

**State of Maine  
EMPG Local and Partner Capacity Grants  
Guidance  
FFY 2009**

**Objective: Increase EMA Capacity**

**Changes for 2009:**

- Per new guidance from FEMA, the way volunteer and unpaid hours are calculated has been revised:
  - A local EMA Director's time above that paid for by his/her stipend, can be considered unpaid time eligible as match (see below for details)
  - The time spent on EMA activities by a salaried employee who has EMA responsibilities as an unpaid extra task, can be considered as in-kind match, subject to certain restrictions (see below)
- Some EOC, JIC and Citizen Corps supplies and equipment may be eligible for funding, with cash match and subject to review by State program managers, and interaction with other grant programs

**Overview:**

Funds are available as of October 1, 2009 and must be spent by September 30, 2011. Allocations for each county will be a base amount plus an amount proportional to each County's population (40%), land area (20%) and number of towns (40%). (Allocations per county will be published separately. Other State agencies and non-profits will also be eligible for projects which further a Maine emergency management objective.

Funds must be used to support activities and projects that improve local and partner EMA programs. Support can be **direct** or **indirect**: **Direct** support can be financial reimbursement to a community or partner, or a purchase that directly benefits a community. **Indirect** support is a program or activity at the county level that provides a discernable benefit (planning, training, etc.) to the local level or county-wide. A program can be a mix of direct and indirectly supported activities. County EMAs may also partner with eligible non-profits for eligible projects.

**Each county will oversee its own local and partner programs.** Record-keeping will be standard and as straightforward as possible, and combined with normal EMPG administration as much as possible. The County will be responsible for record-keeping, and submission of invoices to MEMA; MEMA will provide any necessary forms.

MEMA will oversee statewide State agency or partner projects.

All applicants must be able to advance funds to cover expenditures, and receive reimbursement.

*Eligible activities:*

- Planning, training and exercise activities eligible under the EMPG program guidance as published by FEMA and further refined for this program (see Eligible Costs guidance).

*Eligible match:*

1. Cash Match
  - a. Local EMA contributions and stipends (see additional information below),
  - b. Cash contribution from applicant for eligible projects or programs
2. In-Kind Match
  - a. Volunteer or other unpaid time (based on standard rate) for eligible activities (meetings, workshops, deliverables etc.). The per hour rate for volunteer or unpaid time in the State of Maine will be **\$16.43** for 2009 (extrapolated from Independent Sector annual figures.). Types of hours eligible are:
    - i. Traditional volunteer hours of individual such as CERT team members, community organizers and volunteers, etc.
    - ii. Hours spent by unpaid EMA director who is not a town employee and does not receive a personal stipend
    - iii. Hours spent by EMA Director over and above any stipend he or she may receive in lieu of salary, and who is not on salary in another capacity in town government.
  - b. Services, facilities or supplies donated by a partner agency.
  - c. Value of time (and benefits) spent on EMA of an otherwise salaried individual (town manager, police chief, etc.) who is also an appointed EMA Director
    - i. *Salary must not be derived from federal funding.*
    - ii. *Must have a documented letter, memo, etc. from the jurisdiction specifying percent of time spent on EMA OR actual time sheet specifying hours spent on EMA.*
    - iii. *If the salaried individual receives an additional stipend as EMA Director, this amount must be deducted from the value of the individual's in-kind services*
    - iv. *In some cases, the EMA portion of salary/benefits may be declared as cash match. MEMA will offer technical assistance to work out which approach (designating as cash or in-kind) is more beneficial to the applicant.*
  - d. Value of time (and benefits) spent on EMA activities by any other town or county employee who does not work for EMA, and does not receive federal funding. (Example, town or county employees receiving ICS or other EMA training, or otherwise participating in the EMA program.)

**General Process:**

Counties, locals or other eligible applicants will project what they expect to achieve, and how they expect to use those funds to support that outcome. Applicants will include this information in an initial submission which contains:

- Narrative describing projected activities
- Budget and identification of match

Once this is approved, they will report and bill regularly, (at least quarterly; not more than monthly). Counties will include a summary of outcomes in their final report for the year. MEMA will collect and summarize reports from state-level applicants.

**MEMA will:**

- Calculate allocation amounts for each County
- Provide guidance and forms for record-keeping
- Provide technical assistance in developing budgets and plans
- Approve plans for implementation
- Issue formal award letter
- Reimburse billings
- For local grants, reimburse directly to the local community if requested

**County EMAs will:**

- Develop plan(s) for implementation with locals
- Facilitate technical assistance from MEMA as needed
- Include as part of Annual Submission narrative OR provide update to current Work Plan
- Include billing as part of quarterly billing OR as needed, but no more than monthly
- Include these activities in quarterly and final reports

**Other Eligible Applicants (State and Partner Agencies) will:**

- Develop implementation plan and budget
- Once project is approved, keep all records required by the grant
- Submit bills, not more than monthly
- Submit a short quarterly report on progress to County EMA or MEMA, as appropriate

**Budgeting Projects and Calculating Eligible Match:**

On the County level:

1. Determine county-wide annual total of current town investment in emergency management (e.g., eligible stipends to directors, local budget for programs, etc.)
2. Determine county-wide annual value of volunteer or other unpaid time currently being routinely spent (for example, participant staff hours spent at regular local directors meetings, CERT training and meetings, etc)
3. Determine the value of any donated space, material or supplies at the county or LEPC level.

On the Town level:

1. Determine annual total of current town investment in emergency management (e.g., eligible stipend to directors, local budget for programs, etc.)
2. Determine annual value of volunteer or other unpaid time currently being routinely spent (for example, staff hours spent at regular meetings, etc)
3. Determine the value of any donated space, materials or supplies.

These two steps give you a general sense of what you have right now as available cash and in-kind match.

Specific projects or activities might generate more match in the course of carrying them out. If you will be having additional planning meetings, tabletop exercises, working groups, etc., these would include more people and therefore more volunteer hours. The volunteer time for this activity should only apply to this activity.

Remember: **This is a reimbursement program.** Even if, with cash outlay and in-kind match, you will end up getting all your money back, **you still need to budget for the cash outlay.**

Hint #1: Think of volunteer or unpaid hours as part of the total cost of the project or program. "Time is money".

Hint #2: Avoid "double-dipping" volunteer/unpaid time. Time spent on one project cannot be used on another.

Hint #3: You can think of an entire year's program as your "project" and budget out the reimbursement you might be eligible for.

### **Questions and Answers:**

***Can we just match the town's contributions? If they pay a \$500 stipend can we just pass through \$500 in EMPG to the town?***

In theory, yes. However, you need to think of this as now being a \$1,000 program, and the town will have to demonstrate it is going to do more to justify the additional money. In addition, the town will have to budget \$1,000 and advance that much in expenses paid, in order to be reimbursed \$500. We would also need to see reflected in a work plan what improved capacity is expected for this investment.

If the town is not going to do more, but simply do what it does every year, you could apply to obtain reimbursement for \$250. In this case we would ask you to document the regular program.

Remember, however, that with this scenario, the programs that have no support will still have no support.

***Can't I just pay people for their time? If their time is worth \$16.43, can I just pay them a stipend of \$8.21 per hour?***

No.

EMPG guidance allows personnel costs that are an integral part of a program. You could hire a part-time person, or a contractor, to coordinate planning, training and exercise activities. HOWEVER, this should be in accordance with the County or town's hiring or contracting practices.

If you pay someone to carry out an activity, then he or she is a contractor, cannot be considered a volunteer, and the hourly value of his or her time cannot be used as match.

***I want to pay the expenses of EMA directors for the time they spend coming to meetings. Can I just do that?***

Think of your series of EMA meetings through the year as a specific project or activity. You may be able to justify reimbursing mileage, for example, or otherwise covering expenses.

You will need to identify what outcomes you achieve as result of these meetings. Also consider the precedent you will be setting, and that these funds may not be available in ensuing years.

***Are EOC equipment and supplies eligible under EMPG?***

EOC equipment and supplies will be eligible this year under certain conditions. This will include review by MEMA program managers, and will include cash match for larger items (electronics, for example). Equipment and supplies of any kind may be eligible as required to accomplish other planning, training or exercise activities. Please refer to the “Eligible Costs” document to determine what equipment or supplies might be eligible in connection with potential projects, and talk with MEMA about your specific case.

***Can MEMA reimburse through other than normal EMPG channels? It will be necessary for a number of counties to be able to separate the reimbursements so they can pass the money to the local level.***

MEMA can reimburse under separate cover from regular County reimbursement, so that funds can be tracked and managed separately.

MEMA will provide an EMPG Local Grant cover sheet so that submissions are clearly separate from regular County EMPG reimbursement. County EMAs will be responsible for working with their own finance people on internal procedures. The Senior Contracts and Grants Specialist (Ron Looman) is available to assist with any questions, or to help educate finance people. Specific questions and concerns about how the reimbursement will be managed should be addressed to him.

***Can MEMA reimburse more often than quarterly?***

MEMA can reimburse more often than quarterly, but requests that deviations from quarterly be requested no more than monthly as a general rule.

Counties or other applicants are also requested to contact the MEMA Business Office to let them know if they expect to submit billings more often than quarterly.

***What is the status of county or town employees receiving training or participating in planning, and for hours spent in NIMS training? Are they regarded as volunteers?***

The time of these individual can be used as “in-kind match”

EMPG allows the category of “in-kind” match, meaning services or support funded by another entity. So, if the County Clerk was taking EOC or NIMS training, or participating in an exercise or in planning, his or her time is "in-kind" match. This would be the same for any County or town employee, including those who have NIMS training as a job requirement, **as long as his or her salary is not federally funded**. Therefore:

The time of non-EMA County or town employees spent on EMA planning, exercise or training, including NIMS training, is "in-kind employee time". Their actual salaries plus benefits should be used for record-keeping and billing purposes.

(The volunteer rate could be used, but the actual salary rate plus benefits is likely higher, and thus will generate more match. )

***Can towns be reimbursed by MEMA directly once their projects, budgets and billing have been approved by the County?***

Yes. The county must submit the town’s initial project proposal and budget, and then review and submit their bills to MEMA for reimbursement. The county should include with the bills a written request to reimburse the town directly.

*MEMA also advises that any request for a non-standard reimbursement (such as to a different County account, etc.) be submitted in writing with the billing.*

***Can towns be full applicants under EMPG if they submit the same paperwork that counties do?***

No. If towns have eligible projects and match for EMPG, they will need to apply through the County EMA office, using the forms and guidance provided. Counties will submit the projects and budgets to MEMA, and will also collect, review and transmit town quarterly billings to MEMA.

As noted above, reimbursements can go directly to the town, if that is easier on county budget procedures.

***Will towns have to be NIMS compliant to qualify for EMPG funds?***

Yes. Towns wishing to be funded for an eligible project will be subject the same rules on NIMS compliance that govern the Homeland Security Grant Program (see Maine’s current NIMS policy).

Since all Counties are NIMS-compliant, a County EMA also has the option of proposing a county-level project aimed at assisting individual communities in achieving NIMS compliance, using town EMA budgets or stipends as in-kind match.

***Can LEPC funds be used as matching funds?***

No. The entire amount of funds that the SERC collects are being matched with EMPG at the State level. Since LEPC funds come out of this pool, they cannot be matched again at the county level.

The time put in by LEPC members is eligible as volunteer time for a related project.

***What kind of documentation will be needed to verify the contribution of in-kind facilities, supplies, time, etc., and unpaid hours?***

*Facilities:* You will need documentation of the rate that is usually charged for that facility, and that it was donated to you. Meeting room space that is normally free does NOT qualify as in-kind match.

*Supplies:* You will need documentation of the price of those supplies, and that it was donated to you (for example, if the town lets you have three reams of paper, an invoice showing the cost of the paper)

*Time:* Payroll records documenting the salary and benefits of the individual.

*Unpaid/Volunteer Hours:* Sign-in rosters, including date, time, length of meeting or training, and signatures of those attending.

NOTE: Rules on unreimbursed mileage, and how to handle that as in-kind match, are being determined at this time.

When estimating a budget that includes in-kind match or unpaid hours, be conservative.

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