



# CCEMA Preparedness Grants Guidebook

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## **Purpose & Overview**

The purpose of this guidebook is to provide financial and grants management guidance for the sub-recipients of federal preparedness grants administered by the Cumberland County Emergency Management Agency. This guidebook was created in accordance with requirements set forth by the designated State Administrative Agency, the Maine Emergency Management Agency (MEMA). This guidebook encompasses the Homeland Security Grant Program (HSGP) (sub-recipients receive this funding through the State Homeland Security Program (SHSP)), and the Emergency Management Performance Grant (EMPG).

### **Overview of the Homeland Security Grant Program**

The HSGP assists state, local, tribal, and territorial efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare for, protect against, and respond to acts of terrorism.

Each year, a Notice of Funding Opportunity (NOFO) is published by FEMA. The NOFO contains specific grant guidance and outlines any federal priorities for investments. The date of the NOFO release varies each year. The performance period for the HSGP is generally three years. The HSGP requires that 25% of the grant support projects and activities that support law enforcement and terrorism prevention programs. The NOFO will also provide Maine's state allocation (the dollar amount awarded to the State of Maine to distribute to counties and municipalities), which will be awarded to MEMA acting as the State Administrative Agency for the grant.

In Cumberland County, the majority of these funds are available for eligible applicants to submit project applications. Once the federal NOFO is released, MEMA develops state-specific grant guidance, application documents, and provides allocations for each county and Metro. In Cumberland County, eligible applicants for the HSGP include: NIMS-compliant municipalities (1), regional response teams, County Government, and other eligible organizations listed in the NOFO. MEMA has designated Portland and South Portland as "Metro" communities, which receive separate funding directly from the state. Therefore, Metro's are not eligible to apply for HSGP funding through CCEMA.

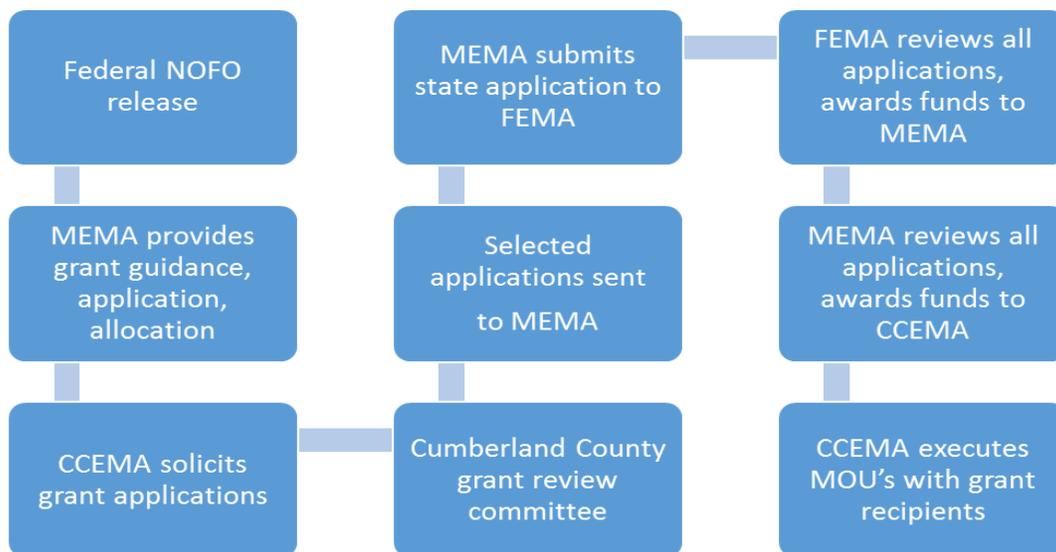
Typically, the funds requested in Cumberland County to support HSGP projects exceeds the funding available for projects. Competitive projects are multi-jurisdictional, multi-disciplinary, and have a strong nexus to terrorism and homeland security priorities.

Once CCEMA receives applications from eligible organizations, it conducts a comprehensive review for completion, clarity and adherence to grant and federal guidance. Applications that meet these requirements are forwarded to a grant review committee for discussion and scoring. This grant review committee is comprised of community partners, and is facilitated by CCEMA. The grant review committee will score and rank projects. CCEMA uses this list of ranked projects to draft and submit an HSGP application to MEMA. MEMA will use applications from Counties and Metros to develop a state application to submit to FEMA. If FEMA approves the state application for HSGP funding, it will then issue a State Award to MEMA. MEMA will act as the pass-through agency, and execute MOU's with Counties. Cumberland County will then execute MOU's with the sub recipients that were selected to receive HSGP funding. The HSGP award process is outlined in Figure 1.

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1 MEMA requires that the Counties and municipalities report NIMS compliance by September 30 annually. The NIMS report provides grant eligibility for the upcoming Federal Fiscal Year (October 1 - September 30 of the next calendar year).

**Figure 1: HSGP Award Process**



**Overview of the Emergency Management Performance Grant**

The EMPG provides federal funding to state, local, tribal and territorial emergency management agencies to implement the National Preparedness System and the National Preparedness Goal of a secure and resilient Nation. EMPG applicants develop and submit a Work Plan in order to receive grant funding.

In Cumberland County, EMPG funds are used to staff the CCEMA office in order to deliver resources and services to municipalities. A portion of EMPG funding is used to support Hazmat teams within the county. EMPG funds are not available for municipal applications or request.

The performance period for the EMPG is two years at the federal level, however MEMA has set a policy that shortens the performance period. For Hazmat teams that receive EMPG support through CCEMA, the performance period is October 1 – September 30 annually. All EMPG-funded activities must be conducted within that performance period.

## PROCUREMENT PROCESS

The sub-recipient is the non-federal entity (County Government or a municipality) that receives a sub-award from a pass-through entity to carry out the part of a Federal program, and which is accountable to the recipient or pass-through entity for the use of the funds provided. Institutions of higher education, hospitals and other private nonprofit organizations must follow the same procurements standards as local and tribal governments.

All non-federal entities are required to follow the state, local and tribal laws and regulations as long as they conform to federal law and standards per 2 CFR Section 200.318 through 326. Subrecipients should follow local and state procurement statutes if they are more stringent than federal requirements. If the subrecipient has no procurement processes in place or are less stringent than Maine or Federal requirements, then the subrecipient would follow Maine procurement processes. **Table 1** is a summary of state and federal thresholds for procuring property and services using federal assistance that all local, county and tribal non-federal entities must follow (unless the subrecipient’s procurement policies are more stringent, in which case the subrecipient would follow those).

**Table 1: State & Federal Thresholds for Procurement**

Purchase Type	Characteristics	Examples of Projects
Micro Purchases	<ul style="list-style-type: none"> <li>• \$3,500 or less</li> <li>• No quotations</li> <li>• Equitable Distributors</li> </ul>	Purchasing 10 cots for a regional emergency shelter. The cots are \$90 each; the project cost is \$900.
Small Purchases	<ul style="list-style-type: none"> <li>• \$3,500 - \$150,000</li> <li>• Price/Rate Quotations must be obtained from adequate number of qualified sources</li> <li>• No price/cost analysis required</li> </ul>	Purchasing a variable message sign board at a cost of \$16,000 to disseminate key messages to the public on busy roadways.
Sealed Bids	<ul style="list-style-type: none"> <li>• \$3,500 - \$150,000</li> <li>• Firm fixed price contract</li> <li>• Formal advertising</li> <li>• 2 or more bidders willing, able to respond</li> <li>• Public opening of bids</li> </ul>	Regional fire chiefs association has a firm budget of \$50,000 to construct a training structure to practice technical rescue skills. Least expensive bid is selected.
Competitive Proposals	<ul style="list-style-type: none"> <li>• \$3,500 - \$150,000</li> <li>• Written method to conduct a technical evaluation of proposals</li> <li>• Requires advertising</li> <li>• Requires responses from an adequate number of qualified sources (normally more than 1)</li> <li>• Award is fixed price or cost reimbursable</li> </ul>	County government contracts a vendor to provide ICS 300 training. The vendor is selected based on the experience levels of the trainers, and history of the vendor providing similar course deliveries. The budget is a fixed price; quality is more important than price.
Sole Source	<ul style="list-style-type: none"> <li>• Available only from a single source</li> <li>• The agency conducting the procurement has expressly authorized a noncompetitive process OR-</li> <li>• After solicitation of quotes, competition is deemed inadequate</li> </ul>	Agency pays for a subscription to an online training program. This training program is the only one on the market. The agency has a procurement policy that allows sole source.

The sub-recipient is responsible for:

- Adhering to the federal procurement standards for sub-recipients (2 CFR 200.318-236)
- Ensuring terms and conditions of the federal award
- Following their own documented procurement procedures. These procedures reflect applicable state, local and tribal laws and regulations, provided the procurements conform to applicable Federal law and the standards identified in 2CFR 200.318 – 326.

Helpful links for Maine Procurement:

- [Maine Procurement of Services Over \\$10,000](#)
- [Maine Procurement of Services \\$10,000 or Less](#)
- [Requests for Proposals \(RFPs\)](#)
- [Procurement for Commodities](#)

## ELIGIBLE ACTIVITIES & ASSOCIATED GUIDANCE

### Training Policy

Allowable training-related costs under FEMA Preparedness Grants include the establishment, support, conduct, and attendance of training. Training conducted FEMA Preparedness Grant funds should address a performance gap identified through a Training and Exercise Plan or other assessments and contribute to building a capability that will be evaluated through a formal exercise. Training must address [core capabilities](#) outlined in the National Preparedness Goal that contribute to the readiness of the County.

- Any training or exercise gaps should be identified in the Cumberland County Multi-Year Training and Exercise Plan.
- Recipients are strongly encouraged to use existing training rather than developing new courses. Recipients are also encouraged to utilize the National Training and Education Division's [National Preparedness Course Catalog](#). There are hundreds of federally funded training courses that can be delivered in your jurisdiction at no cost. In addition, CCEMA has a cadre of local instructors that can provide a variety of training courses. For more information about training resources, please contact CCEMA.

### Exercise Policy

Exercises conducted with federal grant support will be managed and executed in accordance with the Homeland Security Exercise and Evaluation Program (HSEEP). HSEEP guidance for exercise design, development, conduct, evaluation, and improvement planning is located at <https://www.fema.gov/hseep>. The CCEMA office can provide exercise templates, guidance, and technical assistance on HSEEP.

- Developing **exercise documents** is a critical component of exercise planning, conduct, and improvement planning after the exercise. CCEMA does not mandate specific exercise documents or template use. However, the development of an After Action Report with an Improvement Plan (AAR/IP) is required. This AAR/IP shall be submitted to CCEMA within 90 days of exercise conduct. Grant reimbursement for exercise-related expenses is contingent upon CCEMA's receipt of the AAR/IP.
- All exercises using HSGP funding must be **NIMS** compliant.
- The **scenarios** used in HSGP-funded exercises must focus on testing capabilities, must 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. Exercises funded through the HSGP must have a scenario with a nexus to terrorism.

- **Non-governmental participation** in all levels of exercises is strongly encouraged. Leaders from non-governmental entities should be included in the planning, conduct, and evaluation of an exercise. County and local jurisdictions are encouraged to develop exercises that test the integration and use of nongovernmental resources provided by non-governmental entities, defined as the private sector and private non-profit, faith-based, community, children, the elderly, pregnant women, individuals with disabilities, volunteer, and other non-governmental organizations. Exercises should ensure that citizens, including citizens with disabilities, and special needs populations, participate in all phases of emergency responder exercises, to include planning, implementation, and after-action review.

### **Unallowable Training and Exercise Related Costs**

- Includes reimbursement for the maintenance and/or wear and tear of costs of general use vehicles (e.g., construction vehicles) and emergency response apparatus (e.g., fire trucks, ambulances).
- Equipment that is purchased for permanent installation and/or use, beyond the scope of exercise conduct such as electronic messaging signs is not permitted.
- Mileage reimbursements for individuals traveling to/from an exercise (in order to participate) is not an eligible expense for grant reimbursement under the HSGP.

### **Allowable Training and Exercise Related Costs**

- Exercise Planning Costs
  - Costs related to convening an Exercise Planning Workshop
  - Costs related to planning
  - Meeting space and other meeting costs
  - Costs related to implementation of the Homeland Security Exercise and Evaluation Program to include the reporting of scheduled exercises and the tracking and reporting of after action reports and corrective actions from exercises
- Facilitation costs
  - The services of contractors/consultants may also be procured for the design, development, conduct and evaluation of exercises.
  - The services of contractors/consultants to deliver training courses.
- Materials and supplies
  - Supplies are items that are expended or consumed during the course of the design, planning and conduct of the exercise or training course.
    - Examples include: copying paper, gloves, tape, non-sterile masks, exercise signage, printing exercise documents, and badges for participants, etc.
  - Fuel consumed during course of an exercise
    - Fuel consumed during an exercise may be reimbursed by mileage or hourly use, but not both. Examples may include running a generator during an exercise, or driving a vehicle to move supplies during exercise conduct. Costs must be incurred during exercise play.
    - Supporting documentation must be provided to document the use of the equipment or vehicle. Examples of supporting documentation include an Exercise Plan with specific mention of the equipment/vehicle, or a photo taken during exercise conduct.
    - Fuel reimbursement requests will be submitted using the CCEMA Travel Form.

- Reimbursements for equipment use at hourly rates must complete [FEMA Form 90-125](#) in accordance with [FEMA's Schedule of Equipment Rates](#).
  - Rehabilitation and refreshments consumed during the actual conduct of the exercise as part of the Incident Action Plan.
    - Itemized receipts, sign-in sheets/roster, and agendas must be provided.
- Travel and exercise plan development
  - Travel associated with design, planning and conduct of exercises.
  - Airfare, mileage, per diem, hotel, etc. are allowable expenses by employees who are on travel status for official business related to the design, planning and conduct (Controllers/Evaluators) of exercise projects.
- Backfill/Overtime for first responders (including part time/volunteers) and exercise management personnel involved in the **design, planning and conduct** (Planning Team/Controllers/Evaluators) of exercises.
  - In no case is dual compensation allowable
  - Backfill/OT for participating first responders is limited to staffing required to maintain continuity of community emergency response.
  - Reimbursement for Backfill/OT will be submitted using the Personnel Reimbursement Form (Annex A)
  - See the "Personnel Expenses" section for additional information.
- Miscellaneous costs related to design, planning and conduct of training and exercise activities.
  - Includes rental of exercise space/location fees, Port-o-potties, event insurance, etc.

### **Exercise-Specific Timeline for the Reimbursement Process**

1. Exercise is incorporated into the Cumberland County Training and Exercise Plan.
2. Exercise Budget is developed using the Exercise Budget Template (Annex B)
3. Exercise is approved for grant funding through CCEMA.
4. Exercise is planned in accordance with HSEEP principles.
5. Exercise is conducted.
6. Within 90 days, an AAR/IP is completed and submitted to CCEMA.
7. All exercise expense reimbursement requests will be submitted to CCEMA with all supplemental documentation.

### **Travel and Mileage Policy**

#### Mileage Expenses:

- List staff name, travel period, proof of reimbursement payment to the employee, and document reason for travel on the Travel Form Template (Annex G).
- Shall be reimbursed at the current amount allowed by the State of Maine Title 5, M.R.S.A §1541 or existing written county or local policy not to exceed the federal IRS rate. The 2020 IRS rate for business-related mileage can be found at <https://www.irs.gov/tax-professionals/standard-mileage-rates>

#### Travel Expenses:

- Grant-funded travel that will incur costs associated with lodging, airfare, or long-distance mileage reimbursements must be pre-approved by CCEMA.
- The sub recipient is expected to submit all documentation related to the travel with the reimbursement request, items include but not limited to: travel approval, reason for travel, agenda and reservations, certification of completion, detailed itemized food receipts, lodging,

fuel and toll receipts, airfare receipts to include related items such as baggage fees and travel insurance.

- Per Diem shall be in accordance with the Federal Government's General Services Administration (GSA) travel rates for calculating maximum per diem for meals and lodging reimbursement. All travel costs must be documented in accordance with federal regulations and must comply with the sub-recipients own travel reimbursement policies not to exceed federal per diem rates. <http://www.gsa.gov/portal/content/104877>

## Personnel Expenses

- Reimbursement will take place at the actual rate of pay for paid personnel.
- Reimbursement for volunteers used during training or exercises is an eligible expense. Reimbursement for volunteers during real-world incidents is not an eligible expense; this would duplicate other FEMA funding streams. Required documentation for volunteer reimbursement includes: W-9 Forms for each individual, proof of payment from the grant applicant to the individual, proof of volunteer hours (sign in/out form), and details of volunteer duties (job action sheet, ICS-214 form, etc.).

### Required Submissions for Personnel Expenses Reimbursement:

- Overtime/backfill or volunteer/on-call sheet if requesting backfill or overtime.
- Personnel Reimbursement Form (Annex A)
- Payroll documentation for all attendees for the entire pay period with the approved activity, showing as applicable regular as well as overtime/backfill hours worked and associated pay rates and gross wages.
- Proof of attendance if for training, exercise, or travel.
  - 1) Clear copies of training course certificates for each individual who attended and is seeking reimbursement
  - OR 2) Letter from training provider or exercise director stating that the individuals backfill/overtime is being request for actually attended the approved activity and were present for the entire duration
  - OR 3) Copy of sign in roster from training provider or exercise host/sponsor listing all individuals who attended. Sign in Roster must include date, activity start time, and activity end time.

## Equipment Policy

- All equipment purchased with FEMA grant funding must be on the [Authorized Equipment List \(AEL\)](#).
- For purchases of equipment on the Controlled Equipment List ([IB 407.a](#)), the sub recipient is responsible to meet all federal requirements before reimbursement from CCEMA will be made.
- Simmunitions are an allowable expense under HSGP. MEMA considers Simmunitions as blank or marking training cartridges that fit into the normal LE service assigned firearms. They can be used for active shooter/complex coordinated attacks training and/or exercises. They can never be used operationally as non-lethal ammunition, they are training aids only.
- Airsoft training aids (look like firearms) and training projectiles are an allowable cost as long as used explicitly for training purposes.
- All communications equipment must be reviewed and approved by the State Wide Interoperability Coordinator (SWIC) at MEMA prior to purchase. CCEMA will facilitate this

process. Sub-recipients must keep emergency communication investments aligned with the Maine State Communication Interoperable Plan (SCIP) to ensure compliance with SAFECOM guidance. The purchase of communication equipment, such as radios, sub-recipients requests must address a recognized gap, whether identified in a county or municipal communication plan. For any projects requiring new frequencies, contact MEMA immediately for guidance on frequency coordination to ensure project frequencies are approved through the FCC process in a timely enough fashion to allow a successful completion of the project within the grant's performance period. For specific questions on whether a communication project or investment is allowed, please contact the Maine Statewide Interoperability Coordinator (SWIC).

- The use of DHS/FEMA preparedness grant funds for equipment maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable, as described in [FEMA Policy FP 205-402-125-1](#), unless otherwise noted. Except for maintenance plans or extended warranties purchased incidental to the original purchase of the equipment, the period covered by maintenance or warranty plan must not exceed the period of performance for the specific grant funds used to purchase the plan or warranty.
- If the equipment is valued at \$5,000 or more, it is subject to property inventory/control measures. CCEMA will contact the sub-recipients that this applies to for a status update each year (in August/September). Sub recipients must retain the following information for each piece of equipment valued at more than \$5,000 at the time of purchase: serial number or other id number, source of funding, who holds the title, acquisition date, costs of property, location and condition or property, and disposition information to include date of disposal and sale price of the property if applicable.
- Sub-recipients that purchase equipment shall maintain an effective property management system; safeguards to prevent loss, damage or theft, maintenance procedures to keep equipment in good condition; and disposition procedures.
- For guidance on disposition of equipment, please contact CCEMA. Items under \$5,000 may be sold and the sub recipients can keep the proceeds. MEMA requires these funds be put back into their respective programs.

## Installation and Construction Projects

Although construction and renovation projects are eligible under federal guidance, **Maine discourages construction or renovation with the HSGP**. Construction and renovation projects will be reviewed on a case-by-case basis by MEMA and FEMA. Should they be approved for funding, they will require additional studies and documentation. Construction and renovation projects are challenging to complete within the grant performance period.

The National Environmental Policy Act of 1969 (NEPA) requires that the Federal government examine the proposed impacts of its actions before project implementation. **Grant projects that include any permanent installation of equipment, construction of communications towers or antennae, base radios, repeaters, sirens, security cameras, lighting, access control and fencing, generators, etc. will likely require an Environmental and Historic Preservation (EHP) screening and may possibly require additional environmental impact studies before approval to begin spending on the project.**

Your EHP must be approved by FEMA before any funding is spent, or any aspect of the project has begun. FEMA takes a zero tolerance approach to EHP reviews submitted after a project has begun, and/or funding has been expended. Failure to follow this guidance will result in reimbursement being denied.

Sub-recipients must factor in the time required to submit an EHP review and secure EHP approval into their project timelines. Depending on the complexity of the project, an EHP review and approval can take several months to a year. It is the sub recipient’s responsibility to complete an EHP and submit it to CCEMA. CCEMA will act as the sub-recipients liaison to submit the EHP to MEMA and FEMA. CCEMA will communicate any updates on the EHP status directly to the sub-recipient.

The EHP form is included as Annex C. Additional guidance documents include the EHP Form Instructions (Annex D) and EHP Policy, FEMA (Annex E). Additional EHP resources can be accessed at: <https://www.maine.gov/mema/grants/environmental-planning-historical-properties>.

### **EMPG Specific Guidance – Hazmat Teams Receiving Funds**

- All EMPG-funded personnel (including full- and part-time state, local, tribal and territorial (SLTT) recipients and sub recipients) shall complete the following training requirements and record proof of completion: (1) \*NIMS Training, Independent Study (IS)-100 (any version), IS-200 (any version), IS700 (any version), and IS-800 (any version), AND (2) Professional Development Series (PDS) OR the Emergency Management Professionals Program (EMPP) Basic Academy. (FEMA Preparedness Grants Manual, page 160)
- All EMPG-funded personnel will submit a summary of projects and updates with each personnel reimbursement.
- For EMPG reimbursements for Hazmat teams: if the reimbursement includes a cover letter, it shall be submitted on team letterhead.
- CCEMA is required to submit a Multi-Year Training and Exercise Plan, an annual EMPG Work Plan, and quarterly updates on the EMPG Work plan to MEMA. For Hazmat teams that receive EMPG funding support, it is required to submit quarterly reports to CCEMA, and input to the annual Work Plan.

<b>EMPG Quarter</b>	<b>Reporting Period</b>	<b>Quarterly Report Due to CCEMA</b>
<b>1</b>	October 1 – December 31	January 15
<b>2</b>	January 1 – March 31	April 15
<b>3</b>	April 1 – June 30	July 15
<b>4</b>	July 1 – September 30	October 15

### **REIMBURSEMENT PROCESS**

Both the HSGP and the EMPG are reimbursement grants. As a sub-recipient, you will be responsible for the upfront costs. CCEMA will reimburse your agency, and CCEMA will request reimbursement from MEMA.

1. Execute activity/project in accordance with the approved scope of work
2. Sub-recipient pays for the activity. Retain proof of payment.
3. The Sub-recipient submits a reimbursement request to CCEMA. Please include either a detailed cover letter or Annex H, Reimbursement Summary Sheet. All supporting documentation must be provided. Failure to submit proper documentation will delay the reimbursement process for your agency, as well as the County. CCEMA will review the reimbursement submission and contact you if further information is required.
4. If approved, CCEMA will reimburse your agency directly.
5. CCEMA submits the reimbursement request to MEMA to facilitate our reimbursement.

**Recommendations for Lost/Misplaced Receipts:**

- Reimbursements require itemized receipts in order to be paid. If a reimbursement is submitted to without supporting receipts, CCEMA will deny the reimbursement. MEMA will not reimburse expenses without receipts, and the CCEMA budget cannot support reimbursing those expenses.

**Additional Guidance**

- In the event that a subrecipient wishes to change the scope of work or budget for a grant-funded project, it is required to complete and submit a Grant Contract Modification Form (also referred to as an MMF) to CCEMA. The Grant Contract Modification Form is accessible on [MEMA's website](#) and in Annex F. The Grant Contract Modification form must be approved, signed, and sent back to the sub-recipient before any changes to the project can occur. This process can take several weeks to months, so please plan accordingly.
- Subrecipients are encouraged to recognize the role of the CCEMA office and any applicable funding sources in news media coverage, press releases, or social media posts regarding a grant-funded project.
- As a subrecipient to a FEMA Preparedness Grant, you are agreeing to the DHS/FEMA pass-through requirements. These requirements include EHP Compliance, Ensuring the Protection of Civil Rights, and compliance with SAFECOM, NIMS and FirstNet among others.
- Per 2 C.F.R. § 200.336, FEMA, through its authorized representatives, has the right, at all reasonable times, to make site visits or conduct desk reviews to review project accomplishments and management control systems to review award progress and to provide any required technical assistance. Grant recipients are subject to audit oversight from multiple entities including the DHS Office of the Inspector General, the Government Accountability Office, MEMA, or independent auditing firms.
- For additional details of requirements for FEMA Preparedness Grants, please review the [FEMA Preparedness Grants Manual](#).
- Link to the [Code of Federal Regulations](#)
- Link to [Maine state procurement laws](#)
- Link to [Maine Schedule for Financial Record Retention](#).

## **Annexes**

- Annex A – Personnel Reimbursement Form
- Annex B – Exercise Budget Template
- Annex C – EHP Blank Form
- Annex D – EHP Form Instructions
- Annex E – EHP Policy, FEMA
- Annex F – Grant Contract Modification Form
- Annex G – Travel Form Template
- Annex H – Reimbursement Summary Sheet