

FY21

Grant Program Guidance

STATE HOMELAND SECURITY GRANT PROGRAM

OREGON EMERGENCY MANAGEMENT
www.oregon.gov/OEM



Mailing address:
P.O. Box 14370
Salem, OR 97309-5062

Physical address:
3225 State Street, Rm 115
Salem, OR 97301

Applications Due:
April 18, 2021, 11:59 p.m. PDT

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INTRODUCTION

State Homeland Security Grant Program

The State Homeland Security Grant Program (SHSP) supports implementation of state homeland security strategies to address planning, organization, equipment, training, and exercise (POETE) needs to prevent, prepare for, protect against, and respond to, acts of terrorism and other catastrophic events. Use of SHSP funds must be consistent with, and supportive of, implementation of the State Homeland Security Strategy, the State Preparedness Report (SPR), State Threat and Hazard Identification and Risk Assessment (THIRA), and federal priority areas designated in the FY21 Notice of Funding Opportunity. Linkages between specific projects undertaken with SHSP funds, and state strategic goals and objectives, will be highlighted through regular recipient reporting.

Eligibility

Eligible applicants for direct awards 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.”

Eligible projects address an identified gap to prevent, prepare for, protect against, and respond to acts of terrorism or other catastrophic events, and support at least one of the state investment justifications.

Law Enforcement Terrorism Prevention-Oriented Activities

At least 25 percent of SHSP funds must be support law enforcement terrorism prevention activities (LETPA) linked to one or more core capabilities within the National Preparedness Goal.

Citizen Corps Program

Although the Citizen Corps Program is no longer a separate grant program, it may be supported through SHSP. The Citizen Corps Program mission is to bring community and government leaders together to coordinate the involvement of community members in emergency preparedness, planning, mitigation, response, and recovery.

AVAILABLE FUNDING

Funding Distribution

The State Administrative Agency (SAA) must obligate at least 80 percent of funds awarded to local units of government and may retain up to 20 percent of funds awarded. These funds will be distributed through a hybrid allocation model: a formula-based allocation (formula allocation) and a competitive application process (competitive awards). For FY21, SHSP funding will be allocated as follows:

- Total FY21 SHSP award: \$4,602,500.00
- Total formula allocations to counties and tribes: \$2,286,666.66
- Total competitive awards: \$1,395,333.34, plus formula allocations declined by counties and tribes

- Total retained by OEM (the SAA): \$920,500.00

Competitive Grants and the Review Committee

The grant review committee will be selected each year through an application process. The committee will be made of not more than 18 individuals select to represent the various geographic, disciplines and demographics of the applicant jurisdictions. The group will conduct a comprehensive, fair, and impartial evaluation of the responses received to this solicitation, and create a ranked list of projects.

The grant review committee's recommendations will be submitted to the Director of the Office of Emergency Management for approval. The final ranked approved list will then be used once final funding levels are known. Applicants will receive notification of approved funding on or before July 1, 2021. A project which has a funding recommendation amount on ranked list, is NOT a guarantee of funding approval. DO NOT proceed with no cost actions until a notification letter is received. DO NOT obligate any funding until a grant agreement has been received.

Funding decisions will be based on:

1. Overall response to the Project Worksheet. Specifically, a project with a clearly identified gap and solution that aligns with the State's Strategy, State's Preparedness Report, State THIRA and projects identified within the State's Investment Justifications.
2. How well the Project Worksheet supports the project and demonstrated need for the request.
3. Impact the project has on the community.
4. Whether proposed projects are able to be implemented within the grant award period.
5. Whether projects will be sustained after grant funding expires.
6. Support for the Cascadia Rising 2022 exercise.

State Administrative Agency (SAA) funds

The State may retain more than 20 percent of SHSP funding if expenditures made by the State are on behalf of the local unit of government. This may occur only with the written consent of the local unit of government, specifying the amount of funds to be retained and the intended use of funds. Four projects have been managed by the State for local benefit in previous grant cycles:

1. Statewide Ops Center systems maintenance
2. Statewide continuity of operations software maintenance
3. Statewide publications
4. Oregon Prepared annual workshop

Duration of Funding

Successful applicants typically are awarded grants for a period of approximately 12 to 24 months, depending on project milestones. Grant periods of performance will begin October 1, 2021. Projects must be completed by September 30, 2023.

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. Quarterly reports describing activities that resulted in eligible expenses must be submitted with requests for reimbursement. All requests for reimbursement and quarterly reports must be submitted to OEM by June 30, 2024, for this grant cycle. Quarterly report and request for reimbursement forms will be provided by OEM to subrecipients upon execution of grant agreements.

STATE FUNDING PRIORITIES

Projects must implement at least one of the State's seven investment justifications. State investment justifications are based upon the State THIRA, the State SPR and the State Homeland Security Strategy. Copies of the State's Investment Justifications and supporting documents are available at

<http://www.oregon.gov/OEM/emresources/Grants/Pages/HSGP.aspx>

State Investment Justifications

1. Planning
2. Communications
3. Chemical, Biological, Radiological, Nuclear and high-yield Explosives (CBRNE) Detection and Response
4. Community Resilience
5. Emergency Operation Centers
6. Mass Care and Mass Casualty
7. Cybersecurity Investment

Formula allocation and competitive award applicants are encouraged 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.

FEDERAL FUNDING PRIORITIES

For 2021, DHS/FEMA has identified five priority areas that must be addressed by the State to receive the full grant award listed in the NOFO:

- Enhancing cybersecurity (7.5 percent)
- Enhancing the protection of soft targets/crowded places (5 percent)
- Enhancing information and intelligence sharing and analysis, and cooperation with federal agencies, including DHS (5 percent)
- Combating domestic violent extremism (7.5 percent)
- Addressing emergent threats (5 percent)

See the FY21 NOFO for more information about the federal priority areas:

https://www.fema.gov/sites/default/files/documents/FEMA_FY2021-HSGP-NOFO_02-19-21.pdf.

Applicants are encouraged but not required to submit projects that address the priority areas. Competitive award applications that address the federal priority areas will be given priority.

APPLICANT REQUIREMENTS

National Incident Management System (NIMS)

To be eligible to receive FY21 Homeland Security Grant Program (HSGP) funding, applicants must have met all FY20 compliance requirements. The State reserves the right to determine NIMS compliancy requirements of Oregon's participating jurisdictions.

NIMS Typing Reporting Requirements: SHSP grantees must report all HSGP-funded equipment or credentialing and training that were purchased to support NIMS-typed resources along with the NIMS-typed resource it supports. NIMS-typed resources should be reported on the quarterly progress report form. The resources should be reported only after equipment is delivered, or after credentialing/training has occurred, and the corresponding grant funds have been expended. The State will submit reports biannually as an attachment to the performance report in the Federal Non-Disaster (ND) Grants system.

Subrecipients must identify the specific resources; capability supported, and whether it is a Tier I or Tier II NIMS-typed resource; the cost; and whether the resource sustains current capabilities or adds new capabilities. The description and listing of Tier I NIMS-typed resources can be found in individual documents under Resource Typing Definitions located at: <https://rtlt.preptoolkit.org/Public> . This information needs to be described in your project details on the Project Application Form.

On the Project application Form, Section 4: Projects Details, "List equipment or product purchased through this project" each NIMS-typed resource should list equipment and training on separate lines and include the total amount of grant dollars expended for equipment or training that supports the NIMS-typed resources. This should also be reported on the Required Budget Form. The equipment purchased column on the budget form should include all equipment purchased with grant funds to support that NIMS-typed resource. If grant funds have supported both equipment and training for the same NIMS-typed resource, make note of this in the project description on your application so NIMS-typed resources are not double counted.

For additional information on NIMS requirements, please contact the State NIMS point of contact:

Vacant – please contact the Operations and Preparedness Section Manager
Traci Naile, Manager
Operations and Preparedness Section
Oregon Office of Emergency Management
503-378-4025
traci.naile@state.or.us

Match Requirement

The federal government does not require a match for State Homeland Security Program projects. The State of Oregon, however, does require a **10 percent match for end-user**

communication units included in projects submitted under the Communications Investment Justification.

Funds from Homeland Security Grant Program awards may not be used as matching funds for any other grants.

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.

Applications

Applications will be submitted online through an online application. The application is available <https://www.oregon.gov/oem/emresources/Grants/Pages/HSGP.aspx>. Completed applications must be submitted no later than **April 18, 2021, 11:59 p.m. PDT.**

PROGRAM INFORMATION

Cascadia Rising 2022

The Cascadia Rising 2022 exercise is a priority for FY21 SHSP funds. Projects related to the exercise will receive a 10-point bonus during competitive award review. The deadline to submit extent of play agreements for this exercise was Feb. 26, 2021. Status of extent of play agreements will be verified during grant application review.

Planning

FY21 SHSP funds may be used for a range of emergency preparedness and management planning activities and that support Performance Objectives One (Threat and Hazard Identification and Risk Assessment (THIRA)) and Two (Planning), by placing an emphasis on updating and maintaining a current Emergency Operations Plan (EOP) that conforms to the guidelines outlined in Comprehensive Preparedness Guide (CPG) 101 v.2.

Planning efforts can also include the prioritizing of needs, building capabilities, updating preparedness strategies, allocating resources, assessing deficiencies, developing Citizen Corps initiatives, developing community resilience plans, and delivering preparedness programs across disciplines (e.g., Tribal governments, law enforcement, fire, EMS, health care systems, public health, behavioral health, public works, rural water associations, agriculture, information technology, and the general public, including people with disabilities) and levels of government.

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 critical perspectives and may have a role in executing the plan. Planning should be flexible enough to address incidents of varying types and magnitudes.

Planning activities should focus on the four homeland security mission areas of prevent, prepare for, protect against, and respond. HSGP funds should also be leveraged to integrate specialized programs, such as the Regional Catastrophic Preparedness Grant Program and

the Voluntary Private Sector Preparedness Accreditation and Certification Program (PS-Prep™), into the overall framework at the State and Urban Area level. Grantees must use the *CPG 101v.2: Developing and Maintaining State, Territorial, Tribal, and Local Government Emergency Plans*, in order to develop robust and effective plans. For additional information, please see http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf.

Agencies receiving SHSP funds to create a plan (EOP, annex, SOP, etc.) must validate the plan through no less than a table top level exercise. The exercise must be conducted within the performance period of the grant, facilitated and documented using the HSEEP process, and the After Action Report and Improvement Plan submitted to the State Exercise Officer. Agencies must provide information in the project narrative and milestones indicating the scale and schedule of the exercise. If the agency chooses, they may request SHSP funds to support the exercise. These funds would be directly awarded to the agency. Questions regarding planning exercise requirements should be directed to the State Exercise Officer:

Amanda Mathis, State Exercise Officer
Operations and Preparedness Section
Oregon Office of Emergency Management
503-378-2201
amanda.mathis@state.or.us

Training and Exercise

Grantees must develop long-term training and exercise priorities that examine, validate, and/or address the capability gaps identified through the State's annual THIRA and SPR by developing a multi-year Training and Exercise Plan (TEP).

Training

Allowable training-related costs under SHSP include the development, support, conduct, and attendance of training approved by FEMA and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS and DOT), or in line with the current State Homeland Security Strategy.

Training conducted using SHSP funds must address performance shortfalls identified through an After Action Report/Improvement Plan (AAR/IP) or other assessments (e.g., National Emergency Communications Plan [NECP] Goal Assessments; conducting a Readiness: Training Identification Preparedness Planning process is highly recommended), and contribute to building a capability that will be evaluated through a formal exercise.

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. Additionally, the training development must follow the "*Developing Training Utilizing SHSP Funds*" policy found on the OEM Web site at:

<http://www.oregon.gov/oem/emresources/Pages/Training.aspx>, and be coordinated through the State Training Officer to ensure all State and Federal requirements are met.

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

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.)
- Training that promotes individual, family, or community safety and preparedness.
- Developing conducting, hosting, or participating in training related to terrorism or catastrophic event preparedness, prevention, mitigation, response and recovery.
- Overtime and backfill.
- Travel costs (e.g., airfare, mileage, per diem, hotel).
- Hiring of full or part-time staff or contractors/consultants.
- Training for the public or civilian volunteer programs.

Training requests that only identify overtime and backfill have not traditionally been supported by the Grant Review Committee. While overtime and backfill are eligible expenses, a training request which is only for overtime and backfill would require a strong description of the newly identified need, and a realistic sustainment plan for the future to receive grant funding.

Overtime and/or backfill for first responders or other agency staff to teach Citizen Corps or community trainings is not an allowable expense.

All training requests funded with State Homeland Security Program grant funds must be coordinated directly through the State Training Officer. Applicants MUST verify with the State Training Officer that all training is allowable prior to submission of the State Homeland Security Program grant application.

Karen Layng, State Training Officer
Operations and Preparedness Section
Oregon Office of Emergency Management
503-378-3231
karen.layng@state.or.us

Exercise

All grantees will develop and maintain a progressive exercise program consistent with the Homeland Security Exercise and Evaluation Program (HSEEP).

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 taking into account 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.

Allowable exercise-related costs include:

- Funds used to design, develop, conduct, and evaluate an exercise.
- Full or part-time staff may be hired to support exercise-related activities.
 - Grantees must follow their jurisdiction's formal written procurement policies.
- Overtime and backfill.
- Travel costs.

- Supply items that are expended or consumed during the course of the planning and conducting of the exercise project(s).
- Disability accommodations: materials, services, tools and equipment for exercising inclusion of people with disabilities (physical, programmatic, and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities).
- Other eligible 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, adults with disabilities, and those with access or functional needs

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) **The only vehicle costs that are reimbursable are fuel/gasoline and mileage**
- 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 State THIRA and SPR.** 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 and disciplines and non-governmental organizations, and take into account the needs and requirements for individuals with disabilities. Exercise scenarios should align with priorities and capabilities identified in the *Multi-year Training and Exercise Plan*.
- **Special Event Planning:** Special event planning should be considered as a training or exercise activity for the purpose of the *Multi-Year Training and Exercise Plan*.
- **Exercise Evaluation and Improvement:** Exercises should evaluate performance of capabilities against the level of capabilities required.
- Exercise requests that only identify overtime and backfill have not traditionally been supported by the Grant Review Committee. While personnel overtime and backfill are eligible expenses, an exercise request which is only for overtime and backfill would require a strong description of the newly identified need, and a realistic sustainment plan for the future to receive grant funding.

For additional assistance with exercise requirements contact:

Amanda Mathis, State Exercise Officer
 Operations and Preparedness Section
 Oregon Office of Emergency Management
 503-378-2201
amanda.mathis@state.or.us

Reporting for Training and Exercise

- Following the Training and Exercise Planning Workshop (TEPW), all grantees and sub-grantees are required to develop a multi-year training and exercise plan that identifies

combination of exercises, along with associated training requirements, that address the priorities identified in the TEPW. The training and exercise plan shall be submitted to the State Exercise Officer no later than **June 1, 2021**.

- Grantees must submit individual AAR/IPs for each HSGP-funded exercise. AAR/IPs must be submitted to Oregon Office of Emergency Management, and include a list of corrective actions and lessons learned, no later than **60 days** after completion of the exercise. In accordance with HSEEP guidance, grantees are reminded of the importance of implementing corrective actions iteratively throughout the progressive exercise cycle.

Equipment

Funds for equipment must be used to enhance the capabilities of state and local emergency response agencies. Equipment requests must include a plan for sustainment. Local units of government may acquire advanced levels of responder equipment from 21 authorized equipment categories. The Authorized Equipment List and additional information on allowable equipment is provided at <https://www.fema.gov/authorized-equipment-list>.

SHSP Equipment Categories

1. Personal Protective Equipment (PPE)*
2. Explosive Device Mitigation and Remediation Equipment
3. CBRNE Operational and Search and Rescue Equipment*
4. Information Technology*
5. Cyber Security Enhancement Equipment
6. Interoperable Communications Equipment*
7. Detection Equipment
8. Decontamination Equipment
9. Medical Supplies and Limited Pharmaceuticals* / **
10. Power Equipment*
11. CBRNE Reference Materials
12. CBRNE Incident Response Vehicles
13. Terrorism Incident Prevention Equipment
14. Physical Security Enhancement Equipment
15. Inspection and Screening Systems
16. Agricultural Terrorism Prevention, Response, and Mitigation Equipment**
17. CBRNE Response Watercraft
18. CBRNE Aviation Equipment
19. CBRNE Logistical Support Equipment*
20. Intervention Equipment
21. Other Authorized Equipment* / ***

* Citizen Corps Allowable

** Not allowable for law enforcement

*** Items not identified on the Authorized Equipment List (AEL) must receive prior approval before applications are submitted.

Grantees that are using FY21 SHSP funds to support emergency communications activities must comply with the FY21 SAFECOM Guidance for Emergency Communication Grants, including provisions on technical standards that ensure and enhance interoperable communications, which can be found at <https://www.cisa.gov/publication/emergency-communications-grant-guidance-documents>

Emergency communications activities include the purchase of Interoperable Communications Equipment and technologies such as Voice-Over-Internet Protocol (VOIP) bridging or gateway devices.

Restrictions on Covered Telecommunications Equipment or Services

See the page 33 of the FY21 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 highly encouraged to participate in the scheduled grant workshops or contact OEM for technical support prior to submitting their application.

Controlled Equipment – Small Unmanned Aircraft Systems (sUAS)

sUAS are controlled equipment, which require additional federal approval prior to award. Jurisdictions applying to purchase sUAS must include, with the application, the following information:

- sUAS Policy statement which includes
 - what is being used

- preservation of citizen privacy
- preservation of civil rights and civil liberties
- accountability
- transparency
- Complete sUAS policy document. Policy should include
 - Review of policy at least every 3 years, if not annually
 - How collection of information is done in accordance with an authorized purpose
 - PII not being retained for more than 180 days unless necessary to an authorized mission of the agency
 - Only disseminating information in accordance with all legal and agency requirements
 - Accountability of UAS actions and operation
 - A complaints process for members of the public
 - Transparency of operations, to include public annual reporting and public notice of operations when appropriate
 - First Amendment and civil rights/civil liberties protections
 - Specifically ensuring that policies are in place to prohibit the collection, use, retention, or dissemination of data in any manner that would violate the First Amendment or in any manner that would discriminate against persons based upon their ethnicity, race, gender, national origin, religion, sexual orientation, or gender identity, in violation of law
 - Responses for data sharing/dissemination and operational assistance to other agencies
- Itemized quote
- Statement that operations are performed under Section 333 of Certificate of Authorization
- sUAS request letter to FEMA which includes
 - The need for the aircraft
 - How the requested platform best meets the need compared to another platform
 - How the requested aircraft fits into the State's integrated operational plans
 - Types of terrorism incident response and prevention equipment the aircraft will be outfitted with (e.g. FLIR)
 - How the aircraft will be used operationally and which response assets will be deployed using the requested aircraft
 - How the aircraft will be utilized on a regular, non-terrorist related basis

Equipment for Citizen Preparedness

Any equipment purchased with SHSP funding in support of CERT must be used for specific preparedness, volunteer training, and/or by volunteers in carrying out their response functions. CERT equipment 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 includes such items as burn pans or volunteer response kits.

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.

Unallowable 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 squads
- Equipment and software intended for general use or equipment already required by virtue of the occupation (i.e. bulletproof vests for law enforcement, turnout gear for fire)
- Equipment not supported or well documented in the Project Worksheet
- Land acquisition
- General-use software, general use computers and related equipment
- Weapons and ammunition
- 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

Personnel

Program funds may be used to support the hiring of full or part-time personnel to conduct program activities that are allowable under the FY21 HSGP (i.e. planning, training program management, exercise program management, etc.).

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 (50%) of SHSP funding without time limitation placed on the period of time that such personnel can serve under the grant.

In general, the use of HSGP 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 (50%) 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 deliverable of plan documents, training courses, and or exercise development and support are not considered personnel.

Management and Administration (M&A) and Indirect Costs

Sub recipients may also 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. In accordance with 2 CFR 200.414 indirect charges will be allowable for all eligible expenditures within eligible projects. To be eligible for indirect costs, the sub-recipient must include indirect costs in the application package. Indirect costs are not allowable on projects which are equipment purchases only.

Recipients or subrecipients may apply or credit M&A funding toward the recipient's requirement to allocate funding toward the five National Priority Areas. For example, if a recipient spends \$5,000 to manage or administer its funding dedicated toward its enhancing cybersecurity investment, the recipient may credit that funding toward its requirement to allocate at least 7.5 percent of its award to the enhancing cybersecurity National Priority Area

For assistance with indirect cost questions, please contact the Grant Accountant directly:

Carolyn Gresham, HSGP Accountant
Oregon Office of Emergency Management
503-378-3256
Carolyn.gresham@state.or.us

Community Preparedness and CERT

All grant recipients supporting CERT volunteer programs must register their Council on the CERT website (<https://community.fema.gov/Register/>). Recipients are required to manage their program and contact information located on the site. Interested parties must coordinate with the State CERT point-of-contact at OEM to ensure their CERT program is registered.

Community Preparedness funds may be used to support the capitalization on 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 on CERT requirements, please contact the State CERT Program Coordinator:

Erik Rau, Emergency Management Planner
Operations and Preparedness Section
Oregon Office of Emergency Management
503.373.7766
erik.rau@mil.state.or.us

REPORTING AND REIMBURSEMENTS

Program Narrative Reports/Progress Reports

Applicants will be required to submit progress reports: quarterly narrative progress reports that contain specific information regarding the activities carried out under the FY21 Homeland

Security Grant Program. An electronic version of the project specific quarterly narrative progress report which includes the approved milestones will be sent to subrecipients with executed agreements. Narrative progressive reports must be submitted electronically to shspadmin@oem.state.or.us no later than 15 days following the end of each calendar quarter (March, June, September and December)

- **Progress reporting must clearly identify efforts associated with the approved milestones from the application.**

Requests for Reimbursement (Fiscal Report)

Reimbursements will only be made for actual expenses. Requests for Reimbursements (RFR) **must** be submitted quarterly but may be submitted as often as monthly. If you have no reimbursement needs, RFRs are still required to be submitted. In this case, indicate a zero need or indicate the project is completed. 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 which includes the approved budget will be sent to subgrantees with the executed agreement. RFRs may be submitted electronically to shspadmin@oem.state.or.us or by mail to **PO Box 14370, Salem, OR 97309-5062** no later than 15 days following the end of each calendar quarter (March, June, September and December). Reimbursements may be delayed if any program narrative reports are outstanding.

Note: A Request for Reimbursement (RFR) is due every quarter even if there were no expenses incurred during the quarter. A “Zero RFR” is required that reflects no expenses incurred and no funds requested during the reporting period. Quarterly Reports must be submitted with RFRs.

SUSPENSION OR TERMINATION OF FUNDING

The Oregon Office of Emergency Management may suspend or terminate funding, in whole or in part, or impose other measures 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

Before taking action, the Oregon Office of Emergency Management will provide the subrecipient with reasonable notice of intent to impose measures and will make efforts to resolve the problem informally.

AWARD ADMINISTRATION INFORMATION

For required assurances, please review the U.S. Department of Homeland Security Fiscal Year 2021 Homeland Security Grant Program Notice of Funding Opportunity (NOFO) with the

understanding that any new assurances included in the Fiscal Year 2021 Homeland Security Grant Program NOFO will be included in the subrecipient agreement.

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 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 so as 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 sub-recipient elect to award a contract without competition, sole source justification may be necessary. Justification must be provided for non-competitive procurement and 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 obtain prior written approval from Oregon Office of Emergency Management for any sole source procurements in excess of \$100,000. The sole source procurement approval form is available from OEM upon request.

Justification for Sole Source Procurement

The following outline provides the recommended format for sub-recipients to use when pursuing sole source procurement.

Paragraph 1:

- A brief description of the program and what is being contracted

Paragraph 2:

Explanation of why a non-competitive contract is necessary, to include the following:

- Expertise of the contractor
- Management
- Responsiveness
- Knowledge of the program
- Experience of personnel

Paragraph 3:

- Time Contracts
- When contractual coverage is required and why
- Impact on program if dates are not met
- How long would it take another contractor to reach the same level of competence? (equate to dollars if desired)

Paragraph 4:

- Uniqueness of the vendor, product, services to be procured, or work to be performed

Paragraph 5:

- Other points that should be covered to make a convincing case

Paragraph 6:

- A declaration of how this action is in the best interest of the agency

Non-Competitive Practices

The sub-recipient must be alert 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 Oregon Office of Emergency Management.

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

Kevin Jeffries, Grants Coordinator
Operations and Preparedness Section
Oregon Office of Emergency Management
503-378-3661
kevin.jeffries@state.or.us

or

Traci Naile, Manager
Operations and Preparedness Section
Oregon Office of Emergency Management
503-378-4025
traci.naile@state.or.us