



OREGON DEPARTMENT OF EMERGENCY MANAGEMENT

STATE HOMELAND SECURITY GRANT PROGRAM

FY25

Grant Program Guidance

Applications Due:

Wednesday October 8, 2025, by 10pm



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INTRODUCTION

State Homeland Security Grant Program

In Oregon, the 2025 Homeland Security Grant Program (HSGP) focuses on two primary sub programs: the State Homeland Security Grant Program (SHSP) and the Urban Area Security Initiative (UASI). The following program guidance focused solely on SHSP. The purpose of SHSP is to assist states, tribes, local, and county governments to prevent, respond to, prepare for, and respond to acts of terrorism. Projects submitted under SHSP must have a nexus with terrorism, as well as reflect the capability needs established in the annual assessment. Use of SHSP funds must be consistent with and supportive of [the 2025- 2028 Oregon State Homeland Security Strategy](#), the most recent Capability Assessment or State of the State Report; and state and federal priority areas. This strategy includes a commitment to whole community preparedness efforts reflecting the needs of individuals with access and functional needs, including people with disabilities, older adults, children and youth, people with limited English proficiency, and other communities that may be disproportionately impacted by acts of terrorism.

Through the Integrated Preparedness Planning Workshops (IPPW) and the Capability Assessments, Oregon Department of Emergency Management (OEM) has identified the overarching needs statewide. Through consultation with state, local, and federal partners, the Oregon State Homeland Security Strategy identifies goals by which a more resilient and prepared community can be both built and enhanced.

For FY25, OEM recommends potential applicants prioritize funding to 1) establish a Homeland Security Anti-Terrorism Strategy (ATS) or Plan and/or 2) establish a multi-disciplinary, anti-terrorism steering committee or advisory board to promote information sharing, threat identification, and capabilities needed and/or available to address those threats.

Eligibility

Eligible applicants include local and tribal units of government. “Local unit of government” means any county, city, village, town, district, borough, parish, port authority, transit authority, intercity rail provider, commuter rail system, freight rail provider, water district, regional planning commission, council of government, Indian tribe with jurisdiction over Indian country, authorized Tribal organization, independent authority, special district, or other political subdivision of Oregon.

All local units of government applying for grant funding must be NIMS compliant (see NIMS Section Below).

Eligible projects must have a demonstrated nexus to achieving target capabilities related to preventing, preparing for, protecting against, and responding to acts of terrorism.

All applicants must coordinate with their Tribal or County Emergency Managers when applying. Only Tribal and County Emergency Managers or their assigned staff may submit applications to OEM.

Law Enforcement Terrorism Prevention-Oriented Activities

At least 35 percent of SHSP funds must be in support of law enforcement terrorism prevention activities (LETPA) related to one or more core capabilities within the National Preparedness Goal.

AVAILABLE FUNDING

Funding Distribution

In accordance with federal guidance, the State Administrative Agency (SAA) must obligate at least 80 percent of funds to local units of government. Funds will be distributed through a hybrid allocation model combining a formula-based allocation (formula allocation) and a competitive application process (competitive awards).

Match Requirement

The federal government does not require a match for State Homeland Security Program projects. There is no match for emergency communications equipment or end user radios like in years past, however, Competitive funded projects that provide a local match of at least 20% will receive priority. Matching funds must not be from other federal or state funding sources.

Supplanting

Federal funds may not supplant, replace, or offset state or local funds but will be used to supplement the amount of funds that, in the absence of federal funds, would be made available for purposes consistent with the HSGP.

Competitive Grants and the Review Committee

For projects not requesting funds for Emergency Communications Equipment, A review committee of no more than 18 members will be selected via an application process. The committee will represent diverse geographic regions, disciplines, and demographics and will rank competitive grant proposals based on comprehensive, fair, and impartial evaluation.

The grant review committee's recommendations will be submitted to the director of the Oregon Department of Emergency Management for approval. The final ranked approved lists

will be used once final funding levels are known. A project with a funding recommendation on the project ranked list is NOT a guarantee of funding approval.

No project is officially funded until a contract has been issued to successful applicants. Contracts will be sent within 45 days following OEM receiving the federal award., Federal awards are typically announced in the last quarter of the federal fiscal year (July to September).

Funding decisions will be based on:

1. Overall responsiveness to the required project application worksheets and forms.
2. How well the applicant describes the project with a clearly identified gap and solution that aligns with the Oregon State Homeland Security Strategy, most recent Capability Assessment or State of the State Report, and the state investment justifications, including federal priority areas designated in the FY25 Notice of Funding.
3. The impact the project has on the applicant's community, especially underserved and underrepresented communities.
4. Feasibility of completing the proposed project(s) within the two-year grant period of performance.
5. Sustainability of the project post-grant.
6. The application form will include total possible points available per section.

Projects seeking funds for Emergency Communications Equipment will not be scored by the grant review committee but will be reviewed by the SWIC and the SIEC. See Emergency Communications Equipment section below for more information.

State Administrative Agency (SAA) funds

DHS/FEMA requires OEM to pass through 80 percent of total SHSP award funds to local entities. OEM reserves the right to seek local approval to support projects which will fund the Federal Priority Area minimum spending requirements, as well as projects that serve local entities throughout the state.

State Administrative Agencies can retain 20 percent of SHSP funding. OEM may retain more than 20 percent if expenditures made by the state are on behalf of the local unit of government. This can occur only with the written consent of a local unit of government, specifying the amount of funds to be retained and the intended use of funds.

Duration of Funding

Successful applicants are awarded grants with a period of performance of 24 months. Projects must be completed and grants closed before the period of performance ends.

For FY25, the period of performance will begin October 1, 2025, and end September 30, 2027. Extra time and funding to complete projects will be considered on a case-by-case basis. *Such requests can only be submitted to OEM within 90 days of the end of the contracts period of performance.* Requests will be automatically denied if the awardee is not current on their financial and program reporting requirements.

Funding Reimbursement

The SHSP is a reimbursement grant. Grant subrecipients must provide invoices and proof of payment to receive grant fund reimbursement for all eligible expenses. Further details and instruction on the reimbursement process can be found in the [OEM Request for Reimbursement \(RFR\) Guidance](#).

Request for reimbursement and quarterly report forms will be provided by OEM to subrecipients upon execution of grant agreements.

2025 FUNDING PRIORITIES

Projects must implement at least one of the Four Investment Justifications (IJ). FY25 IJs are based upon the Oregon State Homeland Security Strategy, the Capability Assessment, and federal priority areas. Copies of the Investment Justifications guidance documents and supporting documents are available at <http://www.oregon.gov/OEM/emresources/Grants/Pages/HSGP.aspx>

FY25 Investment Justifications

- Combating Domestic Violent Extremism
- Soft Target Hardening
- Emergency Communications
- Emergency Operations Center/National Incident Management System/OR-State Qualification System Implementation

All applicants are expected to build and sustain capabilities to achieve National Preparedness Goals and implement state homeland security strategies. Projects that integrate planning, training, and exercises in addition to equipment procurement will be given priority during the review process for competitive awards.

See “*FY25 SHSP Investment Justifications*” guidance document.

APPLICANT REQUIREMENTS

National Incident Management System (NIMS)

The state reserves the right to determine NIMS compliance requirements for Oregon’s participating jurisdictions.

Only agencies that are NIMS compliant, or working to become NIMS compliant, are eligible for SHSP funding. You must have completed a NIMS assessment between January 1, 2025, and the date you submit your application. If you've completed the NIMS assessment to fulfill a requirement under EMPG, you do not need to complete it a second time for SHSP and vice versa.

You can access the assessment tool here: [OEM NIMS Assessment](#)

For additional information about NIMS requirements, please contact:

Sarah Puls

Preparedness Planner

Oregon Department of Emergency Management

Mobile: 971-345-7255

sarah.puls@oem.oregon.gov

Applications

Applications will be submitted by County and Tribal Emergency Managers electronically through Basecamp and a Web-based sub-applicant cover sheet.

OEM expects County and Tribal Emergency Managers to coordinate with all stakeholders within their geographic area to identify threats, vulnerabilities, and their capabilities to address them. Counties and tribes are not entitled to those funds for their own objectives alone but must work with all partners to identify needs and projects to address those needs. The County and Tribal Emergency Manager is responsible for selecting those projects that will be submitted to OEM, but should do so as equitably, and transparently as possible (such as through meaningful consultation and coordination with organizations that represent individuals with access and functional needs, such as disability advocates, language access organizations, and Tribal health programs, or other organizations serving disproportionately impacted populations.

FY25 Update: OEM highly encourages the alignment of projects with the state, county or tribal homeland security Anti-terrorism Strategy (ATS). In future years, this may become a requirement for application.

Eligible Project Guidance

Projects applied for through the State Homeland Security Program (SHSP) must be consistent with and support the Oregon State Homeland Security Strategy, the most

recent Capability Assessment or State of the State Report, and applicable state and federal priority areas.

Planning, training, and exercise activities being proposed through the State Homeland Security Program (SHSP) grant should be clearly identified and incorporated into the Integrated Preparedness Planning data submitted annually by county and tribal nations. These activities should be aligned with local capability priorities and documented during the **Integrated Preparedness Planning Workshops (IPPWs)** held statewide to ensure coordinated, strategic investment in preparedness efforts.

Planning Projects

Planning provides a methodical way to engage the whole community in thinking through the life cycle of potential crises, determining required capabilities, and establishing a framework for roles and responsibilities. Planning must include participation from all stakeholders in the community who are able to contribute to critical perspectives and may have a role in executing plans, including for example, community members with access and functional needs and the organizations that support them to ensure plans address real-world barriers and improve operational equity during emergencies. Planning should be flexible enough to address incidents of varying types and magnitudes. Planning activities should focus on four homeland security mission areas of prevent, prepare for, protect against, and respond to acts of terrorism.

Agencies receiving SHSP funds for planning activities (e.g., EOP, annex, standard operating procedure) must validate the plan utilizing a discussion-based exercise event (page __ will have more details on the specific exercise guidance). The exercise must be conducted within the performance period of the grant and be facilitated and documented in accordance with the Homeland Security Exercise and Evaluation Program (HSEEP). Agencies must provide information in the project narrative and milestones indicating the scale and schedule of the exercise. If the agency chooses, it may request SHSP funds to support the exercise as part of the project.

For additional information about planning projects contact:

Sarah Puls

Preparedness Planner

Oregon Department of Emergency Management

971-345-7255

Sarah.PULS@oem.oregon.gov

Training and Exercise Projects

Training Projects

Allowable training-related costs under SHSP include the development of, support for, conduct of, and attendance at training approved by FEMA and/or in conjunction with emergency preparedness training by other federal agencies or aligned with the current State Homeland Security Strategy. Training projects should also be identified and reported through the Integrated Preparedness Planning workshops (IPPW).

Grantees are encouraged to use existing training rather than developing new courses. If a jurisdiction wishes to develop a unique course that is not available through any provider, the proposed training must have a terrorism or catastrophic event nexus.

Training activities should be coordinated across jurisdiction(s) to the maximum extent possible to include the whole community and to better foster coordination and working relationships across the jurisdiction(s).

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

- Developing, delivering, and evaluating training (including costs related to administering training, planning, scheduling, facilities, materials and supplies, reproduction of materials, disability accommodations, and equipment).
- Training promotes individual, family, or community safety and preparedness.
- Developing, conducting, hosting, or participating in training related to terrorism or catastrophic event preparedness, prevention, response, and recovery.
- Overtime and backfill.
- Travel costs (e.g., airfare, mileage, per diem, hotel).
- Hiring full- or part-time staff or contractors/consultants.
- Training for the public or civilian volunteer programs.
- Food and snacks at per-diem rate for attendees (See RFR Guidance)

Costs associated with disability accommodations such as ASL interpretation, captioning, or accessible formats as needed.

Unauthorized Training Costs

- Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the training (e.g., electronic messaging signs).
- Repair or replacement of equipment damaged or lost during training.
- Overtime and/or backfill for first responders or other agency staff to teach Citizen Corps or community training.

All training requests funded with State Homeland Security Program grant funds must be coordinated directly through the state training officer. The state training officer will assist the applicant if the training request requires another state agency endorsement or support. Applicants **MUST** verify with the state training officer that all training is allowed before the submission of the State Homeland Security Program grant application.

For information about training requirements, please contact:

Elijah Davis

State Training Officer

Oregon Department of Emergency Management

971-719-6537

oem.training@oem.oregon.gov

Exercise

All grantees will validate the developed plan via a discussion-based exercise event prior to the end of the performance window. This discussion-based exercise event is required as follows:

- Tactical or Operational Plan: A tabletop exercise to validate the accuracy and realistic implementation of the plan. This event will identify gaps to support further adjustments to the product.
- Strategic Plan: A seminar exercise is required to educate key partners listed in the plan, and additional key preparedness or response partners, on the roles, responsibilities, expectations, and next steps with the product.

These exercise events should be developed, conducted, and followed-up consistent with the Homeland Security Exercise and Evaluation Program (HSEEP) – utilizing the project management tool scalable to the needs of the grantees exercise event.

Plan Maintenance Section Integration – Exercise Content

Organizations are encouraged to develop a realistic vision for exercising the plan utilizing a progressive exercise approach. A progressive, multi-year exercise program enables organizations to participate in a series of increasingly complex exercises, with each successive exercise building upon the previous one until mastery is achieved while also considering prior lessons learned. Regardless of the exercise type, each exercise within the progressive series is linked to a set of common program priorities and designed to test associated capabilities.

Far too often plans are completed and never validated or implemented within a no-fault exercise environment prior to real-world use. A progressive exercise approach detailed in the maintenance section of the plan will support organizations refine the product, engage relevant partners with their roles and responsibilities, and provide a roadmap for consistent interaction with the product.

A reminder that exercises don't have to be large-complex events, they just need to be useful in assessing that a product can be used and is accurate.

Allowable exercise-related costs include:

- Developing, delivering, and evaluating exercise (including costs related to administering exercises, planning, scheduling, facilities, materials and supplies, reproduction of materials, disability accommodations, and equipment).
- Overtime and backfill.
- Travel costs (e.g., airfare, mileage, per diem, hotel).
- Hiring full- or part-time staff or contractors/consultants.
- Exercises involving the public or civilian volunteer programs.
- Costs associated with disability accommodations such as ASL interpretation, captioning, or accessible formats as needed.
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Unauthorized Exercise Costs

- Equipment that is purchased for permanent installation and/or use, beyond the scope of the conclusion of the exercise (e.g., electronic messaging signs).
- Repair or replacement of equipment damaged or lost during an exercise.

Additional Exercise Information

- **The scenarios used in SHSP-funded exercises must be based on gaps identified in the most recent Capability Assessment or State of the State Report.** The scenarios used in HSGP-funded exercises must focus on testing capabilities; be large enough in scope and size to exercise multiple activities and warrant involvement from multiple jurisdictions, disciplines, and non-governmental organizations.
- Each exercise event must include an exercise objective that addresses the needs of individuals or groups with access and functional needs identified in the plan. Where feasible, individuals with lived experience of access and functional needs should be included in exercise planning, implementation, and evaluation to ensure exercises reflect real-world conditions and barriers.
- Special event planning: Special event planning should be considered as a training or exercise activity for the integrated preparedness plan.
- Exercise evaluation and improvement: Exercises should evaluate performance of capabilities against the level of capabilities required.

For additional information about exercise requirements, please contact:

Robert Quinn

State Exerciser Officer

Oregon Department of Emergency Management

971-345-7698

oem.exercise@oem.oregon.gov

Report on Training and Exercise

- Grantees must report their completed Tabletop Exercise, along with supporting documentation, to the OEM Exercise Program via an Emergency Management Exercise Report (EMER). The EMER process is used by the Oregon Department of Emergency Management to track completion of exercise requirements. The EMER submission link and guidance document can be found on the OEM Exercise Program Webpage under “Emergency management Exercise Reporting.” AAR/IPs (After-Action Report/Improvement Plan) for each HSGP-funded exercise to the Oregon Department of Emergency Management and include a list of corrective actions and lessons learned no later than **60 days** after completion of the exercise. Corrective actions should specifically address any identified barriers to participation, inclusion, or service delivery for individuals with access and functional needs. In accordance with HSEEP guidance, implementing corrective actions iteratively is an important component of the progressive exercise cycle.

EMER Program Contact
Zachary Glenn
Oregon Department of Emergency Management
971-719-0841
Zachary.glenn@oem.oregon.gov

Equipment

Applicants must comply with all requirements set forth in 2 Code of Federal Regulations (CFR) Part 200 for the active tracking and monitoring of property/equipment. Applicants without adequate property/equipment tracking procedures will be disqualified from grant funding.

Equipment purchases will have additional reporting and closeout requirements, which include NIMS resource typing and submission of an inventory and general ledger report

FY25 UPDATE: All equipment requests must comply with state and federal laws and guidance. For FY25 SHSP, the following equipment will not be funded:

- Items listed in FEMA Policy 207-22-0002ⁱ
- Drones, UAV, sUAV, sUAS, Photo Kites or any other aerial equipment requiring FEMA prior approval or FAA certification and special training.
- Items described in section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (FY 2019 NDAA)ⁱⁱ

Other Unauthorized Equipment Costs

- Self-contained breathing apparatuses (SCBAs) requested for general use by fire departments
- Explosive device mitigation equipment for personnel outside of FBI-approved bomb teams
- Equipment, supplies and software intended for general use.
- Equipment required by virtue of the occupation (e.g., bulletproof vests for law enforcement, turnout gear for fire)
- Equipment not supported by or associated with the scope of the project
- Land acquisition
- General-use software, general use computers and related equipment
- Weapons and ammunition
- Shields and gas masks as PPE used in crowd control
- Vehicle licensing fees
- Hiring of public safety personnel for the purpose of fulfilling traditional public safety duties
- Activities unrelated to the completion and implementation of the Homeland Security Grant Program
- Other items not in accordance with the AEL or previously listed allowable costs
- Stockpile type supplies with expiration dates (food, water, medication, medical supplies etc.)

Emergency Communications Equipment

All emergency communications equipment purchased with SHSP funds must align with SAFECOM, the Oregon Statewide Communication Interoperability Plan (SCIP) and a promulgated local communications plan and/or strategy, and, when applicable, be P25 compliant. More information about these requirements is provided at <https://www.cisa.gov/publication/emergency-communications-grant-guidance-documents>.

Applicants are required to coordinate with OEM's Communications Officer, Oregon's Statewide Interoperability Coordinator (SWIC) and/or the State Interoperability Executive Council (SIEC) Technical Committee when developing an emergency communications project. This coordination will ensure the project supports the statewide strategy to improve emergency communications and is compatible and interoperable with surrounding systems. Competitive funding projects that are developed in coordination with these entities may receive priority by the grant review committee.

Emergency communications activities include the purchase of interoperable communications equipment and technologies such as voice-over-internet protocol (VOIP) bridging or gateway devices.

FY25 UPDATE: All funding requests for Emergency Communications Equipment will be reviewed by the SWIC and the SIEC. No more than 20% of the total FY25 program fund may go towards Emergency Communications Equipment, unless the funds are part of a county or tribe's allocation funds. The SWIC will provide application forms for those seeking funding for Emergency Communications Equipment. ***"See Application Instructions for Comms Equipment."***

Restrictions on Covered Telecommunications Equipment or Services

See the most recent Notice of Funding Opportunity (NOFO) regarding *Prohibitions on Expending FEMA Award Funds for Covered Telecommunications Equipment or Services*.

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

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

Due to federal requirements on communication tower project preparation, tower projects are allowable but must include documentation regarding the permitting process in the grant application. Applicants interested in enhancing communication towers are required to consult with the SWIC prior to applying.

For additional information about emergency communications requirements, please contact:

Mike Fletcher

Deputy SWIC / ESF-2

Oregon Department of Emergency Management
(971) 719-0089

mike.fletcher@oem.oregon.gov

Equipment for Citizen Preparedness

Any equipment purchased with SHSP funding in support of Community Emergency Response Teams (CERTs) must be used for terrorism specific preparedness, volunteer training, and/or by volunteers in carrying out their response functions. Equipment for CERT programs is not intended to be used by uniformed emergency responders, except to support training for citizens. Examples of equipment used to support training for citizens include items such as burn pans or volunteer response kits.

Community Preparedness and CERT

All grant recipients supporting CERT volunteer programs must register with the State CERT Coordinator via email. Recipients are required to manage program and contact information with the State CERT Coordinator.

Community preparedness funds may be used to support volunteer outreach, education of the public to ensure a whole community preparedness vision, and the creation and expansion of public/private partnerships which benefit the response capability and overall resiliency of the community.

Overtime and/or backfill for first responders or agency employees to teach volunteer or community classes is not an eligible expense.

For additional information about CERT requirements, please contact:

Kayla Thompson

Community Preparedness Coordinator

Oregon Department of Emergency Management

Cell 503-983-5633

kayla.thompson@oem.oregon.gov

Personnel Costs (Organizational)

Program funds may be used to support the hiring of full- or part-time personnel to conduct program activities that are allowable under the FY25 SHSP (e.g., planning, training program management, exercise program management).

As directed by the Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act (Public Law 110-412), all personnel and personnel-related costs, including those for intelligence analysts, are allowed up to 50 percent of SHSP funding without time limitation placed on the period that such personnel can serve under the grant.

In general, the use of SHSP grant 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 cap of 50 percent include but are not limited to:

- Operational overtime
- Overtime/backfill to participate in approved training or exercise deliveries
- Salaries and personnel costs of intelligence analysts
- Overtime to participate in intelligence sharing activities
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators

The use of contractors to provide a delivery of plan documents, training courses, and/or exercise development and support are not considered personnel.

Management and Administration (M&A) and Indirect Costs

Subrecipients may retain a maximum of up to 5 percent of the funding passed through by the state solely for M&A purposes associated with the HSGP award. Management and administration costs must be described in the project application and the required budget. See the recent HSGP Notice of Funding Opportunity for more information on the limitations of activities that qualify for M&A costs.

Applicants for SHSP funds **may not** seek indirect funding costs.

AWARD ADMINISTRATION INFORMATION

REPORTING AND REIMBURSEMENTS

Program Narrative Reports - Quarterly Progress Reports

Subrecipients will be required to submit quarterly progress reports that contain specific information regarding the activities carried out under the FY25 Homeland Security Grant Program. A template of the project-specific quarterly narrative progress report that includes approved milestones will be sent to subrecipients with executed agreements. Quarterly Reports must be submitted via email to shspadmin@oem.oregon.gov no later than 15 days following the end of each calendar quarter (March, June, September and December).

Progress reporting must clearly identify the efforts associated with the approved milestones listed in the project-specific narrative progress report form.

Fiscal Report – RFR (Requests for Reimbursement)

Reimbursements will be made only for actual expenses paid by the awardee and when proper order. Awardees must use the appropriate RFR cover sheet provided by OEM to request reimbursement.

The updated HSGP Quarterly Report form meets the program and fiscal reporting requirements. If you do not spend funds during a reporting period, you do not need to submit an RFR cover sheet for that period. You do, however, need to submit a Quarterly Report and reflect fiscal information there.

All requests for reimbursement must include supporting documentation to substantiate claimed expenses. Accurate and clear expenditure information will be required before reimbursement is made. Reimbursements are made only for equipment purchased and/or services performed during the grant period. A project-specific electronic version of the RFR form that includes the approved budget will be sent to subgrantees with executed agreements.

Requests for reimbursement may be submitted as often as once a month, but no less than once a quarter, when funds have been spent.

Requests for reimbursement may be submitted via email to shspadmin@oem.oregon.gov **no later than 15 days** following the end of each calendar quarter (March, June, September and December). Reimbursements may be delayed if quarterly program narrative reports have not been submitted.

Please be clear, thoughtful, and consistent with the naming of your documents and attachments. If we must search your forms for answers, your reimbursement will be delayed.

As you upload your documents, please use descriptive names for your files to support efficient processing and review. [Item]_[County/tribe/city]_[short title]_[application#]

For example, an application could be named

“Application_GreeneCo_EOP_2.”
“NIMS_GreeneCo_EOP_2”
“EHP_GreeneCo_EOP_2”

SUSPENSION OR TERMINATION OF FUNDING

The OEM may suspend or terminate funding, in whole or in part, or impose other restrictions for any of the following reasons:

- Failing to make satisfactory progress toward the goals, objectives or strategies set forth in the project worksheet.
- Failing to follow grant agreement requirements, or standard or special conditions,
- Proposing or implementing substantial plan changes to the extent that, if originally submitted, the project would not have been selected for funding.
- Failing to submit required reports.
- Filing a false certification in this application or other report or document.

- Rescission of Federal Funding by the Federal Government.

Before taking action, the OEM will provide the subrecipient with notice of intent to impose restrictions and will make efforts to resolve concerns, according to the terms established in the award contract.

Please review the current year's U.S. Department of Homeland Security Grant Program Notice of Funding Opportunity (NOFO) with the understanding that any new terms and conditions, and assurances included in the NOFO will be included in grant contracts.

Procurement Standards

General – Agencies must follow the same policies and procedures used for procurement from non-federal funds, in accordance with the appropriate OMB Circular (OMB Circular A-110 or OMB Circular A-102).

Standards – Subrecipients must use their own procurement procedures and regulations, provided that the procurement conforms to or exceed applicable federal laws and standards.

Adequate competition – All procurement transactions, whether negotiated or competitively bid and without regard to dollar value, shall be conducted in a manner to provide maximum open and free competition.

Sole Source Procurement (Non-Competitive)

All non-state procurement transactions must be conducted in a manner that provides, to the maximum extent, practical, open and free competition. However, should a subrecipient elect to award a contract without competition, sole source justification may be necessary.

Justification must be provided to OEM for all non-competitively procured goods and services, which cost more than \$100,000. Justification should include a description of the program and what is being contracted for, an explanation of why it is necessary to contract non-competitively, time constraints, and any other pertinent information. Subrecipients must provide evidence of their due diligence and provide a local legal opinion for why the sole source procurement is justified and in accordance with local, state, and federal procurement law. *OEM will not reimburse projects that lack this documentation.*

Non-Competitive Practices

The subrecipient must be alerted to organizational conflicts of interest or non-competitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade. Contractors that develop or draft specifications, requirements, statements of work, and/or requests for proposals (RFPs) for a proposed procurement shall be excluded from bidding or submitting a proposal to compete for the award of such procurement. Any request for exemption must be submitted in writing to the Oregon Department of Emergency Management.

Purchasing under a GSA schedule

When purchasing from a GSA schedule, eligible non-state entities, that are tribal governments, local governments, and educational institutions, will satisfy the federal requirements for full and open competition provided that the GSA ordering procedures are followed. However, the eligible non-state entities will still need to follow the other federal procurement rules at [2 C.F.R. §§ 200.318 – 200.327](#), to include the socioeconomic affirmative steps, contractor oversight, cost and price analysis, and required contract provisions. For more information please visit:

<https://www.fema.gov/fact-sheet/purchasing-under-fema-award-using-gsa-schedule>

Do not expend any funds until a grant contract has been received and fully executed with signatures from OEM and your organization. Awardees may proceed with no cost actions, such as seeking bids and quotes for goods and services, before receiving an executed agreement.

Any questions regarding this document and its guidance should be directed to:

shspadmin@oem.oregon.gov

ⁱ Prohibited or Controlled Equipment Under FEMA Awards, FEMA Policy 207-22-0002

ⁱⁱ https://www.fema.gov/sites/default/files/documents/fema_policy-405-143-1-prohibition-covered-services-equipment-gpd.pdf