

FEMA Preparedness Grants Manual for EMPG specifically
As of February 2021



FEMA 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 has helped people before, during, and after disasters for more than 40 years. FEMA remains committed to building 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 impacted areas are the true first responders during any emergency or disaster—individuals, families, neighbors, and local communities. FEMA’s role is to coordinate federal resources to supplement SLTT capabilities. FEMA does this by coordinating through the levels of government, meaning that states and their local political subdivisions, tribes, and territories are our 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 Department of Homeland Security, largely through grants and cooperative agreements. These programs account for a significant amount of the federal 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 law 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)*
SHSP assists state, local, tribal, and territorial efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.
- *Urban Area Security Initiative (UASI)*
UASI assists high-threat, high-density 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 Customs and Border Protection (CBP), United States Border Patrol (USBP), and federal, state, local, tribal, and territorial 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 as a result of participation 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 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 state, local, tribal, and territorial 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*, 1 (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 [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 <https://www.fema.gov/national-preparedness-goal>.

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 <http://www.fema.gov/national-preparedness-system>. 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 Program¹
- 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
- 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 application is submitted. 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 are received 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, 9:00 a.m. – 6:00 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, 9:00 a.m. – 5:00 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 are not available. To access these materials, go to <http://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. The registration process can take four or more weeks to be completed. Therefore, registration should be done with enough 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.

In order to apply for an award, all applicants must:

1. Apply for, update, or verify their Data Universal Numbering System (DUNS) number from Dun & Bradstreet and Employer Identification Number (EIN) from the Internal Revenue Service;
2. In the application, provide a valid DUNS number, which is currently the unique entity identifier;
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 it has an active federal award or an application or plan under consideration by a federal awarding agency.

Specific instructions on how to apply for, update, or verify a DUNS 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 DUNS 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.



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. **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 DUNS Number, EIN, and an active SAM registration.

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 DUNS 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 <https://www.grants.gov/web/grants/applicants/registration.html> to create an account with [Grants.gov](https://www.grants.gov).

2. **Obtain a DUNS Number:** All entities applying for funding, including renewal funding, must have a DUNS number from Dun & Bradstreet. Applicants must enter the DUNS number in the data entry field labeled "Organizational DUNS" on the SF-424 form.

For more detailed instructions for obtaining a DUNS number, refer to <https://www.grants.gov/web/grants/applicants/organization-registration/step-1-obtain-duns-number.html>.

Note: At some point, the DUNS Number will be replaced by a "new, non-proprietary identifier" requested in, and assigned by, SAM.gov. This new identifier is being called the Unique Entity Identifier (UEI), or the Entity ID. Grants.gov has begun preparing for this transition by educating users about the upcoming changes and updating field labels and references to the DUNS Number (the current identifier) within the Grants.gov system. Users should continue using the DUNS Number in UEI fields until further notice. To learn more about SAM's rollout of the UEI, please visit <https://gsa.gov/entityid>.

3. **Obtain Employer Identification Number:** In addition to having a DUNS number, all entities applying for funding must provide an EIN. The EIN can be obtained from the IRS by visiting: <https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online>.

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 here: https://secure.login.gov/sign_up/enter_email?request_id=34f19fa8-14a2-438c-8323-a62b99571fd3.

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: <https://www.sam.gov/SAM/pages/public/loginFAQ.jsf>.

5. **Register with SAM:** In addition to having a DUNS number, 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 <https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>.

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 DUNS 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, DUNS number, and EIN are up to date in SAM and that the DUNS 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 <https://www.fsd.gov/fsd-gov/home.do> 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 DUNS number to complete this process.

For more information, follow the on-screen instructions or refer to <https://www.grants.gov/web/grants/applicants/registration.html>.

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 of your grant applications. To add an organizational profile to your Grants.gov account, enter the DUNS Number for the organization in the DUNS field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to <https://www.grants.gov/web/grants/applicants/registration/add-profile.html>.

8. **EBiz 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 <https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>.

9. **Track Role Status:** To track your role request, refer to <https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>.
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** seven days before the application deadline.

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

- SF-424, Application for Federal Assistance
- 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: <https://www.grants.gov/web/grants/applicants/workspace-overview.html>

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/web/grants/applicants/adobe-software-compatibility.html) to download the appropriate version of the software at <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>.

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 DUNS 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 <https://www.grants.gov/web/grants/applicants/applicant-training.html>.

Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to a specific grant contact the number listed in the NOFO of the grant for which you are applying.

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 <https://www.fema.gov/grants/guidance-tools/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 on Grants.gov](https://www.fema.gov/grants/guidance-tools/non-disaster-grants-management-system). 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 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 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 will receive an acknowledgement of receipt, a tracking number (GRANTXXXXXXXX) from 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 **5:00 PM ET** 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.

Content and Form of Application Submission

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

<https://www.grants.gov/web/grants/forms/sf-424-family.html>.

Grants.gov:

- **SF-424, Application for Federal Assistance**, submitted through Grants.gov
- **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
- **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 have 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 <https://www.archives.gov/federal-register/codification/executive-order/12372.html>;
https://www.whitehouse.gov/wp-content/uploads/2020/01/spoc_1_16_2020.pdf.

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).

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. Award funds may not be used for matching funds for any other federal awards, 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.

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 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 must be consistent with the statutory authority for the award.

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
8. Training

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

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, 200.326, 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. For additional guidance, please refer to FEMA Policy #405-143-1, [Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services \(Interim\)](#).

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
- **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 amended 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:

- i. Financial stability.
- ii. Quality of management systems and ability to meet management standards.
- iii. History of performance in managing federal award.
- iv. Reports and findings from audits.
- v. 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 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 in the designated integrity and performance system accessible through SAM, which is currently the [Federal Awardee Performance and Integrity Information System](#) (FAPIIS) and is accessible through the [SAM](#) website.
- 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. 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.

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. 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

All successful applicants for all FEMA grant and cooperative agreements are required to comply with [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.

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.

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. A GPD EHP screening form and supporting documentation for preparedness projects requiring EHP review should be submitted to gpdehpinfo@fema.dhs.gov.

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 the [FEMA.gov EHP page](#), 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.

The GPD EHP screening form is located at <https://www.fema.gov/media-library/assets/documents/90195>. Additionally, all recipients under this funding opportunity are required to comply with the FEMA GPD EHP Policy Guidance, FEMA Policy #108-023-1, available at <https://www.fema.gov/media-library/assets/documents/85376>.

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 504 of the Rehabilitation Act of 1973 and Title VI of the Civil Rights Act of 1964, along with 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.

The DHS Standard Terms and Conditions include a fuller list of the civil rights provisions that apply to recipients. These terms and conditions can be found in the [DHS Standard Terms and Conditions](#). Additional information on civil rights provisions is available at <https://www.fema.gov/office-equal-rights>.

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.

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.

- 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. FEMA [Information Bulletin \(IB\) #386](#) has been rescinded by prior NOFOs and remains rescinded as the technical requirements and nationwide network architecture has been developed, and FirstNet is operational. Recipients, however, 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.

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 Notices of Funding Opportunities. 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 <https://www.fema.gov/emergency-managers/nims/implementation-training>.

Emergency management and incident response activities require carefully managed resources (personnel, teams, facilities, equipment, and/or supplies) to meet incident needs. 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 <https://www.fema.gov/emergency-managers/nims/components>. 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](#) to describe the basic principles of standard qualification, certification, and credentialing processes. This guideline supersedes the *NIMS Guideline for the Credentialing of Personnel*.

The National Qualification System 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.

State, local, tribal, territorial, and private sector partners (including nongovernmental organizations) are not required but are strongly encouraged to credential their personnel in accordance with the NIMS National Qualification System guidelines.

Additional information about NIMS implementation is available at <https://www.fema.gov/emergency-managers/nims/implementation-training>.

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). Conformance 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., SCIPs). 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 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 <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html#sortBy=1>. 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 90 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 closeout (and the last quarterly FFR) the following reporting periods and due dates apply for the 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
- 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.

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

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;
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 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 \$10,000,000 for any period of time during the period of performance 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 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 Government and Accountability Office's (GAO) Government Auditing Standards, located at <https://www.gao.gov/yellowbook/overview>, and the requirements of Subpart F of 2 C.F.R. Part 200, located at <http://www.ecfr.gov/cgi-bin/text-idx?node=sp2.1.200.f>.

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 to review 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:

- EMPG
- HSGP
 - SHSP
 - UASI

- OPSG
- NSGP
- TSGP
- PSGP

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 	<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;

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

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

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.

Environmental Planning and Historic Preservation (EHP)

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 laws, Executive Orders, regulations, and policies, as applicable.

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, or new construction including replacement of facilities, 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. Federal law requires EHP review to be completed before federal funds are released to carry out proposed projects. FEMA may not be able to fund projects that are not in compliance with applicable EHP laws, Executive Orders, regulations, and policies.

DHS and FEMA EHP policy is found in directives and instructions available on the [FEMA.gov EHP page](#), 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.

The GPD EHP screening form is located at <https://www.fema.gov/media-library/assets/documents/90195>. Additionally, all preparedness grants recipients are required to comply with the FEMA GPD EHP Policy Guidance, FEMA Policy #108-023-1, available at <https://www.fema.gov/media-library/assets/documents/85376>.

Please refer to the program appendices for additional program-specific EHP requirements and information.

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 (<https://www.fema.gov/grants/preparedness/about/case-studies>). By accepting the award, the recipient agrees to participate in a case study or evaluation if requested.

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.

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.

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)-(iv). 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. §§ 200.216, 200.471, and Appendix II as well as [FEMA Policy #405-143-1](#), 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, in order to ensure objective contractor performance and eliminate unfair competitive advantage, 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. 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.

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. 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. 2 C.F.R. § 200.318(c)(2). 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 <https://www.gsa.gov/resources-for/programs-for-State-and-local-governments> and

<https://www.gsa.gov/buying-selling/purchasing-programs/gsa-schedules/schedule-buyers/state-and-local-governments>.

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.

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.
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 the 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(is);
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 the FEMA Preparedness Officer as needed when preparing an extension request.

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
- Cancelled 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 cancelled 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, how the amount can be paid, and the consequences 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.
- 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-119A, Direct Deposit Form.

FEMA utilizes the Payment and Reporting System (PARS) for financial reporting, invoicing and tracking payments. For additional information, refer to <https://isource.fema.gov/sf269/execute/LogIn?sawContentMessage=true>.

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 other 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, 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.

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.

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:

- Individuals and families, including those with access and functional needs
- Businesses
- Faith-based and community organizations
- Nonprofit groups
- Schools and academia
- Media outlets
- 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.
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 <https://www.cisa.gov/active-shooter-preparedness>.

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: <https://www.dhs.gov/cveas-portal#>.

States and 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 the following website: <https://training.fema.gov/is/courseoverview.aspx?code=is-907>.

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, 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, 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. While 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 [Community Lifelines | FEMA.gov](https://www.fema.gov/media-library/assets/documents/177222) and <https://www.fema.gov/media-library/assets/documents/177222>.

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, principals, and goals they outline.

Program Appendix H:

Emergency Management Performance Grant Program

As a reminder, although 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. Please be sure to read the main content of this Manual in addition to the program-specific appendices.

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, sustaining, 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 closing capability gaps or sustaining capabilities identified in the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) process and other relevant information sources, such as: 1) after-action reports (AARs) following exercises or real-world events; 2) audit and monitoring findings; 3) Hazard Mitigation Plans; and/or 4) other deliberate planning products. In advance of issuing the FY 2021 EMPG Program awards, FEMA Regional Administrators will identify regional priorities based on their unique knowledge of the 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 or territory and Regional Administrator through a collaborative negotiation process. Ideally, all EMPG Program-funded projects, as outlined in the approved FY 2021 EMPG Program Work Plan, will support the priorities identified through this collaborative approach. See [EMPG Program Work Plan](#) section for additional guidance.

FEMA continues to emphasize 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 (EMAC). 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, 2021, recipients are required to complete a THIRA/SPR that addresses all 32 core capabilities and is compliant with [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#). Specific guidance on the requirements for each core capability will be forthcoming in 2021, as some core capabilities have fewer reporting requirements than others. Building on the requirement implemented in 2020, recipients must respond to a series of planning-related questions as part of the THIRA/SPR process.

Recipients are required to submit a THIRA every three years to establish a consistent baseline for assessment. Although the THIRA will be only required every three years, recipients will continue to be required to submit an SPR annually. For additional guidance on the THIRA/SPR, please refer to [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#).

Reporting:

- In each EMPG Program recipient's Biannual Strategy Implementation Report ([BSIR](#)), as part of programmatic monitoring, the recipient is required to describe how expenditures support 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 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. EMPG Program funds may be used 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. 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.

National Qualification System (NQS)

EMPG Program recipients are strongly encouraged to implement components of the NQS and may use their EMPG Program funds to support NQS implementation efforts. Beginning in FY 2022, FEMA intends to

make the implementation of NQS a requirement of award for EMPG Program funding. Jurisdictions should achieve, or work toward achieving, each of the activities listed below. The activities that support NQS implementation include:

- Ensuring that incident personnel qualifying for a position meet the minimum training requirements from the Job Title/Position Qualification for that position. All of the NIMS resource typing definitions and job title/position qualifications can be downloaded from the [Resource Typing Library Tool](#) (RTLTL).
- Developing organizational qualification procedures in alignment with the [NIMS Guideline for the National Qualification System \(NQS\)](#). These procedures include:
 - Qualification, certification, and credentialing processes for incident management and emergency management personnel.
 - Qualification review board, or equivalent review processes for incident management and emergency management personnel qualifications.
 - Individual and team coach and evaluation processes for incident management and emergency management personnel qualifications.
- Conducting exercises in accordance with the [Homeland Security Exercise and Evaluation](#) Program.

Data collection methods of the implementation of the NQS include the following:

Ways that the NIC is tracking collecting data on NQS:

- NIMS Survey
- Unified Reporting Tool questions
- NIMS Regional Coordinator Program Guide that allows NIMS Regional Coordinators to review state NIMS programs

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 Notice of Funding Opportunity (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.

Logistics Planning

Distribution Management Plans

Continuing the mandate from 2020, 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 [FEMA Distribution Management Plan Guide \(August 2019\)](#) 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.

The DM plan must be reviewed by recipients on an annual basis and updated as necessary by September 30 of each year. A question in the URT under the CPG 101 captures whether a jurisdiction has developed and incorporated a DM plan in its 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 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](#)

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 <https://training.fema.gov/is/courseoverview.aspx?code=IS-26>.
- **Interagency Logistics (IL) Training:** This basic IL training course 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 the course by visiting: <https://training.fema.gov/emigrams/2018/1439%20-%20training%20opportunity%20-%2018540%20basic%20interagency%20logistics%20fy19.pdf?d=10/2/2018>.
- **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 more than \$100,000.

Reporting

Annual DM plan reviews will be reported in the Periodic Performance 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 EMPG Program manager for review by regional logistics staff. The Regional Logistics Staff will review and rate the plans using the [FEMA Distribution Management Plan Guide, August 2019](#).

Evacuation Planning

EMPG Program recipients should review and update their EOP at least once every two years in accordance with [Comprehensive Preparedness Guide \(CPG\) 101 v2, *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 | FEMA.gov](#) and [Planning Guides | FEMA.gov](#). 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 provided by FEMA Individual Assistance (IA) 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.

Table 4: 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 and Historical Preservation (EHP) strategy, 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 pre-placed contract would need to comply with applicable federal procurement requirements at 2 C.F.R. §§ 200.317-200.327. For more information, regarding Direct Housing Assistance, please refer to the Individuals and Households Unified Guidance available at <https://www.fema.gov/assistance/individual/program-policy-guide>.

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 | FEMA.gov](#). 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:

- Develop 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. Table 5 details the processes that should be included in the State Administrative Plan and recommendations on where they should be placed.

Table 5: 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 \(PAPPG\)](#) is a comprehensive, consolidated policy document for the Public Assistance program provides an overview of the Public Assistance 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 <https://www.fema.gov/assistance/public/policy-guidance-fact-sheets/job-aids-faqs>.
- **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.

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 state or national preparedness reports (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 FEMA website at <https://www.fema.gov/emergency-managers/national-preparedness/exercises/hseep> and <https://preptoolkit.fema.gov/>.

Recipients shall 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 use the same shared set of priorities in both their IPP and EMPG Program Work Plan, so that EMPG Program investments and projects help recipients implement the planning, training, and exercise activities in their IPPs and advance their IPP priorities. To this end, recipients should develop their IPPs and EMPG Program Work Plans together to create a planned, organized, and methodical approach for closing capability gaps over multiple years. This will help ensure that priorities for both the IPP and EMPG Program Work Plan are based on closing capability gaps documented in their THIRA/SPR and other relevant sources of information. For example, if a recipient selects Logistics and Distribution Management, Resilient Communications, and Housing as its priorities for its EMPG Program Work Plan, those should also be priorities in its IPP. Additionally, IPPs should include all planning, training, and exercise activities funded by the EMPG Program and included in EMPG Program Work Plans, as well as activities funded by other sources. This 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 Homeland Security Exercise and Evaluation Program (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. See [Exercises | FEMA.gov](#) for additional information.

Although there are no minimum exercise requirements, FEMA Regional Administrators and State Emergency Management Directors will negotiate an exercise program that addresses the priorities and capability gaps identified through the collaborative work plan development process. These exercises must be included in the FY 2021 EMPG Program Work Plan submitted for regional approval and should also be included in the state/territory's IPP. See the [EMPG Program Work Plan](#) section for additional guidance.

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.

Reporting

- All EMPG Program-funded exercise activities must be captured in the approved EMPG Program Work Plan.
- 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 <https://preptoolkit.fema.gov/>.
- 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).
- AAR/IPs must be submitted no later than December 31st of each year. For exercises conducted during the final quarter of a calendar year, submission of AAR/IPs must occur within 90 days of exercise completion. Regardless of conduct date, recipients are encouraged to submit AAR/IPs within 90 days after 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 UASI level. Recipients are discouraged from submitting AAR/IPs specific to local jurisdictions which 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 FEMA Regional EMPG Program manager through the Quarterly Performance Progress Report. Exemptions will be reviewed on a case-by-case basis by the regional EMPG Program manager.
 - Recipients can access a sample AAR/IP template at <https://preptoolkit.fema.gov/web/hseep-resources/improvement-planning>.

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 <https://preptoolkit.fema.gov/web/hseep-resources/home>.

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 <https://www.fema.gov/emergency-managers/nims/implementation-training>.

NIMS implementation requires jurisdictions to ensure that their incident personnel receive pertinent NIMS training in alignment with the NIMS Training Program. Jurisdictions report their NIMS implementation status of their jurisdiction and sub-jurisdictions, including the training of personnel, using the 2021 SPR.

All EMPG Program-funded personnel are expected to be trained emergency managers. All EMPG Program-funded personnel shall 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: <https://training.fema.gov/empp/>. A complete list of Independent Study Program Courses may be found at <http://training.fema.gov/is>.

In addition to training activities aligned to and addressed in the IPP, all EMPG Program-funded personnel (including full- and part-time state, local, tribal, and territorial [SLTT] recipients and subrecipients) shall 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 listed in the chart below.

Professional Development Series or Basic Academy		
PDS Professional Development Series		Basic Academy Basic Academy Pre-requisites and Courses
IS-120.a: An Introduction to Exercises	OR	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
		E/L104: Exercise Design
		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.

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.

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.

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, SAAs and TPOCs are encouraged to review the NTED Training Resource and Development Center (TRDC) website at <https://www.firstrespondertraining.gov/frts/trdc/state>.

NTED's National Preparedness Course Catalog

This online searchable catalog features a compilation of courses managed by the three primary FEMA training organizations: the CDP, EMI, and NTED. The catalog features a wide range of course topics in multiple delivery modes FEMA for federal, state, local, territorial, and tribal audiences. The catalog is located at <http://www.firstrespondertraining.gov>.

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.
- 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.
- 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 [FEMA Toolkit](#) 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, resources, and 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.
- **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.
- **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.
- **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 EMPG Program Work Plan Template – specifically the Grant Activities Outline – 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 EMPG Program Work Plan Template has been modified to standardize data collection, which enables improved analysis and reporting. The EMPG Program Work Plan includes eight components: (1) Grant Investment Strategy, (2) Budget Overview, (3) Grant Activities Outline, (4) Project Activities Outline, (5) Personnel Data Table, (6) Training Data Table, (7) Exercise Data Table, and (8) Detailed Budget. Baseline data on personnel, training, and exercises, as well as the Grant Activities Outline and Project Activities Outline, must be provided in the EMPG Program Work Plan at the time of application and will form the basis of the Quarterly PPR submissions.

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 and monitoring. It should be noted that salaries of state and local emergency managers are not typically categorized as M&A, unless the state or local EMA chooses to assign personnel to specific M&A activities.

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.

Allowable Indirect Costs

Indirect costs are allowable under this program as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated indirect cost rate agreement that desire to charge indirect costs to an award must provide a copy of their negotiated indirect cost rate agreement at the time of application. Not all applicants are required to have a current negotiated indirect cost rate agreement. Applicants that are not required by 2 C.F.R. Part 200 to have a negotiated indirect cost rate agreement but are required by 2 C.F.R. Part 200 to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. 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. 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.

Whole Community Preparedness

EMPG Program funds may be used to foster whole community preparedness for disasters and emergencies as stated in the 2018 – 2022 [FEMA Strategic Plan](#), particularly Objective 1.3, Help People Prepare for Disasters. Recipients, and FEMA must learn from and work with a broad and inclusive base of stakeholders to understand the circumstances and challenges different groups of people face, particularly those who may have the hardest time in the aftermath of a disaster, such as the aging population and those with access and functional needs. 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.

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 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 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 | FEMA.gov](#).

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, and directives, visit <http://www.fema.gov/guidance-directives> and <https://www.fema.gov/about/offices/continuity>.

Allowable continuity planning activities include the development of the following:

- Continuity of Operations (COOP) and Continuity of Government (COG) 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 (SHMO) 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.

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 (PPE) (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](#) regarding prohibitions on covered telecommunications equipment or services.

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 GPD 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 Systems (sUAS) with FEMA grant funding must comply with [IB 426](#) and also include a description of the policies and procedures in place to safeguard individuals'

privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the sUAS equipment.

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:

<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 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: <https://www.dhs.gov/news/2020/08/17/interagency-issues-advisory-use-technology-detect-and-mitigate-unmanned-aircraft>.

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 <https://pretoolkit.fema.gov/web/hseep-resources/program-management>.

EMPG Program funds may be used for emergency management-related training activities to enhance the capabilities of state and local emergency management personnel. Training activities should align to a current, Multi-Year IPP developed through an annual Integrated Preparedness Planning Workshop (IPPW) and build from training gaps identified in the THIRA/SPR process. Further guidance concerning the IPP and the IPPW can be found at <https://pretoolkit.fema.gov/web/hseep-resources/program-management>. 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 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 Analyze, Design, Develop, Implement, and Evaluate (ADDIE) model for instruction design. More information is available at <https://www.firstrespondertraining.gov>.
- **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 p.m. to 5 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 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 and Budget detail citing the project costs and an SF-424D Form for standard assurances for the construction project.

The above examples are not intended to exclude other construction projects as potentially allowable costs. For example, construction of a facility for the storage of critical emergency supplies, as a Point of Distribution (POD) for emergency distribution, 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.

EHP Compliance

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.

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 (EA) may be needed, as defined in [DHS Instruction Manual 023-01-001-01, Revision 01](#), [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 at least 12 months before the end of the period of performance. EHP review packets should be sent to gpdehpinfo@fema.gov. Please refer to the EHP section of this Manual for additional information on EHP requirements.

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 sub-recipient 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 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.

Construction of Communication Towers

When applying for funds to construct communication towers, recipients and subrecipients must submit evidence that the Federal Communication Commission's (FCC) Section 106 review process has been completed and submit all documentation resulting from that review to FEMA prior to submitting materials for EHP review.

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.*). See 42 U.S.C. § 5196(j)(9). 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 (DOL) wage determinations, is available at <https://www.dol.gov/whd/govcontracts/dbra.htm>.

Acquisition of Real Property

Acquisition of real property is permissible if such property is needed to support other allowable program costs or activities.

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. Please refer to [IB 458a](#) for additional guidance on disposition requirements.

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 EMPG Program funds, any costs associated with the lease that are charged to an 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:

- Unallowable Equipment: Grant funds must comply with [IB 426](#) 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 to support hiring sworn public safety officers for the purposes of fulfilling traditional public safety duties or to supplant traditional public safety positions and responsibilities
- Activities and projects unrelated to the completion and implementation of the EMPG Program

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.

EMPG Program Work Plan

Submission of an EMPG Program Work Plan is mandatory, as 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 EMPG Program Work Plan Template (available on the [Grants.gov](https://www.fema.gov/grants/preparedness/emergency-management-performance) EMPG Program application page and on the Fema.gov website at <https://www.fema.gov/grants/preparedness/emergency-management-performance>) is provided to facilitate the work plan development process. The submitted Work Plan must address all the information requirements included in the Work Plan Template and in the supplemental guidance included in this section. Therefore, EMPG Program applicants are strongly encouraged to use the provided 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 FEMA 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 primarily driven by the THIRA/SPR process – specifically, the outputs from the THIRA/SPR process – and other relevant information sources. 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, recipients 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 priority area that achieves a specific outcome. Each goal must be specific; measurable; 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 number of people who can find and secure long-term housing within 1 year of an incident by 10%”). The new 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 FEMA Regional Program Manager will ensure that the mutually agreed priorities are fully addressed in the EMPG Program Work Plan. In addition, the EMPG Program 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 against 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 percent of the total award amount – will require advance approval from the Regional Administrator or designated regional FEMA program manager.

EMPG Program Work Plan Instructions

The EMPG Program Work Plan Template has been updated to support the collection of objective information and quantitative data that will allow FEMA to more effectively measure program effectiveness and investment impacts. 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 new EMPG Program Guidance 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 new EMPG Program Work Plan Template largely complements the THIRA/SPR process outlined in [Comprehensive Preparedness Guide \(CPG\) 201, Third Edition](#) (CPG 201, v3). As noted in CPG 201, v3, a coordinated approach to track investments, and understanding the return on investment, can help improve the investment effectiveness. 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 Work Plan Template consists of a Grant Investment Strategy; Budget Overview; Grant Activities Outline; Project Activities Outline; Personnel Data Table; Training Data Table; Exercise Data Table; and Detailed Budget. As explained above, the focus of the updates 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 EMPG Program Work Plan Template.

Grant Investment Strategy

The intent of the Grant Investment Strategy tab of the 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 most recent THIRA/SPR results;
- Significant risks and capability gaps that currently exist;
- Resulting preparedness priorities;
- The performance goals associated with each priority area; and,
- The anticipated impact of the proposed EMPG Program-funded investments on the identified preparedness priorities.

For the priorities/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. 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.

Budget Overview

The Budget Overview tab is auto populated based on data entered in the Detailed Budget tab. **No data is entered directly into the Budget Overview tab**; rather, it summarizes the overall EMPG Program budget entered on the Detailed Budget tab into the standard cost categories, mission areas, and core capabilities, along with the federal and non-federal share for each.

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 Project Activities Outline, 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.

The worksheet 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 worksheet 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 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, project activities are identified. Project activities are key components and/or milestones that are critical to successful completion of the project. An example of this hierarchy is provided below:

- ❖ **Priority:** Logistics and Supply Chain Management
 - **Performance Goal:** Within three years, the [state/territory] will have the capability to identify and mobilize life-sustaining commodities, resources, and services to 10,000 people requiring shelter and 100,000 people requiring food and water, within 24 hours of an incident, and to maintain the 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/Milestone:** Convene cross-discipline working group meeting on May 30, 2021 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.

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 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.
- **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:** Provide a quantitative estimate of the degree to which the project will contribute to achieving the identified performance goal.
- **Build or Sustain:** Select whether the project will build or maintain/sustain the identified core capability(ies).
- **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 that span multiple mission areas. For example, some plans and exercises may involve multiple mission areas.
- **RA Agreed Upon Priority Area:** The applicant selects from a drop-down list that includes the 32 core capabilities, the National Priority Areas identified in the NOFO, and other priorities identified in the latest version of the National Preparedness Report.
- **Emergency Management Functions:** This field is optional. It is made available to those states/territories that are Emergency Management Accreditation Program (EMAP) accredited and want to continue tracking their investments by Emergency Management Function (EMF). Select from a drop-down list the EMFs supported by the project.
- **Core Capabilities:** Select up to three (primary, secondary, and tertiary) core capabilities supported by the project.
- **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.

- **Performance Goals:** List the performance goals supported by the project. As explained in the Grant Investment Strategy section above, 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).
- **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.

Project Activities Outline

The Project Activities Outline tab 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 activities 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. Key project activities should generally correlate with the “Milestones” identified for each project included in the Grant Activities Outline.

The Project Activities Outline enables the applicant to identify key project activities by year/quarter, the associated project management step (Initiate, Plan, Execute, Control, or Closeout), 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.

Personnel Data Table

To facilitate consistent data reporting and performance measures collection, the EMPG Program Work Plan Template includes a Personnel Data Table to provide an accounting of state, local, tribal, and territory personnel supported with EMPG Program funds. This will assist in documenting the extent to which EMPG Program funding supports personnel at the state level. This should be submitted with the EMPG Program Work Plan and a roster of EMPG Program-funded personnel. The roster of EMPG Program-funded personnel should be updated only if numbers change more than 10 percent during the award period of performance.

Personnel Data Table Template

Personnel Metrics	Data
EMPG Program funds (federal and match) allocated towards state/territory emergency management personnel	
EMPG Program funds (federal and match) allocated towards non-state emergency management personnel (local, tribal)	
Total Number of state/territory emergency management full-time equivalent (FTE) personnel (including those supported and not supported by the EMPG Program)	
Number of state/territory emergency management FTE personnel supported (fully or partially) by the EMPG Program	
Total number of state/territory, local, and tribal emergency management personnel supported (fully or partially) by the EMPG Program	

Personnel Data Table Definitions

- Line 1 – The total of all EMPG Program funds (federal and match) allocated for state/territory emergency management personnel. This should exclude local and tribal personnel.
- Line 2 – All EMPG Program funds (federal and match) allocated towards non-state/territory emergency management personnel (i.e., local, tribal personnel). This excludes state/territory personnel.
- Line 3 – Total number of state emergency management full-time equivalent (FTE) personnel (including those supported and not supported by the EMPG Program). This should include only funded positions. Vacant positions should be excluded.
- Line 4 – Number of state/territory emergency management FTE personnel supported by the EMPG Program. This excludes local and tribal personnel.
- Line 5 – Total number of state, territory, local, and tribal emergency management personnel funded (fully or partially) by the EMPG Program. This number provides the "Universe" number for the training and exercise templates.

Training Data Table

To facilitate consistent data reporting and performance measures collection, the 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. 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 Name	Project Number	Name of Training	EMPG Program Required Training? (Y/N)	Number of Personnel Trained	Total Number of SLTT EMPG Program Funded Personnel	Total Number of SLTT EMPG Program Funded Personnel that completed the Course	Training Identified in IPP (Y/N)

Training Data Table Definitions

- Column 1 – Project Name from the Grant Activities Outline
- Column 2 – Project Number from the Grant Activities Outline
- Column 3 – Name of training course
- Column 4 – Is the course required of EMPG Program-funded personnel?
- Column 5 – Number of personnel trained
- Column 6 – Total number of SLTT EMPG Program-funded personnel (Universe)
- Column 7 – Total number of SLTT EMPG Program-funded personnel that completed the course
- Column 8 – 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 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 Name	Project Number	Name of Exercise	Scheduled Date	Type of Exercise	Exercise Fulfills Progressive Exercise Requirement (Y/N)	Total Number of SLTT EMPG Program Funded Personnel	Number of SLTT EMPG Program Funded Personnel that Participated	Exercise Identified in IPP (Y/N)	Date AAR submitted to FEMA

Exercise Data Table Definitions:

- Column 1 – Project Name from the Grant Activities Outline
- Column 2 – Project Number from the Grant Activities Outline
- Column 3 – Exercise Name
- Column 4 – Date of exercise
- Column 5 – Type of exercise (e.g., seminar, workshop, tabletop, games, drills, functional, and/or full-scale)
- Column 6 – Is the exercise part of a progressive exercise series?
- Column 7 – Total number of SLTT EMPG Program Funded Personnel
- Column 8 – Total number of SLTT EMPG Program Funded Personnel Participating in Exercise
- Column 9 – Is exercise identified in the multi-year IPP?
- Column 10– When was the AAR submitted to FEMA?

Detailed Budget

The Detailed Budget tab enables a full accounting of all project activity costs. It also enables a breakdown of the full EMPG Program budget into various categories, including: Mission Area, Core Capabilities, National Priority Area, RA Agreed Upon Priority, EMF, 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.

Project Management Lifecycle

Steps	Description	Process
Initiate	The authorization to begin work or resume work on any particular activity.	Involves preparing for, assembling resources and getting work started. May apply to any

Steps	Description	Process
		level, e.g. program, project, phase, activity, task.
Plan	The purposes of establishing, at an early date, the parameters of the project that is going to be worked on as well as to try to delineate any specifics and/or any peculiarities to the project as a whole and/or any specific phases of the project.	Involves working out and extending the theoretical, practical, and/or useful application of an idea, concept, or preliminary design. This also involves a plan for moving a project concept to a viable project.
Execute	The period within the project lifecycle during which the actual work of creating the project's deliverables is carried out.	Involves directing, accomplishing, managing, and completing all phases and aspects of work for a given project.
Control	A mechanism which reacts to the current project status in order to ensure accomplishment of project objectives. This involves planning, measuring, monitoring, and taking corrective action based on the results of the monitoring.	Involves exercising corrective action as necessary to yield a required outcome consequent upon monitoring performance. Or, the process of comparing actual performance with planned performance, analyzing variances, evaluating possible alternatives, and taking appropriate correct action as needed.
Close Out	The completion of all work on a project. Can also refer to completion of a phase of the project.	Involves formally terminating and concluding all tasks, activities, and component parts of a particular project, or phase of a project.