any type of
 5441 land, water, or vegetation disturbance or building of temporary structures or that are not located at facilities
 5442 designed to conduct training and exercises. Additional information on training requirements and EHP review
 5443 can be found online at [Environmental & Historic Preservation Grant Preparation Resources | FEMA.gov](#).

5444

5445 Recipients are required to submit an After-Action Report/Improvement Plan (AAR/IP) for each PSGP-
 5446 funded exercise to hseep@fema.dhs.gov, and the appropriate local COTP no later than 90 days after
 5447 completion of the exercise conducted within the PSGP period of performance (POP). Recipients are
 5448 reminded of the importance of implementing corrective actions iteratively throughout the progressive
 5449 exercise cycle. Recipients are required to use the HSEEP AAR/IP template located at
 5450 <https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning>.

5451

5452 Recipients of PSGP funding for exercises should verify in progress reports the completion of the
5453 exercise(s), after-action report(s), improvement plan(s), and notifications made to hseep@fema.dhs.gov and
5454 the COTP.

5455

5456 PSGP funds may be used for the following exercise activities:

5457

5458 **Funds Used to Design, Develop, Conduct, and Evaluate an Exercise.** This includes costs related to
5459 planning, meeting space, and other meeting costs, facilitation costs, materials and supplies, travel, and
5460 documentation. Exercises afford organizations the opportunity to validate plans and procedures, evaluate
5461 capabilities, and assess progress toward meeting capability targets in a controlled, low risk setting. Any
5462 shortcoming or gap identified, including those for children and individuals with disabilities or other access
5463 and functional needs, should be identified in an effective corrective action program that includes
5464 development of improvement plans that are dynamic documents, with corrective actions continually
5465 monitored and implemented as part of improving preparedness through the exercise cycle.

5466

5467 **Hiring of Full- or Part-Time Staff or Contractors/Consultants.** Full- or part-time staff may be hired to
5468 support exercise-related activities. Hiring of contractors/consultants must follow the applicable federal
5469 procurement requirements at 2 C.F.R. §§ 200.317-200.327. Such costs must be included within the funding
5470 allowed for program management personnel expenses, which must not exceed 10% of the total allocation.
5471 Dual compensation is never allowable, meaning, in other words, that an employee of a unit of government
5472 may not receive compensation from his or her unit or agency of government and from an award for a single
5473 period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both entities. Personnel
5474 hiring, overtime, and backfill expenses are permitted under this grant only to the extent that such expenses
5475 are for the allowable activities within the scope of the grant.

5476

5477 **Overtime and Backfill Costs.** The entire amount of overtime costs, including payments related to
5478 backfilling personnel that are the direct result of time spent on the design, development and conduct of
5479 exercises are allowable expenses. These costs are allowed only to the extent the payment for such services
5480 is in accordance with the policies of the state or unit(s) of local government and has the approval of the state
5481 or the awarding agency, whichever is more restrictive. Dual compensation is never allowable.

5482

5483 **Travel.** Domestic travel costs are allowable as expenses by employees who are on travel status for official
5484 business related to the planning and conduct of exercise project(s). International travel costs are not
5485 permitted.

5486

5487 **Supplies.** Supplies are items that are expended or consumed during the course of the planning and conduct
5488 of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective equipment).

5489

5490 **Other Items.** These costs include the rental of space/locations for exercise planning and executing, rental of
5491 equipment, etc. Recipients are encouraged to use free public space, locations, or facilities, whenever
5492 available, prior to the rental of space, locations, or facilities. These also include costs that may be associated
5493 with inclusive practices and the provision of reasonable accommodations and modifications to provide full
5494 access for children and adults with disabilities.

5495

5496 The National Exercise Program (NEP) serves as the principal exercise mechanism for examining national
5497 preparedness and measuring readiness. Recipients are strongly encouraged to nominate exercises into the
5498 NEP. For additional information on the NEP, please refer to [http://www.fema.gov/national-exercise-](http://www.fema.gov/national-exercise-program)
5499 [program](http://www.fema.gov/national-exercise-program).

5500

5501 **Management and Administration (M&A)**

5502 M&A costs are allowed under this program. M&A costs are activities directly related to managing and
5503 administering the award. Recipients may use up to 5% of the amount of the award for their M&A. PSGP
5504 funds may be used for the following M&A costs:

- 5505
- 5506 • Hiring full-time or part-time staff, including contractors and consultants, to execute the following:
 - 5507 ○ Management of the awarded fiscal years' PSGP award;
 - 5508 ○ Design and implementation of the awarded fiscal years' PSGP submission meeting
 - 5509 compliance with reporting/data collection requirements, including data calls;
 - 5510 ○ Information collection and processing necessary to respond to FEMA data calls;
 - 5511 ○ Travel expenses related to PSGP grant administration; and
 - 5512 ○ Acquisition of authorized office equipment, including personal computers or laptops for
 - 5513 PSGP M&A purposes.
- 5514

5515 **Allowable Indirect Costs**

5516 Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost Rates”
5517 Section in “Pre-Submission Information” for more information.

5518

5519 **Unallowable Costs**

5520 Projects that do not provide a compelling maritime security benefit or have a direct nexus toward maritime
5521 security risk mitigation are not permitted. For example, projects that are primarily for economic or safety
5522 benefit (as opposed to having a direct maritime security risk mitigation benefit) are ineligible for PSGP
5523 funding. In addition, projects that provide a broad homeland security benefit (e.g., a communication system
5524 or fusion center for an entire city, county, state, etc.) as opposed to providing primary benefit to the port are
5525 ineligible for PSGP funding since these projects should be eligible for funding through other preparedness
5526 grant programs. The following projects and costs are considered ineligible for award consideration:

5527

- 5528 • *Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment](#)*
5529 *[Under FEMA Awards](#), and may not be used for the purchase of the following equipment:*
5530 *firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles*
5531 *of any kind with weapons installed;*
- 5532 • Projects in which federal agencies are the primary beneficiary or that enhance federal property,
5533 including sub-components of a federal agency;
- 5534 • Projects that study technology development for security of national or international cargo supply
5535 chains (e.g., e-seals, smart containers, container tracking or container intrusion detection devices);
- 5536 • Proof-of-concept projects;
- 5537 • Development of training;
- 5538 • Projects that duplicate capabilities being provided by the Federal Government (e.g., vessel traffic
5539 systems);
- 5540 • Business operating expenses (certain security-related operational and maintenance costs are
5541 allowable—see “Maintenance and Sustainment” and “Operational Costs” for further guidance);
- 5542 • Transportation Worker Identification Credential (TWIC) card fees;
- 5543 • Reimbursement of pre-award security expenses;
- 5544 • Outfitting facilities, vessels, or other structures with equipment or items providing convenience
5545 rather than a direct security benefit. Examples of such equipment or items include but are not
5546 limited to office furniture, CD players, DVD players, AM/FM radios, TVs, stereos, entertainment
5547 satellite systems, entertainment cable systems and other such entertainment media, unless sufficient
5548 justification is provided. This includes weapons and associated equipment (i.e., holsters, optical

- 5549 sights, and scopes), including but not limited to, non-lethal or less-than-lethal weaponry including
 5550 firearms, ammunition, and weapons affixed to facilities, vessels, or other structures;
- 5551 • Standard issue uniforms (other than maritime security personal protective equipment [PPE]);
 - 5552 • Expenditures for items such as general-use software, general-use computers, and related equipment
 5553 (other than for allowable M&A activities, or otherwise associated) preparedness or response
 5554 functions), general-use vehicles and licensing fees;
 - 5555 • Land acquisitions and right of way purchases;
 - 5556 • Funding for standard operations vehicles utilized for routine duties, such as patrol cars and fire
 5557 trucks;
 - 5558 • Fuel costs (except as permitted for training and exercises);
 - 5559 • Exercise(s) that do not support maritime security preparedness efforts;
 - 5560 • Patrol vehicles and firefighting apparatus, other than those CBRNE detection equipped vehicles for
 5561 port area and/or facility patrol or response purposes;
 - 5562 • Specialty vehicles such as trucks for towing boat trailers/equipment and armored personnel carriers;
 - 5563 • Providing protection training to public police agencies or private security services to support
 5564 protecting VIPs or dignitaries;
 - 5565 • Aircraft pilot training, including aircraft operations such as aircraft ditch training;
 - 5566 • Post incident investigation training;
 - 5567 • Basic or advanced dive training (except marine unit CBRNE detection/response dive training);
 - 5568 • Training for personnel not primarily assigned to maritime security activities or MTSA required
 5569 security personnel (e.g., vessel patrol officers, facility security officers); and
 - 5570 • Reimbursement for the maintenance and wear and tear costs of general use vehicles (e.g.,
 5571 construction vehicles) and emergency response apparatus (e.g., fire trucks, ambulances, repair, or
 5572 cleaning of PPE, etc.).
- 5573

5574 **Maintenance and Sustainment Costs**

5575 The use of FEMA preparedness grant funds for maintenance contracts or agreements, warranty coverage,
 5576 repair or replacement costs, licenses, upgrades, and user fees are allowable under all active and future grant
 5577 awards, unless otherwise noted. These contracts may exceed the period of performance if they are
 5578 purchased incidental to the original purchase of the system or equipment as long as the original purchase of
 5579 the system or equipment is consistent with that which is typically provided for, or available through, these
 5580 types of agreements, warranties, or contracts. When purchasing a stand-alone warranty or extending an
 5581 existing maintenance contract on an already-owned piece of equipment system, coverage purchased may
 5582 not exceed the period of performance of the award used to purchase the maintenance agreement or
 5583 warranty. As with warranties and maintenance agreements, this extends to licenses and user fees as well.
 5584 Under PSGP, maintenance and sustainment is focused specifically on the repair and replacement of existing
 5585 equipment and does not include routine activities such as oil changes or washing/cleaning existing
 5586 equipment. For example, an IJ for a camera system maintenance contract should detail the number of
 5587 cameras the applicant anticipates repairing/replacing during the period of performance (i.e., the port
 5588 operates 100 cameras and typically replaces 10% of the system each year, funding is for the replacement of
 5589 30 cameras over the 3-year period of performance.

5590

5591 Grant funds are intended to support the National Preparedness Goal and fund projects that build and sustain
 5592 the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover
 5593 from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients the
 5594 ability to meet this objective, the policy set forth in [IB 379: Guidance to State Administrative Agencies to](#)
 5595 [Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible
 5596 maintenance and sustainment costs that must be in (1) direct support of existing capabilities; (2) must be an
 5597 otherwise allowable expenditure under the applicable grant program, and (3) be tied to one of the core

5598 capabilities in the five mission areas outlined in the Goal. Additionally, eligible costs may also be in support
5599 of equipment, training, and critical resources that have previously been purchased with either federal grant
5600 or any other source of funding other than FEMA preparedness grant program dollars.
5601

5602 Port-Wide Risk Management Plans

5603 Port areas with existing PRMPs are encouraged to maintain their PRMPs and use them to identify projects
5604 that will serve to address remaining maritime security vulnerabilities. These ports are also encouraged to
5605 develop or maintain a BCRTTP. For purposes of regional strategic and tactical planning, these plans must
5606 take into consideration all port areas covered by their AMSP, align with the port area’s AMSP, consider the
5607 entire port system strategically as a whole, and identify actions designed to effectively mitigate security
5608 risks associated with the system’s maritime critical infrastructure and key resources.
5609

5610 Additional Port Security Resources

- 5611 • U.S. Department of Transportation “BUILD” grants for National Infrastructure Investments may
5612 include funding to support roads, bridges, transit, rail, ports, or intermodal transportation, see
5613 <https://www.transportation.gov/BUILDgrants>
- 5614 • Cybersecurity assessments may be available via CISA, see [https://www.cisa.gov/cyber-resource-](https://www.cisa.gov/cyber-resource-hub)
5615 [hub](https://www.cisa.gov/cyber-resource-hub)
5616

5617 Sample Memorandum of Understanding/Agreement (MOU/MOA)

5618 The sample MOU/MOA below demonstrates all of the elements required in the PSGP NOFO for
5619 acceptance for review as part of a grant application from a state or local agency providing security services
5620 to MTSA-regulated entities.
5621

**Memorandum of [Understanding / Agreement]
Between [provider of layered security] and [recipient of layered security]
Regarding [provider of layered security's] Use of Port Security Grant Program Funds**

1. **PARTIES.** The parties to this Agreement are the [Provider of Layered Security] and the [Recipient of security service].
 2. **AUTHORITY.** This Agreement is authorized under the provisions of [applicable Area Maritime Security Committee (AMSC) authorities and/or other authorities].
 3. **PURPOSE.** The purpose of this Agreement is to set forth terms by which [Provider of security service] shall expend Port Security Grant Program project funding in providing security service to [Recipient of security service]. Under requested PSGP grant, the [Provider of security service] must provide layered security to [Recipient of security service] consistent with the approach described in an approved grant application.
 4. **RESPONSIBILITIES:** The security roles and responsibilities of each party are understood as follows:
 - (1) [Recipient of security service]
Roles and responsibilities in providing its own security at each MARSEC level
 - (2) [Provider of security service]
 - [-An acknowledgement by the facility that the applicant is part of their facility security plan.]
 - [-The nature of the security that the applicant agrees to supply to the regulated facility (waterside surveillance, increased screening, etc.).]
 - [-Roles and responsibilities in providing security to [Recipient of security service] at each MARSEC level.]
 5. **POINTS OF CONTACT.** [Identify the POCs for all applicable organizations under the Agreement; including addresses and phone numbers (fax number, e-mail, or internet addresses can also be included).]
 6. **OTHER PROVISIONS.** Nothing in this Agreement is intended to conflict with current laws or regulations of [applicable State] or [applicable local Government]. If a term of this agreement is inconsistent with such authority, then that term shall be invalid, but the remaining terms and conditions of this agreement shall remain in full force and effect.
 7. **EFFECTIVE DATE.** The terms of this agreement will become effective on [EFFECTIVE DATE].
 8. **MODIFICATION.** This agreement may be modified upon the mutual written consent of the parties.
 9. **TERMINATION.** The terms of this agreement, as modified with the consent of both parties, will remain in effect until the grant end dates for an approved grant. Either party upon [NUMBER] day's written notice to the other party may terminate this agreement.
- APPROVED BY:** Organization and Title

5622
5623

5624 **PSGP Investment Modifications**

5625 The purpose of the grant award is to implement projects pursuant to the authorities at 46 U.S.C. § 70107.
5626 Under extreme circumstances, a recipient may reallocate award funds from one project to another with prior
5627 written approval from FEMA, and in a manner consistent with 2 C.F.R. § 200.308 as long as it does not
5628 change the overall scope or objective of the award. Circumstances include, but are not limited to, an
5629 inability to complete the original project, disaster events perpetuating an immediate need to reprioritize
5630 funds, and changes in regulatory requirements. A recipient must explain the deviation from the original
5631 project, including why it is deviating from or scaling down the original project, and what specific
5632 circumstances that occurred after the time of its award that necessitate the reallocation request, in its
5633 reallocation request. The recipient must also identify how the reallocation request aligns with PSGP
5634 priorities and the recipient's original application and the award's scope of work. Due to legal limitations,
5635 reallocation requests that would change the scope of the overall project(s) are not permitted. FEMA will
5636 also coordinate such reallocation requests with the USCG COTP, and these requests must be verified and
5637 supported by the COTP as essential in addressing Port Area priorities. Please also see Section C.4 of this
5638 NOFO regarding cost share requirements, including the implications if the project costs are less than what
5639 was applied for.

Program Appendix H:

Emergency Management Performance Grant Program

As a reminder, while this appendix contains [Emergency Management Performance Grant \(EMPG\) Program](#)-specific information and requirements, the main content of this Manual (non-appendix information) contains important information relevant to **all** preparedness grant programs, including the EMPG Program.

NOTE: An “EMPG Requirements Matrix” is provided at the end of this Appendix. It is intended to serve as a useful reference for grant recipients and subrecipients by capturing all of the various programmatic and financial requirements associated with the FY 2023 EMPG Program.

EMPG Program Priorities

The national priorities for the FY 2023 EMPG Program are:

- Equity
- Climate Resilience
- Readiness

These priorities correspond directly to goals outlined in the [2022-2026 FEMA Strategic Plan](#). All EMPG Program recipients are encouraged to review the strategic plan and consider how FY 2023 EMPG Program funding can be used to support the Plan’s goals and objectives as they apply to the state/territory’s specific needs and the needs of the whole community. The national priorities are explained in further detail in the FY 2023 EMPG Program Notice of Funding Opportunity (NOFO).

Alignment of the EMPG Program to the National Preparedness System

The EMPG Program contributes to the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities. Core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the National Preparedness Goal (the Goal). The EMPG Program’s allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas described in the Goal.

FEMA requires recipients to prioritize grant funding to demonstrate how EMPG Program-funded investments support 1) building or sustaining those capabilities that are identified as high priority through the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) process and other relevant information sources, such as: i) after-action reports (AARs) following exercises or real-world events; ii) audit and monitoring findings; iii) Hazard Mitigation Plans; and/or iv) other deliberate planning products; and 2) closing capability gaps that are identified in the state or territory’s most recent SPR. To better understand the relationship between building capabilities and closing capability gaps, refer to [Comprehensive Preparedness Guide \(CPG\) 201: Threat and Hazard Identification and Risk Assessment \(THIRA\) and Stakeholder Preparedness Review \(SPR\) Guide](#). In advance of issuing the FY 2023 EMPG Program awards, FEMA Regional Administrators will identify individual regional priorities based on their unique knowledge of each region’s preparedness and emergency management needs and will share those priorities with the states and territories within their region. The final priorities will be identified and mutually agreed to by the state/territory and Regional Administrator through a collaborative negotiation process. Ideally, all EMPG Program-funded projects, as outlined in the approved FY 2023 EMPG Program Work Plan, will support the priorities identified through this collaborative approach. See the [EMPG Program Work Plan](#) section for additional guidance.

FEMA continues to place emphasis on capabilities that address the greatest risks to the security and resilience of the United States. When applicable, funding should support deployable assets that can be used anywhere in the Nation through automatic assistance and mutual aid agreements, including, but not limited to, the [Emergency Management Assistance Compact](#). The EMPG Program supports investments that improve the ability of jurisdictions nationwide to:

- Prevent a threatened or an actual act of terrorism;
- Protect our citizens, residents, visitors, and assets against the greatest threats and hazards;
- Mitigate the loss of life and property by lessening the impact of future disasters;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident; or
- Recover through a focus on the timely restoration, strengthening, and revitalization of infrastructure, housing, and a sustainable economy, as well as the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident.

The core capabilities contained in the Goal are highly interdependent and require the use of existing preparedness networks and activities to improve training and exercise programs, innovation, and appropriate administrative, finance, and logistics systems.

Implementation of the National Preparedness System

Identifying and Assessing Risk and Estimating Capability Requirements

By December 31, 2022, recipients were required to complete a THIRA/SPR that addresses all 32 core capabilities and is compliant with [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#). Recipients are required to submit a THIRA every three (3) years to establish a consistent baseline for assessment. 2022 is the start of the new 3-year THIRA/SPR cycle and baseline assessment year for existing recipients. Any new grant recipients during calendar year 2023, for which the THIRA/SPR requirement applies, will start their new 3-year THIRA/SPR cycle and baseline assessment year in 2023. Specific guidance on the requirements for each core capability is provided through program implementation support and supplemental guidance, as some core capabilities have fewer reporting requirements than others. Recipients must continue to respond to a series of planning-related questions as part of the THIRA/SPR process.

While the THIRA is only required every three years, jurisdictions are required to submit an SPR annually. The submission deadline is December 31st each year (as applicable). For additional guidance on the THIRA/SPR, please refer to [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#). Recipients are also encouraged to refer to the [Preparedness Toolkit](#), which is an online portal that provides the whole community with tools to aid in implementing all six areas of the National Preparedness System.

Reporting:

- All EMPG Program recipients are required to submit a Biannual Strategy Implementation Report (BSIR) no later than 30 days after the end of each semi-annual reporting period. The BSIR is submitted via [the Grants Reporting Tool \(GRT\)](#).
 - For the reporting period January 1-June 30, the BSIR is due no later than July 30
 - For the reporting period July 1-December 31, the BSIR is due no later than January 30
- In each EMPG Program recipient's Performance Progress Report (PPR), submitted via ND Grants on a quarterly basis, the recipient must describe how expenditures support building capability, closing capability gaps, or sustaining capabilities identified in the THIRA/SPR process. EMPG Program recipients will, on a project-by-project basis, check one of the following:

- Building a capability with EMPG Program funding; or
- Sustaining a capability with EMPG Program funding.

Building and Sustaining Core Capabilities

Recipients must describe how proposed EMPG Program-funded projects will close capability gaps or sustain capabilities identified through the THIRA/SPR process, particularly SPR Step 2 (see [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#)), or other relevant information sources that identify capability needs. See [EMPG Program Work Plan](#) section for additional guidance and requirements.

National Incident Management System (NIMS) Implementation

EMPG Program recipients and subrecipients are required to implement NIMS. NIMS guides all levels of government, nongovernmental organizations (NGO), and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. EMPG Program recipients must use standardized resource management concepts for resource typing, credentialing, and an inventory to facilitate the effective identification, dispatch, deployment, tracking, and recovery of resources.

EMPG Program funds may be used for NIMS implementation; specifically, to meet the requirements described in the [NIMS Implementation Objectives for Local, State, Tribal, and Territorial Jurisdictions](#). This document should be used as a guide for both identifying NIMS implementation objectives and needs and as a tool for evaluating NIMS compliance. Additional information about NIMS implementation is available at [NIMS Implementation and Training](#).

Reporting:

- Recipients will answer questions in the applicable secondary NIMS assessment portion of the Unified Reporting Tool (URT) as part of a jurisdiction’s THIRA/SPR submission. This involves reporting on the status of the qualification system used within the jurisdiction and sub-jurisdictions, as outlined in the EMPG Program NOFO.
- Reporting will also be through a review by the FEMA Regional NIMS Coordinators during annual technical assistance visits with the states, tribes, and territories within their regions.

National Qualifications System (NQS) Implementation

For FY 2023, as a post-award requirement, all recipients in the 50 states and District of Columbia must work towards achieving the Phase 1 NQS Implementation Objectives outlined in the table below and must, at a minimum, execute the Implementation Plan they developed last year as part of the Phase 0 NQS Implementation Objectives. Jurisdictions that began implementation in FY 2023 shall have designed and adopted organizational qualification system procedures, a certification program and credentialing standards for incident workforce personnel in alignment with the NIMS Guideline for the National Qualification System. All other jurisdictions (including territories and FY 2023 EMPG Program subrecipients) are required to work toward implementation of NQS by developing an Implementation Plan, using the FEMA-provided [two-page template](#) referenced in the table below.

For all states and territories, the following requirements shall apply:

- At a minimum, only **EMPG Program-funded deployable personnel, as determined by each recipient organization**, will be required to meet NQS certification requirements.

- Recipients and subrecipients will be considered in compliance with the NQS requirements as long they are **working towards implementing** the NQS Implementation Objectives as outlined in the table below.
- The expected completion date for each phase of the NQS Implementation Objectives is December 31 of the applicable calendar year (CY).

Additional NQS Implementation Guidance can be found at: [National Qualification System Supplemental Documents | FEMA.gov](https://www.fema.gov/national-qualification-system-supplemental-documents).

NQS Implementation Phase Objectives	
Phase 0: NQS Implementation Objectives for CY 2022	Example Indicators
<ul style="list-style-type: none"> ▪ Only the 50 States, the District of Columbia and Puerto Rico shall work toward implementation of NQS by developing an Implementation Plan, using the FEMA-provided two-page template. ▪ The Implementation Plan will identify a jurisdiction’s timeline for implementing NQS by CY 2025. ▪ All other jurisdictions are encouraged to begin working toward identifying, at a minimum, frequently deployed positions and implementation but will not be required until CY 2023. 	<ul style="list-style-type: none"> ▪ Completion of a jurisdiction implementation plan. ▪ Identification of implementation challenges.
Phase 1: NQS Implementation Objectives for CY 2023	Example Indicators
<ul style="list-style-type: none"> ▪ All jurisdictions shall work toward implementation of NQS by developing an Implementation Plan, using the FEMA-provided two-page template. ▪ Jurisdictions that began implementation in CY 2022 shall have designed and adopted organizational qualification system procedures, a certification program and credentialing standards for incident workforce personnel in alignment with the NIMS Guideline for the National Qualification System. 	<ul style="list-style-type: none"> ▪ Completion of a jurisdiction implementation plan. ▪ Identification of implementation challenges. ▪ Qualification policies and procedures approved by the jurisdiction. Procedures may include: <ul style="list-style-type: none"> – Establishment of a Qualification Review Board, or equivalent review processes for incident workforce personnel qualifications. – Individual and team coach and evaluation processes for incident workforce personnel qualifications.

Phase 2: NQS Implementation Objectives for CY 2024	Example Indicators
<ul style="list-style-type: none"> ▪ All jurisdictions shall have designed and approved organizational qualification system procedures, certification program and credentialing standards for incident workforce personnel in alignment with the NIMS Guideline for the National Qualification System. ▪ Jurisdictions that began implementation in CY 2022 shall have issued position task books (PTBs) to incident workforce personnel, as designated by the jurisdiction, and ensure incident workforce personnel show progress in working towards task endorsements and minimum training requirements. ▪ In CY 2024, all jurisdictions partially satisfy the requirement by ensuring incident workforce personnel, which they designate, meet the minimum training requirements from the Job Title/Position Qualification. ▪ Jurisdictions shall use a resource management or qualification tool system to track the qualification, certification and credentialing of incident workforce personnel. 	<ul style="list-style-type: none"> ▪ Qualification policies and procedures approved by the jurisdiction. ▪ Minimum criteria that trainees must meet to be qualified in a specific position is outlined in the NQS Job Title/Position Qualification. ▪ PTB issuance and completion data. ▪ Adoption of a resource management system such as OneResponder, which is a web-based application hosted in a cloud environment. It allows AHJs to manage qualifications of personnel.
Phase 3: NQS Implementation Objectives for CY 2025	Example Indicators
<ul style="list-style-type: none"> ▪ All jurisdictions shall have issued PTBs to incident workforce personnel, which they designate, and ensure incident workforce personnel show progress in working towards task endorsements and minimum training requirements. 	<ul style="list-style-type: none"> ▪ PTB issuance and completion data.

Reporting:

Data collection and reporting on NQS implementation will be addressed via the following:

- NIMS secondary assessment questions on the URT. This involves reporting on the status of the qualification system used within the jurisdiction and sub-jurisdictions.
- NIMS Regional Coordinator Program Guide that allows Regional NIMS Coordinators to review state NIMS programs by the end of CY 2023.
- Review by the Regional NIMS Coordinators during annual technical assistance visits with the states, tribes, and territories within their regions.

Logistics Planning

Distribution Management Plans

EMPG Program recipients are required to develop and maintain a Distribution Management (DM) plan as an annex to their existing Emergency Operations Plan (EOP). [Comprehensive Preparedness Guide \(CPG\) 101](#) provides guidance on the fundamentals of planning and development of Emergency Operations Plans. The [Distribution Management Plan Guide 2.0 \(fema.gov\)](#) released in January 2022 provides information on how to develop the DM plan annex, key DM plan components, how to review and update a DM plan, and how FEMA reviews and evaluates the plans.

A state/territory should submit its DM Plan as both a Word document and PDF to its FEMA Regional Grants Division. The maturity level of the plan may vary by state/territory, but the recipient is required to submit a DM Plan that accurately reflects the state or territory's current capabilities and capacity to distribute resources to survivors after a disaster and addresses the following components: Requirements Defining; Resource Ordering; Distribution Methods; Inventory Management; Transportation; Staging; and Demobilization.

The DM plan must be reviewed by recipients on an annual basis and updated as necessary by September 30th of each calendar year. In the applicable secondary CPG 101 assessment portion of the online URT, jurisdictions capture whether they have developed and incorporated a DM plan in their EOP.

- The DM plan should focus on the distribution of commodities and supplies such as food, water, generators and tarps to survivors following a disaster.
- The DM plan should address strategies/plans for the following:
 - Requirements Defining
 - Resource Ordering
 - Distribution Methods
 - Inventory Management
 - Staging Areas
 - Transportation
 - Demobilization

FEMA Regional Logistics Branch staff will work with EMPG Program recipients to provide technical assistance during the development and maintenance of their DM plans, and to ensure all recipients have effective DM plans capable of integrating with federal, NGOs, private sector, and state, local, tribal, and territorial stakeholders during major disasters. Recipients should refer to the following for additional guidance:

- Information Bulletin (IB) 442, [Guidance on Distribution Management Plans for the Fiscal Year 2019 Emergency Management Performance Grants Program](#); and
- Distribution Management Plan Guidance found at: [Planning Guides | FEMA.gov](#)

Additional Logistics Planning Resources

FEMA recommends that EMPG Program recipients use the following resources in developing their DM plan. To learn more about these programs and documents, or for any questions, please contact the Logistics Section Chief from your FEMA Region.

- **The Logistics Capability Assessment Tool 2 (LCAT2) Flyer:** The LCAT2 Flyer provides an overview of the LCAT2, how it is beneficial, how the LCAT process works, and how to obtain an LCAT2.

- **Points of Distribution (PODs) Training:** FEMA Logistics developed a comprehensive POD training to assist states in developing actionable emergency distribution plans and understanding associated challenges. Additional information, including an explanatory DVD, POD guide, and online exam, are available on the Emergency Management Institute’s (EMI) website at [FEMA - Emergency Management Institute \(EMI\) Course | IS-26: Guide to Points of Distribution](#).
- **Interagency Logistics (IL) Training:** This basic IL training course (Interagency Logistics Training, E8540) familiarizes participants with the IL concepts of planning and response. The course also provides an overview of IL Partner disaster response organizations, discusses parameters for logistics support coordination, and creates a whole community forum to exchange the best logistics practices. Recipients may find more information on this and other courses by visiting the EMI website [Emergency Management Institute | EMI Courses & Schedules \(fema.gov\)](#).
- **Other Logistics Planning Resources:** Recipients will find additional planning guidance at: [Planning Guides | FEMA.gov](#). Specific to logistics planning, [Comprehensive Preparedness Guide \(CPG\) 101, Version 2.0](#) provides guidance on how to incorporate logistics into EOPs. Additionally, the [Supply Chain Resilience Guide](#) provides emergency managers with recommendations and best practices on how to analyze local supply chains and work with the private sector to enhance supply chain resilience using a five-phased approach.

Funding for Critical Emergency Supplies

Critical emergency supplies—such as shelf stable products, water, and basic medical supplies—are an allowable expense under the EMPG Program. Each state must have FEMA’s approval of a five-year viable inventory management plan prior to allocating grant funds for stockpiling purposes. The inventory management five-year plan should include a distribution strategy and related sustainment costs if the grant expenditure is over \$100,000.

Reporting

Annual DM plan reviews will be reported in the Performance Progress Report (PPR) for the quarter ending September 30 of the most recently awarded EMPG Program. Reviews that result in an update must be submitted to the Regional Grants Division Director or Regional EMPG Program Manager for review by regional logistics staff. The Regional Logistics Staff will review and rate the plans using the latest [FEMA Distribution Management Plan Guide 2.0](#).

Evacuation Planning

EMPG Program recipients should review and update their EOP in accordance with [Comprehensive Preparedness Guide \(CPG\) 101 v3, Developing and Maintaining Emergency Operations Plans](#). Recipients are highly encouraged to include an evacuation plan or annex as part of their EOP as well as plans to exercise and validate the evacuation plan and capabilities. At a minimum, recipients should incorporate the National Response Framework’s Mass Evacuation Incident Annex’s planning considerations, and other FEMA documents related to evacuation planning, when developing their own Evacuation Plan or Annex. See [National Response Framework](#) (NRF), Third Edition (June 2016) and [NRF Mass Evacuation Incident Annex](#) (June 2008). Additional National Preparedness resources are available at: [National Preparedness and Planning Guides](#). Specific to evacuation planning, the [Evacuation and Shelter in Place Guidance](#) identifies relevant concepts, considerations, and principles that can inform jurisdictions in planning for evacuation and/or shelter-in-place protective actions.

Disaster Housing Planning

State-Led Disaster Housing Task Force

Based on lessons learned from recent disasters, FEMA strongly encourages EMPG Program recipients to establish a State-Led Disaster Housing Task Force (SLDHTF) plan as part of their EOP or as a standalone document and update their plan at least once every two years.

SLDHTFs lead and coordinate state, local, private sector, and community-based actions to assess housing impacts, identify appropriate post-disaster housing options, and establish processes for expediting post-disaster housing delivery. SLDHTF plans should clearly identify the roles, responsibilities, composition, and mobilization procedures for the SLDHTF, and how the SLDHTF integrates into the incident command structure. To have a successful SLDHTF plan, FEMA encourages recipients to:

- Complete the State Housing Strategy Template; and
- Establish a State Disaster Recovery Coordinator.

State Housing Strategy Template

EMPG Program recipients are strongly encouraged to update their State Housing Strategy using the State Housing Strategy Template as part of their EOP or as a standalone document. In addition to the State Housing Strategy Template, recipients are encouraged to define and emphasize sheltering, short term, and permanent housing planning.

The State Housing Strategy Template helps states identify priorities and document critical, jurisdiction-specific processes and procedures to promote an efficient disaster housing mission. The template walks recipients through the following planning considerations as seen in the table below. See the [State-Administered Direct Housing Grant Guide, July 2020](#) for the template and other supporting information.

State Housing Template Sections and Planning Considerations

Template Section	Planning Considerations
SLDHTF Plan Organization	Participant inclusion, approaches for various types of housing disasters, available materials, available assistance programs, and sources for surge staffing
Housing Background	Identifying a jurisdiction’s current housing situation, priorities, capabilities, challenges, and known risks
Sheltering Phase Strategy	Identifying planning leads, current resources, timeline, key partners, cross-jurisdictional agreements, and other risks
Interim Housing Strategy	Identifying planning leads, current resources and capabilities, known areas of difficulty, key partners, relocation strategies, and risks
Permanent Housing Strategy	Identifying planning leads, long-term housing needs and prioritizations, current resources and capabilities, known areas of implementation challenges, relocation strategies, and risks
Pre-Disaster Activities	Creating communication plans, survivor transition plans, mitigation plans, and program closeout goals
Post-Disaster Activities	Prioritizing disaster housing recovery activities, creating timelines for project completion, documenting planned actions for assessing the availability of affordable housing resources and expediting the delivery of housing by expediting permitting and waiver processes, establishing an information sharing method, creating an Environmental Planning and Historic Preservation (EHP) strategy,

Template Section	Planning Considerations
	identifying potential locations for Manufactured Housing Units and Recreational Vehicles, and identifying available federal disaster housing assistance

State-Administered Direct Housing Implementation

FEMA encourages states to develop the capacity to administer FEMA Direct Housing Assistance through a reimbursable Inter-Governmental Service Agreement (IGSA). Under this arrangement, FEMA determines disaster survivors' eligibility for specific direct housing options and makes all determinations regarding continuing eligibility, appeals, and eligibility terminations. FEMA also monitors the state's administration of approved Direct Housing Options to ensure compliance with federal environmental, historic preservation, and floodplain management requirements as well as program conditions specified within the IGSA. States that choose to administer Direct Housing Assistance through an IGSA are required to develop a Direct Housing Administrative Plan and are encouraged to establish pre-placed contract to support the delivery of direct housing. Any contracts for this work would need to comply with the federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. For more information, regarding Direct Housing Assistance, please visit Chapter 5 of the [Individuals and Households Program Unified Guidance](#) and Chapter 3 of the [Individual Assistance Program and Policy Guide \(IAPPG\)](#).

Disaster Housing Exercises

Recipients are encouraged to exercise and validate their long-term sheltering and housing stabilization plans as part of an existing exercise program. This includes:

- Validating the organizational structure of the Housing Task Force and internal readiness capabilities to address post-disaster housing recovery issues or administer FEMA Direct Housing Assistance under an IGSA
- Validating disaster housing communication plans and procedures that coordinate and integrate the activities and information generated by internal/external partners
- Validating data systems, security, and exchange protocols
- Validating planned actions and milestones transitioning from emergency sheltering to temporary housing to permanent housing and long-term recovery

Additional Disaster Housing Planning Resources

Recipients are encouraged to review the planning guidance available at [Planning Guides](#). The Planning Guides page includes: [Planning Considerations: Disaster Housing Guidance for State, Local, Tribal and Territorial Partners \(May 2020\)](#), which supplements [Comprehensive Preparedness Guide \(CPG\) 101: Developing and Maintaining Emergency Operations Plans](#). It provides guidance on national housing priorities, types of housing, key considerations and housing-specific planning recommendations for state, local, tribal and territorial (SLTT) jurisdictions to use, in conjunction with the Six-Step Planning Process described in CPG 101, to develop or improve disaster housing plans.

State Disaster Recovery Coordinator

The [Pre-Disaster Recovery Planning Guide](#) helps states prepare for recovery by developing pre-disaster recovery plans that follow a process to engage members of the whole community, develop recovery capabilities, and create an organizational framework for recovery efforts.

FEMA strongly recommends that EMPG Program recipients include pre-disaster recovery planning as part of their State Readiness and Preparedness efforts by establishing a State Disaster Recovery Coordinator (SDRC). An effective pre-disaster recovery plan and process is crucial to help recipients prepare for major disaster incidents and recover effectively. Recipients are encouraged to use the [Pre-Disaster Recovery](#)

[Planning Guide](#) to help inform their identification and establishment of a SDRC. The SDRC position should be included in the State Administrative Plan with the following responsibilities:

- Development of the pre-disaster recovery plan, including state-level leadership and structure, formation of communication channels, multi-agency coordination, and building whole-community partnerships to support recovery efforts.
- Set the stage for necessary strategic, operational, and tactical post-disaster planning, actions, and processes.
- Maximize impact of federal, private sector, and nongovernmental dollars to enable recovery and resilience.
- Accelerate the delivery of resources, including funding and technical assistance, to disaster-impacted communities.
- Enable state leadership to better organize and identify gaps in the state’s recovery capabilities.

Disaster Financial Management Policies and Procedures

Lessons learned from recent hurricane seasons and wildfires demonstrate the need for impacted jurisdictions to improve their ability to immediately track and account for disaster costs. Disaster financial management includes policies and procedures that work to recover expenses pertaining to damage, emergency protective measures, and debris management during and after a disaster. These policies and procedures include, but are not limited to, those supporting eligible contract costs and force account labor, materials, and equipment.

State Administrative Plan

FEMA strongly recommends that EMPG Program recipients include disaster financial management planning as part of their State Administrative Plan. An effective disaster financial management plan and process is crucial to help recipients prepare for declarations of emergencies or major disasters and plan for reimbursement. The table below details the processes that should be included in the State Administrative Plan and recommendations on where they should be placed.

State Administrative Plan Guidance

State Administrative Plan Section Recommendations	Processes
<ul style="list-style-type: none"> • Section V Part D: Project Funding and Reimbursement • Section V Part G: Records and Reports 	<ul style="list-style-type: none"> • A process to ensure subrecipients are tracking and documenting disaster costs necessary for federal reimbursement, such as receipts, invoices, procurement documents, contracts, and insurance coverage/claims
<ul style="list-style-type: none"> • Section V Part D: Project Funding and Reimbursement • Section V Part G: Records and Reports 	<ul style="list-style-type: none"> • A process to document disaster cost operations such as labor, equipment, and materials that are allowable under federal requirements
<ul style="list-style-type: none"> • Section V Part D: Project Funding and Reimbursement 	<ul style="list-style-type: none"> • A process to ensure that subrecipients are not receiving a duplication in benefits
<ul style="list-style-type: none"> • Section IV Part B: Organization and Staffing 	<ul style="list-style-type: none"> • A process to ensure pre-disaster contracts and procurement strategies are in place, if necessary

Additionally, recipients are encouraged to use EMPG Program funds for training that develops, delivers, and exercises disaster financial management procedures.

Disaster Financial Management Resources

Recipients are encouraged to use the following resources to inform their disaster financial management planning efforts:

- **State Administrative Plan Template:** Recipients are recommended to use the [State Administrative Plan template](#) found on FEMA’s Public Assistance webpage to inform their planning efforts. The template includes example structure and content as a model for states to create own Administrative Plan.
- **Public Assistance Program and Policy Guide:** The [Public Assistance Program and Policy Guide \(PAPPG\)](#) combines all Public Assistance policy into a single volume and provides an overview of the PA program implementation process.
- **Public Assistance Frequently Asked Questions and Guidance:** Recipients are encouraged to view the Public Assistance Frequently Asked Questions and guidance found on the Public Assistance webpage to assist with disaster financial management planning efforts. The webpage provides information pertaining to documentation, Public Assistance grant funding eligibility, and hazard mitigation and can be found at [Public Assistance Fact Sheets, Job Aids, and FAQs](#).
- **Office of Inspector General (OIG) Audit Tips:** Recipients are recommended to consult the DHS OIG report, [Audit Tips for Managing Disaster-Related Project Costs \(OIG-17-120-D\)](#) for further assistance in documenting and accounting for disaster-related costs. This report is informed by OIG audit findings and can assist recipients in addressing issues that are frequent findings in disaster-related audits.
- **Disaster Financial Management Guide:** The [Disaster Financial Management Guide](#) provides guidance for state, local, tribal, and territorial partners on establishing and implementing sound disaster financial management practices.
- **Procurement Disaster Assistance Team (PDAT):** The PDAT provides [training and other resources to assist grant recipients](#) in their efforts to comply with federal procurement standards. See [Contracting with Federal Funds for Goods and Services Before, During and After Disasters | FEMA.gov](#) for additional information.

Training and Exercises

Integrated Preparedness Plan (IPP)

Recipients are expected to engage senior leaders and other whole community stakeholders to identify preparedness priorities specific to training and exercise needs, which will guide development of a state/territory multi-year IPP. Similar to the EMPG Program Work Plan development process, these priorities should be informed by various factors, including jurisdiction-specific threats and hazards (i.e., the THIRA); areas for improvement identified by real-world events and exercises (i.e., AARs); external requirements such as stakeholder preparedness reviews (i.e., SPRs), homeland security policy, and industry reports; and accreditation standards, regulations, or legislative requirements. Recipients must document these priorities, in conjunction with the Work Plan development process, and use them to deploy a schedule of preparedness events and activities in the IPP. Information related to IPPs and Integrated Preparedness Planning Workshops (IPPWs) can be found on the HSEEP website at [Homeland Security Exercise and Evaluation Program](#) and [FEMA Preparedness Toolkit](#).

Recipients should ensure that their EMPG Program Work Plans and IPPs align with and are complementary to one another and are used in tandem to support shared priorities for building and sustaining the state/territory’s preparedness capabilities. Recipients should include planning, training, and exercise projects in their EMPG Program Work Plan that support priorities included in their IPP. The current multi-year IPP must be submitted to hseep@fema.dhs.gov and the Regional EMPG Program Manager before January 31 of each year.

This will help ensure that priorities for both the IPP and EMPG Program Work Plan are based on building capability and/or closing capability gaps documented in their THIRA/SPR and other relevant sources of information. For example, if a recipient included Logistics and Distribution Management, Resilient Communications, and Housing as priorities for its IPP, those should also be priorities in its EMPG Program Work Plan. Additionally, IPPs should include all planning, training, and exercise activities funded by the EMPG Program as well as activities funded by other sources. This inclusion will ensure that recipients' preparedness projects, investments, and activities are concentrated, focused, and oriented towards closing gaps related to their top priorities, regardless of funding source.

Validating Capabilities through Exercises

All recipients are required to develop and maintain a progressive exercise program consistent with HSEEP guidance in support of the National Exercise Program (NEP). The NEP serves as the principal exercise mechanism for examining national preparedness and measuring readiness. The NEP is a two-year cycle of exercises across the nation that validates capabilities in all preparedness mission areas. The two-year NEP cycle is guided by Principals' Strategic Priorities, established by the National Security Council and informed by preparedness data from jurisdictions across the Nation.

The NEP provides exercise sponsors the opportunity to receive exercise design and delivery assistance, tools and resources, enhanced coordination, and the ability to directly influence and inform policy and preparedness programs. If you have any questions or would like to request assistance through the NEP, please visit the [NEP website](#) or reach out to the NEP directly at NEP@fema.dhs.gov.

The exercises and priorities outlined in the IPP and all EMPG Program-funded exercises must be included in the FY 2023 EMPG Program Work Plan. To avoid duplicate reporting, applicants/recipients are not required to report EMPG Program-funded personnel costs associated with exercises in the FY 2023 EMPG Work Plan. See the [EMPG Program Work Plan](#) section for additional guidance.

Reporting

- All EMPG Program-funded exercise activities must be captured in the approved EMPG Program Work Plan.
- EMPG Program-funded exercise costs in the Work Plan can include costs to plan, conduct and evaluate the exercise (e.g., planning, materials, props, contractual services for conducting the exercise, AAR and Improvement Plan [IP], etc.).
- All EMPG Program-funded exercise activities must be reported quarterly. To simplify reporting, it is recommended that recipients submit an updated Exercise Data Table from the FY 2023 EMPG Program Work Plan Template as an attachment to the quarterly PPR. For those recipients who choose not to use the FY 2023 EMPG Program Work Plan Template, the data and information found in the Exercise Data Table must still be submitted (in any chosen format) as an attachment to the PPR.
- EMPG Program-funded personnel costs associated with exercises are not required in the FY 2023 EMPG Program Work Plan Template for application or reporting purposes.
- Recipients must have a current multi-year IPP that identifies preparedness priorities and activities. The current multi-year IPP must be submitted to hseep@fema.dhs.gov and the Regional EMPG Program Manager before January 31st of each year.
- Recipients are encouraged to enter their exercise information into the Preparedness Toolkit at [FEMA Preparedness Toolkit](#).
- Recipients must submit AAR/IPs to hseep@fema.dhs.gov and copy their Regional EMPG Program Manager and indicate which fiscal year's funds were used (if applicable).
- Submission of AAR/IPs must take place within 90 days following completion of the single exercise or progressive series.

- Recipients are encouraged to submit AAR/IPs reflecting tabletop exercises that validate critical plans or those reflecting large-scale functional or full-scale exercises that took place at the state, territorial, tribal, or regional level. Recipients are discouraged from submitting AAR/IPs specific to local jurisdictions that reflect drills.
- If a state, territory, or local jurisdiction has experienced a major disaster and they would like to request exemptions for a scheduled exercise, the recipient should send this request to its assigned Regional EMPG Program Manager through the quarterly PPR. Exemptions will be reviewed by the Region on a case-by-case basis.
- Recipients can access a sample AAR/IP template at [Preparedness Toolkit Improvement Planning Templates](#).

Training

Similar to the exercise guidance above, training activities should align to a current, multi-year IPP developed through an annual IPPW and build from training gaps identified in the THIRA/SPR and work plan development process. Further guidance concerning the IPP and the IPPW can be found at [HSEEP Resources - Preparedness Toolkit](#).

Through the National Preparedness Directorate’s training and education enterprise, consisting of the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and the National Training and Education Division’s partnerships with the National Domestic Preparedness Consortium, Rural Domestic Preparedness Consortium, Continuing Training Grants partners, and the Center for Homeland Defense and Security, FEMA develops and delivers training and education programs to increase capabilities, reduce risk, and build resilient communities. Over 700 tuition-free courses are offered to members of state, local, tribal, and territorial communities. By accessing the National Preparedness Course catalog, users will find all courses to include EMI training and includes links to the basic, advanced, and executive emergency management academies.

FEMA’s National Preparedness Course Catalog

This online searchable catalog features a compilation of courses managed by the three primary FEMA training organizations: the Center for Domestic Preparedness, EMI, and NTED. The catalog features a wide range of course topics in multiple delivery modes for federal, state, local, territorial, and tribal audiences. The catalog is located at [First Responder Training and Education Division](#).

Training should foster the development of a community-oriented approach to emergency management that emphasizes engagement at the community level, strengthens best practices, and provides a path toward building sustainable resilience, all of which is included in the curriculum of the EMI Basic Academy. The EMI Basic Academy provides a foundational education in emergency management as a way for emergency managers to begin or advance their career. The goal of the Basic Academy is to support the early careers of emergency managers through a training experience combining knowledge of all fundamental systems, concepts, and practices of cutting-edge emergency management.

EMPG Program funds used for training should support the nationwide implementation of NIMS. The NIMS Training Program establishes a national curriculum for NIMS and provides information on NIMS courses. Recipients are encouraged to place emphasis on the core competencies as defined in the NIMS Training Program. NIMS is also included in the curriculum of the EMI Basic Academy. The NIMS Training Program can be found at [NIMS Implementation and Training](#).

All EMPG Program-funded personnel are expected to be trained emergency managers (see [NQS Implementation](#) section). All EMPG Program-funded personnel must complete *either* the Independent Study courses identified in the Professional Development Series *or* the National Emergency Management Basic Academy delivered either by EMI or at a sponsored state, local, tribal, territorial, regional, or other

designated location. Further information on the National Emergency Management Basic Academy and the Emergency Management Professional Program can be found at: [EMI EMPP](#). A complete list of Independent Study Program Courses may be found at [EMI Independent Study](#).

In addition to training activities aligned to and addressed in the IPP, all EMPG Program-funded personnel (including full- and part-time SLTT recipients and subrecipients) must complete the following training requirements and record proof of completion:

- 1) NIMS Training, Independent Study (IS)-100 (any version), IS-200 (any version), IS-700 (any version), and IS-800 (any version)⁴, **and**;
- 2) Professional Development Series (PDS) **or** the Emergency Management Professionals Program (EMPP) Basic Academy courses listed in the chart below.

PDS Professional Development Series	OR	Basic Academy Basic Academy Pre-requisites and Courses
IS-120.a: An Introduction to Exercises		IS-100 (any version): Introduction to the Incident Command System
IS-230.d: Fundamentals of Emergency Management		IS-700 (any version): National Incident Management System (NIMS)-An Introduction
IS-235.b: Emergency Planning		IS-800 (any version): National Response Framework, An Introduction
IS-240.b: Leadership and Influence		IS-230.d: Fundamentals of Emergency Management
IS-241.b: Decision Making and Problem Solving		E/L101: Foundations of Emergency Management
IS-242.b: Effective Communication		E/L102: Science of Disasters
IS-244.b: Developing and Managing Volunteers		E/L103: Planning Emergency Operations
IS-244.b: Developing and Managing Volunteers		E/L104: Exercise Design
IS-244.b: Developing and Managing Volunteers		E/L105: Public Information & Warning

The [EMI Basic Academy](#) provides this foundational Emergency Management education. To ensure the professional development of the emergency management workforce, the recipients must ensure a routine capabilities assessment is accomplished and an IPP is developed and implemented.

Additional Training Information

Per FEMA Grant Programs Directorate [Information Bulletin 432](#), *Review and Approval Requirements for Training Courses Funded Through Preparedness Grants*, issued on July 19, 2018, states, territories, tribal entities, and high-risk urban areas are no longer required to request approval from FEMA for personnel to attend non-DHS FEMA training as long as the training is coordinated with and approved by the state, territory, tribal, or high-risk urban area Training Point of Contact (TPOC) and falls within the FEMA mission scope and the jurisdiction’s EOP.

⁴ NIMS training courses IS-100, IS-200, IS-700, and IS-800 only need to be taken once to fulfill requirements. Also, previous versions of the IS courses are still considered as meeting the NIMS training requirement.

FEMA will conduct periodic reviews of all state, territory, and urban area training funded by FEMA. These reviews may include requests for all course materials and physical observation of, or participation in, the funded training. If these reviews determine that courses are outside the scope of this guidance, recipients will be asked to repay grant funds expended in support of those efforts.

For further information on developing courses using the instructional design methodology and tools that can facilitate the process, State Administrative Agencies (SAAs), and TPOCs are encouraged to review the National Training and Education Division Training Resource and Development Center website at [FRTS-TRDC Home](#).

Reporting

- All EMPG Program-funded training activities must be captured in the approved EMPG Program Work Plan and should be included in the IPP. This includes training for which the only expenses are for overtime and/or backfill costs associated with emergency management personnel attending the training.
- All EMPG Program-funded training activities must be reported quarterly. To simplify reporting, it is recommended the recipient submit an updated Training Data Table from the FY 2023 EMPG Program Work Plan Template as an attachment to the quarterly PPR. For those recipients who choose not to use the FY 2023 EMPG Program Work Plan Template, the data and information found in the Training Data Table must still be submitted (in any chosen format) as an attachment to the PPR.
- Recipients must report their NIMS implementation status of their jurisdiction and sub-jurisdictions, including the training of personnel, in the applicable secondary NIMS assessment portion of the URT as part of their THIRA/SPR submission.
- Recipients must maintain proof of completion of training requirements. Recipients are encouraged to use the OneResponder system to enter, track, and report training.
- Training Information Reporting System (“Web Forms”): Web Forms is an electronic data management system built to assist SAA TPOCs and federal agencies to submit **non-NTED training courses** for inclusion in the State/Federal-Sponsored Course Catalog. The information collected is used in a two-step review process to ensure that the training programs adhere to the EMPG Program’s intent, and the course content is sound and current. While reporting training activities through Web Forms is not required under the EMPG Program, the system remains available and can be accessed through the Web-Forms section of the [FEMA National Preparedness Course Catalog](#) to support recipients in their own tracking of training deliveries.

Reviewing and Updating Planning Products

Based on the applicant’s current THIRA/SPR, capability levels, and resources, plans should be reviewed on an annual basis to determine if they remain relevant or need to be updated. This review should be based on a current THIRA/SPR and utilize information gathered during the capability validation process. These reviews will provide a means to determine priorities, direct preparedness actions, and calibrate goals and objectives.

Additional Considerations

Strengthening Governance Integration

FEMA preparedness grant programs are intended to support the core capabilities across the five mission areas of Prevention, Protection, Mitigation, Response, and Recovery that are necessary to prepare for incidents that pose the greatest risk to the Nation’s security. Each program reflects the Department’s intent to build and sustain an integrated network of national capabilities across all levels of government and the

whole community. Disparate governance structures must be integrated and refined to ensure resources are targeted to support the most critical needs of a community based on risk-driven, capabilities-based planning. Strong and inclusive governance systems better ensure that disparate funding streams are coordinated and applied for maximum impact.

FEMA requires that all governance processes that guide the allocation of preparedness grant funds adhere to the following guiding principles:

- **Coordination of Investments:** Resources must be allocated to address the most critical capability needs as identified in the SPR and coordinated among affected preparedness stakeholders, including appropriate representatives of at-risk, underserved communities.
- **Transparency:** Stakeholders must be provided visibility on how preparedness grant funds are allocated and distributed, and for what purpose.
- **Substantive Local Involvement:** The tools and processes that are used to inform the critical priorities, which FEMA grants support, must include local government representatives. At the state and regional levels, local risk assessments must be included in the overarching analysis to ensure that all threats and hazards are accounted for. Primary focus should be on the needs of socially vulnerable, underserved populations and ensuring equity for those most at risk relative to disaster preparedness, response, and recovery.
- **Accountability:** FEMA recognizes that unique preparedness gaps exist at the local level. Grant recipients are responsible for ensuring the effective use of funds to address those gaps and for maintaining and sustaining existing capabilities, particularly when it comes to serving the needs of at-risk, underserved communities.
- **Support of Regional Coordination:** Inter/intra-state partnerships and dependencies at the state and regional levels, including those within metropolitan areas, must be recognized.

Program Performance Reporting Requirements

Performance Progress Reports (PPR)

Recipients are responsible for providing performance reports to FEMA on a quarterly basis. As explained in the *Standardized Programmatic Reporting* section below, the quarterly PPRs must be based on the approved EMPG Program Work Plan and are due no later than 30 days after the end of the quarter. Although not mandatory, recipients are encouraged to use the updated FY 2023 EMPG Program Work Plan Template – specifically the Implementation Schedule, Training Data Table, and Exercise Data Table – to report on the status of planned project activities, any risks that may affect project progress or success, and updates to project schedules. The PPR (in the form of an updated Work Plan) shall be submitted in ND Grants. See [EMPG Program Work Plan](#) section for additional guidance.

Programmatic Reporting Periods and Due Dates

The following reporting periods and due dates apply for the PPR:

Reporting Period	Report Due Date
October 1 – December 31	January 30
January 1 – March 31	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

Standardized Programmatic Reporting for the EMPG Program

The FY 2023 EMPG Program Work Plan Template has been modified to standardize data collection, which enables improved analysis and reporting. The EMPG Program Work Plan includes ten components:

- 1) Grant Investment Strategy
- 2) Grant Activities Outline
- 3) Detailed Budget – Excluding Management and Administrative (M&A)
- 4) Budget Narrative – Excluding M&A
- 5) Detailed Budget – M&A Only
- 6) Budget Narrative – M&A Only
- 7) EMPG Program Summary
- 8) Implementation Schedule
- 9) Training Data Table
- 10) Exercise Data Table

Although use of the FY 2023 EMPG Program Work Plan Template is not mandatory (see [EMPG Program Work Plan](#) section), baseline data on personnel, training, and exercises, as well as the information included on the Grant Activities Outline and Implementation Schedule, must be provided in the EMPG Program Work Plan at the time of application regardless of the chosen work plan format.

The status of all EMPG Program-funded plans, training, and exercise activities must be reported quarterly as part of the PPR. To facilitate reporting, recipients are encouraged to submit an updated Implementation Schedule, Training Data Table, and Exercise Data Table from the FY 2023 EMPG Program Work Plan Template as an attachment to the quarterly PPR. Recipients who choose not to use the FY 2023 EMPG Program Work Plan Template must still provide the updated data and information included in the Implementation Schedule, Training Data Table, and Exercise Data Table, but may use a different format for reporting that information in their PPR submission.

EMPG Program Funding Guidelines

Allowable Costs

Management and Administration (M&A)

M&A activities are those defined as directly relating to the management and administration of EMPG Program funds, such as financial management, reporting, and program and financial monitoring. Some examples of M&A costs include grants management training for M&A staff, equipment and supplies for M&A staff to administer the EMPG Program grant, travel costs for M&A staff to attend conferences or training related to the EMPG Program, travel costs for the M&A staff to conduct subrecipient monitoring, contractual services to support the M&A staff with M&A activities, and auditing costs related to the grant award to the extent required or permitted by statute or 2 C.F.R. Part 200. Characteristics of M&A expenses can include the following: 1) direct costs that are incurred to administer a particular Federal award; 2) identifiable and unique to each Federal award; 3) charged based on the activity performed for that particular Federal award; and 4) not duplicative of the same costs that are included in the approved Indirect Cost Rate Agreement, if applicable. It should be noted that salaries of state and local emergency managers are not typically categorized as M&A, unless the state or local Emergency Management Agency (EMA) chooses to assign personnel to specific M&A activities. In this case, personnel and fringe benefits for M&A is allowable.

If the SAA is not the EMA, the SAA is not eligible to retain funds for M&A. M&A costs are allowable for both state and local-level EMAs. The state EMA may use up to 5% of the EMPG Program award for M&A purposes. In addition, local EMAs may retain and use up to 5% of the amount received from the state for local M&A purposes.

Indirect Costs

Indirect costs are allowable under this program. See the “Procedures for Establishing Indirect Cost Rates” Section in “Pre-Submission Information” for more information.

Unrecovered Indirect Costs

In accordance with 2 C.F.R. § 200.306(c) “[u]nrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity’s approved negotiated indirect cost rate.” Therefore, unrecovered indirect costs may be applied to meet cost share requirements of the EMPG Program grant with the approval of the Regional Grants Division. To meet the cost sharing requirements, the recipient’s indirect costs contributions must be verifiable, reasonable, allocable, necessary, and otherwise allowable under the grant program, and in compliance with all applicable Federal requirements and regulations.

Whole Community Preparedness

EMPG Program recipients should engage with the whole community to advance community and individual preparedness and to work as a nation to build and sustain resilience. Recipients should consider the three goals of the [2022-2026 FEMA Strategic Plan](#) in their program design and delivery. Recipients should integrate program design and delivery practices that ensure representation and services for under-represented diverse populations that may be more impacted by disasters including children, seniors,

individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations.

Individual preparedness should be coordinated by an integrated body of government and nongovernmental representatives as well, including but not limited to, elected officials, the private sector (especially privately owned critical infrastructure), private nonprofits, nongovernmental organizations (including faith-based, community-based, and voluntary organizations), advocacy groups for under-represented diverse populations that may be more impacted by disasters including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations. By engaging these stakeholders, EMPG Program recipients can help FEMA develop and promote a suite of well-targeted solutions for individuals and communities to adopt. Recipients should coordinate preparedness initiatives with FEMA and whole community partners to efficiently apply federal funding to reach the goal of individual and community resilience.

The following preparedness programs are allowable expenses and resources:

- **Community Emergency Response Team (CERT)** programs, which educate volunteers about disaster preparedness for the hazards that may impact their area and train them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. CERT offers a consistent, nationwide approach to volunteer training and organization that professional responders can rely on during disaster situations, allowing them to focus on more complex tasks.
- **Financial Preparedness Activities** that encourage and assist Americans in preparing for the true cost of disasters. Allowable activities include encouraging emergency savings, promoting home and renter's insurance, and promoting flood insurance for individuals and families. Partnerships with local financial wellness organizations such as credit unions, financial counselors, community banks, and others that reach a variety of audiences are encouraged.
- **Preparedness of Community-Based Organizations** that serve as a critical safety net for Americans disproportionately impacted by disasters. Examples of community-based organizations include but are not limited to food banks, food pantries, homeless shelters, school readiness and after school centers, adult day care centers, job training centers, legal assistance centers, and cultural centers. Allowable activities include Whole Community exercises, trainings, and activities focused on staff preparedness, information sharing with clients and government, and continuity of essential functions in the event of an emergency.
- **Youth Preparedness Resources** are available on [Ready Kids](#). Bolstering youth preparedness across the nation is a priority for FEMA as the Agency works with state, local, tribal, and territorial partners to create a culture of preparedness in the United States. Information on youth-centric educational curricula, games, planning materials, and other relevant resources can be found at [Ready Kids](#). Furthermore, FEMA's Individual and Community Preparedness Division and regional-based Community Preparedness Officers are available to provide grant recipients with guidance and assistance. Please email FEMA-Prepare@fema.dhs.gov to contact one of the Agency's subject matter experts.

The following are examples of youth preparedness activities that recipients are encouraged to undertake as allowable costs:

- Reach out to a local school board or elementary school to encourage the adoption of the Student Tools for Emergency Planning (STEP) curriculum. STEP is a classroom-based emergency preparedness curriculum for 4th- and 5th-graders in an easy, ready-to-teach format. Students will learn about disasters, emergencies, and hazards, and how to create a

disaster supply kit and family emergency communication plan. An overview of the STEP program along with the instructor guide and student activity book is available at [Ready STEP](#).

- Sponsor the creation of a Teen for Community Emergency Response Team (CERT) in your jurisdiction. The CERT Program is a national program of volunteers trained in disaster preparedness and emergency response. Volunteers come from all ages and all walks of life, including teenagers. Additional information, including a step-by-step guide on how to start a Teen CERT, is available at [Ready Teen CERT](#).

The following tools are available to order from FEMA’s warehouse free of charge:

- “Prepare with Pedro” is a joint product of FEMA and the American Red Cross. The “Prepare with Pedro: Disaster Preparedness Activity Book” is designed to teach young children and their families about how to stay safe during disasters and emergencies. The book follows Pedro around the United States and offers safety advice through crosswords, coloring pages, matching games, and more. Additional information, including an ordering form, is available at [Ready - Prepare with Pedro](#).
- The Ready 2 Help card game is a fun way for kids to learn how to respond to emergencies by working with friends and using skills that will help in a real emergency. Ready 2 Help teaches five simple steps to stay safe and make a difference until help arrives:
 - Stay Safe
 - Stay Calm
 - Get Help
 - Give Info
 - Give Care

Ready 2 Help is designed for children ages 8 and up. Additional information, including an ordering form, is available at [Ready 2 Help](#).

Planning

Planning spans all five mission areas of the Goal and provides a methodical way to engage the whole community in the development of a strategic, operational, and/or community-based approach to preparedness. EMPG Program funds may be used to develop or enhance emergency management planning activities. Some examples include:

Emergency Operations Plan

- Maintaining a current EOP that is aligned with guidelines set out in [Comprehensive Preparedness Guide \(CPG\) 101: Developing and Maintaining Emergency Operations Plans](#)
- Modifying existing incident management and emergency operations plans
- Developing/enhancing large-scale and catastrophic event incident plans

Communications Plans

- Developing and updating Statewide Communication Interoperability Plans
- Developing and updating Tactical Interoperability Communications Plans

Administrative Plans

- Developing/enhancing financial and administrative procedures for use before, during, and after disaster events in support of a comprehensive emergency management program

Whole Community Engagement/Planning

- Developing or enhancing mutual aid agreements/compacts, including required membership in EMAC

- Developing/enhancing emergency operations plans to integrate citizen/volunteer and other Non-Governmental Organization (NGO) resources and participation
- Integrating program design and delivery practices that ensure representation and services for under-represented, diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or other access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity, and other underserved populations.

Resource Management Planning

- Developing/enhancing logistics and resource management plans
- Developing/enhancing volunteer and/or donations management plans

Shelter and Evacuation Planning

- Developing/enhancing sheltering and evacuation plans, including plans for alerts/warning, crisis communications, pre-positioning of equipment for areas potentially impacted by mass evacuations, and re-entry

Recovery Planning

- Disaster housing planning, such as creating/supporting a state disaster housing task force and developing/enhancing state disaster housing plans
- Pre-event response, recovery, and mitigation plans in coordination with state, local, and tribal governments
- Developing/enhancing other response and recovery plans
Developing recovery plans and preparedness programs consistent with the principles and guidance in the National Disaster Recovery Framework (NDRF) that will provide the foundation for recovery programs and whole community partnerships. Preparedness and pre-disaster planning were given special attention within the NDRF with specific guidance: *Planning for a Successful Disaster Recovery* (pages 63-70). For more information on the NDRF see [National Disaster Recovery Framework](#).

Continuity Planning

Continuity planning and operations are an inherent element of each core capability. Continuity operations increase resilience and the probability that organizations can perform essential functions. FEMA develops and promulgates Federal Continuity Directives (FCDs) to establish continuity program and planning requirements for executive departments and agencies and Continuity Guidance Circulars (CGCs) for SLTT governments, non-governmental organizations, and private sector critical infrastructure owners and operators. This direction and guidance assist in developing capabilities for continuing the essential functions of federal, state, local, tribal, territorial governmental entities as well as the public/private critical infrastructure owners, operators, and regulators enabling them.

Presidential Policy 40, FCD 1, FCD 2, CGC 1, and CGC 2 outline the overarching continuity requirements and guidance for organizations and provide guidance, methodology, and checklists. For additional information on continuity programs, guidance, directives, and available technical assistance, visit [Continuity Resources and Technical Assistance](#) and the Office of [National Continuity Programs](#).

Allowable continuity planning activities include the development of the following:

- Continuity of operations and Continuity of Government planning products for the continuance of essential functions and associated leadership;
- Risk-based needs assessments based on the THIRA to inform risk mitigation efforts to ensure the continuity of essential functions and associated leadership; and

- Public and private sector outreach and messaging regarding continuity resilience benefits and strategies.

Organization

Per the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, Pub. L. No. 93-288, as amended, (42 U.S.C. §§ 5121-5207), EMPG Program funds may be used for all-hazards emergency management operations, staffing, and other day-to-day activities in support of emergency management, including hazard mitigation staffing of the State Hazard Mitigation Officer position; staffing CERT and Citizen Corps positions at the state and local levels to promote whole community engagement in all phases of emergency management; performing closeout activities on FEMA disaster assistance grants; staffing permanent technical advisors on children’s needs at the state, local, tribal, and territorial levels; and supporting fusion center analysts who are directly involved in all-hazards preparedness activities as defined by the Stafford Act. Proposed staffing activities should be linked to accomplishing the activities outlined in the EMPG Program Work Plan. Recipients are encouraged to fund at least one dedicated Planner, Training Officer, and Exercise Officer. Personnel costs, including salary, overtime, compensatory time off, and associated fringe benefits, are allowable EMPG Program costs and must comply with 2 C.F.R. Part 200, Subpart E – Cost Principles.

Federal (and Mutual Aid) Emergency Response Official (F/ERO) Credentialing and Validation

The following costs related to F/ERO credentialing and validation are allowable under the EMPG Program:

- Working group meetings and conferences relating to emergency responder credentialing and validation;
- Compiling data to enter into an emergency responder repository;
- Coordinating with other state, local, territorial, and tribal partners to ensure interoperability among existing and planned credentialing and validation systems and equipment; and
- Planning to incorporate emergency responder identity and credential validation into training and exercises.

Organizational Clothing Costs for Emergency Management Personnel

There may be a need for emergency management personnel to wear clothing that clearly identifies their agency, organizational function, and responsibilities when carrying out their official emergency-related duties. EMPG funding may be used to purchase organizational clothing for full-time emergency management personnel who may be deployed for emergency operations, including when:

- The Emergency Operations Center (EOC) is activated;
- Emergency management personnel are deployed in the field to conduct damage assessments and response and recovery operations;
- Assisting in and delivering official emergency management training and exercises, and;
- Providing public information briefs and interviews on behalf of their emergency management agency.

The state or territory emergency management agency should maintain an inventory of such clothing and uniforms to allow for issuance to other personnel who may be deployed for emergency operations.

In addition:

- EMPG funding **may not** be used to purchase clothing that would be used for everyday wear by emergency management employees or other personnel.
- Clothing, uniforms, undergarments, jackets, vests, etc. are also allowable for CERT members as listed on the Authorized Equipment List (AEL): [21GN-00-CCEQ | FEMA.gov](#).

For a complete list of other eligible clothing and protective gear allowable for purchase with EMPG funding, applicants, recipients and FEMA staff are encouraged to refer to the AEL website for the most up-to-date information: [Authorized Equipment List | FEMA.gov](#).

Equipment

Allowable equipment categories for the EMPG Program are listed in the [Authorized Equipment List \(AEL\)](#). Unless otherwise stated, equipment must meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment. Allowable equipment includes equipment from the following AEL categories:

- Personal Protective Equipment (Category 1)
- Information Technology (Category 4)
- Cybersecurity Enhancement Equipment (Category 5)
- Interoperable Communications Equipment (Category 6)
- Detection Equipment (Category 7)
- Power Equipment (Category 10)
- Chemical, Biological, Radiological, Nuclear, and Explosive (CBRNE) Reference Materials (Category 11)
- CBRNE Incident Response Vehicles (Category 12)
- Physical Security Enhancement Equipment (Category 14)
- CBRNE Logistical Support Equipment (Category 19)
- Other Authorized Equipment (Category 21)

In addition to the above, general-purpose vehicles may be procured in order to carry out the responsibilities of the EMPG Program.

If recipients have questions concerning the eligibility of equipment not specifically addressed in the AEL, they should contact their Regional EMPG Program Manager for clarification. Applicants should analyze the cost benefits of purchasing versus leasing equipment, especially high-cost items and those subject to rapid technical advances. Large equipment purchases must be identified and explained. For more information regarding property management standards for equipment, please reference 2 C.F.R. Part 200, including 2 C.F.R. §§ 200.310, 200.313, and 200.316. Also see 2 C.F.R. §§ 200.216, 200.471, and [FEMA Policy #405-143-1, Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services](#), or successor policy, regarding prohibitions on covered telecommunications equipment or services.

Recipients using EMPG Program funds to support emergency communications equipment activities must comply with the SAFECOM Guidance on Emergency Communications Grants, including provisions on technical standards that ensure and enhance interoperable communications. This SAFECOM Guidance can be found at [SAFECOM Funding Resources](#).

In general, with exception of critical emergency supplies and the associated inventory management plan, equipment included in the AEL may be purchased without separate approval from FEMA. However, as with all grant-funded activities, the equipment purchase must be well justified and reasonable. Furthermore, the purchase must be supported by the approved Work Plan. If the equipment is not clearly supported by the approved Work Plan, the recipient must seek advance approval from the applicable [FEMA Regional Grant Program Office](#) prior to purchasing the equipment, and an updated Work Plan may be required.

FEMA will consider requests to purchase equipment that is not listed in the AEL on a case-by-case basis. Such requests should be submitted in writing to the applicable [FEMA Regional Grant Program Office](#). FEMA's review and approval of such requests will involve both the FEMA regional office and headquarters

program staff to ensure nationwide consistency in the decision-making process and to support any necessary updates to the AEL.

Requirements for Small Unmanned Aircraft Systems

All requests to purchase Small Unmanned Aircraft System (sUAS) must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and must include the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties in the jurisdiction that will purchase, take title to, or otherwise use the sUAS equipment. Additional information and requirements applicable to sUAS purchases can be found in the AEL at [03OE-07-SUAS](#).

Acquisition and Use of Technology to Mitigate UAS (Counter-UAS)

In August 2020, FEMA alerted of an advisory guidance document issued by DHS, the Department of Justice, the Federal Aviation Administration, and the Federal Communications Commission: [Advisory on the Application of Federal Laws to the Acquisition and Use of Technology to Detect and Mitigate UAS](#).

The purpose of the advisory guidance document is to help non-federal public and private entities better understand the federal laws and regulations that may apply to the use of capabilities to detect and mitigate threats posed by UAS operations (i.e., Counter-UAS or C-UAS). The Departments and Agencies issuing the advisory guidance document, and FEMA, do not have the authority to approve non-federal public or private use of UAS detection or mitigation capabilities, nor do they conduct legal reviews of commercially available product compliance with those laws. The advisory does not address state and local laws nor potential civil liability, which UAS detection and mitigation capabilities may also implicate. It is strongly recommended that, prior to the testing, acquisition, installation, or use of UAS detection and/or mitigation systems, entities seek the advice of counsel experienced with both federal and state criminal, surveillance, and communications laws. Entities should conduct their own legal and technical analysis of each UAS detection and/or mitigation system and should not rely solely on vendors' representations of the systems' legality or functionality. Please also see the DHS press release on this topic for further information: [Interagency Issues Advisory on Use of Technology to Detect and Mitigate UAS](#). For training on the application of UAS technology in emergency management programs, please refer to the [National Preparedness Course Catalog](#) and search 'UAS' on the website.

Funding for Critical Emergency Supplies

Critical emergency supplies—such as shelf stable products, water, and basic medical supplies—are an allowable expense under the EMPG Program. FEMA must approve a state's five-year viable inventory management plan prior to allocating grant funds for stockpiling purposes. The five-year plan should include a distribution strategy and related sustainment costs if the grant expenditure is over \$100,000.

Training

EMPG Program funds may be used for a range of emergency management-related training activities to enhance the capabilities of state and local emergency management personnel through the establishment, support, conduct, and attendance of training. Training activities should align to a current, multi-year IPP developed through an annual IPPW and build from training gaps identified in the THIRA/SPR process. Further guidance concerning the IPP and the IPPW can be found at [Preparedness Toolkit Program Management Templates](#). Training should:

- Foster the development of a community-oriented approach to emergency management that emphasizes engagement at the community level;
- Strengthen best practices; and
- Provide a path toward building sustainable resilience.

Allowable training-related costs include the following:

- **Funds Used to Develop, Deliver, and Evaluate Training:** Includes costs related to administering training, such as planning, scheduling, facilities, materials and supplies, reproduction of materials, and equipment. Training should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Any training or training gaps, including those for children and individuals with disabilities or other access and functional needs, should be identified in the multi-year IPP and addressed in the training cycle. States are encouraged to use existing training rather than developing new courses. When developing new courses, states are encouraged to apply the Analysis, Design, Development, Implementation, and Evaluation (ADDIE) model for instructional design. More information is available at [NTED | Training Resource Development Center](#).
- **Overtime and Backfill:** Overtime costs, including payments related to backfilling personnel, that are the direct result of attendance at FEMA and/or approved training courses and programs are allowable. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or FEMA, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government *and* from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities.
- **Travel:** Travel costs (e.g., airfare, mileage, per diem, and hotel) are allowable as expenses by employees who are on travel status for official business related to approved training. International travel is not an allowable cost under this program unless approved in advance by FEMA.
- **Hiring of Full- or Part-Time Staff or Contractors/Consultants:** Full- or part-time staff or contractors/consultants may be hired to support direct training-related activities. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable.
- **Certification/Recertification of Instructors:** Costs associated with the certification and re-certification of instructors are allowed. States are encouraged to follow the FEMA Instructor Quality Assurance Program to ensure a minimum level of competency and corresponding levels of evaluation of student learning. This is particularly important for those courses that involve training of trainers.

Additional types of allowable training or training-related activities include, but are not limited to:

- Developing/enhancing systems to monitor training programs
- Conducting all-hazards emergency management training
- Attending EMI training or delivering EMI train-the-trainer courses
- Attending other FEMA-approved emergency management training
- State-approved, locally sponsored CERT training
- Mass evacuation training at local, state, territorial and tribal levels

Exercises

Allowable exercise-related costs include:

- **Funds Used to Design, Develop, Conduct and Evaluate Preparedness Exercises:** This includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Recipients are encouraged to use free public

space/locations/facilities whenever available prior to the rental of space/locations/facilities. Exercises should provide the opportunity to demonstrate and validate skills learned, as well as to identify any gaps in these skills. Gaps identified during an exercise, including those for children and individuals with disabilities or other access and functional needs, should be included in the AAR/IP and addressed in the exercise cycle.

- **Hiring of Full- or Part-Time Staff or Contractors/Consultants:** Full- or part-time staff may be hired to support direct exercise activities. Payment of salaries and fringe benefits must be in accordance with the policies of the state or unit(s) of local government and have the approval of the state or FEMA, whichever is applicable. The services of contractors/consultants may also be procured to support the design, development, conduct, and evaluation of exercises. Hiring of contractors/consultants must follow the applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327.
- **Overtime and Backfill:** The entire amount of overtime costs, including payments related to backfilling personnel, that are the direct result of time spent on the design, development and conduct of exercises are allowable expenses. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the state or unit(s) of local government and has the approval of the state or FEMA, whichever is applicable. Dual compensation is never allowable, meaning, in other words, that an employee of a unit of government may not receive compensation from their unit or agency of government *and* from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though their work may benefit both entities.
- **Travel:** Travel costs (e.g., airfare, mileage, per diem, hotel) are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of the exercise activities.
- **Supplies:** Supplies are items that are expended or consumed while planning and conducting the exercise activities (e.g., gloves, non-sterile masks, and disposable protective equipment).
- **HSEEP Implementation:** This refers to costs related to developing and maintaining an exercise program consistent with HSEEP.
- **Other Items:** These costs are limited to items consumed in direct support of exercise activities, such as space/locations rentals for planning and conducting an exercise, equipment rentals (e.g., portable toilets, tents), food/refreshments, and the procurement of other essential nondurable goods. Costs associated with inclusive practices and the provision of reasonable accommodations and modifications that facilitate full access for children and adults with disabilities are allowable.

Unauthorized exercise-related costs include:

- Reimbursement for maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles) and emergency response apparatus (e.g., fire trucks, ambulances). The only vehicle costs that are reimbursable are fuel/gasoline or mileage.
- Equipment that is purchased for permanent installation and/or use beyond the scope of exercise conduct (e.g., electronic messaging signs)
- Durable and nondurable goods purchased for installation and/or use beyond the scope of exercise conduct

Construction and Renovation

Construction and renovation projects for a state, local, tribal, or territorial government's principal Emergency Operations Center (EOC), as defined by the SAA are allowable under the EMPG Program. FEMA must provide written approval prior to the use of any EMPG Program funds for construction or renovation. Requests for EMPG Program funds for construction of an EOC must be accompanied by an EOC Investment Justification (located in the Related Documents tab of the EMPG Program [Grants.gov](https://www.fema.gov/grants))

posting) to their Regional EMPG Program Manager for review. Additionally, recipients are required to submit a SF-424C Form, SF-424D Form, and Budget detail citing the project costs.

The above examples are not intended to exclude other construction projects as potentially allowable costs. For example, construction of a facility for the storage and distribution of critical emergency supplies and/or to serve as a staging area for deployment of emergency response resources is potentially an allowable expense. Other construction or renovation projects, such as a secondary or local EOC, will be considered on a case-by-case basis, as described below in the guidance regarding advance written approval.

Advance Approval Requirement

Recipients must receive advance written approval from FEMA prior to the use of any annual EMPG Program funds for construction or renovation, including such activities at the subrecipient level. Such costs would need to fall within the scope of the recipient's final approved Work Plan, otherwise an updated Work Plan may be required. Such requests should be submitted in writing to the applicable [FEMA Regional Grant Program Office](#). FEMA's review and approval will involve both the regional office and the FEMA Grant Programs Directorate.

Real Property Use and Disposition Requirements

Real property improved under a federal award falls under the 2 C.F.R. Part 200 guidance for real property. In accordance with 2 C.F.R. § 200.311, a recipient or subrecipient may only use real property acquired or improved under a federal award for the originally authorized purpose, as long as it is needed for that purpose, during which time the recipient or subrecipient must not dispose of or encumber its title or other interests. However, upon the end of that period where it needs the property for the originally authorized purpose (i.e., the functional use of the property for which FEMA awarded the grant), the recipient or subrecipient will then dispose of the property in keeping with the requirements set forth in 2 C.F.R. § 200.311.

When a grant-funded property is no longer needed for the originally authorized purpose, the recipient or subrecipient (through the pass-through entity) must obtain disposition instructions from the cognizant FEMA Regional Administrator or the pass-through entity. For additional information on this, see [Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant \(EMPG\) and the FY 2020 COVID-19 EMPG Supplemental \(EMPG-S\) Programs](#).

Construction of Communication Towers

When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the Federal Communication Commission's Section 106 review process has been completed and submit all documentation resulting from that review to FEMA prior to submitting materials for EHP review. Recipients and subrecipients are also encouraged to have completed as many steps as possible for a successful EHP review in support of their proposal for funding (e.g., coordination with their State Historic Preservation Office to identify potential historic preservation issues and to discuss the potential for project effects, compliance with all state and EHP laws and requirements). Projects for which the recipient believes an Environmental Assessment may be needed, as defined in [Implementation of the National Environmental Policy Act](#), and EHP Directive and Instructions: [FEMA Directive 108-1 and FEMA Instruction 108-1-1](#), must also be identified to the Regional EMPG Program Manager within six months of the award, and completed EHP review materials must be submitted no later than 12 months before the end of the period of performance. EHP review packets should be sent to gpdehpinfo@fema.gov.

Davis-Bacon Act Compliance

EMPG Program recipients using funds for construction projects must comply with the *Davis-Bacon Act* and subsequent legislation (40 U.S.C. §§ 3141 *et seq.*). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the

state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor wage determinations, is available at [Davis-Bacon and Related Acts](#).

Accessibility Compliance

EMPG Program recipients using funds to build or alter buildings must comply with accessibility requirements under the *Rehabilitation Act of 1973 and Architectural Barriers Act of 1968 (ABA)*, as well as the Americans with Disabilities Act (ADA), if applicable, to ensure individuals with disabilities have access to such buildings. Accessibility standards under the ABA and ADA are highly similar. Additional information regarding compliance with the *Architectural Barriers Act* is available at [Guide to the ABA](#).

Acquisition of Real Property

Acquisition of real property is permissible if such property is needed to support other allowable program costs or activities. For additional information on this, see [Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant \(EMPG\) and the FY 2020 COVID-19 EMPG Supplemental \(EMPG-S\) Programs](#).

Advance Approval Requirement

Consistent with the requirements outlined above regarding construction activities, recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for acquisition of real property. Additionally, in cases of acquisition or improving real property, recipients are required to submit a [SF-429-B](#), Real Property Status Report, Attachment B providing details of the relevant property to be acquired.

Property Use, Reporting, and Disposition Requirements

The acquisition, use, and disposition of real property shall be subject to the provisions of 2 C.F.R. Part 200. In accordance with 2 C.F.R. Part 200, recipients and subrecipients are required to report on the status of the acquired property on an annual basis using [SF-429-A](#) Real Property Status Report, Attachment A (General Reporting). Such reporting shall continue as long as the property is being used for the originally authorized purpose.

The same use and disposition guidance as outlined in Sections III.D.3 above applies to real property acquired with annual EMPG Program funds. For additional information on this, see [Information Bulletin 458a, Clarifying Guidance for the Annual Emergency Management Performance Grant \(EMPG\) and the FY 2020 COVID-19 EMPG Supplemental \(EMPG-S\) Programs](#).

Leasing of Real Property

Leasing of real property is permissible if the property is needed to support other allowable annual EMPG Program activities.

Advance Approval Requirement

Recipients and subrecipients (through the pass-through entity) must obtain advance written approval from the cognizant FEMA Regional Administrator prior to obligating annual EMPG Program funds for the leasing of real property.

Allowable Period of Lease Expenses

In cases where a property will be leased and the lease will be paid in full or in part using annual EMPG Program, any costs associated with the lease that are charged to an annual EMPG Program award must occur within the period of performance of the associated award(s). Real property lease costs must also comply with 2 C.F.R. Part 200.

Maintenance and Sustainment

Use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active grant awards, unless otherwise noted.

EMPG Program funds are intended to support the Goal and fund activities and projects that build and sustain the capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats and hazards that pose the greatest risk to the security of the Nation. To assist recipients in meeting this objective, the policy set forth in [IB 379: Guidance to State Administrative Agencies to Expedite the Expenditure of Certain DHS/FEMA Grant Funding](#) allows for the expansion of eligible maintenance and sustainment costs, which must be:

- 1) In direct support of existing capabilities;
- 2) An otherwise allowable expenditure under the applicable grant program;
- 3) Tied to one of the core capabilities in the five mission areas contained within the Goal; and
- 4) Shareable through the EMAC.

Additionally, eligible costs may also be in support of equipment, training, and critical resources that have previously been purchased with either federal grant funding or any other source of funding other than FEMA preparedness grant program dollars.

Unallowable Costs

Grant funds may not be used for the following:

- Unallowable Equipment: Grant funds must comply with [FEMA Policy 207-22-0002, Prohibited or Controlled Equipment Under FEMA Awards](#), and may not be used for the purchase of firearms, ammunition, grenade launchers, bayonets, or weaponized aircraft, vessels, or vehicles of any kind with weapons installed;
- Expenditures for weapons systems and ammunition;
- Costs associated with hiring, equipping, training, etc. sworn public safety officers whose **primary** job responsibilities include fulfilling traditional public safety duties such as law enforcement, firefighting, emergency medical services, or other first responder duties;
- Costs that supplant traditional public safety positions and responsibilities; or
- Activities and projects unrelated to the completion and implementation of the EMPG Program
- Clothing used for everyday wear by emergency management employees or other personnel.

Recipients should consult with their Regional EMPG Program Manager prior to making any investment that does not clearly meet the allowable expense criteria established in this Manual and the EMPG Program NOFO.

Amendments for EMPG Costs

In 2 CFR 200.308(f) it states that the Federal awarding agency may, at its option, restrict transfer of funds among direct cost categories where the Federal share exceeds the simplified acquisition threshold, and the cumulative amount of the transfer exceeds 10% of the total budget last approved by the awarding agency. For purposes of 2 CFR 200.308(f), the term “budget” includes both the federal and non-federal cost share. For EMPG awards (which include a 50% cost share), if the recipient wants to revise their budget and there are transfers between the direct cost categories exceeding the Simplified Acquisition Threshold **and** the cumulative amount of the transfers exceeds 10% of the total project costs (federal and non-federal), then EMPG recipients must request prior written approval from their Regional EMPG Program Manager for

those transfers and amendments. Recipients should consult with their Regional EMPG Program Manager prior to making any changes to their EMPG Work Plan.

EMPG Program Work Plan

Submission of an EMPG Program Work Plan is mandatory. It is a required component of the EMPG Program application. The Work Plan outlines the state's emergency management sustainment and enhancement efforts, including new and ongoing activities and projects, that are driven by identified preparedness priorities and proposed for the EMPG Program period of performance. An FY 2023 EMPG Program Work Plan Template (available on the [Grants.gov](https://www.Grants.gov) EMPG Program application page and on the FEMA.gov website at [EMPG](#)) is provided to facilitate the work plan development process. The submitted Work Plan must address all the data and information requirements included in the FY 2023 EMPG Program Work Plan Template and in the supplemental guidance included in this section. Therefore, EMPG Program applicants are strongly encouraged to use the provided FY 2023 EMPG Program Work Plan Template.

Prior to submission of the EMPG Program Work Plan, the applicant must work with the Regional Administrator or designated Regional EMPG Program Manager to identify three to five priority areas which will serve as the focus for EMPG Program-funded investments. The priorities must be mutually agreed to by the applicant and Regional Administrator and should be driven by the THIRA/SPR process – specifically, the outputs from the THIRA/SPR process – and other relevant information sources such as AARs, audit and monitoring findings, Hazard Mitigation Plans and other deliberate planning products. Priorities should also reflect those included in each recipient's IPP so that recipients are focusing all investments, projects, and other resources on a common set of priorities. As they select priorities, applicants should consider which capability gaps would be most operationally consequential, must be closed most urgently, and could be meaningfully addressed within the period of performance. Applicants should refer to the EMPG Program NOFO for further guidance on the priority identification process.

Applicants must set at least one performance goal for each RA agreed-upon priority area that achieves a specific outcome. Each goal must be specific, measurable, and achievable within the period of performance, relevant to the priority area, and have a target date for completion. Applicants must describe how achieving each goal or objective will impact the priority area it supports by the end of the period of performance. Each goal must include an estimate quantifying the extent to which the supporting investments will close capability gaps (e.g., “Increase the percentage of people who can find and secure long-term housing by 10% within 1 year of an incident”). The FY 2023 EMPG Program Work Plan Template includes instructions and examples to help guide this process so that recipients can develop goals that focus on achieving specific outcomes.

The Regional Administrator or designated Regional EMPG Program Manager will ensure that the mutually agreed priorities are fully addressed in the EMPG Program Work Plan. In addition, the Regional Administrator must approve final Work Plans before states may draw down EMPG Program funds. Grant funds will be released upon approval of the state's final Work Plan.

Following Work Plan approval, regional EMPG Program Managers will work closely with recipients to monitor progress toward goals and activities in the Work Plans during the performance period and may request further documentation from the recipients to clarify the projected Work Plan. Further, in accordance with [2 C.F.R. §200.308](#) – *Revision of budget and program plans*, any changes to the approved Work Plan – including changes in project scope and budget changes within any direct cost category exceeding 10% of the total award amount – will require advance approval from the Regional Administrator or designated Regional EMPG Program Manager.

EMPG Program Work Plan Instructions

The FY 2023 EMPG Program Work Plan Template has been updated to support the collection of objective information and quantitative data that will allow FEMA to measure program effectiveness and investment

impacts more effectively. This also enables compliance with [2 C.F.R. § 200.301](#), which requires federal awarding agencies to measure recipient performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices. To this end, the FY 2023 EMPG Program guidance in the NOFO and Work Plan requires recipients to link EMPG Program-funded investments to THIRA/SPR results and other relevant materials that inform capability priorities and needs and to include specific performance measures that will allow FEMA to measure the impact of those investments based on the core capabilities that are addressed.

The FY 2023 EMPG Program Work Plan Template largely complements the THIRA/SPR process outlined in the [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#) (CPG 201, v3). As noted in CPG 201, v3, a coordinated approach to track investments, and understand the return on investments, can help improve the effectiveness of those investments. Tracking how EMPG Program-funded investments result in specific, quantitative changes in capabilities can help guide communities' strategic planning considerations and inform resource allocation decisions that will maximize effectiveness in building or sustaining capabilities. Therefore, applicants are encouraged to refer to CPG 201, v3, along with their most recent THIRA and SPR, when developing their EMPG Program Work Plan.

The FY 2023 EMPG Program Work Plan Template consists of the following tabs: Definitions and Guidance, Quick Links, Grant Investment Strategy, Grant Activities Outline, Detailed Budget – Excluding M&A, Budget Narrative – Excluding M&A, Detailed Budget – M&A Only, Budget Narrative – M&A Only, EMPG Program Summary, Implementation Schedule, Training Data Table, and Exercise Data Table. As explained above, the focus of the FY 2023 EMPG Program Work Plan Template is on improving data collection to better enable measurement of grant outcomes. Therefore, the narrative content is minimized and many of the cells include dropdowns for selecting applicable data. This approach also helps to simplify the Work Plan development process.

Instructions for each Work Plan section are provided below. Additional guidance and instructions are provided in the FY 2023 EMPG Program Work Plan Template.

Definitions and Guidance

The Definitions and Guidance tab collects applicant information and provides instructions for completing each subsequent tab.

Quick Links

The Quick Links Tab uses the link functionality in Excel to allow users to navigate throughout the template quickly and minimize the need to scroll through projects and implementation schedules.

Grant Investment Strategy

The intent of the Grant Investment Strategy tab of the FY 2023 EMPG Program Work Plan Template is to provide an overview of the state/territory's preparedness investment strategy. It should serve as the foundation for completing the remainder of the Work Plan. It includes separate sections to explain the following:

- The performance goals associated with each priority area;
- The most recent THIRA/SPR results;
- Significant risks and capability gaps that currently exist;
- Resulting preparedness priorities; and
- The anticipated impact of the proposed EMPG Program-funded investments.

For the Performance Goals section, the applicant should identify the three to five priorities that were mutually agreed to and approved between the Regional Administrator and the state/territory. These goals serve as the focus for the EMPG Program-funded investments. The reference materials used to identify the priorities should be cited and their relevance explained in this section.

At least one performance goal should be identified for each priority area. Each goal must be specific, measurable, achievable within the period of performance, relevant to the priority area, and have a target date for completion (i.e., SMART goal). It should describe how achieving each goal will impact the priority area it supports by the end of the period of performance.

Grant Activities Outline

The Grant Activities Outline is used to capture the proposed EMPG Program-funded projects and link them to the identified priorities, performance goals, and gaps or needs. Coupled with the Implementation Schedule, the Grant Activities Outline supports identification and tracking of EMPG Program-funded project outcomes, which will enable better understanding of the impacts of those investments relative to the performance goals and the associated core capabilities. Identifying and tracking project outcomes also supports compliance with the [Foundations for Evidence-Based Policy Making Act of 2018](#) and [changes to 2.C.F.R](#) related to performance, evaluation, and risk for federal grants. Applicants can also designate whether a project addresses equity considerations and/or climate change impacts. Examples of allowable activities and associated core capabilities for projects that address the FY 2023 EMPG Program national priorities of equity, climate resilience, and readiness can be found in the [FY 2023 EMPG Program NOFO](#).

The Grant Activities Outline includes sections that allow the applicant to identify the performance goals that are supported by each project and the milestones that are critical to accomplishing each goal. Additional guidance on performance goals and milestones, including specific examples of each, are provided below.

The Grant Activities Outline also requires the applicant to explain the objective and anticipated impact of each project relative to the associated priorities, performance goals, and related core capabilities:

- The “Project Objective” should explain what the project will accomplish; specifically, how the project will address the identified gap or need and how it supports one or more of the identified performance goals.
- The “Anticipated Project Impact” should explain the expected project outcome relative to the associated priorities and performance goals.
 - The impact statement should include a quantitative estimate of the degree to which the project will contribute to achieving the identified performance goal (see hierarchy example below).

Effective completion of the Grant Activities Outline requires an understanding of the established planning hierarchy. Priorities are at the top of the hierarchy, followed by performance goals that define a clear outcome or end-state and provide the basis for addressing each priority. Project proposals should be identified based on the performance goals. High priority capability gaps or needs identified through the THIRA/SPR process, particularly SPR Step 2, and other assessments are also used to inform project selection and to identify specific project objectives. Project objectives, and accompanying impact statements, should complement the performance goals by including similar outcome-focused metrics, as explained above. Lastly, identifying the specific project activities are the last step in the process of completing the GAO. Project activities are key components and/or milestones that are critical to successful completion of the project.

An example of this planning hierarchy for completing the GAO is provided below:

- ❖ **Priority:** Logistics and Supply Chain Management
 - **Performance Goal:** Within 24 hours of an incident, identify and mobilize life-sustaining commodities, resources, and services to 10,000 people requiring shelter and 100,000 people requiring food and water. Maintain distribution system for at least 30 days.
 - **Project:** Update State Logistics and Distribution Management Plan and qualify 40 additional personnel for logistics operations in NQS.
 - **Project Objective/Impact:** Increase capacity to identify and mobilize life-sustaining commodities, resources, and services to people requiring shelter, food, and water by 50%, allowing the state to do so for 7,500 people requiring shelter and 75,000 requiring food and water within 24 hours of an incident and maintain that distribution system for at least 30 days.
 - **Activity:** Convene cross-discipline working group meeting on May 30, 2023, to review current State Logistics and Distribution Management Plan

All EMPG Program-funded investments must be accounted for in the Grant Activities Outline. However, recognizing that some sustainment activities, such as funding of emergency manager salaries, may not align to a specific priority or performance goal, applicants are not required to identify priorities and performance goals for such investments. However, all other portions of the Grant Activities Outline must be completed as a means to justify the applicable sustainment costs.

In cases where emergency management personnel are not assigned to support specific projects included in the Work Plan, the applicant may choose to create a single project (e.g., Emergency Management Personnel Project) to encompass the majority of the EMPG Program-funded salaries and fringe benefits costs. This single project would be populated on the Grant Activities Outline and include the associated activities, priorities, goals, anticipated outcomes, milestones, etc. for the applicable EMPG Program-funded emergency management staff, including staff supporting the M&A activities.

The various elements of the Grant Activities Outline tab are outlined below, along with basic instructions for completing the required entries. Supplemental guidance and instructions are included in the FY 2023 EMPG Program Work Plan Template.

- **Project Name:** Provide a descriptive name for each planned project. Examples include “Development of Emergency Function Annexes,” “Development of Earthquake Scenario Loss Estimations,” “Implementation of Statewide Interoperability Plan,” “NIMS Training for Emergency Management Personnel,” “Development of Emergency Preparedness Plan for Individuals with Disabilities,” etc.
- **Brief Project Description:** Provide further details on the project, particularly where the project name does not sufficiently describe the project.
- **Gap or Need Addressed:** Briefly describe the specific gap or need addressed by the project.
- **Reference for Identified Gap or Need:** Select the documentation used to identify the cited gap or need from the drop-down menu.
- **Project Objective:** Explain how the project addresses the identified gap or need, and how it supports the identified priorities and performance goals.
- **Anticipated Project Impact:** Explain the expected project outcome relative to the associated priorities and performance goals.
- **Build or Sustain:** Select whether the project will build or maintain/sustain the identified core capability(ies).
- **Equity:** Select whether the project will address equity considerations. For FY 2023, **at least one project** must specifically address equity considerations.
- **Climate Change:** Select whether the project will address the impacts of climate change.

- **EMPG Program National Priority Area:** Select the applicable National Priority Area from the drop-down menu.
- **Regional Administrator (RA) Agreed Upon Priority Area:** Select from a drop-down list of the 32 core capabilities and other priorities identified in the latest version of the National Preparedness Report. If the priority is not included in the drop-down list, enter “other” for Primary, Secondary and/or Tertiary, and then enter the priority in the adjacent cell.
- **POETE Category:** Select whether the project relates to Planning, Organization, Equipment, Training, or Exercises. Multiple POETE categories can be selected to accommodate projects that span multiple categories. For example, building capability often involves a combination of planning, training, and exercise activities. Space is provided to populate the Primary, Secondary and Tertiary POETE category.
- **Emergency Management Accreditation Program (EMAP) Standard Element:** This field is optional. It is made available to those states/territories that are EMAP certified and want to continue tracking their investments by EMAP Standard Elements. Select the appropriate EMAP Standard Elements from the drop-down menu, if applicable.
- **Mission Area:** Select the appropriate preparedness mission area supported by the project: Prevention, Protection, Mitigation, Response, or Recovery. Multiple mission areas can be selected to accommodate projects such as plans and exercises that involve multiple mission areas, and space is provided to populate the Primary, Secondary and Tertiary Mission Areas.
- **Core Capabilities:** Select up to five core capabilities supported by the project. Indicate whether the Core Capability has a target with a gap rated as high priority.
- **Performance Goals:** Select the performance goal(s) from the drop-down menu. The drop-down menu will consist of the performance goals as entered in the Grant Investment Strategy.
- **Current Capability Metrics:** Identify capability metrics prior to the project implementation.
- **Milestones:** Identify key project activities and other deliverables or outputs that are critical to accomplishing the identified performance goal and can be tracked to demonstrate progress toward achieving the performance goal.

Detailed Budget – Excluding M&A

The Detailed Budget – Excluding M&A tab enables a full accounting of all project activity costs, excluding M&A costs. This tab contains an itemization of non-M&A costs related to personnel, fringe benefits, travel, equipment, supplies, contractual services, construction, other, and indirect costs. For personnel and fringe benefits, the position title and percentage of time or fringe allocated to the EMPG Program grant is required. Each line item is assigned to its relevant project, allowing the information in mission areas, core capabilities, priorities, EMAP, and POETE categories to populate accordingly. This enables a breakdown of the full EMPG Program budget into various categories: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMAP Standard Elements, and POETE Category. The cells for each of these categories are automatically populated based on the project number as identified in the Grant Activities Outline.

Budget Narrative – Excluding M&A

The purpose of the Budget Narrative – Excluding M&A tab is to 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information provided on the Detailed Budget – Excluding M&A tab. This tab will include a narrative for each cost category of the budget. **For the Cost Share, applicants must include a detailed description of the source of the match/cost share.** If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation. If the M&A Detailed Budget tab includes Indirect Costs, an approved Indirect Cost Rate Agreement signed by the recipient agency and the cognizant agency for the recipient, or a copy of the proposal to the cognizant

federal or state agency for an indirect cost rate, must be included in the submission of the Work Plan for application purposes. Applicants who do not have a current negotiated indirect cost rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Grants Management Specialist for further instructions. Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the Grants Management Specialist for further instructions.

Detailed Budget – M&A Only

This Detailed Budget – M&A Only tab enables a full accounting of all project activity costs as they relate specifically to M&A costs. This tab contains an itemization of **only** M&A costs related to personnel, fringe benefits, travel, equipment, supplies, contractual services, construction, and other direct costs. **For personnel and fringe benefits, the position title and percentage of time or fringe allocated to the EMPG Program grant is required.** Each line item is assigned to its relevant project, allowing the information in mission areas, core capabilities, priorities, EMAP, and POETE categories to populate accordingly. This enables a breakdown of the full EMPG Program budget into various categories, including the following: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMAP Standard Elements, and POETE Category. The cells for each of these categories are automatically populated based on the project number as identified in the Grant Activities Outline.

Budget Narrative – M&A Only

The purpose of the Budget Narrative – M&A Only tab is to: 1) justify the need for each line item and the cost estimates; 2) explain how costs relate to the programmatic goals of the project(s); and 3) supplement other budget information provided on the Detailed Budget– M&A Only tab. For the Cost Share, applicants must include a detailed description of the source of the cost share/matching funds. If funds or services are to be provided by a third party for in-kind match, a dated letter of commitment is required to document the donation. This tab will include a narrative for each cost category of the budget.

Information for the Detailed Budget and Budget Narrative

This section of the Work Plan is a detailed description of the budget found in the SF-424A and must include a detailed discussion of how EMPG Program funds will be used. Applicants must **itemize** costs related to personnel, fringe benefits, travel, equipment, supplies, contractual costs, other direct costs, indirect costs, and total costs.

Applicants should use the following instructions and budget cost category descriptions to complete the Budget Detail section of the Work Plan.

Personnel: List each position with a brief description of the duties and responsibilities (no personnel names), as well as the salary computation for staff. If a Cost-of-Living Adjustment increase and/or merit pay increase in salary will be provided for the position, include those costs in calculations for personnel and the associated fringe benefits on the applicable Detailed Budget and the Budget Narrative.

Fringe Benefits: List the computation for fringe benefits for each of the personnel listed in the budget worksheet. Estimated rates for fringe are allowable but provide the basis for that estimation in the budget narrative (e.g., average percent fringe paid for most employees within the agency). If not using an estimate, list fringe benefit and the associated costs for each employee that will be paid by EMPG Program funding (e.g., Social Security/FICA, Unemployment Compensation, Medicare, Retirement, Health Insurance, Life Insurance, etc.). Also, in cases where fringe benefits costs are included in an indirect cost rate agreement, the fringe benefits cannot also be charged as a direct cost for reimbursement.

Travel: Specify the mileage, per diem, estimated number of trips in-state and out-of-state, number of travelers, and other costs for each type of travel for staff. Travel may be integral to the purpose of the

proposed project (e.g., management, monitoring and/or oversight of grant award and/or subrecipients) or related to propose project activities (e.g., attendance at training or meetings related to management of the EMPG Program award). Travel costs identified in this section are for employees of the applicant/recipient only. For travel costs related to staff training, include as many details as possible about each proposed training cost, including the name of the training course(s), training provider, personnel who will attend the training, proposed dates (estimates are accepted), etc. Travel category costs do not include 1) costs for travel of consultants, contractors, consortia members, or other partner organizations, which are included in the “Contractual” category; or 2) travel costs for employees of subrecipient agencies (those should be included in the Contractual category, if applicable).

Equipment: List each equipment item for EMPG Program purposes only by Line-Item Name and in the same order as listed on the Detailed Budget. Include a brief description of each equipment item (no brand names); per unit cost, quantity and total cost; location of equipment (if other than the direct recipient agency); and how the equipment will be utilized. Equipment is defined in 2 C.F.R. § 200.1.

Supplies: Include all tangible personal property other than those described in the definition of “equipment” as defined by 2 C.F.R. § 200.1. Supplies are also defined in 2 C.F.R. § 200.1. The budget detail should identify categories of supplies to be procured for EMPG Program purposes only (e.g., printing supplies, office supplies, etc.) and the calculation of those costs (e.g., based on monthly rates or based on an average of previous years’ similar costs). Non-tangible goods and services associated with supplies, such as printing service, photocopy services, and rental costs should be included in the “Other” category. Provide the basis for calculation of supplies including the Line-Item Name and list supplies in the Budget Narrative in the same order as listed on the Detailed Budget. Subrecipient M&A and non-M&A costs should be included in the “Other” category.

Contractual: Identify each proposed contract related to EMPG Program purposes only and specify its purpose and estimated cost. Contractual/consultant services are those services to be carried out by an individual or organization (do not include company or individual names in budget narrative), other than the applicant, in the form of a procurement relationship. Leased or rented goods (equipment or supplies) for EMPG Program purposes should be included in the “Other” category. The applicant should list the proposed contract activities along with a brief description of the scope of EMPG Program work or services to be provided and proposed duration. Include the basis for the calculation of contractual services costs (e.g., contractor training instructor speaking fee, contractor travel costs and contractor instructional materials).

Other: This category should include only those types of direct costs that do not fit in any of the other budget categories and are related to EMPG Program purposes only. Include a description of each cost by Line-Item Name and in the same order as listed on the applicable Detailed Budget. Include the basis for calculation of the costs. Examples of costs for EMPG Program purposes that may be in this category include the following: insurance, rental/lease of equipment or supplies, equipment service or maintenance contracts, printing or photocopying rental, etc. Subrecipient M&A and non-M&A costs from their subawards (e.g., subgrants) are a distinct type of cost under this category. The term “subaward” means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient. This term does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the contractual category. Applicants must provide the aggregate amount they propose to issue as subaward work and a description of the types of M&A and non-M&A activities to be supported.

Construction: Include construction costs, including renovation projects for a state or territorial government’s principal EOC. Include a description of the types of construction or renovation services proposed and the calculation of these costs (no company or individual names). Subrecipient construction

costs should be included in the Other category. M&A funding cannot be used for construction or renovation costs.

Indirect Costs: If indirect charges are budgeted, indicate the approved rate and base (the cost categories for which this indirect cost percentage rate will be applied.) Indirect costs are those incurred by the recipient for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. In order for indirect costs to be allowable, the applicant must have a federal or state negotiated indirect cost rate (e.g., fixed, predetermined, final or provisional), or must have submitted a proposal to the cognizant federal or state agency. An approved Indirect Cost Rate Agreement signed by the recipient agency and the cognizant agency for the recipient, or a copy of the proposal to the cognizant federal or state agency for an indirect cost rate, must be included in the submission of the Work Plan Template for application purposes.

Examples of Indirect Cost Rate calculations are shown below:

1. Personnel (Indirect Rate x Personnel = Indirect Costs)
2. Personnel and Fringe (Indirect Rate x Personnel & Fringe = Indirect Costs)
3. Total Direct Costs (Indirect Rate x Total Direct Costs = Indirect Costs)

Applicants who wish to use a cost allocation plan in lieu of an indirect cost rate must also reach out to the FEMA Grants Management Specialist for further instructions. Per 2 C.F.R. Part 200, Appendix VII, paragraph D.1.b, state and local governments are not permitted to use the de minimus rate without seeking and receiving FEMA's approval of a case-by-case exception. Applicants who wish to request the case-by-case exception should reach out to their FEMA Grants Management Specialist for further instructions.

Post-award requests to charge indirect costs will be considered on a case-by-case basis and based upon the submission of an agreement or proposal as discussed above or based upon the de minimis rate or cost allocation plan, as applicable.

EMPG Program Summary

This tab includes summary information for the award as entered in the budget tabs and the Grant Activity Outline. The overall budget summary will include the total award amount, federal amount, non-federal amount (cost share), and M&A amount, along with the calculated percentage of each. The additional budget summary tables will calculate the amount allocated for federal funds, non-federal funds (cost share) and total project costs for each cost category. There is also a budget summary table with similar information for each primary mission area and core capability.

The EMPG Program Summary tab also provides users with an overview of their progress in the FY 2023 EMPG Program Performance Metrics. The metrics are automatically populated from the calculations of information provided in the Grant Activities Outline. These metrics aim to provide the count, percentage, and associated dollar amount affiliated with the following performance metrics: 1) Capability-building Projects for Alignment to Capability Gaps in SPR; 2) Funding Spent on Capability-building Projects Aligned to Capability Gaps in SPR; 3) Building Capabilities for High Priority Targets; 4) Regional and National Priority Area Alignment; and 5) Plans-Training-Exercise Alignment. The EMPG Program Summary Tab further provides a count of all projects that address equity considerations and climate change impacts.

Implementation Schedule

The Implementation Schedule includes the basic elements of a project management plan. It is used to capture key project activities to include both EMPG Program-funded activities that are critical to accomplishing the project objectives as identified in the Grant Activities Outline, as well as tasks that are essential to effective project management. Thus, this product can be used as a basic project management

tool to plan and track the progress of key project activities and associated tasks. Key project activities should generally correlate with the “Milestones” identified for each project included in the Grant Activities Outline.

The Implementation Schedule enables the applicant to identify key project activities by year/quarter, the associated tasks, timelines, status reports, and challenges or risks that may affect successful completion of the activity as planned. It also allows for the tracking of project progress by including estimated and actual completion dates for each activity and the ability to enter quarterly accomplishments relating to the activity. This functionality allows for quarterly reporting of project progress, in accordance with the programmatic requirements of the EMPG Program. Also, data from the Implementation Schedule should be completed and submitted to FEMA as a component of quarterly reporting on grant activities.

The Implementation Schedule further allows the applicant to explain how their project addresses equity considerations. Possible examples include: 1) conducting vulnerability assessments to identify and fully understand the vulnerabilities and needs of underserved communities relating to emergency preparedness; and 2) updating emergency operations plans to ensure the needs of underserved communities are adequately addressed.

The Implementation Schedule also provides the applicant with the ability to explain how their project addresses the impacts of climate change.

Training Data Table

To facilitate consistent data reporting and performance measures collection, the FY 2023 EMPG Program Work Plan Template includes a Training Data Table. This table should reflect training activities outlined in the multi-year IPP and completion of required EMPG Program training courses. The data requirements are defined in the section below. Applicants/recipients are not required to report EMPG Program-funded personnel costs associated with training. Training related to the NQS is not reported on the Training Data Table. Also, data from the Training Data Table should be completed and submitted to FEMA as a component of quarterly reporting on grant activities. Upon entering the project name or number in the template, the cells located to the right of the main Training Data Table will auto-populate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.

Training Data Table Template

Project Number	Project Name	Name of Training	Scheduled Date	Date Training was Conducted/ Completed	EMPG Program Required Training? (Y/N)	Number of Personnel Trained	NIMS Training Course Number (if applicable)	Training Identified in IPP (Y/N)
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Training Data Table Definitions

- Column 1 – Project Number from the Grant Activities Outline
- Column 2 – Project Name from the Grant Activities Outline
- Column 3 – Name of training course
- Column 4 – Scheduled date of training course
- Column 5 – Date training was conducted or completed
- Column 6 – Is the training course required by the EMPG Program?
- Column 7 – Number of personnel trained
- Column 8 – NIMS Training Course Number (if applicable)

- Column 9 – Is the training identified in the multi-year IPP?

Exercise Data Table

To facilitate consistent data reporting and performance measure collection, an Exercise Data Table should be completed for any exercises that meet EMPG Program requirements and/or exercises conducted in whole or part with EMPG Program funds. The Exercise Data should include EMPG Program-funded exercises and costs to run the exercise (e.g., planning, materials, props, contractual services for conducting the exercise, AAR and IP, etc.). Any exercise planned or conducted during the grant period of performance should be reported on the Exercise Data Table. Applicants/recipients are not required to report EMPG Program-funded personnel costs associated with exercises. Data from the Exercise Data Table should also be completed and submitted to FEMA as a component of quarterly reporting on grant activities. The data requirements are defined in the section below. Upon entering the project name or number in the template, the cells located to the right of the main Exercise Data Table will auto-populate the associated priority, mission area, capabilities, and functional areas based on the project data included in the Grant Activities Outline.

Exercise Data Table Template

Project Number	Project Name	Name of Exercise	Scheduled Date	Date Exercise Conducted/ Completed	Type of Exercise	Exercise Fulfills Progressive Exercise Requirement (Y/N)	Exercise Identified in IPP (Y/N)	Date AAR submitted to FEMA
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Exercise Data Table Definitions:

- Column 1 – Project Number from the Grant Activities Outline
- Column 2 – Project Name from the Grant Activities Outline
- Column 3 – Exercise Name
- Column 4 – Scheduled date of exercise
- Column 5 – Date exercise conducted/completed
- Column 6 – Type of exercise (select from drop-down menu)
- Column 7 – Is the exercise part of a progressive exercise series?
- Column 8 – Is exercise identified in the multi-year IPP?
- Column 9 – When was the AAR submitted to FEMA?

EMPG Requirements Matrix

ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
1	Administrative	Pass through 100% of award from SAA or Territory to EMA.	NOFO	Within 15 days of award date (if applicable)	Varies	Work Plan/Electronic Notification
2	Allowability	Critical Emergency Supplies Purchases – 5-year viable inventory management plan with a distribution strategy	App H	Prior to award (if applicable)	Varies	Work Plan/Amendment
3	Application	Work Plan	App H	Per the NOFO	Varies	ND Grants
4	Application	Project addressing Equity Considerations	NOFO, App H	Per the NOFO	Varies	Work Plan: Grant Activities Outline and Budget Narrative
5	Civil Rights	Civil Rights Evaluation Tool	PGM	Within 30 days of receipt of award	Varies	Email to: CivilRightsEvaluation@hq.dhs.gov and cc: Regional EMPG Program Manager
6	Closeout	Closeout Reporting Requirements. (Note: ND Grants does not have a closeout module. Regional closeout processes vary.)	PGM	Per the Closeout notification letter	Varies	ND Grants/Electronic Notification
7	Cost Share	Cost Share	App H	Application, Quarterly, Closeout	Varies	Work Plan Budget, Federal Financial Report (FFR)/SF-425 (Quarterly and at Closeout)
8	Davis-Bacon	Davis-Bacon Compliance	App H	For all EMPG projects	Varies	Monitoring
9	EHP	EHP approval	PGM	Prior to any construction, renovation, or ground disturbing activity	Varies	Email to: CivilRightsEvaluation@hq.dhs.gov , and cc: Regional EMPG Program Manager
10	EHP	Construction Towers	App H	FCC Section 106 review must be completed prior to EHP review	Varies	Monitoring
11	EMAC	EMAC association	NOFO	Prior to award	Varies	Regional EMPG Program Manager to verify on EMAC website
12	Exercise	Exercise program negotiated (align with IPP/priorities)	App H	Prior to award	Varies	Work Plan
13	Exercise	AAR (After Action Report)/IPs	App H	90 days after completion of exercises conducted in Calendar Year (CY) Q4	Varies	Email to: hseep@fema.dhs.gov and cc: Regional EMPG Program Manager

ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
14	Performance Measures	87.5% of all PTE projects align with building capability and/or closing capability gaps identified	NOFO	Prior to award	Varies	Work Plan
15	Pre-Award	Pre-award cost	NOFO	Prior to award (if applicable)	Varies	Work Plan Budget
16	Priorities	3-5 Applicant and RA mutually agreed upon Priorities (Note: These need not be the national priorities)	App H	Prior to award	Varies	Work Plan
17	Reporting	Threat and Hazard Identification and Risk Assessment (THIRA) submitted	App H	Every 3 years starting in 2022	31-Dec	Prep toolkit
18	Reporting	State Preparedness Review (SPR) submitted	App H	Annually	31-Dec	Prep toolkit
19	Reporting	National Incident Management System (NIMS)	App H	Annually	31-Dec	Unified Reporting Tool (URT)
20	Reporting	National Qualification System (NQS) implementation	App H	Phased-in Objectives due Annually	31-Dec	URT
21	Reporting	Distribution Management Plan (DMP) Plan review	App H	After initial submission, DMP updates submitted annually, as necessary	30-Sep	Email to: Regional EMPG Program Manager
22	Reporting	Multi-year Training and Exercise Plan (TEP)/Integrated Preparedness Plan (IPP) developed	App H	Annually	31-Jan	Email to: hseep@fema.dhs.gov and cc: Regional EMPG Program Manager
23	Reporting	Periodic Performance Reporting (PPR) Status of all EMPG Program-funded plans, training and exercise activities must be reported quarterly.	App H	Within 30 days after the end of the CY Quarter	30-Jan 30-Apr 30-July 30-Sep	ND Grants
24	Reporting	Financial Quarterly Reporting	PGM	Within 30 days after the end of the CY Quarter	30-Jan 30-Apr 30-July 30-Sep	PARS
25	Reporting	Biannual Strategy Implementation Report (BSIR)	PGM -	Biannual	No later than: 30-Jan 30-July	Grant Reporting Tool (GRT)
26	Reporting – Exercise	All EMPG Program-funded exercise activities must be reported quarterly.	App H	Quarterly	30-Jan 30-Apr 30-July 30-Sep	Exercise Data Table

ID	Category	Requirement	Location	Due Date Cycle	Due Date	Submission Plan
27	Reporting – Training	All EMPG Program-funded training activities must be reported quarterly.	App H	Quarterly	30-Jan 30-Apr 30-July 30-Sep	Training Data Table
28	Telecomms	FirstNet	PGM	Prior to award (if applicable)	Varies	Verified by Regional EMPG Program Manager
29	Telecomms	SAFECOM	PGM/ App H	Prior to award (if applicable)	Varies	Verified by Regional EMPG Program Manager
30	Training	Training activities captured (align with IPP/priorities)	PGM/ App H	Prior to award	Varies	Work Plan Training Data Table or PPR template
31	Training	EMPG funded personnel who have completed: <ul style="list-style-type: none"> • Basic Academy OR Professional Development Series AND • NIMS 	App H	On-going	Varies	Per Regional Guidance: <ul style="list-style-type: none"> • ND Grants: with PPR • Roster to Regional EMPG Program Manager • Reviewed During Monitoring
32	Training	Training attendance information submitted within 30 days of attendance of training supported with EMPG funding (IB 432)	PGM/ App H	On-going	Varies	Web-Forms