

FY 2014 Homeland Security Grant Program Frequently Asked Questions

1. Who can apply?

Only eligible applicants may apply for HSGP funds. **Eligible applicants include:** Local units of government, as defined in the Department of Homeland Security Appropriations Act of 2005, refer to "any county, city, village, town, district, borough, special district, or other political subdivision of any State." The lead applicant is responsible for grant funds and administration: including but not limited to assurances and audit requirements, maintenance or records, etc.

2. If a hospital is a partner of the applying agency, would the funds flow to the hospital or the applying agency?

Only the applying agency would receive the funds.

3. Can the applicant electronically send in an application?

No. The Department of Safety – Grants Management Unit (DOS/GMU) needs a signed original. All competitive applications must be mailed and delivered to the DOS/GMU no later than noon (12:00 p.m. EST) on October 3, 2014.

4. Who is awarding the funds to the sub-grantees? Is it the Federal Government or the State Government?

The State receives the funds from the Federal Government and awards the sub-grantees.

5. What is "WHOLE COMMUNITY"?

Whole of Community encompasses two key concepts:

1. Ensuring that our response and recovery actions are driven by the actual needs of the entire affected community and the conditions on the ground, including the population demographics and geographic location; and
2. Ensuring that we leverage and rely upon the resources of the entire emergency management team to the greatest extent possible in meeting these needs.
3. **Whole of Community IS NOT** merely catastrophic planning. Its concepts will eventually be applied across FEMA and impact every mission that FEMA executes. Whole of Community describes a distinct operational approach that reinforces the fact that FEMA is only one part of our nation's emergency management team; that we must leverage all of the resources of our collective team in preparing for, responding to, recovering from and mitigating against all hazards; and that collectively we must meet the needs of the entire community in each of these areas.

6. If an application identifies multiple jurisdictions, must the application have signatures from each jurisdiction?

Supporting documentation, such as letters of recommendation/support/MOUS, must be attached.

7. Do specifications on purchases need to be included in the application?

Yes, include anything that will make it clear to the reviewer as to what is being purchased and why it is needed. Also the AEL sheets showing eligibility of the item must be attached to the application. <https://www.rkb.us/>

8. Can an agency submit more than one application?

Yes, an agency can submit as many applications as they want. It is important that only one project be identified on each application.

9. It is mentioned to use a Times New Roman standard font of 12. However spacing was not cited. Can the application be submitted as single spaced or is single/half or double spacing required?

Single space is fine. There is not a requirement on spacing.

10. Is there mandatory cost share or matching required?

No – This grant is 100% federally funded.

11. Are there any document pages that do not count as part of the page limit? For example, what if we need a page to cite our references? Does this page have to count?

There is no limit on supporting documents, attachments, or budget information. However, all attachments must be 8 ½ x 11. Anything larger will not be included in the review process.

12. What is the period of the award?

Projects funded under this program application have up to one month prior to the grant's federal expiration date to complete approved activities and submit their final reimbursement request including invoices and cancelled checks. Projects must be completed by June 30, 2016.

13. What are the reporting requirements?

Each project funded by the NH DOS under the HSGP shall contain an evaluation component. Quarterly reports containing programmatic and financial information will be required.

DHS mandates recourse typing for all assets. The forms and instructions for this will be supplied upon grant award.

The DOS/GMU may conduct periodic site visits to review grant compliance, assess management controls, assess the applicable activities and provide technical assistance. In addition, the subgrantee agrees to provide any data or information needed for the purposes of monitoring and program evaluation.

14. What are the Financial Requirements that pertain to this grant?

The financial management requirements of federal and state government, as well as the NH Department of Safety's policies and procedures, govern grants funded under HSGP. Grant activities must be conducted in accordance with the applicable guidance of:

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- Administrative Requirements - 44 CFR part 13, Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, CFR Part 215, Institutions of Higher Education
- Cost Principles -2 CFR Part 225, State and Local Governments, 2 CFR Part 220, Educational Institutions, 2 CFR Part 230, Non-Profit Organizations, Federal Acquisition Regulation Sub-part 31.2, Contracts with Commercial Organizations
- Audit Requirements -OMB Circular A-133, Audit of States, Local Governments, and Non-Profit Organizations
- OMB Circular A-21 Cost Principles for Education Institutions;
- OMB Circular A-87 Cost Principles for State, Local, and Indian Tribal Governments;
- OMB Circular A-102 Grants and Cooperative Agreements with State and Local Governments;
- OMB Circular A-110 Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations;
- OMB Circulars A-122 Cost Principles for Non-profit Organizations;
- OMB Circular A-133 Audits of States, Local Governments and Non-profit Institutions;

15. What is supplanting and how does it apply to a project?

Federal Homeland Security grant funds will be used to **supplement** (add to) existing funds, and will not **supplant** (replace) funds that have been locally appropriated for the same purpose. Potential supplanting will be addressed in the application review as well as in the pre-award review, post award monitoring, and the audit. Applicants and/or grantees will be/may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons OTHER than the receipt or expected receipt of federal Homeland Security grant funds.

Supplanting funds is loosely defined (for these purposes) as using federal grant money to “replace” or “take the place of” existing local funding for equipment or programs. The funds are intended to provide local entities with **increased capabilities** or to build capacity to address CBRNE/WMD terrorist incidents.. The funds are not to be used to replace items that are worn out/broken or for replacing (supplanting) routine local budget expenses. Supplanting funds is loosely defined (for these purposes) as using federal grant money to “replace” or “take the place of” existing local funding for equipment or programs. The funds are intended to provide local entities with **increased or in 2014 sustained capabilities** or to build capacity to address CBRNE/WMD terrorist incidents. The FY 2014 HSGP plays an important role in the implementation of Presidential Policy Directive 8 (PPD-8) by supporting the development and sustainment of core capabilities. Core capabilities are essential for the execution of each of the five mission areas outlined in the *National Preparedness Goal* (NPG).

16. Is Project Income allowed?

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No. Project income is not allowable under the protocols of the NH Department of Safety.

17. Are any of the eligible equipment items on State Price Contract?

Please refer to the NH Department of Administrative Services, Bureau Purchase and Property website. <http://admin.state.nh.us/purchasing/>

18. Can we contract with Consultants?

Compensation for individual consultant services must be reasonable and consistent with that paid for similar services in the market place. The policy is that the maximum rate for consultants is \$550 (excluding travel and subsistence costs) for an 8-hour day or \$68.75 per hour. An 8-hour day may include preparation, evaluation and travel time in addition to the time required for the actual performance. Additionally, travel and subsistence costs may be paid. A request for compensation for over \$550 a day requires prior approval and additional justification. This must also be approved by the US Department of Homeland Security/FEMA.

Arrangements with individuals must ensure that:

- Dual compensation is not involved (i.e., the individual may not receive compensation from his regular employer and the applicant for work performed during a single period of time even though the services performed benefit both).
- The contractual agreement is written, formal, proper and otherwise consistent with the applicant's usual practices.
- Time and/or services for which payment will be made and rates of compensation must be supported by adequate documentation.
- Travel and subsistence costs are at an identified rate consistent with the cost allowed in Section III, Travel.

19. What can Homeland Security Grant Program funding be used for?

See: <http://www.fema.gov/national-preparedness/national-preparedness-system>. HSGP funding shall be used in areas for projects that enhance New Hampshire's capabilities. The State Homeland Security Grant Program (SHSGP) is a core assistance grant program that provides funds to build capabilities at the state, local, Tribal, and territorial levels and to implement the goals and objectives included in the State Homeland Security Strategy and initiatives in their State Preparedness Report (SPR). Under SHSGP, activities must support terrorism preparedness by building or enhancing capabilities that relate to the prevention of, protection from, response to, and recovery from terrorism (to be considered eligible). However, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate this dual-purpose for any activities implemented under this program that are not explicitly focused on terrorism preparedness.

20. What kind of equipment can I apply for?

Equipment must be individually listed and approved through the original grant application or in subsequent grant adjustment notices prior to the purchase of the equipment. Allowable equipment categories for FY11 are listed in the application and on the web-based **Authorized Equipment List** (AEL) at www.rkb.us. Any questions concerning the eligibility of equipment should be forwarded to the DOS/GMU for clarification.

Applicants shall use their own procurement procedures and regulations if they are more stringent than Federal Requirement 28 CFR Part 66 (formerly OMB Circular A-102) or OMB Circular A-110, as applicable. Minimum compliance is the federal standard. All efforts to expedite the procurement process should be made.

21. What are the Unauthorized Program Expenditures?

- Expenditures for items such as general-use software (word processing, spreadsheet, graphics, etc), general-use computers and related equipment (other than for allowable M & A activities, or otherwise associated preparedness or response functions), general-use vehicles, licensing fees, weapons systems and ammunition.
- Acquisition of land
- Hiring of public safety personnel
- Activities unrelated to the completion and implementation of the SHSP
- Other items not in accordance with the AEL or previously listed as allowable costs.
- FCC Licenses
- Per the 2014 Local Grant Review Committee: No routine use radio applications will be entertained. This applies to portable and mobile radios.
- Per the 2014 Local Grant Review Committee: Vehicles are **LIMITED** to NTOA-compliant regional tactical teams for **NEW** (no replacement vehicles) CBRNE-specific response vehicles. .

22. If the state approves equipment within the application, is the local agency required to send out a bid?

The local agency must follow the local procurement regulations and laws (see #19).

23. Is the installation of equipment considered construction?

No, if it is considered as additional or related equipment costs not requiring EHP approval. See AEL listing at: <https://www.rkb.us/>
Yes, if the equipment will be attached to a structure in any way or if the AEL lists EHP as a requirement.

24. Is computer software allowable?

Yes, if the software is used to accomplish the project activity. However, general use hardware and software is only an allowable cost under Management and Administration (M&A).

25. Would the hiring of security personnel be allowable?

No.

26. When can I purchase items on the approved budget?

After a sub-grant to a jurisdiction has been approved, DOS/GMU will issue an award document including grant requirements. Spending of funds may begin as soon as officials of the jurisdiction sign, date, and return the award documents to the DOS/GMU and you receive approval to proceed. Additional restrictions may be applied upon DOS and you will be notified of how to proceed with your grant at that time.

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27. How does the grant process work as far as getting reimbursed for expenditures?

The sub-grants awarded by the DOS/GMU are reimbursement grants only, meaning that the jurisdiction must spend the money upfront and then apply to DOS for reimbursement of those expenditures. Jurisdictions may submit the proper documentation at any time after its expenditures (invoices and cancelled checks).

28. Do I have to have cancelled checks before I can request reimbursement?

Yes, invoices and cancelled check(s) are required before reimbursement will be made. Also, sub-recipients must also meet the following requirements before reimbursement:

- NIMS compliance
- Single Audit compliance
- Completed quarterly report
- Resource typing is updated
- Environmental approval (when project applicable)

29. What is accepted as “proof of payment”?

“Cancelled checks ” or the bank screen print showing the payment is cleared and tied to that purchase.

30. Why do I need to provide proof of payment?

DOS “reimburses” only. Proof of payment ensures that the request is a reimbursement not an advance.

31. What are the supporting documents needed to get reimbursed?

All requests for reimbursement must include a copy of invoices (not statements or quotes) and proof of payment (see #28). DOS may also require detailed comparison of purchases to match with the original application. Exercise reimbursement requests must be coordinated through the Department of Safety, Homeland Security and Emergency Management’s Exercise Coordinator. Training reimbursements will be coordinated through the Department of Safety, Fire Standards and Training and EMS’s Training Coordinator, Captain Robert Pragoff. Payroll verification is mandatory for personnel reimbursement for training and exercises. See separate background for requirements.

32. After a grant has been approved, may we make changes to the grant?

Generally, changes in the intent of an award are not allowed. On a limited basis, DOS may consider some changes, but the jurisdiction will have to document justification for such an adjustment to the grant.

33. Can changes be made in the grant budget?

Changes are allowed within a grant’s budget on a limited basis. But the entity must request those changes in writing along with a written justification for the adjustment. Entities may NOT move funds between grant awards such as from a Planning grant to an Equipment grant.

34. What happens when all my grant funds have been expended?

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Once the spending cycle of a grant has been reached, all sub-grants are closed and any remaining funds from the awards are pooled. Extensions can be granted on a limited basis as long as the federal deadline is not violated. Extensions are granted only under special circumstances. The jurisdiction must justify and request the extension in writing.

DOS will issue a Closeout Letter to the jurisdiction. Officials of the jurisdiction are asked to sign, date, and return a copy of the Closeout Letter to DOS. Monitoring visits will likely follow.

35. Why am I required to keep documentation after my grant is closed?

Federal law requires that documentation (all financial records, supporting documents, statistical records pertinent to the award be retained by each organization for at least three years from the date the grant is closed at the federal level. This may be up to 5 years from when your grant was completed. Check with DOS – GMU for specifics. In addition per Federal requirement the tracking of all equipment must comply with 44 CFR 13.32:

(a) Title. Subject to the obligations and conditions set forth in this section, title to equipment acquired under a grant or sub grant will vest upon acquisition in the grantee or sub grantee respectively.

(b) States. A State will use, manage, and dispose of equipment acquired under a grant by the State in accordance with State laws and procedures. Other grantees and sub grantees will follow paragraphs (c) through (e) of this section.

(c) Use.

(1) Equipment shall be used by the grantee or sub grantee in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency.

(2) The grantee or sub grantee shall also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency. User fees should be considered if appropriate.

(3) Notwithstanding the encouragement in? 13.25(a) to earn program income, the grantee or sub grantee must not use equipment acquired with grant funds to provide services for a fee to compete unfairly with private companies that provide equivalent services, unless specifically permitted or contemplated by Federal statute.

(4) When acquiring replacement equipment, the grantee or sub grantee may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property, subject to the approval of the awarding agency.

(d) Management requirements. Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, as a minimum, meet the following requirements:

(1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property, the

location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

(2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

(3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.

(4) Adequate maintenance procedures must be developed to keep the property in good condition.

(5) If the grantee or sub grantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

(e) Disposition. When original or replacement equipment acquired under a grant or sub grant is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, disposition of the equipment will be made as follows:

(1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.

(2) Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.

(3) In cases where a grantee or sub grantee fails to take appropriate disposition actions, the awarding agency may direct the grantee or sub grantee to take excess and disposition actions.

(f) Federal equipment. In the event a grantee or sub grantee is provided federally-owned equipment:

(1) Title will remain vested in the Federal Government.

(2) Grantees or sub grantees will manage the equipment in accordance with Federal agency rules and procedures, and submit an annual inventory listing.

(3) When the equipment is no longer needed, the grantee or sub grantee will request disposition instructions from the Federal agency.

(g) Right to transfer title. The Federal awarding agency may reserve the right to transfer title to the Federal Government or a third part named by the awarding agency when such a third party is otherwise eligible under existing statutes. Such transfers shall be subject to the following standards:

(1) The property shall be identified in the grant or otherwise made known to the grantee in writing.

(2) The Federal awarding agency shall issue disposition instruction within 120 calendar days after the end of the Federal support of the project for which it was acquired. If the Federal awarding agency fails to issue disposition instructions within the 120 calendar-day period the grantee shall follow?
13.32(e).

(3) When title to equipment is transferred, the grantee shall be paid an amount calculated by applying the percentage of participation in the purchase to the current fair market value of the property.

36. What is NIMS Compliance?

Per the 2014 Homeland Security Funding Opportunity Announcement, grantees receiving HSGP funding are required to implement the National Incident Management System (NIMS). The NIMS uses a systematic approach to integrate the best existing processes and methods into a unified national framework for incident management. Incident management refers to how incidents are managed across all homeland security activities, including prevention, protection, and response, mitigation, and recovery. FY 2014 grantees must utilize standardized resource management concepts such as typing, inventorying, organizing, and tracking resources that facilitates the identification, dispatch, deployment, and recovery of their resources. 2014 Homeland Security Grant applicants must attach a NIMS certification letter of compliance.

37. Why are progress reports required?

Progress reports are necessary to provide DOS the tools to meet its federal reporting and monitoring requirements on the status of grants awarded to the state.

38. Who has to take NIMS and ICS training?

"NIMS Compliance" is required only for those agencies/jurisdictions that wish to apply for any Federal preparedness grants (Homeland Security, Assistance to Firefighters Act, etc.) However, since ICS is used across the country by response agencies for just about all incidents, it is good training to have.

Who needs to take what?

All first responders, regardless of their discipline (police, fire, Ems, etc.), should take ICS 100, ICS 200 and IS 700 or their equivalent training. This provides the basic tools needed to understand and use ICS in the field. This training can be done online or in a classroom (with the exception of IS 700 which is only online).

Emergency Management Directors should also take IS 800 which is only available online.

When it comes to ICS 300 and ICS 400, these are advanced ICS courses which are designed for those people who could or would be in what are called Command & General Staff positions (Incident Commander, Operations Section Chief, etc.). In New Hampshire, the only folks who are **required** to take these classes are all fire chief officers (chief, assistant chief, deputy chief, etc.), police chiefs of departments with more than 50 members, county sheriffs and certain State Police.

Although anyone is eligible to take these advanced courses, and it would be beneficial for EOC/MACE staff to take them, there is no requirement to do so at this time.

This guidance is from the State only; if your agency or jurisdiction requires that you take this training, then follow that guidance.

Do Selectmen or Town Administrators need this training?

Not that much unless you are also a first responder in some fashion. You should, however, have an understanding of ICS because your employees (first responders) use it. There is a special program for you folks, though. It is short and to-the-point. It's called ICS 402 and it's an overview of ICS that lets you know what ICS is and how it works. If you are only an administrator, this course will satisfy NIMS compliance for grants.

I work in an EOC/MACE. What should I have?

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You should have ICS 100 ICS 200 and IS 700 like all other responders. It would help you in your position to have ICS 300 and ICS 400 as well, but it is not required unless your specific plan calls for it.

I took the NFA ICS class or the NH PSTC ICS class. What does this count for?

If you completed the 16 hour ICS class from the National Fire Academy (H806) or the 16 hour NH Police Academy class (Critical Incident Management), you have the equivalent of ICS 100 and ICS 200.

For further information, please contact Captain Robert Pragoff at the DOS – Fire Standards and Training and EMS (603-223-4200).

39. What are the requirements for an HSEEP compliance exercise program?

HSEEP Compliance is defined as adherence to specific HSEEP-mandated practices for exercise program management, design, development, conduct, evaluation, and improvement planning. In order for an entity to be considered HSEEP compliant it must satisfy four distinct performance requirements:

1. Conducting an annual Training and Exercise Plan Workshop and developing and maintaining a Multi-year Training and Exercise Plan.
2. Planning and conducting exercises in accordance with the guidelines set forth in HSEEP Volumes I-III.
3. Developing and submitting a properly formatted After-Action Report/Improvement Plan (AAR/IP). The format for the AAR/IP is found in HSEEP Volume III.
4. Tracking and implementing corrective actions identified in the AAR/IP.

For further information on Exercises, please contact Katya Brennan, DOS – Homeland Security and Emergency Management (603-223-3638).

40. What is the Threat and Hazard Identification and Risk Assessment (THIRA)?

FEMA has developed a set of Frequently Asked Questions (FAQ) pertaining to the Comprehensive Preparedness Guidance (CPG) 201: Threat and Hazard Identification and Risk Assessment (THIRA). Topics covered in the FAQ include the identification of supporting THIRA tools, templates and technical assistance, submission procedures, and information on the relationship between THIRA and the State Preparedness Report as well as other reporting requirements.

As part of Presidential Policy Directive / PPD-8, the THIRA provides a common, consistent approach for identifying and assessing risks and their associated impacts. It expands on existing state, local, tribal and territorial hazard identification and risk assessment processes. The THIRA process helps jurisdictions understand likely risks and the core capabilities needed to address them.

[Frequently Asked Questions – THIRA \(FY2012\)](#) (this is located at Fema.gov)