



Mike DeWine, Governor
Thomas J. Stickrath, Director

Sima S. Merick, Executive Director

STATE HOMELAND SECURITY PROGRAM FY2019 GRANT GUIDANCE & APPLICATION



Application and Grant Agreement
Due by December 13, 2019

OHIO EMERGENCY MANAGEMENT AGENCY
2855 West Dublin-Granville Road, Columbus, Ohio 43235

Contents

Introduction	2
Key Changes	3
Award Information	4
Program Overview	5
FY2019 SHSP Regional Process	6
FY2019 SHSP Regional Allocations.....	8
Funding Priorities	9
Communications	9
Early Warning/Notification	10
Exercise	10
Cybersecurity	10
Planning	12
Targeted Sustainment of Specialty Teams.....	12
Mass Casualty and Fatality Management.....	13
Physical Protective Measures	13
Funding Guidelines	14
Planning	14
Organization.....	15
Equipment.....	16
Training	17
Exercises.....	19
Unallowable Expenses	21
Grant Administration	22
Application Process.....	22
Post Award Requirements	22
Management and Administration (M&A) Costs and Requirements.....	23
Procurement	26
Project Management	30
Payment	33
Points of Contact	36

Introduction

The FY2019 SHSP 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 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.

The FY2019 SHSP 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

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.

Key Changes

Federal Changes

Cybersecurity Assessment

FY2019 recipients and subrecipients will be required to complete the Nationwide Cybersecurity Review (NCSR), which is open annually from October to December, by the end of calendar year 2019 in order for agencies to benchmark and measure progress of improving their cybersecurity posture. The Chief Information Officer (CIO), Chief Information Security Officer (CISO), or equivalent for each subrecipient is required complete the NCSR. If there is no CIO or CISO, the most senior cybersecurity professional will be required to complete the assessment.

State Changes

Performance Period

The FY2019 SHSP Performance Period will be from September 1, 2019 to December 31, 2021. This is a reduction of three months from previous grant years to allow time for re-allocation of de-obligated funds.

Procurement

For FY2019, Ohio EMA will institute a more comprehensive procurement process that will ensure compliance with federal, state, and local requirements. Please go to page 26 of this guidance document for further details.

Waiver Process

Ohio EMA has developed a waiver process to request approval from FEMA for manned and unmanned watercraft and aircraft (i.e. drones).

Travel

Subrecipients will generally be limited to 3 personnel per agency per training or conference. Additional personnel will require written justification and prior approval by Ohio EMA Grants Branch staff.

Budget Modifications

All budget modifications will require prior approval from Ohio EMA Grants Branch staff prior to incurring expenses. Modifications will need to be entered into EGMS and approved prior to obligating grant funds. **Any budget modification made after the purchase of equipment or services will not be reimbursed.**

Award Information

Issued By

Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), Grants Program Directorate (GPD) through Ohio Emergency Management Agency as the State Administrative Agency (SAA)

Assistance Listings (AL) Number and Title:

97.067 - Homeland Security Grant Program

Authorizing Authority for Program

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

Appropriation Authority for Program

Department of Homeland Security Appropriations Act, 2019 (Pub. L. No. 116-6)

Period of Performance

The period of performance of this grant will be September 1, 2019 through December 31, 2021. Applications should clearly address how actions will be completed within the timeframe allowed by this guidance. Applicants should be aware that as of December 31, 2021, all activities associated with the 2019 SHSP program must be complete and all equipment purchased with the grant must be received, installed, and in service 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 subrecipient asking for the extension will need to demonstrate something truly beyond the control of the subrecipient in order to be considered for the extension. Subrecipients 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.

FY2019 SHSP 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.

Program Overview

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 Stakeholder Preparedness Review (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.

The purpose of this package is to provide:

- The formal grant guidance and application materials needed to apply for funding under the SHSP program (LE-SHSP and OPSG are separately administered for FY2019).
- Administrative requirements that must be met by all subrecipients in order to meet the requirements of federal regulations, mandates and orders.

In order to be funded by FY2019 SHSP funds, Ohio is requiring that local projects meet the following criteria:

- Must support terrorism preparedness/demonstrate nexus to terrorism
- Have measurable and detailed goals to explain what gaps are being filled
- Regional capability as demonstrated by support of all counties within the Ohio Homeland Security Planning Region where the project originates;
- If requesting capability that is deployable/sharable within the region, state and nation-must indicate a commitment to do so per existing EMAC agreements;
- 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
- Must directly support at least one of the core capabilities outlined in this document as being supported by Ohio's FY2019 SHSP Funding Priorities
- Must be connected to a terrorism plan-local plan, regional plan, THIRA/SPR, etc.
- Subrecipients with Communication Projects will be required to explain and show how it ties into the State Communications Interoperable Plan priorities (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 regional project. 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 SHSP funds.

Allowable Investments made in support of the SHSP 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, organization, equipment, 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.

FY2019 SHSP Regional Process

Again, with FY2019 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 FY2019 SHSP grant will be the eight (8) Ohio Homeland Security Planning Regions. Each region must coordinate with their Grants Specialist in order to ensure that proposed projects involve allowable costs and are aligned with priorities outlined in grant guidance. The Grants Specialist for each region is available to attend regional meetings and to coordinate by phone/email for this purpose.

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 the Ohio EMA Grants Branch worked with staff of Ohio Homeland Security to determine funding for each region based upon a risk-based formula that considers 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. Subrecipients 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 FY2019 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 FY2019 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, subrecipient 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 Ohio EMA Grants Branch staff to act as a guide through the process. Regions are encouraged to develop a future schedule of meetings and utilize Grants Branch staff if desired. Including Grants Branch staff in meetings or conference calls has many benefits. In addition to implementation, Grants Branch staff can provide guidance on the development of projects and can offer advice as to allowability of the project in accordance with the guidance.

The grants advisory committee for each region must include, at a minimum, representation from each county 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 FY2019 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 13, 2019.** A grant agreement received without a signed list of prioritized projects will not be considered complete. Going forward each project submitted as a new line in EGMS will require a regional sign-off from all members of the regional advisory committee.

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. Documentation of this non-participation and of the reasonable attempts made, along with signatures of all representatives, must be attached to each regional application not receiving full support.

The county that is designated the fiscal agent for the region also bears responsibility for procuring any equipment through FY2019 SHSP. This means that the regional fiscal agent is in charge of developing the specifications and solicitation, soliciting quotes/bids/proposals, awarding the project, documenting the procurement procedure from start to finish, tracking and transferring equipment and requesting reimbursement.

De-Obligation of Funding

If a region decides not to participate in the process or not submit enough projects to expend available funding, Ohio EMA Grants Branch staff 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 SHSP funds 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.

Eligible Applicants

In accordance with Ohio EMA's past administration of the SHSP (Non-LE) grant, eligible applicants are limited to the eight (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 FY2018 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.

Cybersecurity Assessment

New for FY2019, subrecipients will be required to complete the Nationwide Cybersecurity Review (NCSR) by December 31, 2019. The Chief Information Officer (CIO), Chief Information Security Officer (CISO), or equivalent for each subrecipient is required to complete the NCSR. If there is no CIO or CISO, the most senior cybersecurity professional is required to complete the assessment. Additional guidance will be forthcoming from FEMA.

FY2019 SHSP Regional Allocations



Region	Fiscal Agent	Award Amount
Region 1	Lucas County Emergency Management Agency	\$471,590
Region 2	Cuyahoga County Public Safety and Justice Services	\$653,444
Region 3	Montgomery County Emergency Management	\$402,204
Region 4	Franklin County Emergency Management & Homeland Security	\$647,564
Region 5	Summit County Emergency Management Agency	\$599,778
Region 6	Hamilton County Emergency Management & Homeland Security	\$644,037
Region 7	Jackson County Emergency Management Agency	\$258,728
Region 8	Muskingum County Emergency Management Agency	\$242,655

Funding Priorities

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.

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 for Search and Rescue, Hazardous Materials, and Bomb Disposal specialty teams are narrower in scope and applicants should consult the appropriate section before applying.

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. Subrecipients seeking to receive funding for communication projects must describe how activities align to the statewide Communication Interoperable Plan (SCIP) priorities and describe how the project supports the statewide strategy to improve emergency communications and is compatible and interoperable with surrounding systems.

Subrecipients that are using FY2019 SHSP 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 subrecipient) 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 subrecipients) 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 Grants Specialist on such Investments before developing applications. SAFECOM guidance can be found at: <https://www.dhs.gov/safecom/funding>.

An initial Environmental Planning and Historic Preservation (EHP) should be submitted with the project application for appropriate projects (e.g. a communications tower). Ohio EMA Grants Branch staff 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 Grants Branch staff 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.

Exercise

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). 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 Ohio EMA Training & Exercise Supervisor. All exercises using SHSP funding must be NIMS compliant. More information is available online at the National Integration Center at <http://www.fema.gov/national-incident-management-system>.

The scenarios used in SHSP-funded exercises must be based on the State Homeland Security Investment Justification and plans. Acceptable scenarios for SHSP exercises include: chemical, biological, radiological, nuclear, explosive, cyber, agricultural or technological disasters. The scenarios used in SHSP-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 consider 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.

Cybersecurity

The core capability of Cybersecurity is defined as a capability to protect (and if needed, restore) electronic communications systems, information, and services from damage, unauthorized use, and exploitation. Local jurisdictions are encouraged to utilize a range of free resources listed below.

Resources

DHS strongly recommends participation in its Cyber Hygiene Program:

- The no-cost DHS Cyber Hygiene Program provides vulnerability scanning to help secure internet-facing systems from known vulnerabilities, detects insecure configurations, and encourages the adoption of security best practices.
- DHS performs regular network and vulnerability scans and delivers a weekly report for your action.

Once initiated, this service is mostly automated and requires little direct interaction. After DHS receives the required paperwork for Cyber Hygiene, scans start within 72 hours and state, local, tribal, and territorial (SLTT) governments will begin receiving reports within two weeks. SLTT governments can sign up and obtain further details by contacting NCATS_INFO@hq.dhs.gov.

DHS has several additional no-cost cybersecurity resources for SLTT governments. From cyber awareness and technical training to vulnerability assessments, there are resources available which do not require the expenditure of grant funds. To help SLTT government leaders get started in building a cybersecurity program, or enhance an existing program, DHS has created resources specifically designed to help leaders recognize and address their cybersecurity risks. Resources include discussion points for government leaders, steps to start evaluating a cybersecurity program, and a list of hands-on resources available to SLTT governments. Many of these resources are described in further detail at <https://www.us-cert.gov/ccubedvp/sltt>.

Additional technical assistance available to SHSP and UASI recipients and sub-recipients includes the following:

- General Resources
 - The DHS Office of Cybersecurity and Communications (CS&C), within the National Protection and Programs Directorate, enhances the security, resilience, and reliability of the Nation's cyber and communications infrastructure. CS&C serves as the hub for each state, territory, and urban area's cybersecurity inquiries and resources. States, territories, and urban areas should review these resources with their CIO and CISO to determine which resources will best serve their community's efforts to build and sustain a robust cybersecurity program.
 - The National Institute of Standards and Technology (NIST) Cybersecurity Framework (the Framework) provides standards, guidelines, and best practices to promote the protection of critical infrastructure. Grant recipients and sub-recipients can use the Framework to align cybersecurity investments to policy, communicate cybersecurity requirements to stakeholders, measure current cybersecurity posture through self-assessment, and analyze trade-offs between expenditure and risk. DHS resources aligned to the Framework Function Areas can be found at <https://www.us-cert.gov/ccubedvp/sltt>.
 - Funded by DHS, the Multi-State Information Sharing and Analysis Center (MS-ISAC) improves the overall cybersecurity posture of the Nation's SLTT governments through focused cyber threat prevention, protection, response, and recovery. It is a no-cost, membership-based community that includes 24/7 cybersecurity support, analysis and monitoring, and a central location for reporting threats and suspicious activities. For more on the MS-ISAC, visit <https://www.cisecurity.org/ms-isac/>.
- Training Resources

- The Federal Virtual Training Environment (FedVTE) provides more than 800 hours of free online cybersecurity training to U.S. government (including SLTT government) employees, Federal contractors, and veterans. DHS manages the FedVTE program. It is administered through an interagency agreement with the U.S. Office of Personnel Management and supported by the Department of Defense's Defense Information Systems Agency through course development initiatives. Course proficiency ranges from beginner to advanced levels and have topics such as ethical hacking, risk management, and malware analysis. For more information on how to register for courses and obtain a log-in visit <https://fedvte.usalearning.gov/>.

These resources will allow jurisdictions to assess their cyber posture and prepare for future funding opportunities. Please see FEMA IB 427a for further information on federal resources for training projects.

Planning

FY2019 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: www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf.

Upon completion of a given planning project, the subrecipient will submit copies of the completed plans and/or planning tasks that were developed, enhanced, or updated using FY2019 SHSP funds. These will be submitted to Ohio EMA's 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 FY2019 SHSP 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."

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 remains a priority in FY2019 SHSP. Specialty teams listed in the Ohio Fire Chiefs' Association Emergency Response System, FBI accredited Bomb Teams, and Mission Ready Packages contained in the EMAC Operating System are also eligible for sustainment funding.

Specialty Team Eligibility

Applications for sustainment of search and rescue teams, Hazardous Materials (HazMat) response teams, Incident Management Teams (IMT), and swift water rescue teams are eligible for funding through this category. Teams must be listed within the Ohio Fire Chiefs' Association Emergency Response Plan to be considered for funding. Funding 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 guidance established in other parts of this guidance, especially 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.

Mass Casualty and Fatality Management

The traditional concept of Mass Casualty incident response is a component of the core capability of Public Health, Healthcare, and Emergency Medical Services. The focus of this core capability is to provide lifesaving medical treatment via Emergency Medical Services and related operations, and to avoid additional disease and injury by providing targeted public health, medical, and behavioral health support and products to all affected populations. The goal is to build a capability that can complete triage and initial stabilization of casualties and begin definitive care for those likely to survive their injuries and illnesses, return medical surge resources to pre-incident levels, complete health assessments and identify recovery processes, and deliver medical countermeasures to exposed populations. Investments that can be shown to sustain or build this capability and which are allowable under other provisions and stipulations of this grant would be considered for funding.

The core capability of Fatality Management includes providing fatality management services, including decedent remains recovery and victim identification, and work with multiple levels of government and the private sector to provide mortuary processes, temporary storage or permanent interment solutions, sharing information with Mass Care services for the purposes of reunifying family members and caregivers with missing persons/remains, and providing counseling to the bereaved. The goal is to build a capability that can establish and maintain operations to recover a significant number of fatalities over a geographically dispersed area, and to mitigate hazards from remains, facilitate care to survivors, and return remains for final disposition. Investments that can be shown to sustain or build this capability and which are allowable under other provisions and stipulations of this grant would be considered for funding.

Physical Protective Measures

A new funding priority for FY 2019 is the core capability of Physical Protective Measures. The focus of this core capability is to implement and maintain risk-informed countermeasures, and policies protecting people, borders, structures, materials, products, and systems associated with key operational activities and critical infrastructure sectors. The goal is to build a capability that will allow for local entities across the State of Ohio to decrease the impact of potential terrorist attacks on large gatherings of citizens in soft target locations or high-profile special events.

Funding Guidelines

Recipients must comply with all the requirements in 2 C.F.R. Part 200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*). In general, subrecipients should consult with Ohio EMA Grants Branch staff prior to making any investment that does not clearly meet the allowable expense criteria. Funding guidelines established within this section support the five mission areas—Prevention, Protection, Mitigation, Response, and Recovery—and associated core capabilities within the Goal.

Allowable investments made in support of the SHSP priorities as well as other capability-enhancing projects must have a nexus to terrorism preparedness and fall into the categories of planning, organization, exercises, training, or equipment, aligned to closing capability gaps or sustaining capabilities identified in the THIRA/SPR. Recipients are encouraged to use grant funds for evaluating grant-funded project effectiveness and return on investment. Ohio EMA encourages subrecipients to provide the results of that analysis to Ohio EMA.

Multiple Purpose or Dual-Use of Funds

Many activities that support the achievement of core 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 subrecipients in achieving core capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.

Planning

SHSP funds may be used for a range of emergency preparedness and management planning activities 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 and placing an emphasis on updating and maintaining a current EOP that conforms to the guidelines outlined in [CPG 101 v2](#).

The following are examples of Allowable Planning Activities:

- Developing hazard/threat-specific annexes
- Developing and implementing homeland security support programs and adopting ongoing DHS/FEMA national initiatives
- Developing related terrorism and other catastrophic event prevention activities
- Developing and enhancing plans and protocols
- Developing or conducting assessments
- Hiring of full- or part-time staff or contract/consultants to assist with planning activities
- Materials required to conduct planning activities
- Travel/per diem related to planning activities
- Overtime and backfill costs (in accordance with guidance)
- Issuance of WHTI-compliant Tribal identification cards
- Activities to achieve planning inclusive of people with disabilities and others with access and functional needs and limited English proficiency.
- Coordination with Citizen Corps Councils for public information/education and development of volunteer programs
- Update governance structures and processes and plans for emergency communications
- Development, and review and revision of continuity of operations plans
- Development, and review and revision of the THIRA/SPR continuity of operations plans

Organization

Personnel Activities

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable FY2019 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
 - 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 Grants Branch prior to finalizing any consultant/contractor agreements or contracts;
- Costs associated with providing reasonable accommodations and modifications for workers with disabilities.

FY2019 SHSP 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.

Operational Overtime Costs

In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism and other catastrophic events, operational overtime costs are allowable for increased protective security measures at critical infrastructure sites or other high-risk locations and to enhance public safety during mass gatherings and high-profile events. In that regard, SHSP recipients are urged to consider using grant funding to support soft target preparedness activities. SHSP funds may be used to support select operational expenses associated with increased security measures in the authorized categories cited in the list below, but this list is not exhaustive. FEMA retains the discretion to approve other types of requests that do not fit within one of the categories of the table. All allowable operational overtime costs are also subject to the administration requirements outlined in the following subsection.

The following are examples of Allowable Organizational Activities:

- Program management
- Development of whole community partnerships, through groups such as Citizen Corp Councils
- Structures and mechanisms for information sharing between the public and private sector
- Implementing models, programs, and workforce enhancement initiatives to address ideologically inspired radicalization to violence in the homeland
- Tools, resources, and activities that facilitate shared situational awareness between the public and private sectors
- Operational Support
- Utilization of standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident
- Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS) or needs resulting from a National Special Security Event

Equipment

The 21 allowable prevention, protection, mitigation, response, and recovery equipment categories for SHSP are listed on the [Authorized Equipment List \(AEL\)](#). Some equipment items require prior approval from DHS/FEMA before obligation or purchase of the items. Please reference the grant notes for each equipment item to ensure prior approval is not required or to ensure prior approval is obtained if necessary.

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

Before any equipment item is added to the subrecipient 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 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 subrecipient must receive approval for the item through the EGMS from Ohio EMA Grants Branch. This clarification must take place prior to any encumbrance or expenditure of funds for the item in question.

Investments in emergency communications systems and equipment must meet applicable [SAFECOM Guidance](#). Such investments must be coordinated with the SWIC and the State Interoperability Governing Body (SIGB) to ensure interoperability and long-term compatibility.

Subrecipients that are using FY2019 SHSP funds to support emergency communications activities should comply with the FY2019 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.

Requirements for Small Unmanned Aircraft System and Watercraft

All manned and unmanned aircraft/watercraft require an approved waiver from FEMA. All requests to purchase Small Unmanned Aircraft Systems (SUAS) with FEMA grant funding must comply with [IB 426](#) and [IB 438](#) and also include a description of the policies and procedures in place to safeguard individuals' privacy, civil rights, and civil liberties of the jurisdiction that will purchase, take title to or otherwise use the SUAS equipment.

Ohio EMA has developed a formal process for requesting a waiver from FEMA. Please utilize the Waiver Form (available via https://ema.ohio.gov/PreparednessGrants_Toolkit.aspx) and work with Ohio EMA Grants Branch staff to navigate the FEMA approval process. It is imperative that the subrecipient begin this process as early as possible to ensure completion within the performance period.

Training

Allowable training-related costs under SHSP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP program and/or in conjunction with emergency preparedness training by other federal agencies (e.g., HHS and DOT). Training conducted using SHSP 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 training related to under-represented diverse populations that may be more impacted by disasters, including children, seniors, individuals with disabilities or access and functional needs, individuals with diverse culture and language use, individuals with lower economic capacity and other underserved populations, should be identified in a TEP and addressed in the state or high-risk urban area training cycle. Recipients are encouraged to use existing training rather than developing new courses. When developing new courses, recipients are encouraged to apply the Analyze, Design, Develop, Implement, and Evaluate (ADDIE) model of instructional design.

Recipients are also encouraged to utilize the National Training and Education Division's National Preparedness Course Catalog. Trainings include programs or courses developed for and delivered by institutions and organizations funded by DHS/FEMA/National Training and Education Division (NTED). This includes the Center for Domestic Preparedness (CDP), the Emergency Management Institute (EMI), and NTED's Training Partner Programs, including the Continuing Training Grants (CTG), the National Domestic Preparedness Consortium (NDPC), the Rural Domestic Preparedness Consortium (RDPC), and other partners.

The catalog features a wide range of course topics in multiple delivery modes to meet FEMA's mission scope as well as the increasing training needs of federal, state, local, territorial, and tribal audiences. All courses have been approved through NTED's courses. The catalog can be accessed at <http://www.firstrespondertraining.gov>.

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 Grants Branch prior to finalizing any consultant/contractor agreements or contracts.

Training Activities & Requirements

Allowable training-related costs under SHSP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP program priorities and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS, Department of Transportation). Training conducted using SHSP 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>

All training activities supported by FY2019 SHSP must be eligible based on DHS-FEMA FY2019 grant guidance to Ohio. Training questions from subrecipients can be answered by Ohio EMA by contacting the following Ohio EMA Planning, Training, and Exercise Branch staff.

Subrecipients 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 SHSP 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.

Subrecipients 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 SHSP grant programs for which the funding will be used

Exercises

Exercises conducted with grant funding should be managed and conducted consistent with HSEEP. HSEEP guidance for exercise design, development, conduct, evaluation, and improvement planning is located at <https://www.fema.gov/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). 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

Programmatic information requests and requests for the State of Ohio's Terrorism/All-Hazard EEM should be directed to the Ohio EMA Training & Exercise Supervisor. All exercises using SHSP funding must be NIMS compliant. More information is available online at the National Integration Center at <https://www.fema.gov/national-incident-management-system>.

Applications requesting exercise funding should demonstrate that personnel and resources exist to ensure compliance with the HSEEP requirement and sound exercise management practices. Acceptable scenarios for SHSP exercises include: chemical, biological, radiological, nuclear, explosive, cyber, agricultural or technological disasters. The scenarios used in SHSP-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 consider

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. A Memorandum of Understanding (MOU) or other formal agreement is necessary to encompass all of the requirements with sub-granting funds to other entities for reimbursement of their personnel expenditures. Pre-approval is required for all sub-grants from Ohio EMA.
- 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.

If you have questions regarding eligibility during the developmental stages of your exercise project proposal, please contact Ohio EMA Training & Exercise Supervisor, David Nunley, dbnunley@dps.ohio.gov, or at (614) 799-3677.

Unallowable Expenses

- Unauthorized Exercise Costs
- 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).
- Per FEMA policy, the purchase of weapons and weapons accessories, including ammunition, is not allowed with SHSP funds.
- Grant funds may not be used for the purchase of equipment not approved by DHS/FEMA. Grant funds must comply with [IB 426](#) and may not be used for the purchase of the following equipment: firearms; ammunition; grenade launchers; bayonets; or weaponized aircraft, vessels, or vehicles of any kind with weapons installed.

Grant Administration

The Grant Administration section is intended to help subrecipients in understanding the rules and regulations associated with administering federally-funded grant awards and the state's process for meeting these requirements. This comprehensive resource will provide subrecipients with standard financial and administrative processes that will ensure compliance with the preparedness grant programs.

Application Process

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 13, 2019. 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 as a tool to gather project information in a format that will streamline its input into EGMS. All EHP documentation will also need to be submitted with your region's grant package submission.

For FY2019 a completed application package under SHSP consists of twelve parts:

- 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 certification statement
- EGMS User Form
- Regional Fiscal Agent Contact Form
- Regional Project Sign-off Form
- Subaward Financial Management Form (FFATA for subrecipients)
- EHP Screening tool (required unless project is exempt)

*In order to receive FY2019 SHSP funding, the subrecipient 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 can be found at [Ohio EMA NIMS Guidance](#) or via [FEMA's NIMS web page](#). For FY2019, all 88 county Emergency Management Agencies have verified their NIMS compliance through Ohio EMA Planning, Training, and Exercise Branch. The NIMS certification statement is still required for submission by any other organization receiving FY2019 SHSP funding (e.g. Law Enforcement, Fire, EMS, etc.).

Post Award Requirements

Issuance of Grant Agreement

A grant agreement will be generated and sent to the subrecipient along with any special conditions. This grant agreement must be mailed with original signature to Ohio EMA by December 13, 2019. Any costs incurred prior to issuance of the executed grant agreement with assurances and official EGMS budget approval may not be reimbursed.

Grant Performance Period

The performance period for the FY2019 SHSP will be September 1, 2019 through December 31, 2021. 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 will only be approved if the subrecipient can provide compelling justification for why the approved projects are incomplete.

Standards for Review

Once the region's prioritized list of projects has the necessary signatures, begin the application process by utilizing the [EGMS Budget Line Item Generator](#) to assist in development of the grant application in EGMS. This excel spreadsheet, with dropdowns and prompts, is aimed at simplifying the application process. Subrecipients should utilize the technical expertise of grants staff to ensure they are submitting projects that meet the requirements established in this guidance. Ohio EMA Grants Branch staff will review the submitted projects to ensure compliance with this guidance document. Once the Regional Fiscal Agents have received written approval of their respective projects, they may then enter all projects and budgets within the Electronic Grants Management System (EGMS).

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.

Demonstrating Progress

Regional 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 may 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

Subrecipients are required by 2 CFR 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 subrecipient accounting include the ability to track expenditures by grant program and by federal fiscal of the award (i.e. FY2017 SHSP, FY2018 SHSP, etc.).

Management and Administration (M&A) Costs and Requirements

Subrecipients may retain a maximum of up to five percent (5%) of requested funding for management and administrative purposes associated with the SHSP award. M&A costs are specifically attributed to the management and administration of the FY2019 award. Indirect costs are not considered administrative costs and are not permitted under the FY2019 SHSP grant. 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 FY2019 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 FY2019 SHSP, or for personnel currently being paid with SHSP funds for grant administration and will now be responsible to additionally administer FY2019 SHSP funding.

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.

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.

Construction and Renovation

Use of SHSP funds for construction is generally prohibited and will have limited applicability to Ohio's FY2019 offering of SHSP funding.

Project construction using SHSP funds may not exceed the greater of \$1,000,000 or 15 percent of the grant award. For the purposes of the limitations on funding levels, communications towers are not considered construction.

Written approval must be provided by DHS/FEMA prior to the use of any SHSP funds for construction or renovation. When applying for construction funds, recipients must submit evidence of approved zoning ordinances, architectural plans, and any other locally required planning permits. Additionally, recipients are required to submit a SF-424C form with budget detail citing the project costs.

Recipients using funds for construction projects must comply with the *Davis-Bacon Act* (codified as amended at 40 U.S.C. §§ 3141 *et seq.*). Recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics employed on projects of a character like the contract work in the civil subdivision of the State in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available online at <https://www.dol.gov/whd/govcontracts/dbra.htm>.

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. Criminal Intelligence Systems Operating Policies if this regulation is determined to be applicable.

Standard Financial Requirements

Any subrecipient(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 subrecipient 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 subrecipient of requirements of local and/or state government. In addition, acceptance of federal grant funding means subrecipient Fiscal Agent must comply with and assume financial responsibility for audit findings. You must meet all local, state, and federal guidelines, whichever is stricter.

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 SHSP and other preparedness grant programs, this is accomplished via FEMA's Environmental Planning and Historic Preservation (EHP) Review. Subrecipients must comply with all applicable EHP laws, regulations, and Executive Orders (EOs) in order to draw down their FY2019 SHSP 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.

SHSP 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, subrecipients must complete the FEMA EHP Screening Form (available via https://ema.ohio.gov/PreparednessGrants_Toolkit.aspx) and submit it, with all supporting documentation, to Ohio EMA Grant Branch staff. Refer to IBs 329, 345, and 356 located at <https://www.fema.gov/grant-programs-directorate-information-bulletins> 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 SHSP 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.

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, subrecipients must ensure that they meet the procurement requirements of the Ohio Revised Code and local procurement regulations. All subrecipients 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, subrecipients 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 subrecipients navigate the requirements of procurement:

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

- **Micro-purchases:** Micro-purchases are defined as the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000 or the local procurement policy, whichever is more stringent. To the extent possible, the 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 subrecipients should still seek quotes where feasible. In order to document that the subrecipient has utilized the strictest of local, state, and federal procurement policies, Ohio EMA will require a copy of the subrecipient’s local procurement policy with each cash request.

- Small Purchase—price or rate quotations must be obtained from a minimum of three sources if the cost is less than \$50,000 and the local policy does not establish a different, lower amount
- 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
- 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.
- 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 Grants Branch. Any procurement without 3 quotes or bids must have a pre-approval by Ohio EMA.

Subrecipients 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.

Subrecipients 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. Subrecipients 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.

Pre-Procurement Approval Process

Beginning with the 2019 SHSP grant year, Ohio EMA is implementing the new Pre-Procurement Review Process. Prior to obligating any grant funds for approved projects, grant subrecipients will now be required to submit the [Procurement Process form](#) for review and approval by Ohio EMA Grants Branch staff. This form will detail the required documentation that must accompany the submission based on the intended method of procurement. Review and approval will be returned to the subrecipient within five business days (unless the submission requires additional information and/or clarification). The Pre-Procurement Approval Process applies to any procurement above the Micro-Purchase Threshold (\$10,000 and above).

To provide clarification on several areas of procurement interpretations, the following guidelines will now be required in the procurement process:

- **Micro-Purchase Procurement (<\$10,000)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their reimbursement request.
 - Subrecipients may utilize the GSA Schedule as a source for procuring items under the micro-purchase threshold.
- **Small Purchase Procurement (\$10,000 - \$49,999)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - A minimum of **three valid quotes** will be required to proceed with procurement. A valid quote is one that meets all specifications of the Request for Quote. If any quote is deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of three valid quotes.
 - Subrecipients may utilize the GSA Schedule as a source for one of their valid quotes.
- **Sealed Bid Procurement (\$50,000 and above)**
 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - A minimum of **two valid bids** will be required to proceed with procurement. A valid bid is one that meets all specifications identified in the Invitation to Bid. If any bid is deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of two valid bids.
 - Subrecipients may **NOT** utilize the GSA Schedule as a source for one of their valid bids.
- **Competitive Proposals (\$50,000 and above)**

*****This is only for use when sealed bidding is not possible as the terms of how a project are to be completed must be negotiated.***

 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - The criteria and weight of all scoring criteria must be very clear in the specifications and must not be restrictive of competition per 2 CFR 200.319.
 - A minimum of **two valid proposals** will be required to proceed with procurement. A valid proposal is one that meets all specifications identified in the Request for Proposals. If any proposal is deemed ineligible by the subrecipient or Ohio EMA, the subrecipient will be required to send out additional Requests for Quote until they attain the required minimum of two valid proposals.
- **Inadequate Competition**

*****This is only for use when the minimum amount of quotes, bids, or proposals as specified in the 2 CFR 200 and this guidance are not met.***

 - Subrecipients will need to submit Suspension and Debarment verification documentation with their Procurement Process approval form.
 - Documentation must be provided to demonstrate the effort involved with attempting to competitively solicit price rates.
 - **For Procurements Requiring Quotes:** After a documented effort has been made to achieve three quotes and has not produced three quotes, a

subrecipient may then bid the project. The award should then be made to the lowest bidder

- **For Procurements Requiring Bids:** After the initial Invitation to Bid (ITB) has been solicited and has not produced two valid bids, to document sufficient competitive effort a subrecipient may then solicit a second ITB and award to the lowest cost, qualified bid.
- **For Procurements Requiring Proposals:** After the initial Request for Proposals (RFP) has been solicited and has not produced two valid proposals, to document sufficient competitive effort a subrecipient may then solicit a second RFP and award to the lowest cost, qualified proposals considering other clear evaluation criteria.”

Subrecipients are encouraged to work closely with Ohio EMA Grants Branch Staff throughout the procurement process to address any concerns and ensure compliance with federal, state, and local requirements.

Socioeconomic Contracting Requirements

This section lists the requirements of 2 CFR 200.321 with regard to contracting with small and minority businesses, women’s business enterprises, and labor surplus area firms. While documentation on compliance with this standard will not be required prior to reimbursement, it **MUST** be in your grant files and available for a monitoring visit by Ohio EMA and FEMA as well as subsequent audits. Subrecipients can use the resources of the Small Business Administration (SBA) to create a list of women and minority owned businesses that they can contact for solicitation. FEMA has created several tools to assist non-Federal entities with meeting the above-requirements. For further information, visit <https://www.fema.gov/procurement-disaster-assistance-team> and view documents under the Other Resources tab.

Keep in mind that each subrecipient must meet its own documented procurement procedures that reflect State and local laws and regulations, provided that the procurements conform to applicable Federal laws and standards established in 2 C.F.R. §§ 200.318 – 200.326.

- For example, if we assume that a city has a Minority and Woman-Owned Business Department, and it requires all of its departments to use the resources available through this department when it procures goods and services, then the city must not only meet this local procurement requirement, but also use the services of the SBA.
- The key for subrecipients is to document in grant files that steps have been taken to meet each of the six requirements of this section. When a subrecipient determines that one of the requirements is infeasible or unnecessary, such as establishing a delivery schedule that encourages participation by small and minority businesses, it needs to document its determination and the facts in the file. This documentation will show that it affirmatively attempted to meet each of the six requirements.
- **IMPORTANT NOTE:** The socioeconomic contracting requirements at 2 C.F.R. 200.321 apply to the following procurement methods: micro-purchases, small purchase procedures, sealed bids, and competitive proposals. Per FEMA legal counsel, “It is possible to follow the requirements, taking into consideration that some have qualitative language (“when economically feasible,” “where the requirements permit”).”

“2 CFR 200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

1. The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.
2. Affirmative steps must include:
 - a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
 - b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
 - c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
 - d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
 - e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
 - f. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section."

Food Costs

With the exception of food costs associated with travel/per-diem or providing for a meal during 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.

Project Management

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 Grants Branch requires that subrecipients 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/Conference/Training costs
 - Procurement Documentation
 - Invoices
 - Contracts
 - Agenda/Course Description
 - Attendance roster or Certification (certificate required for training)

Project Changes

Per 2 CFR Part 200, subrecipients must obtain 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 subrecipients 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 SHSP funds for equipment purchases requires that subrecipients 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,
 - Source of funding for the property (including CFDA and FAIN)
 - Who holds title,
 - The acquisition date
 - Cost of the property,
 - The source of property,
 - Percentage of Federal participation in the cost of the property,
 - The location of the property,
 - 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 subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.
- Subrecipients who have purchased equipment with Federal funds must submit an annual inventory certification along with a current Master Asset Listing to the Grants Branch no later than January 31 of each year. The Master Asset Listing must be submitted in electronic format (Excel or .csv). The form is located on the [Ohio EMA Grants Toolkit website](#).

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 subrecipient fails to take appropriate disposition actions, the awarding agency may direct the recipient or subrecipient to take excess and disposition actions.

Equipment is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

Supplies is defined as tangible personal property other than “equipment” for use 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 subrecipient receiving FY2019 SHSP 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 fiscal agent 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

Subrecipients 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. Subrecipients must ensure that funds received and expended under this grant program are coordinated with the county’s fiscal office (treasurer, auditor, etc.).

Audit Findings

As the State Administrative Authority (SAA), Ohio EMA takes seriously the responsibility of administering the grant funds we are entrusted with from DHS/FEMA. This guidance refers to the Super Circular (2 CFR Part 200) and the requirements therein. Subrecipients (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 subrecipients (Regional Fiscal Agents). By signing the grant agreement, subrecipients (Regional Fiscal Agent) 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 subrecipient (Regional Fiscal Agent). Ohio EMA will assume no financial responsibility for said audit findings, and if forced to pay on behalf of the subrecipient (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.

Subrecipients (Regional Fiscal Agents) will be monitored for fiscal performance utilizing the quarterly reports. Ohio EMA staff will be contacting subrecipients (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 Subrecipient (regional fiscal agent) is experiencing.

Payment

Reimbursement Requests

The reimbursement request process for the FY2019 SHSP 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.

Subrecipients 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 Grants Branch, the subrecipients' 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/warrant to the subrecipient. While this process relies heavily on external stakeholders, Ohio EMA Grants Branch staff will work to ensure the quickest processing of subrecipient 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 Grants 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 subrecipient 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 subrecipient fiscal agent for revision. Subrecipients 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.

Enforcement, Termination and After the Grant Requirements

Ohio EMA is required to monitor the subrecipient'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 subrecipient (regional fiscal agent) through a Notice-of-Non-Compliance. The subrecipient (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 subrecipient (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 subrecipient is agreeing to follow:

- **Notice of Non-Compliance:** The Ohio EMA Grants Branch Chief will send electronic notice of Non-Compliance to the subrecipient. The Notice of Non-Compliance will inform the subrecipient of the following: The area(s) of non-compliance; Either (1) the steps required to of the subrecipient to come into compliance and the date by which the subrecipient 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; The method for requesting review of compliance steps or agency action.
- **Review subrecipient's submission of compliance:** In the event the subrecipient submits compliance documentation, Ohio EMA Grants Administrator, in conjunction with the Grants Branch Chief, will review the subrecipient's written submission and determine if there is full compliance. If the subrecipient has not met full compliance, Ohio EMA will take agency action, through a Notice of Action, the subrecipient received notice of in the previously issued Notice of Non-Compliance.
- **Method for requesting review:** Subrecipient 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, the subrecipient will be given notification of the extended time frame. The decision of the Executive Director is final. The subrecipient 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. Subrecipients 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:

Ohio EMA Grants Branch

Grant Administrators:

Geoffrey Martin, Grants Branch Chief	(614) 799-3836	gsmartin@dps.ohio.gov
Margo Schramm, Grants Supervisor	(614) 799-3843	mlschramm@dps.ohio.gov

Grant Management Specialists:

Rudi Blaser (Regions 3 & 8)	(614) 799-3825	rblaser@dps.ohio.gov
Colin Campbell (Regions 5 & 6)	(614) 799-3828	cecampbell@dps.ohio.gov
Jocelyn Fykes (Region 1)	(614) 799-3832	jbfykes@dps.ohio.gov
Dan Green (Region 2)	(614) 799-3820	dgreen@dps.ohio.gov
Tim Manns (Regions 4 & 7)	(614) 799-3682	trmanns@dps.ohio.gov

Grant Monitoring Specialists:

Cathy Deck	(614) 799-3684	cdeck@dps.ohio.gov
Seth McDonald	(614) 799-3819	smcdonald@dps.ohio.gov

For Training & Exercise needs, contact:

Ohio EMA Planning, Training & Exercise Branch

David Nunley, Training & Exercise Supervisor	(614) 799-3677	dbnunley@dps.ohio.gov
Lisa Jones, Training Coordinator	(614) 799-3824	ljones@dps.ohio.gov
Matthew Jaksetic, Training Coordinator	(614) 799-3666	mtjaksetic@dps.ohio.gov