

## **Ohio Emergency Management Agency**

**John R. Kasich, Governor**  
**John Born, Director**

**Sima S. Merick, Executive Director**

# **State Homeland Security Grant Program - Regional**

**Applications and Grant Agreement Due  
by December 29, 2017**



## **FY 2017 Local Program Guidance and Application Package**

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## CHANGES TO LOCAL GUIDANCE FY2017

- ✚ The FY2017 SHSP will continue with awards made directly to the designated fiscal agent within each planning region. Ohio EMA will again use the eight (8) Ohio Homeland Security Planning Regions to distribute funds. Each region will receive a set amount of funding.
- ✚ A statewide conference call will be conducted to answer any general questions and to go over any changes.
- ✚ Each region must coordinate with their Preparedness Grants Specialist so that representatives from Ohio EMA can attend the first regional meeting.
- ✚ A grant agreement, signed and dated by the Executive Director of Ohio EMA, has been forwarded to the regional fiscal agents along with this guidance. The fiscal agent is to sign and return the grant agreement and assurances, along with a list of the prioritized regional projects (signed by each EMA director), to Ohio EMA. Grant agreements, assurances, and the prioritized list are due to Ohio EMA by **December 29, 2017**.
- ✚ No paper applications are to be submitted to Ohio EMA. The official detailed application for each project will be the budget entered and approved in EGMS. The regional fiscal agent will be authorized to obligate grant funds once the region's budget is approved in EGMS.
- ✚ Ohio EMA, in its capacity as the State Administrative Agency (SAA), has decided to break the overall SHSP award into the following categories of funding:
  - ❖ Communications
  - ❖ Early Warning/Notification
  - ❖ Exercise
  - ❖ Intelligence and Information Sharing (including Cyber Security)
  - ❖ Planning
  - ❖ Targeted Sustainment of Specialty Teams (Search and Rescue, Hazmat, Bomb only)
  - ❖ Mass Care and Fatality Management
- ✚ Sub-recipients should pay particular attention to procurement and the requirements of 2CFR 200
- ✚ In accordance with the requirements of 2 CFR 200, Ohio is requiring sub-recipients to obtain pre-approval on purchases or other procurements exceeding \$100,000.
- ✚ Ohio EMA's Electronic Grants Management System will be the sole mechanism for project management and payment of the FY2017 HSGP grant programs.
- ✚ Environmental and Historical Preservation (EHP) Review forms have been revised. Older versions of the form will no longer be accepted by the federal government. EHP's **must** be completed and submitted with applications in EGMS (as applicable per this guidance) and approved by FEMA before beginning the project.

- ✚ Quarterly reporting and cash reimbursement requests for expenses already incurred are required from all FY2017 HSGP sub-recipients and are due the 30<sup>th</sup> of the month following quarter end.
- ✚ The Annual Inventory Control Requirement form, certifying compliance with 2 CFR 200 inventory regulations, and the Master Inventory Listing of HSGP funded assets are due to Ohio EMA by January 31, 2018.
- ✚ Failure to submit required documents and reports or show satisfactory progress will result in suspension of funds.
- ✚ Any projects funded with SHSP funds that are not included in the application must be included in the first Biannual Strategy Implementation per FEMA Guidance. FEMA will review projects for feasibility and effectiveness at reducing the risks for which the project was designed and completed within the end of performance period. Please include in project detail the scope of work; desired outcomes; summary of status of planning and design accomplished to date; project schedule.

## **I. PROGRAM OVERVIEW**

### ***Introduction***

The FY2017 HSGP plays an important role in the implementation of the National Preparedness System by supporting the building, sustainment, and delivery of core capabilities essential to achieving the National Preparedness Goal (the Goal) of a secure and resilient Nation. The building, sustainment, and delivery of these core capabilities are not exclusive to any single level of government, organization, or community, but rather, requires the combined effort of the whole community. The FY2017 HSGP supports core capabilities across the five mission areas of Prevention, Protect, Mitigate, Respond, and Recover based on allowable costs.

HSGP is comprised of three interconnected grant programs:

- State Homeland Security Program (SHSP)
  - o includes the Law Enforcement State Homeland Security Program (LE-SHSP) to be run through a separate funding opportunity; and
- Operation Stonegarden (OPSG) to be run through a separate funding opportunity.
- Urban Area Security Initiative (UASI) to be run through separate funding opportunity.

The purpose of this package is to provide:

1. The formal grant guidance and application materials needed to apply for funding under the SHSP program (LE-SHSP and OPSG is separately administered for FY2017).
2. Administrative requirements that must be met by all sub-recipients in order to meet the requirements of federal regulations, mandates and orders.

### ***Program Overview and Priorities***

SHSP supports the implementation of risk driven, capabilities-based State Homeland Security Strategies to address capability targets set in Urban Area, State, and regional Threat and Hazard Identification and Risk Assessments (THIRAs). The capability levels are assessed in the State Preparedness Report (SPR) and inform planning, organization, equipment, training, and exercise needs to prevent, protect against, mitigate, respond to, and recover from acts of terrorism and

other catastrophic events.

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

For SHSP, many activities which support the achievement of target capabilities related to terrorism preparedness may simultaneously support enhanced preparedness for other hazards unrelated to acts of terrorism. However, all SHSP funded projects must assist recipients and sub-recipients in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism. **Projects that do not make explicitly clear the nexus to terrorism will be deemed ineligible regardless of regional support and prioritization.**

Although no longer funded as discrete grant programs, all activities and costs allowed under the FY 2010 Interoperable Emergency Communications Grant Program (IECGP), FY 2011 Citizen Corps Program (CCP) and FY 2011 Metropolitan Medical Response System (MMRS) grant program are encouraged to the extent in which they are eligible and supported by the requirements outlined in this document as well as federal grant guidance.

### ***Supporting the National Preparedness System (NPS) and National Preparedness Goal (NPG)***

The FY2017 HSGP plays an important role in the implementation of the National Preparedness System (NPS) by supporting the building, sustainment, and delivery of core capabilities essential to achieving the National Preparedness Goal (NPG). 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.”

The objective of the National Preparedness System is to facilitate an integrated, risk informed, capabilities-based, whole community approach to preparedness. Complex and far-reaching threats and hazards require the engagement of individuals, families, communities, private and nonprofit sectors, faith-based organizations, and all levels of government.

Capabilities are the means to accomplish a mission, function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance. The most essential of these capabilities are the core capabilities identified in the National Preparedness Goal. Complex and far-reaching threats and hazards require the whole community to integrate preparedness efforts in order to build, sustain, and deliver the core capabilities and achieve the desired outcomes identified in the National Preparedness Goal. The components of the National Preparedness System provide a consistent and reliable approach to support decision making, resource allocation, and measure progress toward these outcomes. While each of the components of the National Preparedness System is essential to achieve preparedness, it is critical that the components be understood and used in the context of each other. Ultimately, this integrated approach becomes a means to achieve the National



Preparedness Goal in a consistent and measurable way.

The FY2017 HSGP 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 catastrophic events;
- Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of catastrophic incident; and/or
- Recover through a focus on the timely restoration, strengthening, accessibility and revitalization of infrastructure, housing and a sustainable economy, as well as health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident; and do so in a manner that engages the whole community while ensuring the protection of civil rights

### ***Sustaining and Building Core Capabilities***

The FY2017 HSGP plays an important role in 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). The development and sustainment of these core capabilities are not exclusive to any single level of government or organization, but rather require the combined effort of the whole community. The FY2017 HSGP supports select core capabilities in the Prevent, Protect, Mitigate, Respond, and Recover mission areas based on allowable costs.



# Core Capabilities List

Prevention	Protection	Mitigation	Response	Prevention
Planning	Planning	Planning	Planning	Planning
Public Information and Warning	Public Information and Warning	Public Information and Warning	Public Information and Warning	Public Information and Warning
Operational Coordination	Operational Coordination	Operational Coordination	Operational Coordination	Operational Coordination
Forensic and Attribution	Access Control and Identity Verification	Community Resilience	Critical Transportation	Economic Recovery
Intelligence and Information Sharing	Cybersecurity	Long-Term Vulnerability Reduction	Environmental Response/Health and Safety	Health and Social Services
Interdiction and Disruption	Intelligence and Information Sharing	Risk and Disaster Resilience Assessment	Fatality Management Services	Housing
Screening, Search, and Detection	Interdiction and Disruption	Threat and Hazards Identification	Fire Management and Suppression	Infrastructure Systems
	Physical Protective Measures		Logistics and Supply Chain Management	Natural and Cultural Resources
	Risk Management for Protection Programs and Activities		Infrastructure Systems	
	Screening, Search, and Detection		Mass Care Services	
	Supply Chain Integrity and Security		Mass Search and Rescue Operations	
			On-Scene Security, Protection, and Law Enforcement	
			Operational Communications	
			Public Health, Healthcare, and Medical Services	
			Situational Assessment	

Working together, subject matter experts, government officials, and elected leaders can develop strategies to allocate resources effectively and leverage available assistance to reduce risk. The strategies developed should consider both how to sustain current levels of capability and address gaps in order to achieve the NPG. Achieving the NPG will require participation and resource support from all levels of government. Not all capabilities can be addressed in a given funding cycle, nor can funding be expected to flow from any one source.

Ohio continues to rely on the review of the federally identified core capabilities, however, the following is a list of the capabilities Ohio has chosen to fund for FY2017.

- ❖ Communications
- ❖ Early Warning/Notification
- ❖ Exercise
- ❖ Intelligence and Information Sharing Including Cyber Security
- ❖ Planning
- ❖ Targeted Sustainment of Specialty Teams (Search and Rescue, Hazmat, Bomb)
- ❖ Mass Care and Fatality Management



The federal Notice of Funding Opportunity (NOFO) asserts that HSGP recipients should ensure funding is used to sustain core capabilities funded by past HSGP funding cycles and grant programs. This is especially important in an environment where funding has been cut dramatically in previous cycles, yet there are projects that need sustainment funding. Sustainment must be addressed before we look to build new capabilities.

Local officials must prioritize the achievement of capabilities to most effectively ensure security and resilience while understanding the effects of not addressing identified gaps. Building and sustaining capabilities will include a combination of organizational resources, equipment, training, and exercising. Consideration must also be given to finding, connecting to, and strengthening community resources by leveraging the expertise and capacity of individuals, communities, private and nonprofit sectors, faith-based organizations, and all levels of government. Jurisdictions may also choose to use mutual aid agreements to fill gaps or work with partners to develop regional capabilities. Ultimately, a jurisdiction may need to rely on other levels of government to address a gap in capability. This expectation should be communicated well before the time arises when the capabilities are most urgently needed.

### ***Defining Sustainment***

Sustainment has been a term used in recent grant offerings to mean costs of maintenance, repair and user fees for equipment or specific items. For the FY2017 SHSP grant, the concept is sustaining capabilities. Sustaining a capability entails costs associated with keeping a capability at the level it was designed to function. The “sustainment” focus of the FY2017 is a continuation in the preparedness cycle as outlined in PPD-8 and a mechanism to ensure that capabilities that have been built over the last decade remain viable to address the hazards and risks faced by Ohio and the nation.

***Issues regarding what is considered maintenance, sustainment, and routine upkeep created some confusion for sub-recipients in previous cycles of funding. Some further clarification is provided below for a few common issues. Questions regarding projects in this area should be directed to grants staff before submission for further guidance.***

**Note:** Training and exercise of existing capabilities is considered sustainment and is highly encouraged for consideration by locals when developing applications.

**Note:** Sustainment should not be understood to include routine upkeep of equipment. Routine upkeep is not an allowable cost. For example, if a vehicle was procured with homeland security funding it is the responsibility of the agency that received the equipment to provide for oil changes and other required service of the vehicle.

Routine upkeep of equipment would also be considered the repair of blades, hammers, chainsaws or other equipment damaged in training or exercise events. These costs are not allowable under the grant program.

### **Planning to Deliver Capabilities**

Sub-recipients shall develop, maintain, or revise as necessary, jurisdiction-wide, all threats and hazards EOPs consistent with CPG 101 v.2, which serves as the foundation for State, local, Tribal, and territory emergency planning. For grant purposes, sub-recipients must update their EOP at least once every two years. This does not supersede the Ohio Revised Code requirement for county EMA to update their plans annually.

All sub-recipients will report what equipment was purchased and what typed capability it supports as part of the reporting requirements to include progress made in completing project; All sub-recipients will report the number of people trained in a given capability to support a reported number of defined resource typed teams (e.g., 63 responders were trained in structural collapse to support a Type II Ohio Regional Search and Rescue Team); All sub-recipients will report the total number of a defined type of resource and core capabilities built utilizing the resources of this grant as part of the reporting requirement. Sub-recipients will be required to support this reporting requirement by supplying information in quarterly reports to Ohio EMA for submittal to DHS-FEMA.

### **NIMS Compliance**

Grantees and sub-recipients receiving HSGP funding are required to implement the National Incident Management System (NIMS). FY2017 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. In order to receive FY2017 HSGP funding, the county is required to certify as part of their grant application that they are addressing and/or have met the most current NIMS requirements. Please refer to the NIMS Certification form, which is included in the application packet to certify NIMS compliance. Additional information about NIMS compliance and resources for achieving compliance can be found at Ohio EMA NIMS website <http://www.ema.ohio.gov/NimsGuidance.aspx> or the *NIMS Integration Center* web page: <http://www.fema.gov/national-incident-management-system>.

### ***Grant Program Governance***

The authority and responsibility for submittal and acceptance of any project/award will lie completely within the executive structure (Commissioners, Executive or Executive Board/Committee) associated with the County EMA designated as fiscal agent for the region.

### ***Eligible Applicants***

In accordance with Ohio EMA's past administration of the SHSP (Non-LE) grant, eligible applicants are limited to the **8 Homeland Security Regions of Ohio, which are made up of the 88 County Emergency Management Agencies**. While it is understood that the grant requires a regional approach, each region will have a pre-identified EMA fiscal agent who will serve as the eligible applicant for the region. The fiscal agent process will be explained in depth throughout this guidance. As with FY2016 guidance documents, regional will be defined as a project submitted and prioritized by a homeland security planning region committee made up of each County Director within the region. Each application packet submitted to Ohio EMA must include a letter affirming priority on proposed projects and signed by each Director.

## **II. AWARD INFORMATION**

### ***Issued By***

U.S. Department of Homeland Security (DHS): Federal Emergency Management Agency (FEMA) through Ohio Emergency Management Agency as the State Administrative Agency (SAA)

### ***Catalog of Federal Domestic Assistance (CFDA) Number and Title:***

97.067 - Homeland Security Grant Program

### *Authorizing Authority for Program*

*Section 2002 of The Homeland Security Act of 2002, as amended (Pub. L. No. 107-296), (6 U.S.C. § 603)*

### *Appropriation Authority for Program*

*Department of Homeland Security Appropriations Act, 2017 (Pub. L. No. 115-113)*

### *Period of Performance*

The period of performance of this grant is expected to be **September 1, 2017, through March 31, 2020**. Applications should clearly address how actions will be completed within the timeframe allowed by this guidance. Applicants should be aware that **as of March 31, 2020, all activities associated with the 2017 SHSP program must be complete and all equipment purchased with the grant must be received and installed and cash requests submitted.**

### *Extension of the Performance Period*

It is highly unlikely that extensions to the performance period stated above will be granted by the State Administrative Agency (SAA), which is the Executive Director of Ohio EMA. The sub-recipient asking for the extension will need to demonstrate something truly beyond the control of the sub-recipient in order to be considered for the extension. Sub-recipients should consider the unlikely event of an extension when planning project timelines and when doing bids for projects. Federal Procurement guidelines cannot be avoided based on grant timelines.

### *FY2017 HSGP Funding*

As required by the *Homeland Security Act of 2002* (Public Law 107–296), Title XX, § 2006, as amended by the 9/11 Act, Title I, § 101, August 3, 2007, 121 Stat. 280, 6 U.S.C. § 607, Ohio is required to ensure that at least 25% of funding is dedicated to law enforcement terrorism prevention activities. This requirement has been met by dedicating funding to Ohio’s LE-SHSP program to be administered through a separate process. As the SAA, Ohio EMA is required to obligate at least 80% of funds to local units of government.

## **III. FUNDING GUIDELINES**

In order to be funded by FY2017 HSGP funds, Ohio is requiring that local projects meet the following criteria:

- 1. Must support terrorism preparedness/demonstrate nexus to terrorism**
2. Have measurable and detailed goals to explain what gaps are being filled
3. Regional capability as demonstrated by support of all counties within the Ohio Homeland Security Planning Region where the project originates;
4. If requesting capability that is deployable/sharable within the region, state and nation- must indicate a commitment to do so per existing EMAC agreements;
5. If requesting sustainment of core capability not physically deployable, must still support national response capabilities such as Geographic/Geospatial Information Systems (GIS), interoperable communications systems, capabilities as defined under the mitigation mission area of the Goal, and fusion centers
6. Must directly support at least one of the core capabilities outlined in this document as being supported by Ohio’s FY2017 SHSP funding
7. Must be connected to a terrorism plan-local plan, regional plan, THIRA (if applicable),

State Preparedness Report, etc.

8. Sub-recipients with Communication Projects will be required to explain and show how it ties into the State Communications Interoperable Plan (SCIP).

With the regional process, the requirement of a regional capability comprised of multiple counties or supported by multiple counties and deployable within the region, state, and nation shall now be understood to be a project properly submitted and prioritized from a planning region that is supported by all counties within the region. There is no change to the requirement that ***projects must support terrorism preparedness/demonstrate a nexus to terrorism.***

DHS grant funds may only be used for the purpose set forth in the grant, and must be consistent with the statutory authority for the award. Grant funds may not be used for matching funds for other Federal grants/cooperative agreements, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal government or any other government entity. ***Per FEMA policy, the purchase of weapons or weapons accessories is not allowed with HSGP funds.***

Allowable Investments made in support of the HSGP priorities as well as other capability-enhancing projects must fall into the categories outlined below. All projects should also fit within the established project areas of planning, equipment, organization, training, exercise, and M&A activities. Additional detail about each of these allowable expense areas, as well as sections on additional activities including explicitly unallowable costs, is provided.

### ***FY2017 Regional Process***

Again with FY2017 SHSP, Ohio will continue the regional concept, introduced in the FY2016 grant cycle, by making awards directly to the fiscal agent within each planning region. The planning regions for the purpose of the FY2017 SHSP grant will be the eight (8) Ohio Homeland Security Planning Regions. Each region must coordinate with their Preparedness Grants Specialist, so that representatives from Ohio EMA are able to attend the first regional meeting.

The Ohio Homeland Security Planning Regions are outlined below. Ohio EMA received the award amount for SHSP and each of the regions will be provided a specific amount of funding. Staff of Ohio EMA Preparedness Grants Branch worked with staff of Ohio Homeland Security to determine funding for each region based upon a risk-based formula that takes into account population within the region. Not all regions in the State of Ohio will receive equal amounts of funding in light of these factors, but each planning region within the state is guaranteed to receive funding if they comply with the requirements of this guidance. Sub-recipients are encouraged to focus on the needs of a region as opposed to a funding number when developing a list of prioritized projects. This is particularly important if funding becomes available later in the performance period of FY2017 SHSP due to de-obligations or other issues with spending in the planning regions.

### ***Regional Fiscal Agent***

The appointed fiscal agent will be required to submit all FY2017 SHSP applications for a region and will assume fiscal responsibility for ensuring the regional award is distributed as appropriate and spent in accordance with this guidance. It will be the responsibility of the fiscal agent to assume all additional responsibilities outlined in this guidance including, but not limited to, sub-recipient training and working with Ohio EMA staff to get budgets set up within the Electronic Grants Management System (EGMS) as well as request reimbursement for the region.

### *Grant Advisory Team*

The fiscal agent should work with all of the Emergency Management Agencies in the region to develop a grant advisory team to begin accepting projects on behalf of the region. It is the responsibility of the fiscal agent to schedule meetings, ensure proper regional representation based on guidance, create and file notes of the meetings in case of audit, ensure a quorum is available if votes are taken, coordinate representation of Ohio EMA personnel, and all other administrative duties that might arise in connection with this advisory team.

Planning regions should take advantage of the availability of Preparedness Grants Branch staff to act as a guide through the implementation process. For FY2017 Preparedness Grants Branch staff are required to attend each region's initial meeting. Regions are encouraged to develop a future schedule of meetings and utilize Ohio EMA staff if desired. Including EMA staff in future meetings or conference calls has many benefits. In addition to implementation, staff can provide guidance on the development of projects and can offer advice as to allowability of the project in accordance with the guidance.

As before, Ohio EMA expects to see, at a minimum on the grant advisory team, representation from each EMA in the region, as well as a representative from a UASI or largest city in the region. Individual regions may choose to add members to this committee based upon past grant experience or current advisory groups in place. Ohio EMA asks that regional representation of police and fire agencies is also considered.

Once this group is assembled, it will be the responsibility of the group and the fiscal agent to identify projects that are appropriate for submission for FY2017 SHSP funding. Each region will submit a list of prioritized projects, signed by each advisory group member, and the fully executed grant agreement by the deadline of December 29, 2017. A grant agreement received without a signed list of prioritized projects will not be considered complete.

The only exception to this signature requirement is if a County EMA Director or City/UASI representative chooses not to participate in the process. It is the responsibility of the fiscal agent in the planning region to ensure that all County EMA Directors/City/UASI representatives within the region participate in the project review/prioritization and sign off on the projects submitted to Ohio EMA. If the fiscal agent can document that a reasonable number of attempts were made to include all and that one or more participants refused to participate, the projects from the region will still be considered responsive to the guidance as long as documentation of non-participation and of reasonable attempts made to include all representatives is attached to the regional application(s) not receiving full support.

### *De-obligation of Funding*

Should a region decide not to participate in the process or not submit enough projects to expend available funding, Ohio EMA will work with the region to get funding de-obligated as early in the process as possible. It is the responsibility of Ohio EMA as the SAA to ensure HSGP dollars are spent effectively and efficiently across the state and we will work with the planning regions to ensure this responsibility is met. A process has been developed for any funding that is de-obligated and Ohio EMA will follow that process in order to distribute de-obligated funding.

## **OHIO HOMELAND SECURITY PLANNING REGIONS**

### **Ohio Homeland Security Region 1**

- Allen
- Auglaize
- Defiance
- Erie
- Fulton
- Hancock
- Henry
- Huron
- Lucas
- Mercer
- Ottawa
- Paulding
- Putnam
- Sandusky
- Seneca
- Van Wert
- Williams
- Wood

### **Ohio Homeland Security Region 2**

- Ashtabula
- Cuyahoga
- Geauga
- Lake
- Lorain

### **Ohio Homeland Security Region 3**

- Champaign
- Clark
- Darke
- Greene
- Miami
- Montgomery
- Preble
- Shelby

### **Ohio Homeland Security Region 4**

- Crawford
- Delaware
- Fairfield
- Fayette
- Franklin
- Hardin
- Knox
- Licking
- Logan
- Madison
- Marion
- Morrow
- Pickaway
- Union
- Wyandot

### **Ohio Homeland Security Region 5**

- Ashland
- Carroll
- Columbiana
- Holmes
- Mahoning
- Medina
- Portage
- Richland
- Stark
- Summit
- Trumbull
- Tuscarawas
- Wayne

### **Ohio Homeland Security Region 6**

- Adams
- Brown
- Butler
- Clermont
- Clinton
- Hamilton
- Highland
- Warren

### **Ohio Homeland Security Region 7**

- Athens
- Gallia
- Hocking
- Jackson
- Lawrence
- Meigs
- Perry
- Pike
- Ross
- Scioto
- Vinton

### **Ohio Homeland Security Region 8**

- Belmont
- Coshocton
- Guernsey
- Harrison
- Jefferson
- Monroe
- Morgan
- Muskingum
- Noble
- Washington



The following table outlines the award per region and fiscal agent:

FISCAL Agent	REGION	AWARD AMOUNT
Lucas County EMA	Region 1	\$517,453.61
Cuyahoga County EMA	Region 2	\$717,036.71
Montgomery County EMA	Region 3	\$441,319.54
Franklin County EMA	Region 4	\$710,584.67
Summit County EMA	Region 5	\$658,108.08
Hamilton County EMA	Region 6	\$706,713.45
Jackson County EMA	Region 7	\$283,889.76
Noble County EMA	Region 8	\$266,889.76

Ohio EMA in its capacity as the State Administrative Agency has decided to target specific projects with the SHSP award in order to most effectively use Homeland Security grant funds. Listed below are the categories to which applicants should target their projects.

#### ***Homeland Security Grant Program 2017 Allocations***

In order to streamline the efficiency and facilitate the most effective use of federal Homeland Security Grant Program funds, the State of Ohio has developed a mechanism to target areas of response and preparedness capabilities. In this way, the funds will be directed to areas to either sustain current capabilities or fill in functional gaps that may impact the citizens of Ohio and will address needs of specialty response teams to maintain their state of readiness to protect the citizens of the State of Ohio. It is possible that some building of new capabilities may occur, but the preference is to sustain current capabilities or fill in functional gaps.

All projects must adhere to the guidelines stated within this guidance and applicable laws and regulations. The funding sections for Search and Rescue, Hazardous Materials, and Bomb are narrower in scope and applicants should consult the appropriate section before submitting an application.

### **Allowable Costs**

**The following pages outline allowable costs guidance applicable to all programs included in the SHSP funding. Applicants must ensure that costs directly support the funding guidelines listed previously and all other requirements of this guidance.**

#### **EXERCISE**

#### ***Exercise Activities and Requirements***

Ohio EMA requires that exercises conducted with FEMA grant funding must be managed and conducted in accordance with the US Department of Homeland Security's Homeland Security Exercise and Evaluation Program (HSEEP) and the State of Ohio's Terrorism/All-Hazard Exercise and Evaluation Manual (EEM). HSEEP Guidance for exercise design, development, conduct, evaluation, and improvement planning is located at [https://www.fema.gov/media-library-data/20130726-1914-25045-8890/hseep\\_apr13\\_.pdf](https://www.fema.gov/media-library-data/20130726-1914-25045-8890/hseep_apr13_.pdf).

Programmatic information requests and requests for the State of Ohio's Terrorism/All-Hazard EEM should be directed to the OEMA Exercise Program Supervisor (David Nunley, 614-799-3677 or via e-mail at [dbnunley@dps.state.oh.us](mailto:dbnunley@dps.state.oh.us)). All exercises using HSGP funding must be NIMS compliant. More information is available online at the National Integration Center at <http://www.fema.gov/national-incident-management-system>.

Exercise projects selected for funding must be coordinated with the State's Multi-Year Training and Exercise Plan and must have representation from the participating county/counties at the State's Training and Exercise Plan Workshop (TEPW), which will be conducted in the fall of 2017. Additional information will be sent out under separate cover in regard to the 2017 TEPW.

Applications requesting exercise funding should demonstrate that personnel and resources exist to ensure compliance with the HSEEP requirement and sound exercise management practices.

The scenarios used in HSGP-funded exercises must be based on the State Homeland Security Strategy and plans. Acceptable scenarios for SHSP exercises include: chemical, biological, radiological, nuclear, explosive, cyber, agricultural or technological disasters. The scenarios used in HSGP-funded exercises must focus on validating existing capabilities, must be large enough in scope and size to exercise multiple activities and warrant involvement from multiple counties and disciplines and non-governmental organizations, and take into account the needs and requirements for individuals with disabilities. Exercise scenarios should align with objectives and capabilities identified in the Multi-year Training and Exercise Plan.

More specific exercise guidance will be contained within the grant agreement and must be agreed to for exercise projects to be funded.

### *Allowable Exercise Costs*

Allowable exercise-related costs include:

- Funds Used to Design, Develop, Conduct, and Evaluate an Exercise. Includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and documentation. Grantees are encouraged to use government or 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. Any exercise or exercise gaps, including those for children and individuals with disabilities or access and functional needs, should be identified in the AAR/IP and addressed in the exercise cycle.
- Full or part-time staff may be hired to support exercise-related activities. Such costs must be included within the funding allowed for program management personnel expenses.
- The applicant's formal written procurement policy or 2 CFR 200 (**NOTE:**Please see procurement section in this document for additional guidance)–whichever is more stringent – must be followed.
- Overtime and Backfill. The entire amount of overtime costs, including payments related to backfilling personnel, which 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 the awarding agency, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND

from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities.

- Travel. Travel costs are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of exercise project(s) or HSEEP programmatic requirements as described in the HSEEP website (e.g., Improvement Plan Workshops, Training and Exercise Plan).
- Supplies. Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., gloves, non-sterile masks, and disposable protective equipment).
- Disability Accommodations. Materials, services, tools and equipment for exercising inclusive of people with disabilities (physical, programmatic and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities).
- Other Items. These costs include the rental of equipment and other expenses used specifically for exercises, costs associated with inclusive practices and the provision of reasonable accommodations and modifications to provide full access for children and adults with disabilities.

### *Unauthorized Exercise Costs*

Unauthorized exercise-related costs include:

- Reimbursement for the maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
- Equipment that is purchased for permanent installation and/or use beyond the scope of exercise conduct (e.g., electronic messaging signs).

If you have questions regarding eligibility during the developmental stages of your exercise project proposal, please contact OEMA Exercise Program Coordinator David Nunley, [dbnunley@dps.ohio.gov](mailto:dbnunley@dps.ohio.gov), 614-799-3677.

An initial Environmental Planning and Historic Preservation (EHP) should be submitted with the project application for appropriate projects (e.g. an exercise not specifically excluded from a FEMA EHP review per the GPD Programmatic Environmental Assessment). Ohio EMA will work with the recipient of funding to ensure an EHP is approved before the project is initiated. The project cannot commence and no funding can be expended until the EHP has been approved and received by the project director listed in the SHSP application. For additional information on the EHP requirement please see the section in this guidance entitled *Environmental Planning and Historic Preservation (EHP) Compliance*.

### **EARLY WARNING/NOTIFICATION**

Ohio EMA recognizes the need for local jurisdictions to be better prepared to provide early alerts to the public as it relates to terrorism. In light of this growing need, this category was included to assist locals in funding projects that meet the need.

This category of funding is not intended to support the purchase and installation of weather sirens (i.e. “tornado sirens”). Applicants in this category must demonstrate the nexus to terrorism in their applications. Sirens that are all-hazard outdoor sirens tied to a jurisdiction’s or region’s **terrorism plans** for public warning would be an eligible expense and must be clearly outlined within the project description.

An initial EHP should be submitted with the project application for appropriate projects (e.g. installation of a warning siren). Ohio EMA will work with the recipient of funding to ensure an EHP is approved before the project is initiated. The project cannot commence and no funding can be expended until the EHP has been approved and received by the project director listed in the SHSP application. For additional information on the EHP requirement please see the section in this guidance entitled *Environmental Planning and Historic Preservation (EHP) Compliance*.

## **COMMUNICATIONS**

Promoting Interoperable Communications continues to be a priority for local jurisdictions across the state of Ohio, which led to the decision by Ohio EMA to accept applications in this category. Sub-recipients seeking to receive funding for communication projects must describe how activities align to the statewide Communication Interoperable Plan (SCIP) and describe how the project supports the statewide strategy to improve emergency communications and is compatible and interoperable with surrounding systems.

Sub-recipients that are using FY2017 HSGP funds to support emergency communications activities **must** comply with Appendix D of the *SAFECOM Guidance for Emergency Communication Grants*. Appendix D outlines requirements for any FEMA recipient (or sub-recipient) using funds for emergency communications activities. The requirements include alignment to national and state communications plans, project coordination, and technical standards for emergency communications technologies. The *SAFECOM Guidance* is intended to ensure that Federally-funded investments are compatible, interoperable, and support the national goals and objectives for improving emergency communications nationwide. Recipients (including sub-recipients) investing in broadband-related investments should review IB 386, Clarification on Use of DHS/FEMA Public Safety Grant Funds for Broadband-Related Expenditures and Investments, and consult their Ohio EMA Preparedness Grants Specialist on such Investments before developing applications. SAFECOM guidance can be found at <https://www.dhs.gov/safecom/blog/2017/06/09/fy-2017-safecom-guidance>.

The *FY2017 SAFECOM Guidance* provides a list of the following emergency communication priorities, which Federal funding recipients are strongly encouraged to target grant funding toward:

- Priority 1: Governance and Leadership
- Priority 2: Statewide Planning for Emergency Communications
- Priority 3: Emergency Communications Training and Exercises
- Priority 4: Activities that Enhance Operational Coordination
- Priority 5: Standards-Based Equipment

An initial EHP should be submitted with the project application for appropriate projects (e.g. a communications tower). Ohio EMA will work with the recipient of funding to ensure an EHP is approved before the project is initiated. The project cannot commence and no funding can be expended until the EHP has been approved and received by the project director listed in the SHSP application. For additional information on the EHP requirement please see the section in this guidance entitled *Environmental Planning and Historic Preservation (EHP) Compliance*.

## **TARGETED SUSTAINMENT OF SPECIALTY TEAMS**

Ohio EMA recognizes that capabilities associated with specialty teams were often built with homeland security funding. Therefore, sustainment of these specialty teams is a priority in FY2017 SHSP. The funding under this category will be limited to the following types of teams: Search and Rescue, Hazmat Type I and II, FBI Accredited Bomb Teams.

### **Search and Rescue**

Applications for sustainment of search and rescue teams are limited to the following teams:

1. Cuyahoga (Region 2)
2. Franklin (Region 4)
3. Summit (Region 5)
4. Hamilton (Region 6)

Applications may include the purchase of equipment or needed training and exercise assistance for the teams. Capabilities involving water, canine and Incident Management Teams (IMT) will not be supported with funding from this category.

Applicants in this category should ensure they are following the equipment, training and exercise guidance established in other parts of this guidance, especially earlier guidance on maintenance and routine upkeep costs. Applicants should also refer to the guidance on EHP throughout this document. If an EHP form is required for the project and is not submitted with the application it could result in the project not being reviewed.

### **Hazmat**

Applications for the sustainment of Hazmat teams are limited to NIMS Type I and Type II Hazmat teams. Ohio will not be receiving applications this cycle from other typed teams.

If the application submitted is for the purchase of a spectrometer, the application should include the date of reevaluation of your team typing. If the date is not within the performance period of this grant, the application may be prioritized for future grant cycles.

Applicants in this category should ensure they are following the equipment, training and exercise guidance established in other parts of this guidance. Applicants should also refer to the guidance on completing an EHP throughout this document. If an EHP form is required for the project and is not submitted with the application it could result in the project not being reviewed.

### **Bomb**

Applications for the sustainment of bomb teams are limited to bomb teams that can show certification from the Federal Bureau of Investigation (FBI). Applications may include the purchase of equipment or needed training and exercise assistance for the teams.

Applicants in this category should ensure they are following the equipment, training and exercise requirements established in other parts of this guidance. Applicants should also refer to the guidance on EHP throughout this document. If an EHP form is required for the project and is not submitted with the application it could result in the project not being reviewed.

## **INTELLIGENCE AND INFORMATION SHARING TO INCLUDE CYBER SECURITY**

Ohio EMA decided to accept projects in this area in light of a couple of things. The most recent THIRA revealed that Ohio is strong in the area of intelligence and information sharing. In order to sustain this strong capability we are seeking Fusion Center-related projects focused on intelligence and information sharing that otherwise comply with all requirements listed herein. In addition, the Administration has developed an approach to Countering Violent Extremism that is a new focus of the grants this cycle.

### **Fusion Centers**

DHS has identified state and major Urban Area fusion centers as a critical component of our Nation's distributed homeland security and counterterrorism architecture. They provide grassroots intelligence and analytic capabilities within the state and local jurisdiction (<http://www.dhs.gov/state-and-major-urban-area-fusion-centers>). To that end, DHS/FEMA preparedness grants will continue to support designated state and major Urban Area fusion centers (<http://www.dhs.gov/fusion-center-locations-and-contact-information>) and the maturation of the Information Sharing Environment (ISE).

The national network of fusion centers (National Network) provides a mechanism for the Federal Government to receive information from state, local, tribal, and territory partners, which helps create a more complete threat picture at the National level. Participating in the Nationwide Suspicious Activity Reporting (SAR) Initiative enables fusion centers to receive and analyze suspicious activity reporting from frontline public safety personnel, the private sector, and the public, and ensure the sharing of SAR with the Federal Bureau of Investigation's Joint Terrorism Task Forces for further investigation.

The fusion center's individual 2016 Fusion Center Assessment Report must be used when developing projects submitted. Each proposed project must align to and reference the specific Critical Operational Capabilities (COCs) and Enabling Capabilities (ECs) and associated attribute(s) from the Assessment Report the funding is intended to address. Additionally, any projects that support intelligence- or fusion-process related activities must ensure efforts are integrated and/or coordinated with the state or major Urban Area fusion centers.

### **National Information and Exchange Model (NIEM):**

DHS/FEMA requires all grant recipients to use the latest NIEM specifications and guidelines regarding the use of Extensible Markup Language (XML) when using HSGP funds to develop, procure, or implement homeland security information exchanges, including systems and databases. Further information about NIEM specifications and guidelines is available at <https://www.niem.gov/EM>.

NIEM is a community-driven, standards-based approach to exchanging information. To support information sharing, all recipients of grants for projects implementing information exchange capabilities are required to use NIEM and to adhere to NIEM conformance rules. Visit <https://niem.gov/grantguidance> for guidance on how to utilize DHS/FEMA award funding for information sharing, exchange, and interoperability activities.

The NIEM Emergency Management domain supports emergency-related services (including first responders and responding to disasters), information sharing, and activities such as homeland security and resource and communications management. The Emergency Management domain has an inclusive governance structure that includes federal, state, local, industry, and,



where necessary, international partnerships. The NIEM Emergency Management domain is committed to community support via technical assistance and NIEM training.

### ***Homeland Security Information Network***

HSIN is a user-driven, web-based, information sharing platform that connects all homeland security professionals including the Department of Homeland Security (DHS) and its federal, state, local, tribal, territorial, international, and private sector parties across all homeland security mission areas. HSIN is used to support daily operations, events, exercises, natural disasters, and incidents. To support user mission needs, HSIN provides three sets of services for secure information sharing. The first service provides a shared place for communities to securely collaborate on homeland security issues and includes core functions such as a web conferencing and instant messaging tools with white boarding, video, and chat services for real time communication and situational awareness.

The second set provides secure dissemination and sharing capabilities for homeland security alerts, reports, and products. The third set allows users to access and query a variety of shared data and services from all homeland security mission areas and trusted federal partners. Preparedness grant funds may be used to support planning, training and development costs associated with developing and managing, mission critical, HSIN communities of interest and sites. Learn more about HSIN at <http://www.dhs.gov/hsin-hsgp-guidance>.

### ***28 C.F.R. Part 23 Guidance:***

DHS/FEMA requires that any information technology system funded or supported by these funds comply with 28 C.F.R. Part 23, *Criminal Intelligence Systems Operating Policies*, if this regulation is determined to be applicable.

### ***Countering Violent Extremism***

Cases of U.S.-based individuals traveling or attempting to travel overseas to join transnational terrorist organizations such as al Qaeda, al Shabaab, and ISIL, combined with the threat posed by homegrown extremists who carry out violent attacks inside the United States in support of a variety of ideologies, illustrate the need for programs and initiatives aimed at preventing or stopping the radicalization process that can lead to violence. A whole community approach to all-hazards preparedness begins with the premise that well-informed and well-equipped families, communities, and local institutions are the best defense against organizations and ideologies that use or advocate violence to achieve their ends and recognizes that Federal financial assistance programs can be an effective tool for supporting those locally based efforts.

Ohio EMA would like applicants to consider project submissions that:

- Support community and law enforcement engagement strategies and approaches such as roundtable events and town hall meetings; the development of online platforms that improve connections between communities and local officials; funding for existing and expansion of community relations efforts; support for the development of community engagement plans; and joint projects to increase the awareness of violent extremist threats and community mitigation solutions.



Detailed descriptions of the Administration's CVE objectives, as well as additional program descriptions, guidance, and resources for the grant recipients can be found at:

- <http://www.dhs.gov/topic/countering-violent-extremism>
- <http://www.dhs.gov/publication/cve-best-practices>

## **MASS CASUALTY AND FATALITY MANAGEMENT**

Grant funds may be used for the procurement of medical countermeasures. Procurement of medical countermeasures must be conducted in collaboration with State/city/local health departments who administer Federal funds from HHS for this purpose and with existing MMRS committees, where available, in order to sustain their long term planning for appropriate, rapid, and local medical countermeasures, including antibiotics and antidotes for nerve agents, cyanide, and other toxins. Procurement must have a sound threat based justification with an aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response.

Prior to procuring pharmaceuticals, recipients (or sub-recipients) must have in place an inventory management plan to avoid large periodic variations in supplies due to coinciding purchase and expiration dates. Recipients (or sub-recipients) are encouraged to enter into rotational procurement agreements with vendors and distributors. Purchases of pharmaceuticals must include a budget for the disposal of expired drugs within each fiscal year's period of performance for HSGP. The cost of disposal cannot be carried over to another FEMA grant or grant period.

EMS electronic patient care data systems should comply with the most current data standard of the National Emergency Medical Services Information System ([www.NEMESIS.org](http://www.NEMESIS.org)).

## **PLANNING**

### ***Planning Activities***

FY2017 SHSP funds may be used for a range of emergency preparedness and management planning activities and such as those associated with the development, review and revision of the THIRA, SPR, continuity of operations plans and other planning activities that support the Goal. An emphasis should be placed on updating and maintaining a current EOP that conforms to the guidelines outlined in CPG 101 v 2.0 For additional information, please see:

[http://www.fema.gov/pdf/about/divisions/npd/CPG\\_101\\_V2.pdf](http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf)

Upon completion of a given planning project, the sub-grantee will submit copies of the completed plans and/or planning tasks that were developed, enhanced, or updated using FY2017 HSGP funds. These will be submitted to Ohio EMA's Preparedness Grants Branch not later than end of the grant performance period and will be used to validate the work was completed as per the budget. Failure to do so may result in forfeiture or repayment of grant funds.

All publications created with FY2017 HSGP funding shall prominently contain the following statement: "This document was prepared under a grant from the U.S. Department of Homeland Security (DHS). Points of view or opinions expressed in this document are those of the authors and do not necessarily represent the official position or policies of the U.S. DHS."

### *Allowable Planning Activities*

According to *Appendix F-HSGP Allowable Cost Matrix* of the HSGP Notice of Funding Opportunity (NOFO), the following are examples of allowable program activities:

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities;
- Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives;
- Developing related terrorism and other catastrophic event prevention activities;
- Activities to achieve planning inclusive of people with disabilities and others with access and functional needs;
- Coordination with Citizens Corps Councils for public information/education and development of volunteer programs;
- Update governance structures and processes and plans for emergency communications.

A more comprehensive list of specific allowable planning activities is provided as Appendix D of this document.

## **IV. GRANT ADMINISTRATION**

*Grant Administration* information is intended to help sub-recipients in understanding the rules and regulations associated with administering federally-funded grant awards and the state's process for meeting these requirements. We attempted to pull this standard financial and administrative information together in order to create a comprehensive source of information related to the preparedness grant programs.

### *Standard Financial Requirements*

Any sub-recipient(s) accepting grant funds from Ohio EMA shall comply with all applicable laws and regulations outlined here. The administrative requirements that apply to most Department of Homeland Security (DHS) award recipients and specifically the awards made to our governmental partners through the grant program(s) included in this guidance arise from 2 CFR 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

The requirements for allowable costs/cost principles are contained in 2 CFR 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, DHS program legislation, Federal awarding agency regulations, the terms and conditions of the award and the accompanying grant guidance. The applicable costs principles for the grants included in this guidance are:

- 2 CFR 2 Subpart E-*Cost Principles*
- 48 CFR Part §31.2, Federal Acquisitions Regulations (FAR), *Contracts with Commercial Organizations*.

The sub-recipient is required to ensure that the requirements of the federal grant are met as well as any applicable requirements of the state and local government. Acceptance of a federal grant and its requirements do not relieve the sub-recipient of requirements of local and/or state government. In addition, acceptance of federal grant funding means sub-recipient Fiscal Agent is must comply with and assume financial responsibility for audit findings. You must meet all

local, state, and federal guidelines, whichever is stricter.

### **Controlled and Prohibited Equipment (SHSP, UASI, OPSG)**

Grant funds may not be used for the purchase of Prohibited Equipment. Prohibited equipment includes the following:

- Tracked Armored Vehicles;
- Weaponized Aircraft, Vessels, and Vehicles of Any Kind;
- Firearms of .50-Caliber or Higher;
- Ammunition of .50-Caliber or Higher;
- Grenade Launchers;
- Bayonets;
- Camouflage Uniforms Used for Urban Settings

Additionally, grant funds for the **FY2017 cycle may not be used for the purchase of Controlled Equipment.**

Recently, Executive Order 13688 Federal Support for Local Law Enforcement Equipment Acquisition, and the Recommendations Pursuant to Executive Order 13688 was rescinded by the president. In light of this, FEMA is currently reviewing their policy and procedures and will be sending out updated information in the future. Until then, Ohio EMA as the SAA, has decided to prohibit the purchase of controlled equipment in the FY2017 cycle.

For questions related to the equipment that has been designated as controlled, please feel free to consult IB 407 *Use of Grant Funds for Controlled Equipment*, which was developed as part of the implementation of Executive Order (EO) 13688. These documents collectively established a *Prohibited Equipment List* and a *Controlled Equipment List*.

### **Personnel Activities**

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable FY2017 SHSP planning, training, exercise, equipment and M&A activities.

A personnel cost cap of up to 50 percent (50%) of total may be used for personnel and personnel-related activities as directed by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412). In general, the use of SHSP funding to pay for staff and/or contractor regular time or overtime/backfill is considered a personnel cost. Activities that are considered personnel and personnel-related, and therefore count against the personnel cost cap of 50 percent (50%), include, but are not limited to:

- Overtime/backfill to participate in approved training or exercise deliveries;
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators;
- Salaries and personnel costs under the M&A category;
- Contractor costs associated with performing the above activities
  - o A scope of work and contract detailing the job duties and deliverables for all consultants and/or contractors must be provided and approved by the Ohio EMA Preparedness Grants Branch prior to finalizing any consultant/contractor agreements or contracts;
- Costs associated with providing reasonable accommodations and modifications for workers with disabilities.

FY2017 HSGP funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

The following are definitions for the terms as used in this grant guidance:

- **Hiring.** State and local entities may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable FEMA program activities as specified in this guidance. This may not include new personnel who are hired to fulfill any non-FEMA program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent (FTE) employees.
- **Overtime.** These expenses are limited to the additional costs which result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.
- **Backfill-related Overtime.** Also called “Overtime as Backfill,” these expenses are limited to overtime costs which result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- **Supplanting.** Grant funds will be used to supplement existing funds, and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or grantees 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 funds.

### ***Equipment Activities***

All equipment procured under SHSP must be in support of the maintenance or development of a capability described and typed under the NIMS where such typing guidance exists as published by FEMA. More information on the AEL can be found at the following location: <https://www.fema.gov/authorized-equipment-list>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS-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.

Before any equipment item is added to the sub-recipient budget, they must first confirm the item conforms to a specific AEL equipment item. It is recognized that the AEL is not an all-inclusive list. Some items that wish to be purchased may not exactly match a specific item in the AEL. In those cases, the county must consult Ohio EMA’s Preparedness Grants Branch to determine whether or not the item meets the intent and restrictions of a given AEL equipment category/item. If Ohio EMA cannot concur or determine the eligibility of the item, they will consult with DHS to confirm eligibility of the item. The sub-recipient must receive approval for the item through the EGMS from Ohio EMA’s Preparedness Grants Branch. This clarification must take place prior to any encumbrance or expenditure of funds for the item in question.

Sub-recipients that are using FY2017 HSGP funds to support emergency communications activities should comply with the *FY2017 SAFECOM Guidance for Emergency Communication Grants*, including provisions on technical standards that ensure and enhance interoperable communications. Emergency communications activities include the purchase of Interoperable Communications Equipment and technologies such as voice-over-internet protocol bridging or gateway devices, or equipment to support the build out of wireless broadband networks in the 700 MHz public safety band under the Federal Communications Commission Waiver Order.

SAFECOM guidance can be found at <http://www.safecomprogram.gov>.

Any equipment purchased with HSGP funding shall, when practical, be prominently marked as follows: “Purchased with funds provided by the U.S. Department of Homeland Security.” It is recognized that not every individual item can be labeled as such. If the purchased equipment is maintained in bulk storage (i.e., in a packing container) the grant recipient may label the applicable container(s) with the above statement as opposed to labeling each and every item. Labeling should not be intrusive to the piece of equipment and must not include the DHS logo.

### *Maintenance and Sustainment Costs*

The use of DHS/FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in FEMA Policy FP-205-402-125-1 under all active and future grant awards unless otherwise noted. With the exception of maintenance plans purchased incidental to the original purchase of equipment, the period covered by maintenance or warranty plan must not exceed the period of performance of the specific grant funds used to purchase the plan or warranty.

As an example of maintenance plan purchased incidental to the original purchase, you may submit a grant application to purchase a new piece of equipment and as part of the purchase include the cost of a five year warranty. Even though the warranty exceeds the period of performance, the warranty will be considered an eligible cost.

Grant funds are intended to support the Goal by funding projects that build and sustain the core capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the Nation. In order to provide recipients (or sub-recipients) the ability to meet this objective, the policy set forth in GPD’s 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 in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the Goal, and (4) sharable through the Emergency Management Assistance Compact. Additionally, eligible costs must also be in support of equipment, training, and critical resources that have previously been purchased with either federal grant or any other source of funding other than DHS/FEMA preparedness grant program dollars.

Routine upkeep (e.g., gasoline, tire replacement, routine oil changes, monthly inspections, grounds, and facility maintenance, etc.) is not considered a maintenance cost, and as such it is the responsibility of the grantee and may not be funded with preparedness grant funding.

### *Training Activities*

Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP and UASI program priorities and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS, Department of Transportation). Training conducted using HSGP funds should address a performance gap identified through a TEP or other assessments (e.g., National Emergency Communications Plan [NECP] Goal Assessments) and contribute to building a capability that will be evaluated through a formal exercise.

Any training or training gaps, including those for vulnerable populations including children, the elderly, pregnant women, and individuals with disabilities or access and functional needs,



individuals with limited English proficiency and other who have functional needs, should be identified in a TEP and addressed in the State or Urban Area training cycle. Recipients (or sub-recipients) are encouraged to use existing training rather than developing new courses. When developing new courses, grantees are encouraged to apply the Analysis, Design, Development, Implementation and Evaluation model of instructional design (Course Development Tool) located at <https://www.firstrespondertraining.gov>

### ***Training Requirements***

All training activities supported by FY2017 HSGP must be eligible based on DHS-FEMA FY2017 grant guidance to Ohio. Training questions from sub-grantees can be answered by Ohio EMA by contacting the following staff: Lisa Jones, Training Coordinator (*ICS, EMI and Consortium Site Courses*) (614) 799-3824 [ljones@dps.ohio.gov](mailto:ljones@dps.ohio.gov); Susan Traylor, Training Coordinator

(*FEMA G Courses and Ohio Courses*) (614) 799-3666 [sctraylor@dps.ohio.gov](mailto:sctraylor@dps.ohio.gov).

Applicants requesting courses must describe how the course will address both DHS's mission-scope and support the State Investment Justification.

Sub-grantees are required, within 30 days after attendance, to submit information through the SAA via Web-Forms on all training not provided by FEMA, but supported with HSGP funds. This information will consist of course title, course description, mission area, level of training, the training provider, the date of the course, the number and associated disciplines of the individuals, and the sponsoring county.

Sub-grantees intending to use FEMA funds to support attendance at training not provided by FEMA must ensure these courses:

- Fall within the FEMA mission scope to prepare State, local, Tribal, and territorial personnel to prevent, protect against, respond to, and recover from acts of terrorism and catastrophic events;
- Build additional capabilities that: (a) support a specific training need identified by the State, territory, and Urban Area, and (b) comport with the State, territory, or Urban Area Homeland Security Strategy ;
- Address specific tasks and/or competencies articulated in FEMA's *Emergency Responder Guidelines* and the *Homeland Security Guidelines for Prevention and Deterrence*
- Address specific capabilities and related tasks articulated in the NPG.
- Support the specific program training activities identified in the individual HSGP grant programs for which the funding will be used

### ***Allowable Training Costs***

Allowable training-related costs include, but are not limited to, the following:

- *Developing, Delivering, and Evaluating Training*. Includes costs related to administering the training, planning, scheduling, facilities, materials and supplies, reproduction of materials, disability accommodations, and equipment.
- *Overtime and Backfill*. The entire amount of overtime costs, including payments related to backfilling personnel, which 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 the awarding agency, whichever is applicable.
  - In no case is dual compensation allowable. That is, an employee of a

unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities.

- *Travel*. Costs (e.g., airfare, mileage, per diem, hotel) are allowable as expenses by employees who are on travel status for official business related to an approved training.
- *Hiring of Full or Part-Time Staff or Contractors/Consultants*. Payment of salaries and fringe benefits to full or part-time staff or contractors/consultants must be in accordance with the policies of the State or unit(s) of local government and have the approval of the State or awarding agency, whichever is applicable. Such costs must be included within the funding allowed for program management personnel expenses.
  - A scope of work and contract detailing the job duties and deliverables for all consultants and/or contractors must be provided and approved by the Ohio EMA Preparedness Grants Branch prior to finalizing any consultant/contractor agreements or contracts.
- *Certification/Recertification of Instructors*. States are encouraged to follow the NTE 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. This information is contained in IB 193, issued October 20, 2005.

#### ***Management and Administration (M&A) Costs and Requirements***

Sub-recipients may retain a maximum of up to five percent (5%) of requested funding for management and administrative purposes associated with the HSGP award. M&A costs are specifically attributed to the management and administration of the FY2017 award(s). Indirect costs are not considered administrative costs and are not permitted under the FY2017 HSGP grants. The allowable costs specifically include the following:

- Hiring of full-time or part-time staff or contractors to include, but not limited to, completing pre-grant application Budget Worksheets and Program Narrative; initiating, documenting, and tracking grant expenditures; inventorying equipment purchases; producing or completing required grant reports such as the Request for Cash, Encumbrance Report, and federally-required ISIP and BSIR;
- Overtime and backfill costs related to accomplishing allowed administrative tasks only to the extent the payment for such services is in accordance with the policies of the local unit(s) of government;
- Applicable travel expenses to the extent the payment for such services is in accordance with the policies of the local unit(s) of government;
- Non-food meeting related expenses (2 CFR 200) associated with County's Terrorism Advisory Team to discuss local homeland strategy implementation and/or grant program management;
- Acquisition of authorized office equipment, including personal computers, laptop computers, printers, LCD projectors, and other equipment or software which is required to support the implementation of the FY2017 SHSP and *only when* no such equipment is currently available to accomplish the task;
- Recurring fees/charges associated with *authorized office equipment*, such as cell phones, faxes, etc. (this does *not* pertain to *response equipment* purchased under the



eligible equipment program category); and

- Leasing and/or renting of office space for *newly hired personnel* who will administer the programs within FY2017 HSGP, or for personnel currently being paid with SHSP funds for grant administration and will now be responsible to additionally administer FY2017 HSGP funding.

### ***Food Costs***

With the exception of food costs associated with travel/per-diem or providing for a meal during the conduct of an exercise where participants do not have the ability to leave, food costs will not be approved. In all cases where food is permitted, costs must be reasonable. Costs will be determined to be reasonable if the per person (documented participants) cost for food is equal to or less than the permitted per diem for the meal provided per the GSA website.

### ***Construction and Renovation***

Use of HSGP funds for construction is generally prohibited and will have limited applicability to Ohio's FY2017 offering of HSGP funding.

### ***Environmental Planning and Historic Preservation (EHP) Compliance***

FEMA is legally required to consider the potential impacts of all grant-funded projects on environmental resources and historic properties. For HSGP and other preparedness grant programs, this is accomplished via FEMA's EHP Review. Sub-grantees must comply with all applicable EHP laws, regulations, and Executive Orders (EOs) in order to draw down their FY2017 HSGP grant funds. Any project with the potential to impact natural resources or historic properties cannot be initiated until FEMA has completed the required FEMA EHP review. Grantees that implement projects prior to receiving EHP approval from FEMA risk de-obligation of funds.

HSGP projects that involve the installation of equipment, exercises not specifically excluded from a FEMA EHP review per the GPD Programmatic Environmental Assessment (PEA) (for more information on the PEA see IB 345 and ground-disturbing activities, new construction, including communication towers, or modification/renovation of existing buildings or structures must undergo a FEMA EHP review.

Furthermore, for those proposed construction or renovation projects that are part of larger projects funded from a non-FEMA source (such as an EOC that is part of a larger proposed public safety complex), a FEMA EHP review must be complete before the larger project is initiated. For these types of projects, sub-grantees must complete the FEMA EHP Screening Form (included in this guidance) and submit it, with all supporting documentation, to their Ohio EMA Grant Programs Specialist. Refer to IBs 329, 345, and 356 located at <http://www.fema.gov/> for further details on EHP requirements.

The following activities would not require the submission of the FEMA EHP Screening Form:

- planning and development of policies or processes;
- management, administrative or personnel actions;
- classroom-based training;
- table top exercises and;
- acquisition of mobile and portable equipment (not involving installation).

Projects using HSGP funds that were initiated or completed before an EHP review was concluded

will be de-obligated. To avoid unnecessary delays in starting a project, grantees are encouraged to pay close attention to the reporting requirements for an EHP review.

## **A. Application Requirements**

### *Submission Requirements*

Grant agreements, assurances, and additional required documents signed by the fiscal agent, as well as a prioritized list of projects with each regional advisory committee member's signature, must be mailed to Ohio EMA with a postmark no later than December 29, 2017. It is highly recommended that the applicant use a method of delivery that can be tracked, as applications received after the deadline will not be considered. An application template is included with this guidance, however, it is to be used only as a tool to gather project information. The physical applications are not to be submitted, but should be kept on file with the fiscal agent for reference when entering information into EGMS and for audit purposes. All EHP documentation will also need to be submitted with your region's grant package submission.

For FY2017 a completed application package under HSGP consists of **nine** parts:

- FY2017 HSGP regional grant agreement
- 20-16 Summary Sheet for Assurances
- 20-16A Assurances Non-construction
- 20-16B Assurances Construction Program
- 20-16C Lobbying, Debarment, Suspension and Other Requirements
- 20-SF-LLL Disclosure of Lobbying Activities
- NIMS compliance form\*
- All of the above are to be completed and signed by the fiscal agent*
- Regional Project Sign-off Form with an attached list of prioritized projects
- EHP screening tool (as required) for each project

\*In order to receive FY2017 HSGP funding, the sub-recipient is required to certify as part of their grant application that they are addressing and/or have met the most current NIMS requirements. Additional information about NIMS requirements, compliance and resources for achieving compliance can be found at Ohio EMA NIMS website <http://www.ema.ohio.gov/NimsGuidance.aspx> or the NIMS Integration Center web page, <http://www.fema.gov/national-incident-management-system>.

## **B. Application Processing**

### *Standards for Review*

Preparedness Grants Branch staff will review projects submitted in the Electronic Grants Management System (EGMS) to ensure compliance with this guidance document. Approval of each project will be completed in EGMS. Sub-recipients should utilize the technical expertise of grants staff to ensure they are submitting projects that meet the requirements established in this guidance.

Sub-recipient (regional Fiscal Agent) budget applications in EGMS that do not provide minimum levels of documentation as described in this guidance will be returned to the applying

county for revision.

It is the intention of all involved to work from the first prioritized project through the list sequentially until the regional award is expended, provided the projects are allowable and meet all other review criteria established in this section.

## **C. Post Award Requirements**

### ***Issuance of Grant Agreement***

A grant agreement, signed and dated by the Ohio EMA Executive Director, has been forwarded with this guidance to the regional fiscal agent. The fiscal agent is to sign and return the grant agreement, along with a list of the region's prioritized projects, to Ohio EMA. Once all projects are entered and approved in EGMS, the regional fiscal agent is authorized to obligate grant funds.

### ***Sub-grantee training***

With the acceptance of FY2017 SHSP funding, sub-recipient fiscal agents will be required to participate in grant management/administration training provided by Ohio EMA when indicated. The L705 Fundamentals of Grants Management Course scheduled for March 13-15, 2018 is recommended, but not mandatory.

### ***Grant Performance Period***

The performance period for the FY2017 HSGP sub-grants can be found on the grant agreement for each sub-grantees' specific award. Note that all costs must be incurred within the period of performance to include receipt and installation of all equipment. No funds may be spent on activities or costs that occur outside of the defined grant performance period. Extensions to the grant performance period listed on the grant agreement is highly unlikely, so sub-recipients should plan accordingly.

### ***Demonstrating progress***

Fiscal agents will be held accountable for meeting the milestones listed in the project application. While there will be a level of flexibility extended, obvious or repetitive lack of progress towards completion of grant funded activities will result in de-obligation of funds. Any de-obligated funds will be re-programmed by the state to projects that can be completed within the period of performance.

### ***Standards for Financial Management***

Sub-recipients are required by 2 CFF 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* to have in place an accounting system that maintains records which adequately identify the source and application of funds provided for grant funded projects. The accounting system must include information pertaining to sub-grant awards, obligations, un-obligated balances, assets, liabilities, outlays or expenditures and income. Ohio EMA requirements for sub-recipient accounting include the ability to track expenditures by grant program and by federal fiscal of the award (i.e. FY2009 CCP, FY2010 CCP, etc.).

### ***Procurement***

The procurement process is one of, if not the most, scrutinized aspect of the federal grant

programs. The emphasis on how procurements are made is based from the 2 CFR200 requirements that “all procurement transactions be conducted in a manner providing full and open competition with the standards of this section (§200.319)”. Additionally, sub-recipients must ensure that they meet the procurement requirements of the Ohio Revised Code and local procurement regulations. All sub-recipients are strongly urged to seek out their procurement department/individual to seek guidance on implementing the grant requirements into the procurement of any grant funded item or service. In accordance with this requirement, sub-recipients will be required to document actions that demonstrate compliance with the “full and open” regulation. 2 CFR 200 (§200.320) offers the following guidance in an effort to help sub-recipients navigate the requirements of procurement:

The non-Federal entity must use one of the following methods of procurement:

- a. Micro-purchases—purchases that do not exceed \$3,500; to the extent possible, non-Federal entity must distribute these purchases equitably among qualified suppliers; micro-purchases may be awarded without soliciting quotes if the price is considered reasonable and the local policy allows for this; in light of the reasonableness requirement Ohio EMA is suggesting sub-recipients should still seek quotes where feasible
- b. Procurement by small purchase—price or rate quotations must be obtained from three sources if the cost is more than the Simple Acquisition Threshold and the local policy does not establish a different, lower amount
- c. Procurement by sealed bid (formal advertising)-Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is lowest in price; consult 2 CFR 200 §200.320(c)(1) as well as local policy to determine what conditions make a sealed bid feasible
- d. Procurement by competitive proposals-generally used when conditions are not appropriate for the use of sealed bids; consult 2 CFR 200 §320(d) and local policy to determine the requirements that apply if this type of procurement method is used and must list each of the criteria the selection will be based on.
- e. Procurement by noncompetitive proposals- Will **not** be approved except in RARE circumstances when it is extremely well documented and only due to inadequate competition. Should you only receive one bid or quote you will need to contact the Preparedness Grants Branch. Any procurement without 3 quotes or bids must have a pre-approval by Ohio EMA.

Sub-recipients should note that the following situations are considered to be restrictive of competition and should be avoided (2 CFR 200 §200.319):

- 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 awards 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 of other relevant requirements of the procurement, and
- Any arbitrary action in the procurement process.

Sub-recipients will maintain records sufficient to detail the significant history of any procurement. These records will include, but are not necessarily limited to the following: local procurement policy, rationale for the method of procurement, request for quote correspondence, selection of contract type, contractor selection or rejection, and the basis for the contract price. Sub-recipients alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

### *Source Documentation*

2 CFR Part 200 also requires that accounting records be supported by such source documentation as cancelled checks, paid bills, auditor payroll journals, signed (by employee and supervisor) time and attendance records, contract and sub-grant award documents, etc. As such, Ohio EMA requires that sub-recipients have source documentation available prior to requesting cash reimbursement. Proper documentation for select items is as follows but not all inclusive but can be used as a minimum guideline:

- Travel costs
  - Copy of the government unit travel policy. Please specify if employee is being reimbursed directly by Fiscal Agent Jurisdiction or another local agency and their policy
  - Receipts/documentation as required by travel policy
  - Federal Per Diem Policy must be followed unless the jurisdiction reimbursing employee has outlined their own specific per diems.
- Personnel costs
  - Current official jurisdiction approved position description
  - Time and Effort documentation with activity reports reflecting allowable work and accomplishments as it pertains to the program and outlined in 2 CFR 200.
- Contract costs
  - Procurement Documentation
  - Copy of draft contract for eligibility review prior to contract award
  - Copy of awarded contract for grant file
  - Deliverables and timeline listed in contract
  - Terms of payment outlined in contract
  - For contracts to an individual, a signature of the “contractor” is required.
- Equipment costs
  - Procurement
  - Contracts
  - Invoice (not quote) for equipment purchased
  - Documentation that equipment is received on site and installed as necessary
- Meeting costs
  - Procurement Documentation
  - Invoices
  - Contracts
  - Agenda/Course Description
  - Attendance roster or Certification

## *Changes*

Per 2 CFR Part 200, sub-recipients must obtain the prior approval of the awarding agency (Ohio EMA) in any case where a change is to be made to the scope of the project, regardless of budget impact. Ohio EMA will require all sub-recipients to request a budget modification and approval, to include EHP approval, through EGMS prior to costs being incurred for the item(s) to be changed. Costs incurred prior to appropriate actions being taken to modify and approve the budget may result in costs being denied for reimbursement.

## *Equipment and Supplies Requirements*

Utilization of HSGP funds for equipment purchases requires that sub-recipients maintain specific documentation on each item through its useful life until final disposition occurs. Per 2 CFR 200, 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:

- Property records must be maintained that include (2 CFR 200 §200.313(d) *Management requirements*):
  - A description of the property,
  - A serial number or other identification number,
  - Who holds title,
  - The acquisition date, and cost of the property,
  - The source of 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.
- A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- 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.
- Adequate maintenance procedures must be developed to keep the property in good condition.
- If the sub-grantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

When the equipment is no longer needed for the original project and/or has outlasted its useful life, 2 CFR 200 §200.313(e) prescribes the following requirements for final disposition:

- 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.
- Except in limited circumstances, 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 (FEMA through Ohio EMA) 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.
- The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the fair market value of the property.
- In cases where a recipient or sub-recipient fails to take appropriate disposition actions, the awarding agency may direct the recipient or sub-recipient to take excess and disposition actions.



Supplies as defined as tangible personal property other than “equipment” for used in this guidance have a disposition requirement when the residual value of the combined unused inventory exceeds \$5,000. In cases where this may occur, the awarding agency is entitled to its share of the value of the remaining inventory.

### *Sub-Granting*

**No sub-recipient receiving FY2017 HSGP funding may sub-grant funding to another entity without prior coordination and approval from Ohio EMA.** In order to be granted permission to sub-grant, the managing county will have to demonstrate an ability to ensure compliance with all terms, conditions and requirements of the federal grant guidance and this guidance.

### *Single Audit Requirements*

Sub-recipients are responsible for obtaining audits in accordance with the Single Audit Act Amendments of 1996 (31 U.S.C. 7501–7507); 31 U.S.C. 503, 1111; Executive Order 8248; Executive Order 11541; and 2 CFR 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.*” The audits shall be made by an independent auditor in accordance with generally accepted government auditing standards covering financial audits. Sub-recipients must ensure that funds received and expended under this grant program are coordinated with the county’s fiscal office (treasurer, auditor, etc.)

### *Audit Findings*

Ohio EMA as the SAA takes serious the responsibility of administering the grant funds we are entrusted with from DHS/FEMA. We conducted regional sessions on procurement throughout calendar year 2015 and 2016. This guidance refers to the Super Circular (2 CFR Part 200) and the requirements therein. Sub-recipients (regional fiscal agents) should refer to the Super Circular and ensure they are meeting all requirements set forth therein. In addition, all requirements set forth in this guidance are passed along to sub-recipients (regional fiscal agents). Sub-recipients (regional fiscal agents), by signing the grant agreement, agree to be bound by all requirements set forth in this guidance, the grant agreement, and the Super Circular. As a result, any audit findings that occur with respect to improper procurement or from not abiding by the requirements set forth in this guidance will be the responsibility of the sub-recipient (regional fiscal agent). Ohio EMA will assume no financial responsibility for said audit findings, and if forced to pay on behalf of the sub-recipient (regional fiscal agent) will take all action necessary to recover those costs.

### *Reporting Requirements*

Upon official award, applicants acknowledge they agree to complete quarterly reports to the Ohio EMA; and also agree to update the Bi-annual Strategy Implementation Report (BSIR) on the federal Grants Reporting Tool (GRT), due as available from DHS-FEMA and coordinated by Ohio EMA each year until the grant concludes, and then to complete one final BSIR within 120 days of the federal grant closure date. Further information on quarterly and bi- annual reporting will be provided with issuance of the official grant agreement.

Beginning in the FY2017 cycle, sub-recipients (regional fiscal agents) will be monitored for fiscal performance utilizing the quarterly reports. Ohio EMA staff will be contacting sub-recipients (regional fiscal agents) that do not reflect adequate spending levels on the quarterly reports in an effort to encourage active spending of the grant award and proactively address problems the Sub-recipient (regional fiscal agent) is experiencing.



## **D. Payment**

### ***Reimbursement Requests***

The reimbursement request process for the FY2017 HSGP programs will be executed solely through the EGMS system. In order to be processed, Ohio EMA will require that reimbursements include documentation noting that services have been completed (contract, personnel, etc.) and/or that equipment has been received on site and invoiced. To be reimbursed, costs must be eligible and proper back-up documentation must be submitted through the EGMS.

Sub-Recipients must submit cash reimbursement requests as expenses are incurred or no less than once a quarter. Failure to do so will result in improper federal reporting and may result in loss of funds.

Upon approval by the Preparedness Grants Branch, the sub-recipients' funds will be requested for payment from Ohio EMA's fiscal unit. The payment process entails requesting money from the federal entity, receiving funds at the state level, vouchering the funds and the dispatching of an EFT to the sub-grantee. While this process relies heavily on external stakeholders, Ohio EMA will work to ensure the quickest processing of sub-grantee payments.

### ***Standards for Review***

The reimbursement review process includes an initial review for completeness, determination of eligibility and data entry of the cash request for tracking/monitoring. This review is conducted by the Preparedness Grants Program Specialist and focuses on accuracy of requests, prior approval of costs in the budget and ensuring complete documentation accompanies the request. Cash requests that are properly executed by the sub-recipient will be processed in 10 business days or less.

If a request is not complete (including but not limited to the following items: lack of proper documentation, costs not included on the approved budget, no prior EHP approval, etc.) the request will be rejected to the sub-recipient fiscal agent for revision. Sub-recipients are encouraged to utilize their Grants Specialist for technical assistance in filling out the cash request and compiling documentation to support the cash request prior to submission in an attempt to expedite the approval process.

## **E. Enforcement, Termination and After the Grant Requirements**

Ohio EMA is required to monitor the sub-recipient's (regional fiscal agent's) compliance with the Federal statutes, regulations, State law and terms and conditions of the sub award as codified in 2 CFR 200.331. If Ohio EMA becomes aware of an area of non-compliance it will inform the sub-recipient (regional fiscal agent) through a Notice-of-Non-Compliance. The sub-recipient (regional fiscal agent) may be given steps to remedy the area(s) of non-compliance, or if the non-compliance cannot be remedied then Ohio EMA will take action against the sub-recipient (regional fiscal agent) congruent to 2 CFR 200.338-339. Ohio EMA can impose any of the following actions for non-compliance: temporary withholding of funding, disallowing costs and/or reimbursements, wholly or partially suspend an award of funds, initiate suspension or other departmental proceedings, withhold further funding or participation in the program, and any other remedy that is legally available. Below is an outline of the monitoring process the sub-recipient is agreeing to follow:

- A. Notice of Non-Compliance: The Ohio EMA Grants Branch Chief will send electronic notice of Non-Compliance to the sub-recipient. The Notice of Non-

Compliance will inform the sub-recipient of the following: The area(s) of non-compliance;

- B. Either (1) the steps required to of the sub-recipient to come into compliance and the date by which the sub-recipient must demonstrate compliance and the agency action if compliance is not met; or (2) Ohio EMA's action against the sub-recipient if Ohio EMA determines non-compliance cannot be remedied;
  - C. The method for requesting review of compliance steps or agency action.
2. Review sub-recipient's submission of compliance: In the event the sub-recipient submits compliance documentation, Ohio EMA Grants Administrator, in conjunction with the Grants Branch Chief, will review the sub-recipient's written submission and determine if there is full compliance. If the sub-recipient has not met full compliance, Ohio EMA will take agency action, through a Notice of Action, the sub-recipient received notice of in the previously issued Notice of Non-Compliance.
  3. Method for requesting review: Sub-recipient will have thirty (30) days from the date of the Notice of Action to request reconsideration with the Executive Director. The sub-recipient must send the request in writing and should include any additional information or documentation within the thirty day period for the Executive Director to consider. The Executive Director will make a decision in writing within sixty (60) days of receipt of the request for reconsideration. However, if the Executive Director needs additional time she will notify the sub-recipient of the extended time frame. The decision of the Executive Director is final. The sub-recipient is not entitled to any further appeals within Ohio EMA, or pursuant to any federal or state regulation, code, or procedure.

## Availability of Public Records

Ohio's Public Records Law generally requires disclosure of information. Ohio Revised Code Section 149.43 sets forth requirements, along with exceptions for disclosure. Specifically, Section 149.433 allows some security information to be exempt from disclosure.

Applicants are encouraged to consult state and local laws and regulations and discuss these requirements with their legal counsel. Sub-recipients should be familiar with the regulations governing protected critical infrastructure information (6 C.F.R. Part 29) and sensitive security information (49 C.F.R. Part 1520), as these designations may provide additional protection to certain classes of homeland security information.

## POINTS OF CONTACT

For **Grant Fiscal and Administrative** needs, contact:

### Grants Specialists

- |                                       |  |
|---------------------------------------|--|
| • Rudi Blaser –Regions 4,5,8          | 614-799-3825 or via <a href="mailto:rblaser@dps.ohio.gov">rblaser@dps.ohio.gov</a>     |
| • Dan Green – Regions 1,2             | 614-799-3820 or via <a href="mailto:dpgreen@dps.ohio.gov">dpgreen@dps.ohio.gov</a>     |
| • Andy Lorenzo – Regions 3,6,7        | 614-799-3683 or via <a href="mailto:ablorenzo@dps.ohio.gov">ablorenzo@dps.ohio.gov</a> |
| • Kathleen Nelson, Branch Chief       | 614-799-3836 or via <a href="mailto:knelson@dps.ohio.gov">knelson@dps.ohio.gov</a>     |
| • Margo Schramm, Grants Administrator | 614-799-3843 or via <a href="mailto:mschramm@dps.ohio.gov">mschramm@dps.ohio.gov</a>   |

## **LIST OF APPENDICES:**

Appendix A) Terms and Conditions of the Grant and Sub-Grant

Appendix B) Grant Application Checklist

Appendix C) Summary of Core Capabilities

Appendix D) Detailed list of Planning Activities

## Appendix A: Terms and Conditions of the Grant

Ohio EMA, as the recipient of this grant is required to advise all sub-recipients of the HSGP program of the requirements imposed upon them by Federal statute, executive orders and regulations. Please carefully review and understand the following pages.

**Freedom of Information Act (FOIA).** Information submitted in the course of applying for funding under this program or provided in the course of an entity's grant management activities which is under Federal control is subject to the *Freedom of Information Act* (FOIA), 5 U.S.C. §552. The applicant is also encouraged to consult its own State and local laws and regulations regarding the release of information, which should be considered when reporting sensitive matters in the grant application, needs assessment and strategic planning process. Note that some information, though not considered classified, may be protected from release or in how it is released. It is important to understand those laws and regulations that fall into an alternate category of Sensitive But Unclassified (SBU) information.

- **Sensitive But Unclassified (SBU).** SBU is a designation of information in the United States Federal government that, though unclassified, often requires strict controls over its distribution. SBU is a broad category of information that includes material covered by such designations as For Official Use Only (FOUO), Law Enforcement Sensitive (LES), Sensitive Homeland Security Information, Security Sensitive Information (SSI), Protected Critical Infrastructure Information (PCII), etc. Some categories of SBU information have authority in statute or regulation (e.g. SSI, CII) while others, including FOUO, do not.
- **Sensitive Security Information (SSI).** Information submitted in the course of applying for funding or reporting under certain programs or provided in the course of an entity's grant management activities under those programs which is under Federal control is subject to protection under SSI, and must be properly identified and marked. Sensitive Security Information (SSI) is a control designation used by the Department of Homeland Security related to protecting information related to transportation security. It is applied to information about security programs, vulnerability and threat assessments, screening processes, technical specifications of certain screening equipment and objects used to test screening equipment, and equipment used for communicating security information relating to air, land, or maritime transportation. The applicable information is spelled out in greater detail in 49 CFR Part §1520.7.
- **Protected Critical Infrastructure Information (PCII).** The PCII Program, established pursuant to the *Critical Infrastructure Act of 2002* (Public Law 107-296) (*CII Act*), created a framework which enables members of the private sector, States, local jurisdictions, and Tribal nations to voluntarily submit sensitive information regarding critical infrastructure to DHS. The Act provides statutory protection from public disclosure and civil litigation for CII that is validated as PCII. When validated as PCII, the information can only be shared with government employees who complete the training requirement, who have homeland security duties, and a need to know. PCII accreditation is a formal recognition that the covered government entity has the capacity and capability to receive and store PCII appropriately. DHS encourages all States, local jurisdictions, and Tribal nations to pursue PCII accreditation to cover their government agencies. Accreditation activities include signing a memorandum of agreement (MOA) with DHS, appointing a PCII Officer and developing a standard operating procedure for handling PCII. For additional information about PCII or the accreditation process, please contact the DHS PCII Program Office at [pcii-info@dhs.gov](mailto:pcii-info@dhs.gov).
- **Chemical-terrorism Vulnerability Information (CVI).** DHS issues a Manual to provide guidance on how to identify, handle and safeguard information developed by private and public entities under Section 550 of Public Law 109-295 and its implementing regulations, the Chemical Facility Anti-Terrorism Standards (CFATS), 6 CFR Part §27. Pursuant to CFATS. This information is known as Chemical-terrorism Vulnerability Information, or CVI, is relevant for anyone authorized to possess or receive CVI (including chemical facility officers, employees, representatives and contractors, and Federal, State, local and Tribal government employees and contractors), as well as anyone who obtains what they reasonably should know is CVI. [http://www.dhs.gov/xlibrary/assets/chemsec\\_cvi\\_proceduresmanual.pdf](http://www.dhs.gov/xlibrary/assets/chemsec_cvi_proceduresmanual.pdf)

- **Sensitive Personally Identifiable Information (Sensitive PII).** Certain personally identifiable information, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual and needs to be carefully managed. Social Security number or alien number (A-number), for example, requires stricter handling guidelines because of the increased risk to an individual if compromised. A key part of the DHS mission to protect the homeland is to minimize our impact on individual privacy. In this regard DHS has developed a *Handbook for Safeguarding Sensitive PII, which can be found at [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_guide\\_spII\\_handbook.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_guide_spII_handbook.pdf)*. As required by OMB M- 07-16, these rules also apply to DHS licensees, certificate holders, and grantees that handle or collect PII, including Sensitive PII, for or on behalf of DHS.

**Civil Rights Act of 1964.** All recipients of financial assistance will comply with the requirements of Title VI of the *Civil Rights Act of 1964* (42 U.S.C. § 2000d *et seq.*), which provides that no person in the United States will, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

**Civil Rights Act of 1968.** All recipients of financial assistance will comply with Title VIII of the *Civil Rights Act of 1968*, which prohibits recipients from discriminating in the sale, rental, financing, and advertising of dwellings, or in the provision of services in connection therewith, on the basis of race, color, national origin, religion, disability, familial status, and sex (42 U.S.C. §3601 *et seq.*), as implemented by the Department of Housing and Urban Development at 24 CFR Part §100. The prohibition on disability discrimination includes the requirement that new multifamily housing with four or more dwelling units—*i.e.*, the public and common use areas and individual apartment units (all units in buildings with elevators and ground-floor units in buildings without elevators)—be designed and constructed with certain accessible features (see 24 CFR Part §100.201).

**Title IX of the Education Amendments of 1972 (Equal Opportunity in Education Act).** All recipients of financial assistance will comply with the requirements of Title IX of the *Education Amendments of 1972* (20 U.S.C. §1681 *et seq.*), which provides that no person in the United States will, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance. These regulations are codified at 44 CFR Part §19.

**Age Discrimination Act of 1975.** All recipients of financial assistance will comply with the requirements of the *Age Discrimination Act of 1975* (42 U.S.C. § 6101 *et seq.*), which prohibits discrimination on the basis of age in any program or activity receiving Federal financial assistance.

**Americans with Disabilities Act of 1990.** All recipients of financial assistance will comply with the requirements of Titles I, II, and III of the *Americans with Disabilities Act*, which prohibits recipients from discriminating on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§12101–12213).

**Limited English Proficiency (Civil Rights Act of 1964, Title VI).** All recipients of financial assistance will comply with the requirements of Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, and resulting agency guidance, national origin and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, recipients must take reasonable steps to ensure that LEP persons have meaningful access to your programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Recipients are encouraged to consider the need for language services for LEP persons served or encountered both in developing budgets and in conducting programs and activities. For assistance and information regarding LEP obligations, go to <http://www.lep.gov>.

**Lobbying Prohibitions.** None of the funds provided under an award may be expended by the recipient to pay any person to influence, or attempt to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with any Federal action concerning the award or renewal of any Federal contract, grant, loan, cooperative agreement. These lobbying prohibitions can be found at 31 U.S.C. §1352.

**Drug-Free Workplace Regulations.** All recipients of financial assistance will comply with the requirements of the *Drug-Free Workplace Act of 1988* (412 U.S.C. §701 *et seq.*), which requires that all organizations receiving grants from any Federal agency agree to maintain a drug-free workplace. The recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute. Failure to comply with these requirements may be cause for debarment. These regulations are codified at 44 CFR Part §17.

**Debarment and Suspension.** Executive Orders 12549 and 12689 provide protection from fraud, waste, and abuse by debarment or suspending those persons deemed irresponsible in their dealings with the Federal government. The recipient must certify that they are not debarred or suspended from receiving Federal assistance. For additional information, see 2 CFR Part §3000.

**Federal Debt Status.** The recipient may not be delinquent in the repayment of any Federal debt. Examples of relevant debt include delinquent payroll or other taxes, audit disallowances, and benefit overpayments. (See OMB Circular A-129, also refer to SF-424, item number 17.)

**Hotel and Motel Fire Safety Act of 1990.** In accordance with section 6 of the *Hotel and Motel Fire Safety Act of 1990*, 15 U.S.C. §2225a, the recipient agrees to ensure that all conference, meeting, convention, or training space funded in whole or in part with Federal funds, complies with the fire prevention and control guidelines of the *Federal Fire Prevention and Control Act of 1974*, 15 U.S.C. §2225.

**Rehabilitation Act of 1973.** All recipients of financial assistance will comply with the requirements of Section 504 of the *Rehabilitation Act of 1973*, 29 U.S.C. §794, as amended, which provides that no otherwise qualified handicapped individual in the United States will, solely by reason of the handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. These requirements pertain to the provision of benefits or services as well as to employment.

For additional detailed information, please refer to the following:

**FEMA Office of Disability Integration and Coordination.** at <http://www.fema.gov/about/odic>.

**Guidelines for Accommodating Individuals with Disabilities in Disaster.** at <http://www.fema.gov/oer/reference/>.

**Disability and Emergency Preparedness Resource Center.** available at <http://www.disabilitypreparedness.gov>.

**ADA Best Practices.** available at <http://www.ada.gov/pcatoolkit/toolkitmain.htm>.

**National Environmental Policy Act (NEPA) of 1969.** All recipients of financial assistance will comply with the requirements of the *NEPA*, as amended, 42 U.S.C. §4331 *et seq.*, which establishes national policy goals and procedures to protect and enhance the environment, including protection against natural disasters. To comply with NEPA for its grant-supported activities, DHS requires the environmental aspects of construction grants (and certain non-construction projects as specified by the component and awarding office) to be reviewed and evaluated before final action on the application.

**Equipment Marking.** Awardees may consider marking equipment in the following manner, "Purchased with funds provided by the U.S. Department of Homeland Security," in order to facilitate their own audit processes, as well as Federal audits and monitoring visits, which may result from receiving Federal funding. Equipment maintenance requirements are outlined in 44 CFR Part §13.32.

**Disadvantaged Business Requirement.** Applicants are advised that, to the extent that recipients of a grant use contractors or subcontractors, such recipients shall use small, minority, women-owned or disadvantaged business concerns and contractors or subcontractors to the extent practicable.

**National Preparedness Reporting Compliance.** *The Government Performance and Results Act of 1993* (Public Law 103-62) (GPRA) requires that the Department collect and report performance information on all programs. For grant programs, the prioritized Investments and their associated milestones provide an important tool for assessing grant performance and complying with these national preparedness reporting requirements. FEMA will work with grantees to develop tools and processes to support this requirement. FEMA anticipates using this information to inform future-year



grant program funding decisions. Award recipients must agree to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within their grant agreement. This includes any assessments, audits, or investigations conducted by DHS, the Office of the Inspector General, or the U.S. Government Accountability Office (GAO).

***Animal Welfare Act of 1966.*** All recipients of financial assistance will comply with the requirements of the *Animal Welfare Act*, as amended (7 U.S.C. §2131 *et seq.*), which requires that minimum standards of care and treatment be provided for vertebrate animals bred for commercial sale, used in research, transported commercially, or exhibited to the public. Recipients must establish appropriate policies and procedures for the humane care and use of animals based on the *Guide for the Care and Use of Laboratory Animals* and comply with the *Public Health Service Policy and Government Principles Regarding the Care and Use of Animals*.

***Clean Air Act of 1970 and Clean Water Act of 1977.*** All recipients of financial assistance will comply with the requirements of 42 U.S.C. §7401 *et seq.* and Executive Order 11738, which provides for the protection and enhancement of the quality of the Nation's air resources to promote public health and welfare and for restoring and maintaining the chemical, physical, and biological integrity of the nation's waters is considered research for other purposes.

***Protection of Human Subjects.*** All recipients of financial assistance will comply with the requirements of the Federal regulations at 45 CFR Part §46, which requires that recipients comply with applicable provisions/law for the protection of human subjects for purposes of research. Recipients must also comply with the requirements in DHS Management Directive 026-04, *Protection of Human Subjects*, prior to implementing any work with human subjects. For purposes of 45 CFR Part §46, research means a systematic investigation, including research, development, testing, and evaluation, designed to develop or contribute to general knowledge. Activities that meet this definition constitute research for purposes of this policy, whether or not they are conducted or supported under a program that is considered research for other purposes. The regulations specify additional protections for research involving human fetuses, pregnant women, and neonates (Subpart B); prisoners (Subpart C); and children (Subpart D). The use of autopsy materials is governed by applicable State and local law and is not directly regulated by 45 CFR Part §46.

***National Flood Insurance Act of 1968.*** All recipients of financial assistance will comply with the requirements of Section 1306(c) of the *National Flood Insurance Act*, as amended, which provides for benefit payments under the Standard Flood Insurance Policy for demolition or relocation of a structure insured under the Act that is located along the shore of a lake or other body of water and that is certified by an appropriate State or local land use authority to be subject to imminent collapse or subsidence as a result of erosion or undermining caused by waves or currents of water exceeding anticipated cyclical levels. These regulations are codified at 44 CFR Part §63.

***Flood Disaster Protection Act of 1973.*** All recipients of financial assistance will comply with the requirements of the *Flood Disaster Protection Act of 1973*, as amended (42 U.S.C. §4001 *et seq.*), which provides that no Federal financial assistance to acquire, modernize, or construct property may be provided in identified flood-prone communities in the United States, unless the community participates in the National Flood Insurance Program and flood insurance is purchased within one year of the identification. The flood insurance purchase requirement applies to both public and private applicants for DHS support. Lists of flood-prone areas that are eligible for flood insurance are published in the *Federal Register* by FEMA.

***Coastal Wetlands Planning, Protection, and Restoration Act of 1990.*** All recipients of financial assistance will comply with the requirements of Executive Order 11990, which provides that federally funded construction and improvements minimize the destruction, loss, or degradation of wetlands. The Executive Order provides that, in furtherance of Section 101(b)(3) of NEPA (42 U.S.C. § 4331(b)(3)), Federal agencies, to the extent permitted by law, must avoid undertaking or assisting with new construction located in wetlands unless the head of the agency finds that there is no practicable alternative to such construction, and that the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use. In making this finding, the head of the agency may take into account economic, environmental, and other pertinent factors. The public disclosure requirement described above also pertains to early public review of any plans or proposals for new construction in wetlands. This is codified at 44 CFR Part §9.

**USA Patriot Act of 2001.** All recipients of financial assistance will comply with the requirements of the *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act* (USA PATRIOT Act), which amends 18 U.S.C. §§175–175c. Among other things, it prescribes criminal penalties for possession of any biological agent, toxin, or delivery system of a type or in a quantity that is not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose. The Act also establishes restrictions on access to specified materials. —Restricted persons,<sup>ll</sup> as defined by the Act, may not possess, ship, transport, or receive any biological agent or toxin that is listed as a select agent.

**Trafficking Victims Protection Act of 2000.** All recipients of financial assistance will comply with the requirements of the government-wide award term which implements Section 106(g) of the *Trafficking Victims Protection Act (TVPA) of 2000*, as amended (22 U.S.C. §7104), located at 2 CFR Part §175. This is implemented in accordance with OMB Interim Final Guidance, *Federal Register*, Volume 72, No. 218, November 13, 2007. In accordance with the statutory requirement, in each agency award under which funding is provided to a private entity, Section 106(g) of the TVPA, as amended, requires the agency to include a condition that authorizes the agency to terminate the award, without penalty, if the recipient or a sub-recipient —

Engages in severe forms of trafficking in persons during the period of time that the award is in effect; 15

Procures a commercial sex act during the period of time that the award is in effect; or

Uses forced labor in the performance of the award or sub-awards under the award. Full text of the award term is provided at 2 CFR §175.15.

**Fly America Act of 1974.** All recipients of financial assistance will comply with the requirements of the Preference for U.S. Flag Air Carriers: Travel supported by U.S. Government funds requirement, which states preference for the use of U.S. flag air carriers (air carriers holding certificates under 49 U.S.C. §41102) for international air transportation of people and property to the extent that such service is available, in accordance with the *International Air Transportation Fair Competitive Practices Act of 1974* (49 U.S.C. §40118) and the interpretative guidelines issued by the Comptroller General of the United States in the March 31, 1981, amendment to Comptroller General Decision B138942.

**Activities Conducted Abroad.** All recipients of financial assistance will comply with the requirements that project activities carried on outside the United States are coordinated as necessary with appropriate government authorities and that appropriate licenses, permits, or approvals are obtained. All recipients of financial assistance will comply with requirements to acknowledge Federal funding when issuing statements, press releases, requests for proposals, bid invitations, and other documents describing projects or programs funded in whole or in part with Federal funds.

**Copyright.** All recipients of financial assistance will comply with requirements that publications or other exercise of copyright for any work first produced under Federal financial assistance awards hereto related unless the work includes any information that is otherwise controlled by the Government (e.g., classified information or other information subject to national security or export control laws or regulations). For any scientific, technical, or other copyright work based on or containing data first produced under this award, including those works published in academic, technical or professional journals, symposia proceedings, or similar works, the recipient grants the government a royalty-free, nonexclusive and irrevocable license to reproduce, display, distribute copies, perform, disseminate, or prepare derivative works, and to authorize others to do so, for government purposes in all such copyrighted works. The recipient shall affix the applicable copyright notices of 17 U.S.C. §401 or 402 and an acknowledgement of government sponsorship (including award number) to any work first produced under an award.

**Use of DHS Seal, Logo, and Flags.** All recipients of financial assistance must obtain DHS' approval prior to using the DHS seal(s), logos, crests or reproductions of flags or likenesses of DHS agency officials, including use of the United States Coast Guard seal, logo, crests or reproductions of flags or likenesses of Coast Guard officials.

**DHS Specific Acknowledgements and Assurances.** All recipients of financial assistance must acknowledge and agree—and require any sub-recipients, contractors, successors, transferees, and assignees acknowledge and agree—to comply with applicable provisions governing DHS access to records, accounts, documents, information, facilities, and staff.

- Recipients must cooperate with any compliance review or complaint investigation conducted by DHS.


- Recipients must give DHS access to and the right to examine and copy records, accounts, and other documents and sources of information related to the grant and permit access to facilities, personnel, and other individuals and information as may be necessary, as required by DHS regulations *and* other applicable laws or program guidance.
- Recipients must submit timely, complete, and accurate reports to the appropriate DHS officials and maintain appropriate backup documentation to support the reports.
- Recipients must comply with all other special reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.
- If, during the past three years, the recipient has been accused of discrimination on the grounds of race, color, national origin (including limited English proficiency), sex, age, disability, religion, or familial status, the recipient must provide a list of all such proceedings, pending or completed, including outcome and copies of settlement agreements to the DHS awarding office and the DHS Office of Civil Rights and Civil Liberties.
- In the event any court or administrative agency makes a finding of discrimination on grounds of race, color, national origin (including limited English proficiency), sex, age, disability, religion, or familial status against the recipient, or the recipient settles a case or matter alleging such discrimination, recipients must forward a copy of the complaint and findings to the DHS Component and/or awarding office.
- The United States has the right to seek judicial enforcement of these obligations.

## Prohibition on Using Federal Funds

The recipient understands and agrees that it cannot use any Federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government, without the express prior written approval of FEMA.

## State Policy Requirements Affecting Grant Programs

The following Ohio Department of Public Safety policies are included as required by the policy.



**Ohio Department of Public Safety**  
Policy Number : DPS-501.40

**ADDRESSING CIVIL RIGHTS COMPLAINTS FROM CLIENTS OF THE DEPARTMENT OF PUBLIC SAFETY**

Date of Revision : **8/30/2011**  
Priority Review : **All Employees ; All Supervisors**  
Distribution : **All ODPS Divisions**

**Summary of Revisions**

New policy to ensure compliance with Title VI of the Civil Rights Act of 1964 and other federal laws and regulations prohibiting discrimination.

**Purpose**

To provide guidelines and procedures that allow the Ohio Department of Public Safety (ODPS) to process and forward complaints alleging discrimination from clients, customers, program participants, or consumers of ODPS or ODPS grant recipients.

**Policy**

**A. STATEMENT OF POLICY**

1. All individuals have the right to participate in programs and activities operated by ODPS and ODPS grant recipients regardless of race, color, national origin, sex, religion, disability, and age. **ODPS will make every effort to ensure ODPS and its grant recipients comply with Title VI of the Civil Rights Act of 1964, the Omnibus Crime Control and Safe Streets Act of 1968, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and the DOJ regulations on the Equal Treatment for Faith-Based Organizations.**
2. **RETALIATION**
  - a. Persons who believe they have been discriminated against on the basis of their membership in a protected class (race, color, religion, sex, national origin, disability, age, ancestry, or military status) shall not be retaliated against in terms and conditions of employment or services for exercising their right to file a discrimination complaint or inquiry.
  - b. No person who participates in the investigation of a complaint, or is a witness in an investigation, or brings attention to a person in authority, of an alleged discrimination shall be retaliated against.

**B. DEFINITIONS**

1. **Discrimination:** To make a distinction, show bias towards, or be prejudicial against, a person or thing on the basis of the group, class, or category to which the person or thing belongs, rather than according to actual merit.
2. **Civil Rights Complaint Coordinator:** Person designated by ODPS who is responsible for receiving and acknowledging discrimination complaints and forwarding them to the U.S. Department of Justice (DOJ), Office of Justice Programs, Office for Civil Rights (OCR); the Ohio Civil Rights Commission

(OCR), or other appropriate agency for review of the complaint to determine if a violation was committed. The ODPS EEO Manager shall be the designated Civil Rights Complaint Coordinator.

3. **Grant Recipient:** An agency or organization that receives funding from a division within ODPS, whether it is federal pass-through funding or a state grant. ODPS divisions that provide grants to agencies and organizations include, but are not limited to, the Office of Criminal Justice Services (OCJS), Ohio Emergency Management Agency (EMA) and Ohio Homeland Security (OHS).
4. **Retaliation:** Occurs when adverse action is taken against an individual in a protected class because he or she engaged in protected activity.
5. **Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d):** Prohibits an individual from being excluded from participation in, being denied the benefits of, or being subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart C).
6. **Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. §3789d(c)(1)):** Prohibits recipients that receive federal funding under this statute from discriminating, either in employment practices or in the delivery of services or benefits, on the basis of race, color, religion, national origin, and sex as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart D).
7. **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794):** Prohibits discrimination on the basis of disability, in regard to both employment and the delivery of services or benefits, in any program or activity receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart G).
8. **Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132):** Prohibits discrimination against qualified individuals with disabilities, in regard to both employment and the delivery of services or benefits, in all programs, activities, and services of public entities as set forth in the DOJ implementing regulations (28 C.F.R. Part 35). Title II applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.
9. **Title IX of the Education Amendments of 1972 (20 U.S.C. §1681):** Prohibits discrimination on the basis of sex in educational programs and activities that receive federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 54).
10. **Age Discrimination Act of 1975 (42 U.S.C. §6102):** Prohibits discrimination on the basis of age in the programs and activities receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart I). The Act, which applies to all ages, permits the use of certain age distinctions and factors other than age that meet the Act's requirements.
11. **DOJ regulations on the Equal Treatment for Faith-Based Organizations:** Prohibits discrimination on the basis of religion in the delivery of services and prohibits organizations from using DOJ funding on

inherently religious activities (28 C.F.R. Part 38).

### C. COMPLAINT PROCEDURES

1. ODPS shall accept and acknowledge all discrimination complaints from clients, customers, program participants, or consumers of ODPS or ODPS grant recipients. All discrimination allegations and complaints shall be referred to the designated ODPS Civil Rights Complaint Coordinator.
2. A client, customer, program participant or consumer may file a complaint of discrimination via email to the appropriate ODPS grant coordinator or via U. S. Mail to the attention of the ODPS Civil Rights Complaint Coordinator (1970 West Broad Street, Columbus, OH, 43223). The complaint should include the complainant's name, contact information, and a brief explanation of the alleged discrimination. If the complaint is sent to an ODPS Grant Coordinator, that employee shall forward it immediately to the ODPS Civil Rights Complaint Coordinator.
3. The Complaint Coordinator shall provide an acknowledgement of the complaint to the client, customer, program participant, or consumer via e-mail or in a letter confirming the complaint has been received. The contents of the acknowledgement response must include information specifying the external agency to which the complaint has been forwarded for investigation, and provide information in which the complainant can contact that agency directly. If the complaint is against the ODPS or an ODPS grant recipient implementing funding from the DOJ and the ODPS is not forwarding the complaint to the OCR, the acknowledgement response shall also notify the complainant that he/she may file a complaint directly with the OCR at the following address:

**Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 Seventh Street NW  
Washington, D.C. 20531**

4. The Complaint Coordinator shall then forward the complaint to OCR, OCRC, or other appropriate agency. The complaint shall be investigated by the appropriate agency.
5. All clients, customers, program participants, or consumers of ODPS or ODPS grant recipients shall have access to these procedures at any time via the ODPS website ([www.publicsafety.ohio.gov](http://www.publicsafety.ohio.gov)).
6. Any client, customer, program participant, or consumer may choose to file a complaint directly with the DOJ-OCR (if the complaint is against the ODPS or an ODPS grant recipient implementing funding from the DOJ), OCRC, or the appropriate agency as opposed to filing with ODPS. If a complaint is filed directly with an outside agency, ODPS requests that a courtesy copy be forwarded to the ODPS Civil Rights Complaint Coordinator by the complainant. If the complaint is against an ODPS grant recipient, once the grant recipient becomes aware of the complaint, the grant recipient must notify the ODPS Civil Rights Complaint Coordinator of the complaint and how it is being investigated.

### D. TRAINING

1. ODPS shall provide annual training for agency employees on these complaint

procedures. The training shall explain an employee's responsibility to refer discrimination complaints from clients, customers, program participants, or consumers to the Complaint Coordinator. This information shall be disseminated to new ODPS employees during new employee orientation training or as appropriate. ODPS will also disseminate a copy of these complaint procedures to ODPS grant recipients.

2. The current policy shall be evaluated annually to determine its effectiveness. ODPS shall make any necessary changes to ensure the complaint process is timely and efficient.

### Current Form and Supplemental References

#### Department of Justice Informational Links:

- [Title VI of the Civil Rights Act of 1964 \(42 U.S.C. 42000d\)](#)
- [Omnibus Crime Control and Safe Streets Act of 1968 \(42 U.S.C. 6719d\)\(c\)\(1\)](#)
- [Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. 794, Section 794\)](#)
- [Title II of the Americans with Disabilities Act of 1990 \(42 U.S.C. 12132\)](#)
- [Title IX of the Education Amendments of 1972 \(20 U.S.C. 1681\)](#)
- [Age Discrimination Act of 1975 \(42 U.S.C. 6102\)](#)
- [DOJ regulations on the Equal Treatment for Faith-Based Organizations](#)

#### Standard References

None

#### Policy References

<a href="#">DPS-100.01</a>	ADMINISTRATIVE INVESTIGATIONS
<a href="#">DPS-501.01</a>	WORK RULES - NON-SWORN BARGAINING UNIT PERSONNEL
<a href="#">DPS-501.02</a>	WORK RULES - SWORN PERSONNEL
<a href="#">DPS-501.03</a>	WORK RULES - EXEMPT PERSONNEL
<a href="#">DPS-501.04</a>	WORK RULES - TEMPORARY WORKERS, CONTRACT VENDORS, CONSULTANTS, NON-DPS STAFF
<a href="#">DPS-501.15</a>	INITIAL EMPLOYMENT ORIENTATION TRAINING
<a href="#">DPS-501.29</a>	DISCRIMINATION AND UNLAWFUL HARASSMENT
<a href="#">OSP-103.19</a>	ADMINISTRATIVE INVESTIGATIONS - DSP EMPLOYEES
<a href="#">OSP-203.03</a>	POWERS / DUTIES, AUTHORITY / CODE OF ETHICS / OATH / RULES AND REGULATIONS



**ADDRESSING COMPLAINTS OF EMPLOYMENT  
DISCRIMINATION AGAINST ODPS GRANT RECIPIENTS**

Date of Revision : 8/30/2011

Priority Review : All Employees ; All Supervisors

Distribution : All ODPS Divisions

**Summary of Revisions**

New policy to ensure compliance with federal laws and regulations prohibiting employment discrimination.

**Purpose**

To provide guidelines and procedures that allow the Ohio Department of Public Safety (ODPS) to process and forward complaints alleging employment discrimination by employees or applicants of ODPS grant recipients.

**Policy**

**A. STATEMENT OF POLICY**

1. It is the policy of ODPS to prohibit discriminatory employment practices against anyone employed by an ODPS grant recipient, and to ensure all employees have equal employment opportunity. It is the policy of the State of Ohio and ODPS to ensure a working environment free from any discrimination and to prohibit sexual harassment of applicants, customers, clients, and employees, including discriminatory sexual advances or harassment adversely affecting an employee's terms and conditions of employment either directly or indirectly. **ODPS will ensure that grant recipients comply with all applicable federal laws regarding employment discrimination.**

**2. RETALIATION**

- a. Persons who believe they have been discriminated against on basis of their membership in a protected class (race, color, religion, sex, national origin, disability, age, ancestry, or military status) shall not be retaliated against in terms and conditions of employment or services for exercising their right to file a discrimination complaint or inquiry.
- b. No person who participates in the investigation of a complaint, or is a witness in an investigation, or brings attention to a person in authority, of an alleged discrimination complaint shall be retaliated against.

**B. DEFINITIONS**

1. **Discrimination:** To make a distinction, show bias towards, or be prejudicial against, a person or thing on the basis of the group, class, or category to which the person or thing belongs, rather than according to actual merit.
2. **Civil Rights Complaint Coordinator:** Person designated by ODPS who is responsible for acknowledging discrimination complaints filed by employees

or applicants of ODPS grant recipients and forwarding them to one of the following: U.S. Equal Employment Opportunity Commission (EEOC); the U.S. Department of Justice (DOJ), Office for Civil Rights (OCR); the Ohio Civil Rights Commission (OCRC); or other appropriate agency. The ODPS EEO Manager shall be the designated Civil Rights Complaint Coordinator.

3. **Grant Recipient:** An agency or organization that receives funding from a division within ODPS, whether it is federal pass-through funding or a state grant. ODPS divisions that provide grants to agencies and organizations include the Office of Criminal Justice Services (OCJS), Ohio Emergency Management Agency (EMA) and Ohio Homeland Security (OHS).
4. **Retaliation:** Occurs when adverse action is taken against an individual in a protected class because he or she engaged in protected activity.
5. **Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. §3789d(c)(1)):** Prohibits discrimination on the basis of race, color, religion, national origin, and sex, in regard to both employment practices and the delivery of services, in any program or activity receiving federal financial assistance under this statute as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart D).
6. **Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132):** Prohibits discrimination against qualified individuals with disabilities, in regard to both employment and the delivery of services or benefits, in all programs, activities, and services of public entities as set forth in DOJ implementing regulations (28 C.F.R. Part 35).
7. **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794):** Prohibits discrimination on the basis of disability, in regard to both employment and the delivery of services or benefits, in any program or activity receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart G).
8. **Title IX of the Education Amendments of 1972 (20 U.S.C. §1681):** Prohibits discrimination on the basis of sex, in regard to both employment and the delivery of services or benefits, in educational programs receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 54).

**C. COMPLAINT PROCEDURES**

1. ODPS shall accept and acknowledge all discrimination complaints from employees or applicants of ODPS grant recipients. All discrimination allegations and complaints shall be referred to the designated ODPS Civil Rights Complaint Coordinator.
2. An employee or applicant of an ODPS grant recipient may file a complaint of discrimination via e-mail to the appropriate ODPS grant coordinator or via U.S. Mail directly to the attention of the ODPS Civil Rights Complaint Coordinator (1970 West Broad Street, Columbus, Oh, 43223). The complaint should include the complainant's name, contact information, and a brief explanation of the alleged discrimination. If the complaint is sent to an ODPS Grant Coordinator, that employee shall forward it immediately to the ODPS Civil Rights Complaint Coordinator.
3. The Complaint Coordinator shall provide an acknowledgement of the complaint to the employee or applicant of the ODPS grant recipient via e-



mail or in a letter confirming the complaint has been received. The contents of the acknowledgement response must include information specifying the external agency to which the complaint has been forwarded for investigation. If the complaint is against an ODPS grant recipient implementing funding from the DOJ and the ODPS is not forwarding the complaint to the OCR, the acknowledgement response shall also notify the complainant that he/she may file a complaint directly with the OCR at the following address:

**Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 Seventh Street NW  
Washington, D.C. 20531**

4. The Complaint Coordinator shall then forward the complaint to the EEOC, DOJ-OCR, OCRC, or other appropriate agency. The complaint shall be investigated by the appropriate agency.
5. All employees or applicants of ODPS grant recipients shall have access to these procedures at any time via the ODPS website ([www.publicsafety.gio.gov](http://www.publicsafety.gio.gov)).
6. Any employee or applicant of an ODPS grant recipient may choose to file a complaint directly with the grant recipient, EEOC, DOJ-OCR (if the grant recipient receives funding from the DOJ), OCRC, or other appropriate agency as opposed to filing with ODPS. If a complaint is filed directly with the grant recipient or with an outside agency, once the grant recipient becomes aware of the complaint, the grant recipient must notify the ODPS Civil Rights Complaint Coordinator of the complaint and how it is being investigated.

#### D. TRAINING

1. ODPS shall provide annual training for agency employees on these complaint procedures. The training shall explain an employee's responsibility to refer discrimination complaints from employees or applicants of ODPS grant recipients to the Complaint Coordinator. This information shall be disseminated to new ODPS employees during new employee orientation training or as appropriate. **The ODPS shall also disseminate a copy of these complaint procedures to ODPS grant recipients.**
2. The current policy shall be evaluated annually to determine its effectiveness. ODPS shall make any necessary changes to ensure the complaint process is timely and efficient.

#### Current Form and Supplemental References

##### Department of Justice Informational Links:

- [Omnibus Crime Control and Safe Streets Act of 1968 \(42 U.S.C. §3789\)\(c\)\(1\)](#)
- [Title II of the Americans with Disabilities Act of 1990 \(42 U.S.C. §12132\)](#)
- [Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. §794, Section 504\)](#)
- [Title IX of the Education Amendments of 1972 \(20 U.S.C. §1681\)](#)

##### Standard References

None

##### Policy References

<a href="#">DPS-100.01</a>	ADMINISTRATIVE INVESTIGATIONS
<a href="#">DPS-501.01</a>	WORK RULES - NON-SWORN BARGAINING UNIT PERSONNEL
<a href="#">DPS-501.02</a>	WORK RULES - SWORN PERSONNEL
<a href="#">DPS-501.03</a>	WORK RULES - EXEMPT PERSONNEL
<a href="#">DPS-501.04</a>	WORK RULES - TEMPORARY WORKERS, CONTRACT VENDORS, CONSULTANTS, NON-DPS STAFF
<a href="#">DPS-501.15</a>	INITIAL EMPLOYMENT ORIENTATION TRAINING
<a href="#">DPS-501.29</a>	DISCRIMINATION AND UNLAWFUL HARASSMENT
<a href="#">OSP-103.19</a>	ADMINISTRATIVE INVESTIGATIONS - OSP EMPLOYEES
<a href="#">OSP-203.03</a>	POWERS / DUTIES, AUTHORITY / CODE OF ETHICS / OATH / RULES AND REGULATIONS



## Appendix B) Application Preparation Checklist

- ❑ Read the entire guidance and application package.
- ❑ Meet with Regional Advisory Committee to develop and prioritize regional projects (ensure Ohio EMA is included in the first regional meeting)

\_\_\_\_\_ Signed grant agreement  
\_\_\_\_\_ 20-16 Summary Sheet for Assurances  
\_\_\_\_\_ 20-16A Assurances Non-Construction  
\_\_\_\_\_ 20-16B Assurances Construction Program  
\_\_\_\_\_ 20-16C Lobbying, Debarment, Suspension and Other Requirements  
\_\_\_\_\_ 20-SF-LLL Disclosure of Lobbying Activities  
\_\_\_\_\_ NIMS compliance form  
\_\_\_\_\_ EHP Screening tool (required unless project is exempt)

- ❑ Provide a list of prioritized projects from the region signed by all County EMA Directors in designated region, largest city representative, and any other member of the panel

**An Application Template has been provided for use in developing each project. Paper applications ARE NOT to be submitted to Ohio EMA, but are to be used as a tool for developing the necessary information to enter each project into EGMS.**

*With this ensure the following:*

- ❑ Application addresses how each project directly supports terrorism preparedness, response, recovery or dual purpose as applicable.
- ❑ Application clearly supports core capability(ies) allowable by funding opportunity
- ❑ EHP has been addressed regardless of project
- ❑ ALL budget figures have been checked for accuracy.
- ❑ Application entered in EGMS is being submitted by County EMA designated as fiscal agent for region.
- ❑ **All grant projects entered in EGMS by December 29, 2017**
- ❑ **The signed grant agreement and all required forms are submitted by mail (postmarked, no faxes or emails will be accepted), by December 29, 2017.**

## Appendix C) – Summary of Core Capabilities

### Crosswalk of Target Capabilities to Core Capabilities

The following table maps the target capabilities outlined in the former *Target Capabilities List (TCL)* version 2.0, released in September 2007, to the new core capabilities outlined in the first edition of the *National Preparedness Goal*. The mapping was performed such that all thirty-seven target capabilities from the *TCL* were mapped; and each target capability was mapped to *one, and only one*, core capability. In a few cases, the alignment of a target capability to a single core capability is unclear—i.e., the target capability either did not match any core capabilities in a straightforward manner, or could be mapped to more than one core capability. Thus, the “Justification” column provides details as to the rationale used in the placement of the target capability.

Please note that not all core capabilities have a target capability associated with them. Furthermore, some core capabilities have more than one target capability associated with them. Importantly, readers should not interpret that the target capabilities assigned to a core capability necessarily capture *the entirety* of what that core capability is meant to address.

The core capabilities and their definitions are taken from the first edition of the *National Preparedness Goal*, which was issued in September 2011. Descriptions of the target capabilities are excerpts taken from the Capability Description section of each target capability in the *TCL*.

This crosswalk was created to support the transition that states, localities, tribes, and territories face in realigning activities that may have previously been organized by the *TCL* to the new core capabilities as part of the 2011 State Preparedness Report effort. The contents are meant to provide additional context and stimulate thinking, but are for discussion purposes only, and should not be taken as official FEMA doctrine.

Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Critical Transportation	Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment, and services into the affected areas.	Citizen Evacuation and Shelter-in-Place	“to prepare for, ensure communication of, and immediately execute the safe and effective sheltering-in-place of an at-risk population (and companion animals), and/or the organized and managed evacuation of the at-risk population (and companion animals) to areas of safe refuge in response to a potentially or actually dangerous environment. In addition, this capability involves the safe reentry of the population where feasible.”	The notification-related portions of this target capability fall under the <b>Public Information and Warning</b> core capability. The evacuation-related portions of the <b>Citizen Evacuation and Shelter-in-Place</b> target capability correspond to the provision of transportation for evacuation of people and animals in the <b>Critical Transportation</b> core capability.
	<u>Core Capability Targets</u> 1. Establish physical access through appropriate transportation corridors and deliver required resources to save lives and to meet the needs of disaster survivors. 2. Ensure basic human needs are met, stabilize the incident, transition into recovery for an affected area, and restore basic services and community functionality.			
Cybersecurity	Protect against damage to, the unauthorized use of, and/or the exploitation of (and, if needed, the restoration of) electronic communications systems and services (and the information contained therein).	NONE		
	<u>Core Capability Targets</u> 1. Implement risk-informed guidelines, regulations, and standards to ensure the security, reliability, integrity, and availability of critical information, records, and communications systems and services through collaborative cybersecurity initiatives and efforts. 2. Implement and maintain procedures to detect malicious activity and to conduct technical and investigative-based countermeasures, mitigations, and operations against malicious actors to counter existing and emerging cyber-based threats, consistent with established protocols.			

Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Environmental Response/Health and Safety	Ensure the availability of guidance and resources to address all hazards including hazardous materials, acts of terrorism, and natural disasters in support of the responder operations and the affected communities.	Environmental	“to protect the public from environmental hazards and manage the health effects of an environmental health emergency on the public. The capability minimizes human exposures to environmental public health hazards (e.g., contaminated food, air, water, solid waste/debris, hazardous waste, vegetation, sediments, and vectors). The capability provides the expertise to run fate and transport models; design, implement, and interpret the results of environmental field surveys and laboratory sample analyses; develop protective guidance where none exists; and use available data and judgment to recommend appropriate actions for protecting the public and environment.”	Self-evident.
		Health		
		Responder Safety and Health	“ensures adequate trained and equipped personnel and resources are available at the time of an incident to protect the safety and health of on scene first responders, hospital/medical facility personnel (first receivers), and skilled support personnel through the creation and maintenance of an effective safety and health program.”	Self-evident.
	WMD and Hazardous Materials Response and Decontamination	“to assess and manage the consequences of a hazardous materials release, either accidental or as part of a terrorist attack. It includes testing and identifying all likely hazardous substances onsite; ensuring that responders have protective clothing and equipment; conducting rescue operations to remove affected victims from the hazardous environment; conducting geographical survey searches of suspected sources or contamination spreads and establishing isolation perimeters; mitigating the effects of hazardous materials, decontaminating on-site victims, responders, and equipment; coordinating off-site decontamination with relevant agencies, and notifying environmental, health, and law enforcement agencies having jurisdiction for the incident to begin implementation of their standard evidence collection and investigation procedures.”	The <b>Environmental Response/Health and Safety</b> capability targets include the deployment of hazardous materials teams as a resource in support of response personnel and the affected population; and the functions of assessing, monitoring, and performing cleanup actions, which correspond to activities in the <b>WMD and Hazardous Materials Response and Decontamination</b> target capability.	
<b>Core Capability Targets</b> 1. Conduct health and safety hazard assessments and disseminate guidance and resources, to include deploying hazardous materials teams, to support environmental health and safety actions for response personnel and the affected population. 2. Assess, monitor, perform cleanup actions, and provide resources to meet resource requirements and to transition from sustained response to short-term recovery.				
Fatality Management Services	Provide fatality management services, including body recovery and victim identification, working with state and local authorities to provide temporary mortuary solutions, sharing information with mass care services for the purpose of reunifying family members and caregivers with missing persons/remains, and providing counseling to the bereaved.	Fatality Management	“to effectively perform scene documentation; the complete collection and recovery of the dead, victim’s personal effects, and items of evidence; decontamination of remains and personal effects (if required); transportation, storage, documentation, and recovery of forensic and physical evidence; determination of the nature and extent of injury; identification of the fatalities using scientific means; certification of the cause and manner of death; processing and returning of human remains and personal effects of the victims to the legally authorized person(s) (if possible); and interaction with and provision of legal, customary, compassionate, and culturally competent required services to the families of deceased within the context of the family assistance center.”	Self-evident.
	<b>Core Capability Target</b> 1. Establish and maintain operations to recover a significant number of fatalities over a geographically dispersed area.			

Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
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Infrastructure Systems	Stabilize critical infrastructure functions, minimize health and safety threats, and efficiently restore and revitalize systems and services to support a viable, resilient community.	Restoration of Lifelines	"to initiate and sustain restoration activities. This includes facilitating the repair/replacement of infrastructure for oil, gas, electric, telecommunications, drinking water, wastewater, and transportation services."	The <b>Infrastructure Systems</b> core capability focuses on stabilizing critical infrastructure, which correspond to the types of lifelines identified in the <b>Restoration of Lifelines</b> target capability.
		Structural Damage Assessment	"to conduct damage and safety assessments of civil, commercial, and residential infrastructure and to perform structural inspections, and mitigation activities. The capability includes being able to provide contractor management, construction management, cost estimating, technical assistance, and other engineering services to support and manage response and recovery operations."	First, damage and safety assessments are a necessary precursor to restoration activities. The relationship between the <b>Structural Damage Assessment</b> target capability and the <b>Restoration of Lifelines</b> target capability is explicitly called out in the <i>TCL</i> . Second, while some overlap with the <b>Housing Systems</b> core capability exists, the <b>Infrastructure Systems</b> core capability more effectively captures the breadth of assessments needed, and the connection between damage assessment and restoration/construction activities.
Mass Care Services	<b>Core Capability Targets</b> <ol style="list-style-type: none"> <li>1. Decrease and stabilize immediate infrastructure threats to the affected population, to include survivors in the heavily-damaged zone, nearby communities that may be affected by cascading effects, and mass care support facilities and evacuation processing centers with a focus on life-sustainment and congregate care services.</li> <li>2. Re-establish critical infrastructure within the affected areas to support ongoing emergency response operations, life sustainment, community functionality, and a transition to recovery.</li> <li>3. Restore and sustain essential services (public and private) to maintain community functionality.</li> <li>4. Develop a plan with a specified timeline for redeveloping community infrastructures to contribute to resiliency, accessibility, and sustainability.</li> <li>5. Provide systems that meet the community needs while minimizing service disruption during restoration within the specified timeline in the recovery plan.</li> </ol>			
	Provide life-sustaining services to the affected population with a focus on hydration, feeding, and sheltering to those who have the most need, as well as support for reunifying families.	Mass Care (Shelter, Feeding and Related Services)	"to provide immediate shelter, feeding centers, basic first aid, bulk distribution of needed items, and related services to persons affected by a large-scale incident."	Self evident.
	<b>Core Capability Targets</b> <ol style="list-style-type: none"> <li>1. Move and deliver resources and capabilities to meet the needs of disaster survivors, including individuals with access and functional needs and others who may be considered to be at-risk.</li> <li>2. Establish, staff, and equip emergency shelters and other temporary housing options (including accessible housing) for the affected population.</li> <li>3. Move from congregate care to non-congregate care alternatives and provide relocation assistance or interim housing solutions for families unable to return to their pre-disaster homes.</li> </ol>			

Mass Search and Rescue Operations	Deliver traditional and atypical search and rescue capabilities, including personnel, services, animals, and assets to survivors in need, with the goal of saving the greatest number of endangered lives in the shortest time possible.	Search and Rescue (Land-based)	"to coordinate and conduct search and rescue (SAR) response efforts for all hazards, including searching affected areas for victims (human and, to the extent no humans remain endangered, animal) and locating, accessing, medically stabilizing, and extricating victims from the damaged area."	Self-evident.
	<b>Core Capability Targets</b> <ol style="list-style-type: none"> <li>1. Conduct search and rescue operations to locate and rescue persons in distress, based on the requirements of state and local authorities.</li> <li>2. Initiate community-based search and rescue support operations across a wide geographically dispersed area.</li> <li>3. Ensure the synchronized deployment of local, regional, national, and international teams to reinforce ongoing search and rescue efforts and transition to recovery.</li> </ol>			

<b>On-scene Security and Protection</b>	Ensure a safe and secure environment through law enforcement and related security and protection operations for people and communities located within affected areas and also for all traditional and atypical response personnel engaged in lifesaving and life-sustaining operations.	<b>Emergency Public Safety and Security Response</b>	"to reduce the impact and consequences of an incident or major event by securing the affected area, including crime/incident scene preservation issues as appropriate, safely diverting the public from hazards, providing security support to other response operations and properties, and sustaining operations from response through recovery."	The core capability and target capability specifically both relate to incident scene control and security operations.
		<b>Explosive Device Response Operations (EDRO)</b>	"to coordinate, direct, and conduct improvised explosive device (IED) response after initial alert and notification. Coordinate intelligence fusion and analysis, information collection, and threat recognition, assess the situation and conduct appropriate Render Safe Procedures (RSP). Conduct searches for additional devices and coordinate overall efforts to mitigate chemical, biological, radiological, nuclear, and explosive (CBRNE) threat to the incident site."	Key actions under the <b>Explosive Device Response Operations</b> target capability include conducting render-safe procedures, and searching for additional devices to mitigate threats at the incident site. These actions align to the objective of ensuring a safe and secure environment within affected areas, as described in the <b>On-scene Security and Protection</b> core capability.
<b>Core Capability Targets</b> 1. Establish a safe and secure environment in an affected area. 2. Provide and maintain on-scene security and meet the protection needs of the affected population over a geographically dispersed area while eliminating or mitigating the risk of further damage to persons, property, and the environment.				

Core Capability	Core Capability Definition	Cross-walked Target Capabilities Communications	Target Capability Description (Target Capability List version 2.0)	Justification
<b>Operational Communications</b>	Ensure the capacity for timely communications in support of security, situational awareness, and operations by any and all means available, among and between affected communities in the impact area and all response forces.		"Agencies must be operable, meaning they must have sufficient wireless communications to meet their everyday internal and emergency communication requirements before they place value on being interoperable, i.e., able to work with other agencies. Communications interoperability is the ability of public safety agencies (police, fire, EMS) and service agencies (public works, transportation, hospitals, etc.) to talk within and across agencies and jurisdictions via radio and associated communications systems, exchanging voice, data and/or video with one another on demand, in real time, when needed, and when authorized. It is essential that public safety has the intraagency operability it needs, and that it builds its systems toward interoperability."	Many activities listed under the <b>Communications</b> target capability address communication systems and networks, and their ability to adequately function. These align to the <b>Operational Communications</b> core capability definition.
<b>Operational Coordination</b>	<b>Core Capability Targets</b> 1. Ensure the capacity to communicate with both the emergency response community and the affected populations and establish interoperable voice and data communications between Federal, state, and local first responders. 2. Re-establish sufficient communications infrastructure within the affected areas to support ongoing life-sustaining activities, provide basic human needs, and transition to recovery.			
	Establish and maintain a unified and coordinated operational structure and process that appropriately integrates all critical stakeholders and supports the execution of core capabilities.	<b>Emergency Operations Center (EOC) Management</b>	"to provide multi-agency coordination (MAC) for incident management by activating and operating an EOC for a pre-planned or no-notice event. EOC management includes EOC activation, notification, staffing, and deactivation; management, direction, control, and coordination of response and recovery activities; coordination of efforts among neighboring governments at each level and among local, regional, State, and Federal EOCs; coordination public information and warning; and maintenance of the information and communication necessary for coordinating response and recovery activities."	The emphasis of EOCs as a coordinating entity makes <b>Operational Coordination</b> a logical alignment for the <b>Emergency Operations Center Management</b> target capability.
		<b>On Site Incident Management</b>	"to effectively direct and control incident activities by using the Incident Command System (ICS) consistent with the National Incident Management System (NIMS)."	NIMS and ICS provide a systematic approach for entities to work together effectively. As such, the <b>On Site Incident</b> target capability aligns well to the <b>Operational Coordination</b> core capability.
<b>Core Capability Targets</b> 1. Execute operations with functional and integrated communications among appropriate entities to prevent initial or follow-on terrorist attacks within the United States in accordance with established protocols. 2. Establish and maintain partnership structures among Protection elements to support networking, planning, and coordination. 3. Establish protocols to integrate mitigation data elements in support of operations within all states and territories and in coordination with Federal agencies. 4. Mobilize all critical resources and establish command, control, and coordination structures within the affected community and other coordinating bodies in surrounding communities and across the Nation and maintain as needed throughout the duration of an incident. 5. Enhance and maintain National Incident Management System (NIMS)-compliant command, control, and coordination structures to meet basic human needs, stabilize the incident, and transition to recovery. 6. Mobilize all critical resources and establish command, control, and coordination structures within the affected community and other coordinating bodies in surrounding communities and across the Nation and maintain as needed throughout the duration of an incident. 7. Enhance and maintain National Incident Management System (NIMS)-compliant command, control, and coordination structures to meet basic human needs, stabilize the incident, and transition to recovery.				

Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Planning	Conduct a systematic process engaging the whole community as appropriate in the development of executable strategic, operational, and/or community-based approaches to meet defined objectives.	Planning	"Unlike the other target capabilities, the attributes of planning are difficult to quantify, as individual planners may have considerably varied education and experience and still produce plans that lead to the successful implementation of a target capability. The focus of the Planning Capability is on successful achievement of a plan's concept of operations using target capabilities and not the ability to plan as an end unto itself. Plans should be updated following major incidents and exercises to include lessons learned. The plans should form the basis of training and should be exercised periodically to ensure that responders are familiar with the plan and able to execute their assigned role. Thus, it is essential that plans reflect the preparedness cycle of plan, train, exercise, and incorporation of after action reviews and lessons learned."	Self-evident.
	<b>Core Capability Targets</b> 1. Identify critical objectives based on the planning requirement, provide a complete and integrated picture of the sequence and scope of the tasks to achieve the objectives, and ensure the objectives are implementable within the time frame contemplated within the plan using available resources for prevention-related plans. 2. Develop and execute appropriate courses of action in coordination with Federal, state, local, and private sector entities in order to prevent an imminent terrorist attack within the United States. 3. Develop protection plans that identify critical objectives based on planning requirements, provide a complete and integrated picture of the sequence and scope of the tasks to achieve the planning objectives, and implement planning requirements within the time frame contemplated within the plan using available resources for protection-related plans. 4. Implement, exercise, and maintain plans to ensure continuity of operations. 5. Develop approved hazard mitigation plans that address all relevant threats/hazards in accordance with the results of their risk assessment within all states and territories. 6. Develop operational plans at the Federal level, and in the states and territories, that adequately identify critical objectives based on the planning requirement, provide a complete and integrated picture of the sequence and scope of the tasks to achieve the objectives, and are implementable within the time frame contemplated in the plan using available resources. 7. Convene the core of an inclusive planning team (identified pre-disaster), which will oversee disaster recovery planning. 8. Complete an initial recovery plan that provides an overall strategy and timeline, addresses all core capabilities, and integrates socioeconomic, demographic, accessibility, and risk assessment considerations, which will be implemented in accordance with the timeline contained in the plan.			
Public and Private Services and Resources	Provide essential public and private services and resources to the affected population and surrounding communities, to include emergency power to critical facilities, fuel support for emergency responders, and access to community staples (e.g., grocery stores, pharmacies, and banks) and fire and other first response services.	Critical Resource Logistics and Distribution	"to identify, inventory, dispatch, mobilize, transport, recover, and demobilize and to accurately track and record available human and material critical resources throughout all incident management phases. Critical resources are those necessary to preserve life, property, safety, and security."	Elements of this target capability are captured under the <b>Critical Transportation</b> core capability. However, <b>Critical Transportation</b> appears to be more focused on providing transportation and access to transportation services. The full spectrum of activities associated with logistics and supply chain management is best represented in the systems developed by both public agencies (e.g., FEMA) and private organizations (e.g., Federal Express, American Red Cross).
		Fire Incident Response Support	"provides coordination and implementation of fire suppression operations, which include the following tasks: assessing the scene, assigning resources, establishing an incident command system (ICS) consistent with the National Incident Management System (NIMS), communicating the status of the situation, requesting additional resources, establishing a safe perimeter, evacuating persons in danger, rescuing trapped victims, conducting fire suppression, determining the cause of the fire(s), and ensuring the area is left in a safe condition. This capability further includes support necessary to prepare the community and reduce vulnerabilities in the event of a major event."	The core capability specifically mentions the provision of fire and other first response services.
		Volunteer Management and Donations	"to effectively coordinate the use of volunteers and donations in support of domestic incident management."	Coordination of volunteers and donations is typically achieved by public and private agencies (e.g., NGOs, ARC).
	<b>Core Capability Targets</b> 1. Mobilize and deliver governmental, nongovernmental, and private sector resources within and outside of the affected area to save lives, sustain lives, meet basic human needs, stabilize the incident, and transition to recovery, to include moving and delivering resources and services to meet the needs of disaster survivors. 2. Enhance public and private resource and services support for an affected area.			



Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Public Health and Medical Services	Provide lifesaving medical treatment via emergency medical services and related operations and avoid additional disease and injury by providing targeted public health and medical support and products to all people in need within the affected area.	Emergency Triage and Pre-Hospital Treatment	"to appropriately dispatch emergency medical services (EMS) resources; to provide feasible, suitable, and medically acceptable pre-hospital triage and treatment of patients; to provide transport as well as medical care en-route to an appropriate receiving facility; and to track patients to a treatment facility."	Self-evident.
		Epidemiological Surveillance and Investigation	"to rapidly conduct epidemiological investigations. It includes exposure and disease (both deliberate release and naturally occurring) detection, rapid implementation of active surveillance, maintenance of ongoing surveillance activities, epidemiological investigation, analysis, and communication with the public and providers about case definitions, disease risk and mitigation, and recommendation for the implementation of control measures."	Surveillance and epidemiology has been identified as a core public health function by the Centers for Disease Control and Prevention (CDC).
		Isolation and Quarantine	"to protect the health of the population through the use of isolation and/or quarantine measures in order to contain the spread of disease. Isolation of ill individuals may occur in homes, hospitals, designated health care facilities, or alternate facilities."	According to the <i>TCL</i> , the <b>Isolation and Quarantine</b> target capability deals specifically with infectious disease, thus placing it squarely in the realm of public health. Furthermore, resource elements described in this target capability include CDC quarantine stations.
		Laboratory Testing	"is the ongoing surveillance, rapid detection, confirmatory testing, data reporting, investigative support, and laboratory networking to address potential exposure, or exposure, to all-hazards which include chemical, radiological, and biological agents in all matrices including clinical specimens, food and environmental samples, (e.g., water, air, soil). Such all-hazard threats include those deliberately released with criminal intent, as well as those that may be present as a result of unintentional or natural occurrences."	Laboratories have been identified as a core public health function by the CDC. Furthermore, many of the Critical Tasks and Performance Measures associated with the <b>Laboratory Testing</b> target capability deal with the Laboratory Response Network, which is managed by the CDC.
		Mass Prophylaxis	"to protect the health of the population through the administration of critical interventions in response to a public health emergency in order to prevent the development of disease among those who are exposed or are potentially exposed to public health threats. This capability includes the provision of appropriate follow-up and monitoring of adverse events, as well as risk communication messages to address the concerns of the public."	As noted in the target capability description, <b>Mass Prophylaxis</b> deals with the administration of interventions in response to a public health emergency. Moreover, the <b>Public Health and Medical Services</b> core capability definition emphasizes providing lifesaving medical treatment by providing products to all people in need within the affected area.
		Medical Supplies Management and Distribution	"to procure and maintain pharmaceuticals and medical materials prior to an incident and to transport, distribute, and track these materials during an incident."	Similar to the rationale for the <b>Critical Resource Logistics and Distribution</b> target capability, the <b>Medical Supplies Management and Distribution</b> target capability was not linked to the <b>Critical Transportation</b> core capability because of this core capability's limited scope. Instead, this target capability was aligned to the <b>Public Health and Medical Services</b> core capability because of its explicit medical nature.
		Medical Surge	"to rapidly expand the capacity of the existing healthcare system (long-term care facilities, community health agencies, acute care facilities, alternate care facilities and public health departments) in order to provide triage and subsequent medical care. This includes providing definitive care to individuals at the appropriate clinical level of care, within sufficient time to achieve recovery and minimize medical complications. The capability applies to an event resulting in a number or type of patients that overwhelm the day-to-day acute-	Self-evident.

			care medical capacity. Planners must consider that medical resources are normally at or near capacity at any given time. Medical Surge is defined as rapid expansion of the capacity of the existing healthcare system in response to an event that results in increased need of personnel (clinical and non-clinical), support functions (laboratories and radiological), physical space (beds, alternate care facilities) and logistical support (clinical and non-clinical equipment and supplies)."	
	<b>Core Capability Targets</b> 1. Deliver medical countermeasures to exposed populations. 2. Complete triage and initial stabilization of casualties and begin definitive care for those likely to survive their injuries. 3. Return medical surge resources to pre-incident levels, complete health assessments, and identify recovery processes.			
Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Public Information and Warning <sup>1</sup>	Deliver coordinated, prompt, reliable, and actionable information to the whole community through the use of clear, consistent, accessible, and culturally and linguistically appropriate methods to effectively relay information regarding any threat or hazard and, as appropriate, the actions being taken and the assistance being made available.	Emergency Public Information and Warning	"Includes public information, alert/warning and notification. It involves developing, coordinating, and disseminating information to the public, coordinating officials, and incident management and responders across all jurisdictions and disciplines effectively under all hazard conditions."	Self-evident.
	<b>Core Capability Targets</b> 1. Share prompt and actionable messages, to include National Terrorism Advisory System alerts, with the public and other stakeholders, as appropriate, to aid in the prevention of imminent or follow-on terrorist attacks, consistent with the timelines specified by existing processes and protocols. 2. Provide public awareness information to inform the general public on how to identify and provide terrorism-related information to the appropriate law enforcement authorities, thereby enabling the public to act as a force multiplier in the prevention of imminent or follow-on acts of terrorism. 3. Use effective and accessible indication and warning systems to communicate significant hazards to involved operators, security officials, and the public (including alerts, detection capabilities, and other necessary and appropriate assets). 4. Communicate appropriate information, in an accessible manner, on the risks faced within a community after the conduct of a risk assessment. 5. Inform all affected segments of society by all means necessary, including accessible tools, of critical lifesaving and life-sustaining information to expedite the delivery of emergency services and aid the public to take protective actions. 6. Deliver credible messages to inform ongoing emergency services and the public about protective measures and other life-sustaining actions and facilitate the transition to recovery. 7. Inform all affected segments of society by all means necessary, including accessible tools, of critical lifesaving and life-sustaining information to expedite the delivery of emergency services and aid the public to take protective actions. 8. Deliver credible messages to inform ongoing emergency services and the public about protective measures and other life-sustaining actions and facilitate the transition to recovery.			

Screening, Search, and Detection	Identify, discover, or locate threats and/or hazards through active and passive surveillance and search procedures. This may include the use of systematic examinations and assessments, sensor technologies, or physical investigation and intelligence.	CBRNE Detection	“ provides the ability to detect CBRNE materials at points of manufacture, transportation, and use. It is important to note that the activities and tasks described in this capability will be carried out individually for each specific agent, rather than for all agents at the same time....This capability includes the detection of CBRNE material through area monitoring, but does not include detection by their effects (i.e., signs or symptoms) on humans and animals. Such population level monitoring is addressed, respectively, in the Epidemiological Surveillance and Investigation and Animal Disease Emergency Support capabilities. The CBRNE Detection capability includes the identification and communication of CBRNE threats, but does not include actions taken to prevent an incident or respond to the consequences of a CBRNE incident, which are also addressed in other capabilities.”	Self-evident.
	<p><b>Core Capability Targets</b></p> <ol style="list-style-type: none"> <li>1. Maximize the screening of targeted cargo, conveyances, mail, baggage, and people associated with an imminent terrorist threat or act using technical, non-technical, intrusive, or non-intrusive means.</li> <li>2. Initiate operations immediately to locate persons and networks associated with an imminent terrorist threat or act.</li> <li>3. Conduct CBRNE search/detection operations in multiple locations and in all environments, consistent with established protocols.</li> <li>4. Screen cargo, conveyances, mail, baggage, and people using information-based and physical screening technology and processes.</li> <li>5. Detect WMD, traditional, and emerging threats and hazards of concern using: <ol style="list-style-type: none"> <li>a. A laboratory diagnostic capability and the capacity for food, agricultural (plant/animal), environmental, medical products, and clinical samples</li> <li>b. Bio-surveillance systems</li> <li>c. CBRNE detection systems</li> <li>d. Trained healthcare, emergency medical, veterinary, and environmental laboratory professionals.</li> </ol> </li> </ol>			

Core Capability	Core Capability Definition	Cross-walked Target Capabilities	Target Capability Description (Target Capability List version 2.0)	Justification
Situational Assessment	Provide all decision makers with decision-relevant information regarding the nature and extent of the hazard, any cascading effects, and the status of the response.	NONE		
	<p><b>Core Capability Targets</b></p> <ol style="list-style-type: none"> <li>1. Deliver information sufficient to inform decision making regarding immediate lifesaving and life-sustaining activities and engage governmental, private, and civic sector resources within and outside of the affected area to meet basic human needs and stabilize the incident.</li> <li>2. Deliver enhanced information to reinforce ongoing lifesaving and life-sustaining activities, and engage governmental, private, and civic sector resources within and outside of the affected area to meet basic human needs, stabilize the incident, and transition to recovery.</li> </ol>			

## Appendix D) – Detailed Planning Eligible Activities

### Detailed Eligible Planning Activities:

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, mitigation, response, and recovery activities as identified in the national planning frameworks
- Developing and implementing homeland security support programs and adopting DHS national initiatives including but not limited to the following:
  - Conducting a THIRA process
  - Implementing the Goal, National Preparedness System, and the Whole Community Approach to Security and Emergency Management including efforts to support strengthening of capacity among whole community partners
  - Pre-event recovery planning
  - Implementing the 2015 National Infrastructure Protection Plan (NIPP) and associated Sector Specific Plans
  - Enhancing and implementing SCIPs and Tactical Interoperable Communications Plans (TICPs) that align with the goals, objectives, and initiatives of the *National Emergency Communications Plan* (NECP)
  - Costs associated with the adoption, implementation, and sustainment of the NIMS, including implementing the NIMS Guideline for Credentialing of Personnel
  - Modifying existing incident management and EOPs to ensure proper alignment with the coordinating structures, processes, and protocols described in the National Frameworks
  - Establishing or enhancing mutual aid agreements
  - Developing communications and interoperability protocols and solutions consistent with NIMS/ICS that include communications support for faith-based and voluntary organizations
  - Developing emergency communications SOPs and plain language protocols
  - Integrating emergency communications SOPs across jurisdiction, disciplines, and levels of government
  - Conducting local, regional, and Tribal program implementation workshops
  - Developing or updating resource inventory assets in accordance to NIMS-typed resource definitions which are managed by FEMA's National Integration Center (NIC) and can be found at: <http://www.fema.gov/resource-management>
  - Designing State and local geospatial data systems
  - Developing and conducting public education and outreach campaigns, including promoting individual, family, and organizational emergency preparedness and support for the National Preparedness Campaign including America's PrepareAthon! and Ready campaigns, as required by the National Preparedness System; alerts and warnings education; promoting training, exercise, and volunteer opportunities; informing the public about emergency plans, evacuation routes, shelter locations; and evacuation plans as well as CBRNE prevention awareness
  - Designing programs to address targeting at-risk populations and engaging them in emergency management planning efforts
  - Developing and conducting public education and outreach campaigns, including promoting individual, family, and organizational emergency preparedness and support for the national Campaign to Build and Sustain Preparedness, including America's PrepareAthon!, as required by the National Preparedness System; the Ready Campaign; alerts and warnings education; promoting training, exercise, and volunteer opportunities; informing the public about emergency plans, evacuation routes, shelter locations; and evacuation plans as well as CBRNE prevention awareness activities, materials, services, tools and equipment to achieve planning, protection, mitigation, response and recovery that is inclusive of people with disabilities (physical, programmatic and

communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities)

- Preparing materials for SPRs
- WHTI implementation activities including the issuance of WHTI-compliant Tribal identification cards
- Conducting statewide emergency communications and preparedness planning, including the following activities:
  - Conducting/attending planning and governance workshops
  - Engaging and expanding the participation of the whole community in emergency communications planning, response, and risk identification
  - Participating in THIRA development process
  - Collecting and using data (e.g., NECP Goal Assessments, findings from national-level exercises) to assess user needs, capabilities, and gaps, and to facilitate coordination and asset-sharing
  - Assessing emergency communications needs and assets and integrating needs into State plans (e.g., SCIP, SPR, and broadband plans)
  - Coordinating with SWIC, SAA, and State-level planners to ensure proposed investments align to statewide plans (e.g., SCIP, State broadband plan) and comply with technical requirements
- Developing related terrorism prevention activities:
  - Coordinating fusion center efforts with other analytical and investigative efforts including, but not limited to JTTFs, Field Intelligence Groups (FIGs), High Intensity Drug Trafficking Areas (HIDTAs), Regional Information Sharing Systems (RISS) Centers, criminal intelligence units, and real-time crime analysis centers.
  - Developing THIRAs that reflect a representative makeup and composition of the jurisdiction
  - Developing initiatives that directly support local efforts to understand, recognize, prepare for, prevent, mitigate, and respond to pre-operational activity and other crimes that are precursors or indicators of terrorist activity, in accordance with civil rights/civil liberties protections
  - Developing law enforcement prevention activities, to include establishing and/or enhancing a fusion center
  - Hiring an IT specialist to plan, develop, and implement the IT applications necessary for a fusion center
  - Developing and planning for information/intelligence sharing groups
  - Integrating and coordinating the fire service, emergency management, public health care, public safety, and health security data-gathering (threats to human and animal health) within designated fusion centers to achieve early warning, monitoring, and mitigation of threats
  - Hiring and training privacy, security, and/or fusion liaison officers (FLO) coordinators to support fusion center operations
  - Integrating and coordinating private sector participation with fusion center activities
  - Developing and implementing preventive radiological/nuclear detection activities
  - Acquiring systems allowing connectivity to State, local, Tribal, territorial, and Federal data networks, such as the National Crime Information Center (NCIC) and Integrated Automated Fingerprint Identification System (IAFIS), as appropriate
  - Planning to enhance security during heightened alerts, terrorist incidents, and/or during mitigation and recovery
  - Accessible public information/education: printed and electronic materials, public service announcements, seminars/town hall meetings, and web postings coordinated through local Citizen Corps Councils
  - Volunteer programs and other activities to strengthen citizen participation
  - Conducting public education campaigns including promoting suspicious activity reporting and preparedness; individual, family, and organizational emergency preparedness; Promoting the national Campaign to Build and Sustain Preparedness and the Ready campaign

- Evaluating Critical Infrastructure Protection (CIP) security equipment and/or personnel requirements to protect and secure sites
- CIP cost assessments, including resources (e.g., financial, personnel) required for security enhancements/deployments
- Underwater Terrorist Protection Plans
- Developing and implementing a comprehensive model for preventing violent extremism in local communities:
  - Including existing law enforcement agencies' initiatives and including mechanisms for engaging the resources and expertise available from a range of social service providers, such as education administrators, mental health professionals, and religious leaders;
  - Enhancing engagement with communities to discuss violent extremism in an effort to (1) share sound, meaningful, and timely information about the threat of radicalization to violence with a wide range of groups and organizations, particularly those involved in public safety; (2) respond to concerns about government policies and actions; and (3) increase understanding for how community-based solutions can be supported.
  - Building expertise, including a robust training program to improve cultural competency and to ensure that communities, government, and law enforcement receive accurate, intelligence-based information about the dynamics of radicalization to violence.
- Developing and enhancing risk centric capabilities-based plans and protocols, including but not limited to:
  - Community-based planning to advance "whole community" security and emergency management
  - Incorporating government/non-governmental collaboration, citizen preparedness, and volunteer participation into State and local government homeland security strategies, policies, guidance, plans, and evaluations
  - Developing, enhancing, maintaining a current EOP that conforms to the guidelines outlined in the CPG 101 v 2.0
  - Planning for the relocation of existing systems operating in the T-Band
  - Developing or enhancing local, regional, or Statewide strategic or tactical interoperable emergency communications plans including such actions to support communications with faith-based and voluntary entities who act as immediate responders in disaster
  - Developing or enhancing critical infrastructure planning, to include planning for incidents at chemical facilities
  - Developing protocols or SOPs for specialized teams to incorporate the use of equipment acquired through this grant program
  - Developing terrorism prevention/protection plans
  - Developing plans, procedures, and requirements for the management of infrastructure and resources related to HSGP and implementation of State or Urban Area Homeland Security Strategies
  - Developing plans for mass evacuation and pre-positioning equipment
  - Developing or enhancing plans for responding to mass casualty incidents caused by any hazards
  - Developing or enhancing applicable procedures and operational guides to implement the response actions within the local plan including patient tracking that addresses identifying and tracking children, access and functional needs population, and the elderly and keeping families intact where possible
  - Developing or enhancing border security plans
  - Developing or enhancing cybersecurity and risk mitigation plans
  - Developing or enhancing secondary health screening protocols at major points of entry (e.g., air, rail, port)
  - Developing or enhancing agriculture/food security risk mitigation, response, and recovery plans
  - Developing public/private sector partnership emergency response, assessment, and resource sharing plans



- Developing or enhancing plans to engage and interface with, and to increase the capacity of, private sector/non-governmental entities working to meet the human service response and recovery needs of survivors
- Developing or updating local or regional communications plans
- Developing plans to support and assist jurisdictions, such as port authorities and rail and mass transit agencies
- Developing or enhancing continuity of operations and continuity of government plans
- Developing or enhancing existing catastrophic incident response and recovery plans to include and integrate Federal assets provided under the NRF and the National Disaster Recovery Framework (NDRF)
- Developing plans and response procedures for adjudicating, validating and responding to an alarm from a chemical or biological detector (response procedures should include emergency response procedures integrating local first responders)
- Developing or enhancing evacuation plans
- Developing mechanisms for utilizing the National Emergency Family Registry and Locator System (NEFRLS)
- Developing or enhancing plans to prepare for surge capacity of volunteers
- Developing or enhancing the State EMS systems
- Developing or enhancing plans for donations and volunteer management and the engagement/integration of private sector/non-governmental entities, and faith-based organizations in preparedness, mitigation, response, and recovery activities
- Developing school preparedness plans
- Developing preparedness plans for child congregate care facilities, including group residential facilities, juvenile detention facilities, and public/private child care facilities
- Developing plans to educate youth on disaster preparedness
- Ensuring jurisdiction EOPs adequately address warnings, emergency public information, evacuation, sheltering, mass care, resource management from non-governmental sources, unaffiliated volunteer and donations management, and volunteer resource integration to support each Emergency Support Function, to include appropriate considerations for integrating activities, materials, services, tools and equipment to achieve planning inclusive of people with disabilities (physical, programmatic and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities). Developing and implementing civil rights, civil liberties, and privacy policies, procedures, and protocols
- Designing and developing State, local, Tribal, and territorial geospatial data systems
- Developing and implementing statewide electronic patient care reporting systems compliant with the National Emergency Medical Services Information System (NEMSIS)
- Costs associated with inclusive practices and the provision of reasonable accommodations and modifications to provide full access for children and adults with disabilities
- Preparing and submitting SCIPs for SHSP, Preparing and submitting reports to the Office of Emergency Communications (OEC) on progress of implementing that State's SCIP and achieving interoperability at the interstate, State, county, regional, and city levels
- Updating and implementing SCIP and TICP to:
  - Address findings and gaps identified in AARs from real world incidents and planned exercises, NECP Goal assessments, other State-level preparedness reports and assessments
  - Incorporate the National Preparedness System and DHS Whole Community initiatives
  - Address plans for implementation of the Federal Communications Commission (FCC) narrowband requirements
  - Describe strategic broadband planning activities and initiatives in preparation for the future deployment of the Nationwide Public Safety Broadband Network (NPSBN)
- Developing or conducting assessments, including but not limited to:
  - Developing pre-event recovery plans

- Conducting point vulnerability assessments at critical infrastructure sites/key assets and develop remediation/security plans
- Participating Regional Resiliency Assessment Program (RRAP) activities
- Conducting or updating interoperable emergency communications capabilities assessments at the local, regional, or Statewide level (e.g., Communications Assets and Mapping [CASM])
- Developing border security operations plans in coordination with CBP
  - Developing, implementing, and reviewing Area Maritime Security Plans for ports, waterways, and coastal areas
  - Updating and refining threat matrices
  - Conducting cyber risk and vulnerability assessments
  - Conducting assessments and exercising existing catastrophic incident response and recovery plans and capabilities to identify critical capability gaps that cannot be met by existing local, regional, and State resources
  - Activities that directly support the identification of specific catastrophic incident priority response and recovery projected needs across disciplines (e.g., law enforcement, fire service, EMS, public health, behavioral health, public works, agriculture, information technology, and citizen preparedness)
  - Activities that directly support the identification of pre-designated temporary housing sites
  - Activities that support the identification and development of alternate care sites
  - Conducting community assessments, surveys, and research of vulnerabilities and resource needs to determine how to meet needs and build effective and tailored strategies for educating individuals conducting assessments of the extent to which compliance with the integration mandate of disability laws is being achieved
  - Conducting Preparedness research
  - Conducting or updating interoperable emergency communications capabilities and broadband needs assessments at the local, regional, or Statewide level
  - Soft target security planning (e.g., public gatherings)
- Developing, hosting, or participating in bombing prevention/counter-improvised explosives device (IED)-specific planning initiatives to include:
  - Incorporating appropriate IED-specific intelligence and threat analysis when developing and maintaining a THIRA;
  - Conducting inventories and assessments of capabilities or typed resource using the counter-IED-specific DHS National Counter-IED Capabilities Analysis Database (NCCAD) program for use in applicable THIRAs, preparedness reporting, or strategies;
  - Conducting DHS Multi-Jurisdiction IED Security Planning (MJIEDSP) workshops to develop THIRA-based plans and strategies that maximize the use of limited resources;
  - Developing IED hazard-specific EOP annexes.
  - Implementing a Corrective Action Plan (CAP) to close IED-related capability gaps identified through MJIEDSP or other planning processes
- Continuity of Operations/Continuity of Government (COOP/COG) Planning activities, which include but are not limited to:
  - Determining essential functions and activities, interdependencies, and resources needed to perform them
  - Establishing orders of succession and delegations of authority to key agency positions and establish and maintain current roster(s) of fully equipped and trained COOP personnel with the authority to perform essential functions
  - Providing for the identification and preparation of alternate operating facilities for relocated operations
  - Providing for the regular training, testing, and exercising of COOP personnel, systems, and facilities
  - Providing for reconstitution of agency capabilities and transition from continuity operations to normal operations

- Identifying resources for medical supplies necessary to support children during an emergency, including pharmaceuticals and pediatric-sized equipment on which first responders and medical providers are trained
- Ensuring subject matter experts, durable medical equipment, consumable medical supplies and other resources required to assist children and adults with disabilities to maintain health, safety and usual levels of independence in general population environments
- Developing and implementing a community preparedness strategy for the State/local jurisdiction
- Building and expanding governance structures to:
  - Include representatives from multiple agencies, jurisdictions, disciplines, levels of government, Tribes, rural areas, subject matter experts, and private industry
  - Integrate statewide leadership and governance structures into broader statewide planning efforts (e.g., statewide broadband planning activities, grants coordination activities, needs assessments) to ensure emergency communications needs are represented
  - Conduct outreach and education on emergency communications needs and initiatives to stakeholder groups
- Establishing, expanding, and maintaining volunteer programs and volunteer recruitment efforts that support disaster preparedness and/or response
  - Allowable volunteer programs and efforts include, but are not limited to: Citizen Corps Councils, partners, and affiliates; CERTs; Fire Corps; Medical Reserve Corps (MRC); Neighborhood Watch/USAonWatch; Volunteers in Police Service (VIPS); and jurisdiction-specific volunteer programs and efforts.
- Establishing and sustaining Citizen Corps Councils
- Working with youth-serving organizations and houses