



OHIO DEPARTMENT  
OF PUBLIC SAFETY  
EDUCATION · SERVICE · PROTECTION

# Ohio Emergency Management Agency

John R. Kasich, Governor  
Thomas P. Charles, Director

Nancy J. Dragani, Executive Director

## Homeland Security Grant Program (SHSP, LE-SHSP, UASI, MMRS, CCP, OPSG)



## FY 2011 Local Program Guidance and Application Package

February 2012



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## CHANGES TO LOCAL GUIDANCE FY2011

- ✦ Ohio EMA's Electronic Grants Management System will be the sole mechanism for application, management and payment of the FY 2011 HSGP grant programs.
- ✦ Food costs with the exception of per diem and for full scale exercises have been eliminated.
- ✦ Per recent FEMA guidance, the maintenance and sustainment costs have been expanded to include equipment purchased with non-federal sources.
- ✦ In accordance with the requirements of 44 CFR, sub-grantees seeking to make a purchase or other procurement exceeding \$100,000 must pre-coordinate the procurement with Ohio EMA.
- ✦ Applicants will have 60 calendar days to submit completed FY2011 applications.
- ✦ Environmental and Historical Preservation (EHP) Review forms have been updated and **must** be completed and submitted with projects (as applicable per this guidance).
- ✦ Quarterly reporting will be conducted for all FY2011 HSGP sub-grants.
- ✦ FY2011 LE SHSP grant funds may **not** be used to support fusion center-related initiatives unless the fusion center is able to certify that privacy and civil rights/civil liberties (CR/CL) protections are in place that are determined to be at least as comprehensive as the *ISE Privacy Guidelines* by the ISE Privacy Guidelines Committee (PGC) *within 6 months of the award date on this FY2011 award.*
- ✦ A fifth statewide priority for CBRNE Detection was added to the LE SHSP as in the FY 2010 Program and continues as an allowable priority in FY 2011. No more than 30% of the total regional award (excluding NBI funds) may be used toward the CBRNE detection priority.
- ✦ Per FEMA clarification promotional items are no longer an allowable cost in the CCP grant.

# I. PROGRAM OVERVIEW

## INTRODUCTION

The Fiscal Year (FY) 2011 Homeland Security Grant Program (HSGP) is comprised of interconnected grant programs:

- State Homeland Security Program (SHSP) to include the Law Enforcement State Homeland Security Program (LE-SHSP)
- Urban Areas Security Initiative (UASI)
- Metropolitan Medical Response System (MMRS)
- Citizen Corps Program (CCP)
- Operation Stonegarden (OPSG)

The HSGP is one tool among a comprehensive set of initiatives authorized by Congress and implemented by the Administration to help strengthen the Nation against risks associated with potential terrorist attacks.

The purpose of this package is to provide:

- (1) An overview of the HSGP;
- (2) The formal grant guidance and application materials needed to apply for funding under the program(s).
- (3) Administrative Requirements that must be met by all sub-grantees in order to meet the requirements of federal regulations, mandates and orders.

The package also reflects changes called for in the *Implementing Recommendations of the 9/11 Commission Act of 2007* (Public Law 110-53) (hereafter —9/11 Act||) and the *Department of Defense and Full-Year Continuing Appropriations Act, 2011* (Public Law 112-10).

<b>FY 2011 Homeland Security Grant Program Overview</b>	<b>Program Overview</b>
<b>SHSP</b>	SHSP is allocated to each of Ohio's 88 counties to support the implementation of State Homeland Security Strategies to address the identified planning, organization, equipment, training, and exercise needs to prevent, protect against, respond to, and recover from acts of terrorism and other catastrophic events.
<b>LE-SHSP</b>	Provided to the eight (8) identified Homeland Security Regions in Ohio to support the Law Enforcement priorities/requirements for activities dedicated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA).
<b>UASI</b>	UASI program funds are allocated to the Cleveland/Cuyahoga and Cincinnati/Hamilton urban areas for FY2011. The funds are made available to address the unique planning, organization, equipment, training, and exercise needs of high-threat, high-density Urban Areas, and assists them in building an enhanced and sustainable capacity to prevent, protect against, respond to, and recover from acts of terrorism.
<b>MMRS</b>	MMRS program funds have been provided by FEMA to Akron, Cincinnati, Cleveland, Columbus, Dayton and

	Toledo to support the integration of emergency management, health, and medical systems into a coordinated response to mass casualty incidents caused by any hazard. Successful MMRS grantees reduce the consequences of a mass casualty incident during the initial period of a response by having augmented existing local operational response systems before an incident occurs.
<b>CCP</b>	CCP's mission is to bring community and government leaders together to coordinate the involvement of community members and organizations in emergency preparedness, planning, mitigation, response, and recovery.
<b>OPSG</b>	OPSG funds are intended to enhance cooperation and coordination among local, Tribal, territorial, State, and Federal law enforcement agencies in a joint mission to secure the United States' borders along routes of ingress from international borders to include travel corridors in States bordering Mexico and Canada, as well as States and territories with international water borders.

## **SUPPORTING NATIONAL PRIORITIES**

### *National Preparedness Guidelines*

The National Preparedness Guidelines are instrumental in guiding stakeholders in meeting the Nation's most urgent needs. For additional information on the National Preparedness Guidelines, please see [http://www.fema.gov/pdf/emergency/nrf/National\\_Preparedness\\_Guidelines.pdf](http://www.fema.gov/pdf/emergency/nrf/National_Preparedness_Guidelines.pdf).

### *SHSP and UASI Priorities for FY 2011*

For FY2011, FEMA has identified priorities specifically for the SHSP and UASI programs. Based on FY2011 Federal Guidance, the SHSP and UASI priorities are:

- Priority One – Whole Community; Advancing “Whole Community” Security and Emergency Management
- Priority Two – Building Prevention and Protection Capabilities
- Priority Three – Maturation and Enhancement of State and Major Urban Area Fusion Centers

While the intent of these priorities will be echoed throughout this guidance, the details on each of the priorities can be read in detail on pages 4-11 in the federal guidance document located at [http://www.fema.gov/pdf/government/grant/2011/fy11\\_hsgp\\_kit.pdf](http://www.fema.gov/pdf/government/grant/2011/fy11_hsgp_kit.pdf).

### ***NIMS COMPLIANCE***

In order to receive FY 2011 HSGP funding, the jurisdiction is required to certify as part of their grant application that they are addressing and/or have met the FY2010 NIMS requirements. Please refer to the NIMS Certification form, which is included in the application packet to certify NIMS compliance. Additional information about NIMS compliance and resources for achieving compliance can be found at Ohio EMA NIMS website <http://www.ema.ohio.gov/NimsGuidance.aspx> or the *NIMS Integration Center web page*, <http://www.fema.gov/emergency/nims>

## **STATE PRIORITIES**

### ***Addressing Outstanding Projects and Investments***

As evidenced by the significant reductions seen in FY2011 grant programs and a downward trend in funding for future grant years, Ohio and its sub-recipients must prepare to accept the challenge of completing capability enhancement and the long term sustainment of capabilities and equipment. As such, sub-grantees from all grant programs are strongly urged to focus the efforts of their FY2011 funding towards the completion of existing projects, investments and capabilities while also building sustainment plans for these same items.

### ***Funding Priorities***

The HSGP cluster of grants is an important part of Ohio's larger, coordinated effort to strengthen homeland security preparedness. The programs will implement objectives addressed in Ohio's FY2011 Investment Justifications. As the State Administering Agency, the Ohio Emergency Management Agency (EMA) expects our State, local and private partners to be familiar with this state preparedness architecture and to incorporate elements of this architecture into their anti-terrorism planning, operations and capability building efforts.

Based upon ongoing intelligence analysis, capability review and assessment, Ohio will continue to focus available grant funding on risk and capability-based investments. Ohio's FY2011 local investment areas and funding priorities are as follows:

- 1) Expand Interoperable communications throughout Ohio
- 2) Conduct Multi-Agency Local, Regional and State-wide Exercises
- 3) Implement Preparedness Training Initiatives
- 4) Strengthen CBRNE Prevention, Protection, Detection and Response
- 5) Enhance Intelligence Fusion and Information Sharing Capabilities (LE-SHSP Funds)
- 6) Implement the National Infrastructure Protection Program

Grant program applications must align with one or more of the above funding priorities to be eligible for funding.

### ***Grant Program Governance***

As with past DHS grants, individual agencies or departments will not apply to Ohio EMA for funding via FY2011 HSGP. Instead, individual agency or department needs will be forwarded to and coordinated by each grant program's respective governance structure (commonly referred to as Terrorism Advisory Teams, etc.). The team, via their respective county EMA or sub-recipient office, will submit one comprehensive grant application to Ohio EMA.

The FY 2011 HSGP re-emphasizes the importance of creating or utilizing existing governing bodies to act on this guidance and coordinate grant resources. Examples include: Terrorism Advisory Committees, Urban Area Working Groups, Interoperability Governing Board (SIGB), Area Maritime Security Committees, Citizen Corps Councils, MMRS Leadership, etc.

Each team must gather, share, and consider needs for all disciplines located within the county's boundaries as well as the current local, state and federal grant priorities. The Team can/should include and consider private as well as public agency needs as they develop their countywide

programs. The Team will not include in the local budget any needs of state or federal agencies that may operate within the county.

The team must be comprised of representatives across all disciplines and jurisdictions. No one person on the team may represent multiple disciplines. The team may elect to have more than one representative for a given discipline, but will ensure that no one discipline has the majority of representation. The team will also appoint its own Chair (or Co-Chairs) to oversee and direct the governance requirements.

**A current listing of the Team's membership and Chair(s) must be submitted with the grant application in order to be eligible for funding.** This information must be maintained throughout the grant period in order to continue to remain eligible for funding.

## **PROGRAM SPECIFIC OVERVIEWS AND PRIORITIES**

### ***State Homeland Security Program (SHSP; LE-SHSP)***

The SHSP is a core assistance program that provides funds to build capabilities at the local and regional levels, to enhance our national resilience to absorb disruptions and rapidly recover from incidents both natural and manmade as well as to implement the goals and objectives included in State homeland security strategies and initiatives in their State Preparedness Report (SPR).

**Activities implemented under SHSP must support terrorism preparedness by building or enhancing capabilities that relate to the prevention of, protection from, response to and recovery from terrorism in order to be considered eligible.** However, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate this dual-use quality for any activities implemented under this program that are not explicitly focused on terrorism preparedness. Per the 9/11 Act, States are required to ensure that at least 25 percent (25%) of SHSP appropriated are dedicated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA). Ohio meets this commitment through the establishment of the LE-SHSP awards to eight (8) regions and Ohio Homeland Security.

### ***Urban Areas Security Initiative (UASI)***

Since its inception in FY 2003, the intent of the UASI program has been to enhance regional preparedness in major metropolitan areas. The UASI program is a core program in the DHS mission to build the capacity of American society to be resilient in the face of disruptions, disasters, and other crises. The UASI program directly supports the National Priority on expanding regional collaboration in the *National Preparedness Guidelines* and is intended to assist participating jurisdictions in developing integrated regional systems for prevention, protection, response, and recovery.

Ultimately, the FY 2011 UASI program is intended to provide financial assistance to address the unique multi-discipline planning, organization, equipment, training, and exercise needs of high-threat, high-density Urban Areas, and to assist these Areas in building and sustaining capabilities to prevent, protect against, respond to, and recover from threats or acts of terrorism.

**Activities implemented with UASI funds must support terrorism preparedness by building or enhancing capabilities that relate to the prevention of, protection from, response to or recovery from terrorism in order to be considered eligible.** However, many capabilities



which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate the dual-use quality for any activities implemented that are not explicitly focused on terrorism preparedness.

Urban Areas must use UASI funds to employ regional approaches to overall preparedness and are encouraged to adopt regional response structures whenever appropriate. UASI program implementation and governance must include regional partners and should have balanced representation among entities with operational responsibilities for prevention, protection, response, and recovery activities within the region. In some instances Urban Area boundaries cross State borders.

Grantees must also demonstrate the integration of children and individuals with disabilities or access and functional needs into activities implemented under this program.

### ***UASI Allocation of Funds***

The use and allocation of all grant funds available through the FY 2011 UASI program must focus on the Investments identified in the Urban Area's IJ and the implementation of the FEMA-approved Urban Area Homeland Security Strategy. The use of funds must also be consistent with the State Homeland Security Strategy, *National Preparedness Guidelines, Target Capabilities List* (TCL) and overall UASI program guidelines. Funds used to support whole community and individual preparedness related efforts, such as engaging non-governmental organizations and vulnerable populations and demonstrating the integration of children and individuals with disabilities or access and functional needs in all phases of emergency management, participation of disaster volunteers in training, exercises and response and recovery operations, and educating the public should be coordinated with Citizen Corps Councils. Per the 9/11 Act, 25 percent (25%) of UASI appropriated funds are dedicated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA). Funds leveraged toward LETPA must prioritize activities associated with Priorities Two and Three, in particular those activities that focus on:

- Building Prevention and Protection Capabilities
- Maturation and Enhancement of State and Major Urban Area Fusion Centers.

### ***Metropolitan Medical Response System (MMRS)***

The MMRS program provides funding to local jurisdictions to support and enhance the integration of local emergency management, health, and medical systems into a coordinated, sustained local capability to respond effectively to a mass casualty incident. Sub-grantees must also demonstrate how their investments will increase the effectiveness of emergency preparedness planning and response for the whole community by integrating and coordinating activities implemented under this program for children and adults with disabilities and others with access and functional needs.

The responsibilities of MMRS sub-grantees are to:

- Establish and support designated MMRS leadership, such as a Steering Committee, to act as the designated POCs for program implementation
- Promote integration of local emergency management, health, and medical systems with their Federal and State counterparts through a locally established multi-agency, collaborative planning framework
- Promote sub-State regional coordination of mutual aid with neighboring localities

- Enhance, using MMRS funds, sub-State regional planning and training to expand and improve an integrated, inclusive health and medical response to mass casualty events
- Validate the sub-grantee's local emergency response capability to a mass casualty incident by means of a regular schedule of exercises that are Homeland Security Exercise and Evaluation Program (HSEEP)-compatible
- Coordinate all MMRS expenditures with the local health department and, where appropriate, local representatives who manage PHEP grants, managed by CDC, and HPP, managed by HHS-ASPR, and Strategic National Stockpile

### ***MMRS Collaboration***

MMRS sub-grantees are strongly encouraged to collaborate with local, regional, and State health and medical partners, such as Medical Reserve Corps Units and Citizen Corps Councils, as well as leverage other Federal programs, such as the HHS ASPR Hospital Preparedness Program and Emergency Systems for Advance Registration of Volunteer Health Professionals (ESAR-VHP), CDC Cities Readiness Initiative (CRI), PHEP, and Strategic National Stockpile Programs. The intent of collaboration should be to coordinate and support plans, processes, and strategies related to, but not limited to: Continuity of Government; Continuity of Operations; Age-Appropriate Equipment and Supplies Procurement; Emergency Triage and Pre-Hospital Treatment/Emergency Medical Services; 9-1-1/Medical Dispatch; Fatality Management; Forward Movement of Patients; Hospital Evacuation; Interoperable Communications; Patient Tracking; Pharmaceutical and Medical Supply Management and Distribution; Public Education; Outreach and Information; Recruiting Volunteers; and Training. Plans, processes, and strategies should specifically address disability accessibility and functional needs and pediatric capabilities except where infants and children are not a specific concern, such as interoperable communications (which may be a concern for workers with hearing and vision disabilities). The Medical Reserve Corps (MRC) program is administered by the HHS Office of the Surgeon General. MRC units are organized locally to meet the health and safety needs of their community. MRC members are identified, credentialed, trained, and prepared in advance of an emergency, and may be utilized throughout the year to improve the health and medical response system. MMRS jurisdictions are encouraged to actively collaborate with MRC unit representatives. MMRS funds may be used to support local MRC units if endorsed by the local MMRS Steering Committee. Local MRC units must submit proposals to the MMRS Steering Committee outlining the amount of funds requested, the purpose of the funds, and the specific goals that will be addressed by the MRC unit as outlined in the proposal. The MMRS Steering Committee shall ensure that the proposed MRC activities will support and complement the objectives of the MMRS program prior to approval of the MRC funds request. The following are examples of the types of allowable expenses that MMRS jurisdictions may consider when supporting/establishing MRC units:

- Implementing mechanisms to assure appropriate integration and coordination with existing local emergency response and health assets and capabilities (including provision of legal protections for volunteers)
- Developing plans to organize and mobilize the MRC unit in response not only to urgent needs, but also to address other public health needs in the community
- Implementing activities to address the needs of children and individuals with disabilities or access and functional needs

- Recruiting volunteers for the MRC unit including volunteers with subject matter expertise in assessing the acute medical and non-acute health, safety and maintenance of independence needs of survivors with disabilities to determine and provide appropriate assistance in the most integrated setting appropriate
- Tracking volunteer information
- Screening and verifying credentials
- Training
- Providing age-appropriate equipment and supplies for the MRC unit.

***Citizen Corps Program (CCP)***

***\*Note\* FY2011 CCP will be released as a separate award at a separate time.***

The Citizen Corps mission is to bring community and government leaders together to coordinate the involvement of community members and organizations in emergency preparedness, planning, mitigation, response, and recovery. The participation of community leaders in developing emergency plans is critical to the success of a comprehensive planning process. Community-based planning that involves the whole community will reflect an accurate composite of that community and establish a viable, fully integrated and coordinated plan that emergency officials will execute when an incident occurs. Specific emphasis should be placed on community preparedness practices that increase the inclusion of people with disabilities into community planning initiatives. Effective preparedness activities will include strategies, projects, and tools for meeting the access and functional needs of workers with disabilities, as well as citizens with disabilities through increased physical, programmatic, and communications access for people who have physical, sensory, intellectual, cognitive, and mental health disabilities in compliance with applicable laws that require inclusive preparedness, response, recovery, and mitigation. FY 2011 CCP funds provide resources for the State and local communities to:

- Bring together the appropriate leadership to form and sustain a Citizen Corps Council
- Develop and implement a plan and amend existing plans, such as EOPs to achieve and expand citizen preparedness and participation
- Conduct public education and outreach
- Ensure clear, timely, and accessible alerts/warnings and emergency communications with the public
- Develop training programs for the public, including children, individuals with disabilities, and access and functional needs populations, for both all-hazards preparedness and volunteer responsibilities
- Provide reasonable accommodations and modifications to enable individuals with disabilities to fully participate
- Facilitate citizen participation in exercises
- Implement volunteer programs, like the Community Emergency Response Team (CERT) Program, and other activities to support emergency response services in response and recovery functions
- Involve citizens in surge capacity roles and responsibilities during an incident in alignment with the Emergency Support Functions and Annexes
- Conduct evaluations of programs and activities

As uniformed emergency responders constitute less than one percent (1%) of the total United States population, it is clear that citizens must be better prepared, trained, and practiced on how best to take care of themselves and assist others in those first crucial hours during and after a

catastrophic incident. Individuals can reduce the demand for emergency assistance during catastrophic incidents by taking appropriate preparedness measures and actively contribute to the Nation's response capability by participating in response and recovery activities.

A knowledgeable, trained, and involved public will provide the Nation with a critical surge capacity to augment government efforts in a catastrophic incident. Through the *Ready Campaign* and the nationwide network of State and local Citizen Corps Councils, DHS will focus on strengthening citizen preparedness capabilities, particularly for children, individuals with disabilities or access and functional needs, and socially vulnerable populations. Timely alert and warning to American citizens during catastrophic events is critical to preservation of life and property.

### ***CCP Program Requirements***

All CCP grant recipients must register their Citizen Corps Council and/or CERT program and receive approval on the Citizen Corps website at <http://www.citizencorps.gov/>. In addition, all grant recipients must update / validate their Citizen Corps and/or CERT information, activity, and contacts located on the Citizen Corps and national program websites twice a year.

Volunteer programs and assets, which are authorized to deploy in response and recovery operations, must meet the minimum training and equipment requirements, as determined by the national program office in coordination with the sponsoring State.

State Citizen Corps Program Managers shall provide quarterly updates to the FEMA Regional Community Program Manager. As such, CCP recipients will be required to submit quarterly program updates to the State. These quarterly updates should include information on local Council activities or events such as community preparedness public education and outreach, volunteer integration, and training and exercises.

### ***Operation Stonegarden (OPSG)***

OPSG provides funding to *designated localities* to enhance cooperation and coordination between Federal, State, local, Tribal, and territorial law enforcement agencies in a joint mission to secure the United States borders along routes of ingress from international borders to include travel corridors in States bordering Mexico and Canada, as well as States and territories with International water borders.

FY 2011 OPSG is intended to support:

- Increasing capability to prevent, protect against, and respond to border security issues
- Encouraging local operational objectives and capabilities to enhance National and State Homeland Security Strategies (such as the Federal Secure Borders Initiative and United States Customs and Border Protection (CBP)/Border Patrol (BP) strategies)
- Increasing coordination and collaboration among Federal, State, local, Tribal, and territorial law enforcement agencies
- Continuing the distinct capability enhancements required for border security and border protection
- Providing intelligence-based operations through CBP/BP Sector Level experts to ensure safety and operational oversight of Federal, State, local, Tribal, and territorial law enforcement agencies participating in OPSG operational activities

- Supporting a request to the Governor to activate, deploy, or redeploy specialized National Guard Units/Packages and/or elements of State law enforcement to increase or augment specialized/technical law enforcement elements operational activities
- Continuing to increase operational, material and technological readiness of State, local, Tribal, and territorial law enforcement agencies

***OPSG Program Requirements***

The FY 2011 OPSG funds must be used to increase operational capabilities of local law enforcement, promoting a layered, coordinated approach to law enforcement within United States border States and territories.

Grantees may not begin operations, obligate, or expend any funds until the final Operations Order and embedded budget has been approved by FEMA GPD and CBP/BP Headquarters and any existing special conditions and/or restrictions are removed. FY 2011 OPSG activities are expected to maximize HSGP strategic planning efforts and integration with State, Urban Area and local Homeland Security Strategies.

## II. AWARD INFORMATION

### *Authorizing Statutes*

The *Department of Defense and Full-Year Continuing Appropriations Act, 2011* (Public Law 112-10) and Section 2003 of the *Homeland Security Act of 2002*, as amended by section 101 of the *Implementing Recommendations of the 9/11 Commission Act*, 6 U.S.C. 604 authorized the FY 2011 HSGP.

### *Period of Performance*

The period of performance of this grant is **September 1, 2011 through April 30, 2014**. Extensions to the period of performance will be considered only through formal requests to Ohio EMA with specific and compelling justifications as to why an extension is required.

### *FY2011 HSGP Allocations*

As outlined in the tables below, a specific FY2011 allocation has already been determined and set aside for each grant recipient. Award allocations were determined by the federal award or by a risk formula based on population, critical infrastructure vulnerability and base amount.

### *State Homeland Security Program – formula based*

Adams	\$	24,341	Hamilton	\$	364,574	Noble	\$	21,204
Allen	\$	71,856	Hancock	\$	42,132	Ottawa	\$	31,436
Ashland	\$	34,736	Hardin	\$	25,784	Paulding	\$	20,820
Ashtabula	\$	58,991	Harrison	\$	19,387	Perry	\$	27,056
Athens	\$	40,100	Henry	\$	24,584	Pickaway	\$	34,512
Auglaize	\$	35,882	Highland	\$	29,801	Pike	\$	24,246
Belmont	\$	39,699	Hocking	\$	24,636	Portage	\$	78,143
Brown	\$	30,424	Holmes	\$	29,452	Preble	\$	29,529
Butler	\$	168,357	Huron	\$	36,487	Putnam	\$	26,786
Carroll	\$	24,428	Jackson	\$	26,294	Richland	\$	63,949
Champaign	\$	35,430	Jefferson	\$	39,912	Ross	\$	47,275
Clark	\$	67,465	Knox	\$	36,358	Sandusky	\$	36,865
Clermont	\$	88,912	Lake	\$	110,510	Scioto	\$	43,026
Clinton	\$	30,130	Lawrence	\$	37,613	Seneca	\$	35,252
Columbiana	\$	61,782	Licking	\$	81,035	Shelby	\$	34,563
Coshocton	\$	27,342	Logan	\$	35,744	Stark	\$	171,035
Crawford	\$	30,322	Lorain	\$	137,680	Summit	\$	249,696
Cuyahoga	\$	558,287	Lucas	\$	203,585	Trumbull	\$	95,066
Darke	\$	33,539	Madison	\$	31,837	Tuscarawas	\$	55,399
Defiance	\$	28,368	Mahoning	\$	105,364	Union	\$	34,294
Delaware	\$	77,186	Marion	\$	38,847	Van Wert	\$	24,548
Erie	\$	43,209	Medina	\$	79,574	Vinton	\$	18,574
Fairfield	\$	68,378	Meigs	\$	22,220	Warren	\$	95,758
Fayette	\$	24,382	Mercer	\$	29,210	Washington	\$	37,224
Franklin	\$	469,564	Miami	\$	56,936	Wayne	\$	57,404
Fulton	\$	29,854	Monroe	\$	18,937	Williams	\$	28,182
Gallia	\$	25,384	Montgomery	\$	231,064	Wood	\$	68,528
Geauga	\$	50,042	Morgan	\$	19,048	Wyandot	\$	22,078
Greene	\$	83,827	Morrow	\$	26,752			
Guernsey	\$	28,962	Muskingum	\$	46,309			
						Total:	\$	5,915,293

***State Homeland Security Program – Law Enforcement – formula based***

Region	Recipient	Allocation
One	Lucas County Sheriff	\$ 330,961
Two	Cuyahoga County Justice Programs	\$ 441,685
Three	Montgomery County EMA	\$ 289,331
Four	Franklin County Justice Programs	\$ 446,627
Five	Summit County EMA	\$ 475,263
Six	Hamilton County EMA	\$ 388,932
Seven	Jackson County EMA	\$ 176,736
Eight	Muskingum County Sheriff	\$ 169,010
	Northern Border Initiative	\$ 200,000

***Urban Areas Security Initiative – Federally designated and awarded***

UASI	Recipient	Allocation
Cleveland/Cuyahoga	Cuyahoga County Public Safety & Justice Services	\$ 3,590,432
Cincinnati/Hamilton	Hamilton County EMA	\$ 3,491,256

***Metropolitan Medical Response System – Federally designated and awarded***

MMRS	Recipient	Allocation
Akron	Summit County EMA	\$ 281,693
Cincinnati	Cincinnati Fire Department	\$ 281,693
Cleveland	Cuyahoga County Public Safety & Justice Services	\$ 281,693
Columbus	Columbus Health Department	\$ 281,693
Dayton	City of Dayton	\$ 281,693
Toledo	City of Toledo Fire and Rescue	\$ 281,693

***Citizen Corps Program***

Citizen Corps Program grant funding will be determined through a separate process that will be held after the release of this guidance. Supplemental information will be provided on the application and award process.

***Operation Stonegarden – Federally designated and awarded***

County	Recipient	Allocation
Ashtabula	Ashtabula County Sheriff's Office	\$ 95,088
Cuyahoga	Cuyahoga County Sheriff's Office	\$ 94,000
Erie	Erie County Sheriff's Office	\$ 90,254
Lake	Lake County Sheriff's Office	\$ 100,000
Lorain	Lorain County Sheriff's Office	\$ 100,000
Lucas	Lucas County Sheriff's Office	\$ 85,212
Ottawa	Ottawa County Sheriff's Office	\$ 93,039

The CFDA number for the FY2011 HSGP (all programs) is **97.067**.

### III. FUNDING GUIDELINES

DHS grant funds may only be used for the purpose set forth in the grant, and must be consistent with the statutory authority for the award. Grant funds may not be used for matching funds for other Federal grants/cooperative agreements, lobbying, or intervention in Federal regulatory or adjudicatory proceedings. In addition, Federal funds may not be used to sue the Federal government or any other government entity.

Use of SHSP and UASI funds must be consistent with and supportive of implementation of the State Homeland Security Strategy. Linkages between specific projects undertaken with SHSP and UASI funds and strategic goals and objectives will be highlighted through regular required reporting mechanisms, including the BSIR.

Allowable Investments made in support of the HSGP priorities as well as other capability-enhancing projects must fall into the categories of planning, organization, equipment, training or exercises. Additional detail about each of these allowable expense categories, as well as sections on additional activities including explicitly unallowable costs, is provided. Sub-grantees should consult their Ohio EMA Grant Programs Specialist Program Analyst prior to making any Investment that does not clearly meet the allowable expense criteria established by the Guidance.

#### *Allowable Costs*

**The following pages outline global allowable costs guidance applicable to all programs included in the HSGP.**

#### *Personnel Activities (SHSP, LE-SHSP, UASI, MMRS, CCP)*

Personnel hiring, overtime, and backfill expenses are permitted under this grant in order to perform allowable FY 2011 HSGP planning, training, exercise, equipment and M&A activities. A personnel cost cap of up to 50 percent (50%) of total **SHSP, and UASI** and a cap of 35% (35%) for **LE-SHSP** program funds may be used for personnel and personnel-related activities as directed by the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412). In general, the use of SHSP and UASI funding to pay for staff and/or contractor regular time or overtime/backfill is considered a personnel cost. Activities that are considered personnel and personnel-related, and therefore count against the personnel cost cap of 50 percent (50%), include, but are not limited to:

- Operational overtime
- Overtime/backfill to participate in approved training or exercise deliveries
- Salaries and personnel costs of intelligence analysts for intelligence and medical fusion center activities
- Overtime to participate in intelligence sharing activities
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators
- Salaries and personnel costs under the M&A category
- Contractor costs associated with performing the above activities
  - o A scope of work and contract detailing the job duties and deliverables for all consultants and/or contractors must be provided and approved by the Ohio EMA Preparedness Grants Branch prior to finalizing any consultant/contractor agreements or contracts.



- Costs associated with providing reasonable accommodations and modifications for workers with disabilities
- Statewide Interoperability Coordinator (SWIC) or equivalent position

These activities are also subject to the funding and eligibility requirements detailed under the allowable cost categories. MMRS and CCP do not have a personnel cost cap.

FY 2011 HSGP funds may not be used to support the hiring of any personnel for the purposes of fulfilling traditional public health and safety duties or to supplant traditional public health and safety positions and responsibilities.

The following are definitions for the terms as used in this grant guidance:

- **Hiring.** State and local entities may use grant funding to cover the salary of newly hired personnel who are exclusively undertaking allowable FEMA program activities as specified in this guidance. This may not include new personnel who are hired to fulfill any non-FEMA program activities under any circumstances. Hiring will always result in a net increase of Full Time Equivalent (FTE) employees.
- **Overtime.** These expenses are limited to the additional costs which result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of FEMA-approved activities specified in this guidance. Overtime associated with any other activity is not eligible.
- **Backfill-related Overtime.** Also called —Overtime as Backfill,|| these expenses are limited to overtime costs which result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to FEMA-approved activities outside their core responsibilities. Neither overtime nor backfill expenses are the result of an increase of FTE employees.
- **Supplanting.** Grant funds will be used to supplement existing funds, and will not replace (supplant) funds that have been appropriated for the same purpose. Applicants or grantees may be required to supply documentation certifying that a reduction in non-Federal resources occurred for reasons other than the receipt or expected receipt of Federal funds.

### ***Planning Activities (SHSP, LE-SHSP, UASI, MMRS, CCP, OPSG)***

FY 2011 SHSP and UASI funds may be used for a range of emergency preparedness and management planning activities and that support updating and maintaining a current EOP that conforms to the guidelines outlined in CPG 101 v.2. Planning efforts can also include the prioritizing of needs, building capabilities, updating preparedness strategies, allocating resources, and delivering preparedness programs across disciplines 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.

Sub-recipients are further encouraged to include disciplines responsible for the health, safety, education, rehabilitation, and care of infants and children and those responsible for integrating the accessibility and functional needs of children and adults with disabilities. Planning activities should focus on the four homeland security mission areas of prevention, protection, response, and recovery. All jurisdictions are encouraged to work through Citizen Corps Councils, existing public-private partnerships that support emergency management, nongovernmental entities, and the general public in planning activities.

Sub-grantees must use the *CPG 101: 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](http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf).

Upon completion of a given planning project, the sub-grantee will submit copies of the completed plans and/or planning tasks that were developed, enhanced, or updated using FY2011 HSGP funds. These will be submitted to Ohio EMA's Grant Branch not later than end of the grant performance period and will be used to validate the work was completed as per the budget. Failure to do so may result in forfeiture or repayment of grant funds.

All publications created with FY2011 HSGP funding shall prominently contain the following statement: "This document was prepared under a grant from the U.S. Department of Homeland Security (DHS). Points of view or opinions expressed in this document are those of the authors and do not necessarily represent the official position or policies of the U.S. DHS."

### ***Allowable Planning Activities***

The *FY 2011 HSGP Guidance and Application Kit* defines five broad categories of allowable planning costs. Following are examples for each of the categories. A specific emphasis should be placed on the preparedness of child congregate care systems, providers and facilities, and especially school districts and child/day care. Additional examples are group residential facilities operated by State and local child welfare authorities, and juvenile detention facilities.

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities;
- Developing and implementing homeland security support programs and adopting DHS national initiatives;
- Developing related terrorism prevention activities;
- Developing and enhancing plans and protocols;
- Developing or conducting assessments.

A comprehensive list of specific allowable planning activities is provided as Appendix B of this document.

*MMRS Planning* - Critical factors in planning are to ensure that MMRS jurisdictions have:

- Applicable and up to date plans for responding to mass casualty incidents caused by any hazards
- Applicable procedures and operational guides to implement the response actions within the local plan including patient tracking that addresses identifying and tracking children, access and functional needs population, and the elderly and keeping families intact where possible
- Identified resources for medical supplies necessary to support children during an emergency, including pharmaceuticals and pediatric-sized equipment on which first responders and medical providers are trained
- Subject matter experts, durable medical equipment, consumable medical supplies and other resources required to assist children and adults with disabilities to maintain health, safety and usual levels of independence in general population environments

*CCP Planning* - Integrating the whole community, including non-governmental entities, into the planning process is critical to achieve comprehensive community preparedness and resilience. To meet this important objective, HSGP funds may be used to support the following:

- Establishing and sustaining bodies to serve as Citizen Corps Councils
- Assuring that State and local government homeland security strategies, policies, guidance, plans, and evaluations include a greater emphasis on government/non-governmental collaboration, citizen preparedness, and volunteer participation
- Developing and implementing a community preparedness strategy for the State/local jurisdiction
- Developing or reproducing accessible public education and outreach materials to: increase citizen preparedness and knowledge of protective actions (to include the national Ready Campaign materials); promote training, exercise, and volunteer opportunities; and inform the public about emergency plans, evacuation routes, shelter locations, and public alerts/warnings
  - o All public education and outreach materials must include the national or jurisdiction's Citizen Corps logo, tagline or website or the Ready logo, tagline, or website and comply with logo standards. For more information go to <http://www.citizencorps.gov>. In addition, all public education and outreach materials must be accessible to people with disabilities and must be provided in formats that allows access to information that is comparable to access available to others.
- Allowable expenditures include:
  - o Media campaigns: Public Service Announcements (PSAs), camera-ready materials, website support, and newsletters
  - o Outreach activities and public events: Booth displays, event backdrops or signs, displays and demonstrations, utilizing translation services, and informational materials such as brochures/flyers
  - o Costs associated with inclusive practices and the provision of reasonable accommodations and modifications to provide full access for children and adults with disabilities
- Establishing, expanding, and maintaining volunteer programs and volunteer recruitment efforts that support disaster preparedness and/or response
  - o Citizen support for emergency responders is critical through year-round volunteer programs and as surge capacity in disaster response. Citizen Corps funding may be used to establish, expand, or maintain volunteer programs that support disaster preparedness and/or response including but not limited to: Citizen Corps Affiliate Programs and Organizations, Community Emergency Response Teams (CERT), Fire Corps, Medical Reserve Corps (MRC), Neighborhood Watch/USAonWatch, Volunteers in Police Service (VIPS), and jurisdiction specific volunteer efforts
- Allowable expenditures include:
  - o Recruiting, screening, and training volunteers (e.g., background checks)
  - o Retaining, recognizing, and motivating volunteers
  - o Purchasing, maintaining, or subscribing to a system to track volunteers (to include identification and credentialing systems, and to track volunteer hours) and other available resources in compliance with applicable privacy laws
  - o Necessary non-structural accommodations to include persons with programmatic and communications access needs (e.g., sign language interpreters, Computer Assisted Realtime Translation (CART) and other modifications of policies and practices to fully include volunteers with disabilities)

- Evaluating volunteers

- Organizational activities supported with CCP funding are limited to 25 percent (25%) of the grantee's CCP funding. Organizational activities include hiring of full- or part-time staff or contractors for emergency management activities

***Organizational Activities (LE-SHSP and UASI sub-recipients only)***

Organizational activities include:

- Program management
- Outreach and marketing to support recruitment, as well as sustain and increase year around partnership efforts
- Structures and mechanisms for information sharing between the public and private sector
- Tools, resources and activities that facilitate shared situational awareness between the public and private sectors
- Operational Support
- Utilization of standardized resource management concepts such as typing, inventorying, organizing, and tracking to facilitate the dispatch, deployment, and recovery of resources before, during, and after an incident

Section 2008 of the *Homeland Security Act of 2002*, as amended by the 9/11 Act, allows the use of grant funds for the following activities:

- Responding to an increase in the threat level under the National Terrorism Advisory System (NTAS), or needs resulting from a National Special Security Event. The NTAS replaces the color codes of the Homeland Security Advisory System (HSAS). For more information on the NTAS, please see <http://www.dhs.gov/files/programs/ntas.shtm>
- Establishing, enhancing, and staffing State and Major Urban Area fusion centers
- Paying salaries and benefits for personnel to serve as qualified intelligence analysts

LE-SHSP sub-grantees are allowed to utilize up to 35 percent (35%) of their FY 2011 LE-SHSP funding and Urban Areas are allowed up to 50 percent (50%) of their FY 2011 UASI funding for personnel costs. Personnel costs (e.g., for intelligence analysts, operational overtime), as well as costs associated with planners, and equipment, training, and exercise related personnel costs are applied towards the applicable caps.

- ***Intelligence Analysts***; Per the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412), LE-SHSP and UASI funds may be used to hire new staff and/or contractor positions to serve as intelligence analysts to enable information/intelligence sharing capabilities, as well as support existing intelligence analysts previously covered by SHSP or UASI funding. In order to be hired as an intelligence analyst, staff and/or contractor personnel must meet at least one of the following criteria:

- Successfully complete training to ensure baseline proficiency in intelligence analysis and production within six months of being hired; and/or,
- Previously served as an intelligence analyst for a minimum of two years either in a Federal intelligence agency, the military, or State and/or local law enforcement intelligence unit

All fusion centers analytic personnel must demonstrate qualifications that meet or exceed competencies identified in the *Common Competencies for State, Local, and Tribal Intelligence Analysts*, which outlines the minimum categories of training needed for intelligence analysts. These include subject-matter expertise, analytic methodologies, customer-service ethics, information handling and processing skills, critical thinking skills, computer literacy, and objectivity and intellectual honesty. A certificate of completion of such training must be on file with the SAA and must be made available to FEMA Program Analysts upon request. In addition to these training requirements, fusion centers should also continue to mature their analytic capabilities by addressing gaps in analytic capability identified during the fusion center's BCA.

- **Overtime Costs**; Overtime costs are allowable for personnel to participate in information, investigative, and intelligence sharing activities specifically related to homeland security and specifically requested by a Federal agency. Allowable costs are limited to overtime associated with federally requested participation in eligible fusion activities including anti-terrorism task forces, Joint Terrorism Task Forces (JTTFs), Area Maritime Security Committees (as required by the *Maritime Transportation Security Act of 2002*), DHS Border Enforcement Security Task Forces, and Integrated Border Enforcement Teams. Grant funding can only be used in proportion to the Federal man-hour estimate, and only after funding for these activities from other Federal sources (i.e. FBI JTTF payments to State and local agencies) has been exhausted. Under no circumstances should DHS grant funding be used to pay for costs already supported by funding from another Federal source.
- **Operational Overtime Costs**: In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism, operational overtime costs are allowable for increased security measures at critical infrastructure sites. **FY 2011 UASI funds may only be spent for operational overtime costs upon prior approval provided in writing by the FEMA Administrator.** FY2011 LE SHSP funds may be used only for organizational activities directly supporting the Northern Border Initiative (NBI) project and may only be spent for operational overtime costs upon prior approval provided in writing (email or memorandum) from the OH EMA NBI Grants Coordinator.

FY 2011 UASI funds for organizational costs may be used to support select operational expenses associated with increased security measures at critical infrastructure sites in the following authorized categories:

- Backfill and overtime expenses (as defined in this Guidance) for staffing State or Major Urban Area fusion centers
- Hiring of contracted security for critical infrastructure sites
- Public safety overtime (as defined in this Guidance)
- Title 32 or State Active Duty National Guard deployments to protect critical infrastructure sites, including all resources that are part of the standard National Guard deployment package (Note: Consumable costs, such as fuel expenses, are not allowed except as part of the standard National Guard deployment package)
- Increased border security activities in coordination with CBP, as outlined in Information Bulletin (IB) 135

### ***Equipment Activities (SHSP, LE-SHSP, UASI, MMRS, CCP)***

All equipment procured under SHSP, LE-SHSP and UASI must be in support of the development or maintenance of an identified team or capability described and typed under the NIMS where such typing guidance exists as published by FEMA. The 21 allowable prevention, protection, response, and recovery equipment categories and equipment standards for FY 2011 HSGP are listed on the web-based version of the Authorized Equipment List (AEL) on the Responder Knowledge Base (RKB), at <https://www.rkb.us>. Unless otherwise stated, equipment must meet all mandatory regulatory and/or DHS-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

Before any equipment item is added to the sub-grantee budget, they must first confirm the item conforms to a specific AEL equipment item. It is recognized that the AEL is not an all-inclusive list. Some items that wish to be purchased may not exactly match a specific item in the AEL. In those cases, the county must consult Ohio EMA's Preparedness Grants Branch to determine whether or not the item meets the intent and restrictions of a given AEL equipment category/item. If Ohio EMA cannot concur or determine the eligibility of the item, they will consult with DHS to confirm eligibility of the item. The sub-grantee must receive approval for the item through the EGMS from Ohio EMA's Grants Branch. This clarification must take place prior to any encumbrance or expenditure of funds for the item in question.

Sub-grantees that are using FY 2011 HSGP funds to support emergency communications activities should comply with the *FY 2011 SAFECOM Guidance for Emergency Communication Grants*, including provisions on technical standards that ensure and enhance interoperable communications. Emergency communications activities include the purchase of Interoperable Communications Equipment and technologies such as voice-over-internet protocol bridging or gateway devices, or equipment to support the build out of wireless broadband networks in the 700 MHz public safety band under the Federal Communications Commission Waiver Order. SAFECOM guidance can be found at <http://www.safecomprogram.gov>.

Sub-grantees interested in developing a public safety broadband network in the 700 MHz band in their jurisdictions must adhere to the technical standards set forth in the FCC Waiver Order, or any succeeding FCC orders, rules, or regulations pertaining to broadband operations in the 700 MHz public safety band. If any future regulatory requirement (from the FCC or other governmental entity) results in a material technical or financial change in the project, the recipient must submit a revised budget, associated documentation, and other material, as applicable, for review and approval by the Statewide Interoperability Coordinator (SWIC), or SWIC equivalent. Upon approval by the SWIC, the grantee shall then forward the approval and associated documentation to FEMA Grant Programs Directorate (GPD). The recipient shall also ensure projects support the Statewide Communication Interoperability Plan (SCIP) and are fully coordinated with the full-time SWIC in the State of the project.

- ***Critical Emergency Supplies;*** Prior to allocating grant funding for stockpiling critical emergency supplies, such as shelf stable food products, water, and basic medical supplies purposes, each State must have FEMA's approval of a viable inventory management plan, an effective distribution strategy, sustainment costs for such an effort, and logistics expertise to avoid situations where funds are wasted because supplies are rendered ineffective due to lack of planning. At the time of development of

this guidance, Ohio does not have such a plan. *As such, costs for stockpiling of critical emergency supplies will not be approved.*

- **MMRS Equipment** - MMRS grant funds are intended to ensure an appropriate supply of pharmaceuticals and equipment, personal protective equipment, as well as detection equipment for chemical, biological, radiological, nuclear, and explosive incidents for the first crucial hours of a response to a mass casualty incident. Procurements should have a sound threat based justification with an aim to reduce the consequences of mass casualty incidents during the first crucial hours of a response.
  - o **Pharmaceuticals** - Prior to procuring pharmaceuticals and equipment with MMRS grant funds, grantees must have in place an inventory management plan. The inventory management plan should avoid large periodic variations in supplies due to coinciding purchase and expiration dates. MMRS grantees are strongly encouraged to enter into rotational procurement agreements with vendors and distributors. MMRS grant funds cannot be used to duplicate supplies already available through local and State sources, including local/regional public health offices and hospital associations, or other Federal programs. Purchases of pharmaceuticals have to include a budget for the disposal of expired drugs within the period of performance of the FY 2011 HSGP. The cost of disposal cannot be carried over to another FEMA grant or grant period.
- **CCP Equipment** - Any equipment purchased with CCP funding must be used for specific preparedness or volunteer training or by volunteers in carrying out their response functions. Examples of equipment used to support training and exercises for citizens include items such as burn pans or sample preparedness kits. Expenditures for kits used in volunteer response (e.g., CERT or MRC kits / backpacks) or clothing for official identification must not exceed 30 percent (30%) of the total Citizen Corps Program allocation. Clothing for official identification includes those items that volunteers are required to wear when engaging in public safety activities or disaster response (e.g., t-shirts for CERT members, baseball caps for Neighborhood Watch/USAonWatch Program foot patrol members). To assure appropriate and consistent use, such clothing items must be issued by the agency that trains the volunteers. Necessary accommodations that meet the disability related access and functional needs of participants should be provided.

Any equipment purchased with HSGP funding shall, when practical, be prominently marked as follows: "Purchased with funds provided by the U.S. Department of Homeland Security." It is recognized that not every individual item can be labeled as such. If the purchased equipment is maintained in bulk storage (ie. in a packing container) the grant recipient may label the applicable container(s) with the above statement as opposed to labeling each and every item. Labeling should not be intrusive to the piece of equipment and must not include the DHS logo.

#### ***Maintenance and Sustainment Costs (SHSP, UASI, OPSG, MMRS, CCP)***

The use of FEMA preparedness grant funds for maintenance contracts, warranties, repair or replacement costs, upgrades, and user fees are allowable under all active and future grant awards, unless otherwise noted. Grantees are reminded to be sensitive to supplanting issues. In accordance with FEMA's recently released Information Bulletin #379, maintenance and sustainment costs has been expanded to allow for the support of equipment, training, and critical resources that have previously been purchased with *either* federal grant *or* any other source of funding other than DHS/FEMA preparedness grant program dollars. The expansion of eligible

maintenance and sustainment costs must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the National Preparedness Goal, and (4) sharable through the Emergency Management Assistance Compact. Please refer to GPD's IBs 336, 348 and 379 located at <http://www.fema.gov/government/grant/bulletins/index.shtm>

Routine upkeep (e.g., gasoline, tire replacement, routine oil changes, monthly inspections, grounds, and facility maintenance, etc.) is the responsibility of the grantee and may not be funded with preparedness grant funding.

*Maintenance Contracts and Warranties* - To increase the useful life of the equipment, maintenance contracts and warranties may be purchased using grant funding from one fiscal year to cover equipment purchased with funding from a different fiscal year. The use of grant funding for the purchase of maintenance contracts and warranties must meet the following conditions:

- The term of the maintenance contract or warranty shall not exceed the period of performance of the grant to which the contract is being charged
- Costs must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the National Preparedness Goal, and (4) sharable through the Emergency Management Assistance Compact.

*Repair and Replacement Costs* - The cost of repair and replacement parts for equipment purchased using FEMA preparedness grant funding is an allowable expense.

- Costs must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the National Preparedness Goal, and (4) sharable through the Emergency Management Assistance Compact.

*Upgrades* - FEMA preparedness grant funding may be used to upgrade previously purchased allowable equipment. For example, if the grantee purchased risk management software with HSGP funds in FY 2005 and would like to use FY 2009 grant funding to upgrade the software, this is allowable.

- Costs must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the National Preparedness Goal, and (4) sharable through the Emergency Management Assistance Compact.

*User Fees.* User fees are viewed as costs for specific services required maintaining and providing continued operation of equipment or systems. An example would be the recurring service fees associated with handheld radios or mobile data computers.

- User fees shall not exceed the period of performance of the grant to which the contract is being charged
- Costs must be in (1) direct support of existing capabilities; (2) must be an otherwise allowable expenditure under the applicable grant program; (3) be tied to one of the core capabilities in the five mission areas contained within the National Preparedness Goal, and (4) sharable through the Emergency Management Assistance Compact.

Sub-grantees must comply with all the requirements in 44 CFR Part §13 and 2 CFR Part §215.



### ***Training Activities (SHSP, LE-SHSP, UASI, MMRS, CCP)***

Being prepared as a Nation means moving beyond a —government-centric approach to emergency management. As a team, we need to implement training activities that serve the entire community while also leveraging the resources that the entire community brings to the table. All training procured under HSGP must be in support of the development or maintenance of an identified team or capability described and typed under the NIMS where such typing guidance exists as published by FEMA.

Allowable training topics include, but are not limited to, CBRNE terrorism, NIMS related training, cyber/agriculture/food security, intelligence gathering and analysis, citizen community and private sector preparedness, public-private partnership, interoperable and emergency communications, and training for volunteers and children and individuals with disabilities in disasters, pediatric medical surge, and evacuation, tracking (including patients), and sheltering with particular emphasis on children, keeping children with parents or guardians, addressing needs of unaccompanied minors, and integrating individuals with disabilities and accessibility and functional needs.

Allowable training-related costs under HSGP include the establishment, support, conduct, and attendance of training specifically identified under the SHSP, UASI, MMRS, and CCP grant programs and/or in conjunction with emergency preparedness training by other Federal agencies (e.g., HHS, Department of Transportation).

Training conducted using HSGP funds should address a performance gap identified through an After Action Report/Improvement Plan (AAR/IP) or contribute to building a capability that will be evaluated through an exercise. Exercises should be used to provide the opportunity to demonstrate and validate skills learned in training, as well as to identify training gaps. Any training or training gaps, including those for children and individuals with disabilities or access and functional needs, should be identified in the AAR/IP and addressed in the State or Urban Area training cycle. All training and exercises conducted with HSGP funds should support the development and testing of the jurisdiction's EOP or specific annexes, and validation of completed corrective actions from previous exercises or real world events, where applicable.

### ***Training Requirements***

All training activities supported by FY2011 HSGP must be pre-approved by the Ohio EMA. The sub-grantee must submit the training pre-approval form enclosed in this guidance and obtain approval in writing (email or memorandum) prior to delivery or participation in the training opportunity.

Non-DHS approved training courses may be considered and approved for a maximum of three deliveries. Applicants proposing a non-DHS approved course must be specific on the Training Pre-Approval Form on how the course will address both DHS's mission-scope and support the State Investment Justification. If you have questions regarding eligibility during the developmental stages of your training project proposal, please contact Phil Johnson, Training Supervisor, at 614-799-3680.

Sub-grantees are required, within 30 days after attendance, to submit information through the SAA via Web-Forms on all training not provided by FEMA, but supported with HSGP funds. This information will consist of course title, course description, mission area, level of training,

the training provider, the date of the course, the number and associated disciplines of the individuals, and the sponsoring jurisdiction.

Sub-grantees intending to use FEMA funds to support attendance at training not provided by FEMA must ensure these courses:

- Fall within the FEMA mission scope to prepare State, local, Tribal, and territorial personnel to prevent, protect against, respond to, and recover from acts of terrorism and catastrophic events
- Build additional capabilities that: (a) support a specific training need identified by the State, territory, and Urban Area, and (b) comport with the State, territory, or Urban Area Homeland Security Strategy
- Address specific tasks and/or competencies articulated in FEMA's *Emergency Responder Guidelines* and the *Homeland Security Guidelines for Prevention and Deterrence*
- Address specific capabilities and related tasks articulated in the September 2007 version of the TCL
- Support the specific program training activities identified in the individual HSGP grant programs (SHSP, UASI, OPSG, MMRS, CCP) for which the funding will be used

*CCP Training* - Training funded through the CCP includes but is not limited to: all-hazards safety such as emergency preparedness, basic first aid, lifesaving skills, crime prevention and terrorism awareness, school preparedness, public health issues, mitigation/property damage prevention, safety in the home, light search and rescue skills, principles of NIMS/ICS, community relations, volunteer management, serving and integrating people with disabilities, pet care preparedness, any training necessary to participate in volunteer activities, any training necessary to fulfill surge capacity roles, or other training that promotes individual, family, or community safety and preparedness.

There is no cap on the number of deliveries State or local jurisdictions may conduct of non-responder community-based training workshops, seminars, demonstrations, or conferences. Examples include: CPR/AED training, identity theft workshops, terrorism awareness seminars, chain-saw safety demonstrations, and disability-inclusive community preparedness conferences. Funding for CERT training includes the delivery of the CERT Basic Training Course, supplemental training for CERT members who have completed the basic training, the CERT Train-the-Trainer Course, and the CERT Program Manager Course. Any CERT Basic training conducted by State or local entities must: 1) include the topics covered in the FEMA CERT Basic Training Course; 2) be instructor-led; and 3) classroom-based, using lecture, demonstration, and hands-on practice throughout. Note that the Independent Study course, Introduction to CERT (IS 317) must not be substituted for classroom delivery of CERT Basic Training.

Supplemental training for CERT members who have completed the basic training includes modules available on the national CERT website, as well as other supplemental training that meets the following criteria:

- Relates to a reasonably foreseeable activity which CERT members might be tasked to perform in support of emergency services responders; or,
- Increases competency and understanding of the emergency management context in which CERT members may be asked to operate; or
- Enhances understanding of a particular local hazard CERT members might encounter in their response activities.

There is no cap on the number of deliveries state or local jurisdictions may conduct of the CERT Basic Training, the CERT Train-the-Trainer, Campus CERT Train-the-Trainer, Teen CERT Train-the-Trainer, or CERT Program Manager courses, or supplemental/advanced training for CERT program participants.

Any training supported with these CCP funds should be delivered with specific consideration to include all ages, ethnic and cultural groups, persons with disabilities, and access and functional needs populations at venues throughout the community, to include schools, neighborhoods, places of worship, the private sector, non-governmental organizations, and government locations. Expenditures to provide necessary non-structural accommodations for persons with disabilities and other access and functional needs is allowable (e.g., sign language interpreters, CART and other modifications of policies and practices to fully include participants with disabilities). Jurisdictions are also encouraged to leverage existing training provided via educational/professional facilities and to incorporate non-traditional methodologies such as the internet, distance learning, or home study whenever such delivery supports training objectives. Pilot courses and innovative approaches to training citizens and instructors are encouraged. Instruction for trainers and training to support the Citizen Corps Council members in their efforts to manage and coordinate the Citizen Corps mission is also an allowable use of the FY 2011 CCP funding.

### ***Allowable Training Costs***

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

- *Developing, Delivering, and Evaluating Training.* Includes costs related to administering the training, planning, scheduling, facilities, materials and supplies, reproduction of materials, disability accommodations, and equipment.
- *Overtime and Backfill.* The entire amount of overtime costs, including payments related to backfilling personnel, which are the direct result of attendance at FEMA and/or approved training courses and programs, are allowable. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the State or unit(s) of local government and has the approval of the State or the awarding agency, whichever is applicable. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities.
- *Travel.* Costs (e.g., airfare, mileage, per diem, hotel) are allowable as expenses by employees who are on travel status for official business related to approved training.
- *Hiring of Full or Part-Time Staff or Contractors/Consultants.* Payment of salaries and fringe benefits to full or part-time staff or contractors/consultants must be in accordance with the policies of the State or unit(s) of local government and have the approval of the State or awarding agency, whichever is applicable. Such costs must be included within the funding allowed for program management personnel expenses.
  - A scope of work and contract detailing the job duties and deliverables for all consultants and/or contractors must be provided and approved by the Ohio EMA Preparedness Grants Branch prior to finalizing any consultant/contractor agreements or contracts.
- *Certification/Recertification of Instructors.* States are encouraged to follow the NTE Instructor Quality Assurance Program to ensure a minimum level of competency and corresponding levels of evaluation of student learning. This is particularly important for those courses that involve training of trainers. This information is contained in IB

193, issued October 20, 2005. Additional information can be obtained at [http://www.fema.gov/good\\_guidance/download/10146](http://www.fema.gov/good_guidance/download/10146).

### ***Exercise Activities (SHSP, UASI, MMRS, CCP)***

Sub-recipients are encouraged to exercise their capabilities with regard to improving existing preparedness for catastrophic events and associated response operations through more effective collaboration with all members of a community, to include Federal, State, and local government partners, as well as the private sector, non-governmental organizations, and the citizens in and around an impacted area. This also includes consideration for infants and children across all aspects of response and recovery, including pediatric medical surge capabilities, integrating child congregate care systems (e.g. schools, child care, juvenile justice facilities, or group homes), and integrating the accessibility and functional needs of children and adults with disabilities.

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. State, local, Tribal, and territorial jurisdictions are encouraged to develop exercises that test the integration and use of non-governmental resources provided by non-governmental entities, defined as the private sector and private non-profit, faith-based, community, disability, volunteer, and other non-governmental organizations. Non-governmental participation in exercises should be coordinated with the local Citizen Corps Council(s) and other partner agencies.

### ***Exercise Requirements***

All exercise activities must be approved by Ohio EMA prior to incurring costs associated with the activity. Sub-grantees interested in conducting a local exercise utilizing their local FY2011 HSGP funding must complete the Exercise Pre-Approval Form enclosed in this application package.

Exercises conducted with FEMA support must 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://hseep.dhs.gov>. Additionally, all exercises using HSGP funding must be NIMS compliant.

Jurisdictions developing exercises without exercise contractor support must have at least two (2) members on their jurisdiction's exercise planning team that have completed the FEMA Exercise Design and Evaluation Course and the HSEEP Training Course. All consultants/contractors, including their support staff (e.g., exercise planners, controllers, facilitators) that are utilized to develop, conduct, or evaluate exercises must have completed the FEMA Exercise Design and Evaluation Course and the HSEEP Training Course, as well as have a strong working knowledge of the National Exercise Schedule (NEXS) and Corrective Action Program (CAP) systems. A scope of work and contract detailing the job duties and deliverables for all consultants/contractors must be provided and approved by the Ohio EMA Exercise Program Manager prior to finalizing any consultant/contractor agreements or contracts.

Acceptable scenarios for SHSP, UASI, MMRS, and CCP exercises include: chemical, biological, radiological, nuclear, explosive, cyber, agricultural and natural or technological disasters. Exercise scenarios must be catastrophic in scope and size as defined by the *National Response Framework*. The scenarios used in HSGP-funded exercises must focus on validating existing

capabilities, must be large enough in scope and size to exercise multiple activities, warrant involvement from multiple jurisdictions and disciplines and non-governmental organizations, and take into account the needs and requirements for individuals with disabilities.

*MMRS Exercises* - The scenarios used in MMRS exercises should focus on incidents that would be catastrophic to the grant implementer's community and/or have national impact caused by any hazard. Grantees are encouraged to use scenarios with a focus on medical issues related to preparedness and response. Scenarios should test appropriate Target Capabilities that support the MMRS mission. Citizen participation in exercises is strongly encouraged and should be coordinated with the local Medical Reserve Corps and Citizen Corps Council. MMRS jurisdictions, in coordination with regional, Urban Area, and State exercises, and public health officials (e.g., EMS), are expected to schedule, design, conduct, and evaluate mass casualty exercises that are in compliance with both FEMA and CDC Public Health Emergency Preparedness Cooperative Agreement Exercise requirements and guidance.

*CCP Exercises* - Exercises specifically designed for or that include participation from non-governmental entities and the general public are allowable activities and may include testing public warning systems, evacuation/shelter in-place capabilities, family/school/business preparedness, and participating in table-top or full scale emergency responder exercises at the local, State, Tribal, territorial, or national level, to include the National Level Exercises.

### ***Allowable Exercise Costs***

Allowable exercise-related costs include:

- *Funds Used to Design, Develop, Conduct, and Evaluate an Exercise.* Includes costs related to planning, meeting space and other meeting costs, facilitation costs, materials and supplies, travel, and documentation.
- *Hiring of Full or Part-Time Staff or Contractors/Consultants.* Full or part-time staff may be hired to support exercise-related activities. Such costs must be included within the funding allowed for program management personnel expenses, which must not exceed 15 percent (15%) of the total allocation. The applicant's formal written procurement policy or the Federal Acquisition Regulations (FAR) – whichever is more stringent – must be followed. In no case is dual compensation allowable.
- *Overtime and Backfill.* The entire amount of overtime costs, including payments related to backfilling personnel, which are the direct result of time spent on the design, development, and conduct of exercises are allowable expenses. These costs are allowed only to the extent the payment for such services is in accordance with the policies of the unit(s) of local government and has the approval of the State. In no case is dual compensation allowable. That is, an employee of a unit of government may not receive compensation from their unit or agency of government AND from an award for a single period of time (e.g., 1:00 p.m. to 5:00 p.m.), even though such work may benefit both activities.
- *Travel.* Travel costs are allowable as expenses by employees who are on travel status for official business related to the planning and conduct of exercise project(s) or HSEEP programmatic requirements as described in the HSEEP website (e.g., Improvement Plan Workshops, Training and Exercise Plan).
- *Supplies.* Supplies are items that are expended or consumed during the course of the planning and conduct of the exercise project(s) (e.g., copying paper, gloves, tape, non-sterile masks, and disposable protective equipment).

- *Disability Accommodations.* Materials, services, tools and equipment for exercising inclusive of people with disabilities (physical, programmatic and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities).
- *Other Items (with prior approval)* - These costs include the rental of equipment (e.g., portable toilets, tents), food, gasoline, exercise signs, badges, etc., used specifically for exercises.

### ***Unauthorized Exercise Costs***

Unauthorized exercise-related costs include:

- Reimbursement for the maintenance and/or wear and tear costs of general use vehicles (e.g., construction vehicles), medical supplies, and emergency response apparatus (e.g., fire trucks, ambulances).
- Equipment that is purchased for permanent installation and/or use, beyond the scope of exercise conduct (e.g., electronic messaging signs).

If you have questions regarding eligibility during the developmental stages of your exercise project proposal, please contact Darren Price, Exercise Program Manager, at 614-799-3660 or via e-mail [deprice@dps.state.oh.us](mailto:deprice@dps.state.oh.us)

### ***Management and Administration (M&A) Costs and Requirements***

Sub-grantees may retain a maximum of up to five percent (5%) of funding passed through by the State solely for management and administrative purposes associated with the HSGP award unless otherwise indicated in this guidance or specific grant award documents. M&A costs are specifically attributed to the management and administration of the FY2011 award(s). Indirect costs are not considered administrative costs and are not permitted under the FY2011 HSGP grants. The allowable costs specifically include the following:

- Hiring of full-time or part-time staff or contractors to include, but not limited to, completing pre-grant application Budget Worksheets and Program Narrative; initiating, documenting, and tracking grant expenditures; inventorying equipment purchases; producing or completing required grant reports such as the Request for Cash, Encumbrance Report, and federally-required ISIP and BSIR;
- Overtime and backfill costs related to accomplishing allowed administrative tasks only to the extent the payment for such services is in accordance with the policies of the local unit(s) of government;
- Applicable travel expenses to the extent the payment for such services is in accordance with the policies of the local unit(s) of government;
- Non-food meeting related expenses (IAW with OMB Circular A-87 and 44 CFR) associated with County's Terrorism Advisory Team to discuss local homeland strategy implementation and/or grant program management;
- Acquisition of authorized office equipment, including personal computers, laptop computers, printers, LCD projectors, and other equipment or software which is required to support the implementation of the FY09 SHSP and *only when* no such equipment is currently available to accomplish the task;

- Recurring fees/charges associated with *authorized office equipment*, such as cell phones, faxes, etc. (this does *not* pertain to *response equipment* purchased under the eligible equipment program category); and
- Leasing and/or renting of office space for *newly hired personnel* who will administer the programs within FY2011 HSGP, or for personnel currently being paid with SHSP funds for grant administration and will now be responsible to additionally administer FY2011 HSGP funding.

***Food Costs (SHSP, LE-SHSP, UASI, MMRS, CCP)***

With the exception of food costs associated with travel/per-diem or providing for a meal during the conduct of a full-scale exercise where participants do not have the ability to leave, food costs will not be approved.

***Construction and Renovation (SHSP, UASI)***

Use of HSGP funds for construction is generally prohibited except as outlined below. Such construction shall be strictly limited and allowable only when it is a necessary component of a security system at critical infrastructure facilities. OPSG, CCP, and MMRS funds may not be used for any type of construction. Project construction not exceeding \$1,000,000 is allowable as deemed necessary.

FEMA is legally required to consider the potential impacts of all HSGP projects on environmental resources and historic properties. Grantees must comply with all applicable environmental planning and historic preservation (EHP) laws, regulations, and Executive Orders (EOs) in order to draw down their FY 2011 HSGP grant funds. The following types of projects are considered to constitute construction or renovation and may require a review under Federal EHP laws and requirements prior to initiation of the project:

- Construction and renovation of guard facilities which are intended to provide enhanced security at grantee-designated critical infrastructure sites
- Renovation of and modifications, including the installation of security and communication equipment, to buildings and structures
- Any other construction or renovation efforts that change or expand the footprint of a facility or structure, including security enhancements to improve perimeter security
- Physical security enhancements including, but not limited to:
  - Lighting
  - Fencing
  - Closed-circuit television (CCTV) systems
  - Motion detection systems
  - Barriers, doors, gates, and related security enhancements

The erection of communications towers that are included in a jurisdiction's interoperable communications plan is allowed, subject to all applicable laws, regulations, and licensing provisions. Communication tower projects must be submitted to FEMA for EHP review. Per the *Department of Defense and Full-Year Continuing Appropriations Act, 2011* (Public Law 112-10), communications towers are not subject to the \$1,000,000 construction cap.

Before grantees can draw down funds for construction and renovation costs under HSGP, grantees must provide to FEMA:

- A description of the asset or facility, asset location, whether the infrastructure is publicly or privately owned, and the construction or renovation project

- Certification that a facility vulnerability assessment has been conducted
- An outline addressing how the construction or renovation project will address the identified vulnerabilities from the assessment
- Consequences of not implementing the construction or renovation project
- Any information requested by FEMA to ensure compliance with Federal EHP requirements

***Environmental Planning and Historic Preservation (EHP) Compliance***

FEMA is legally required to consider the potential impacts of all grant-funded projects on environmental resources and historic properties. For HSGP and other preparedness grant programs, this is accomplished via FEMA’s EHP Review. Sub-grantees must comply with all applicable EHP laws, regulations, and Executive Orders (EOs) in order to draw down their FY 2011 HSGP grant funds. Any project with the potential to impact natural resources or historic properties cannot be initiated until FEMA has completed the required FEMA EHP review. Grantees that implement projects prior to receiving EHP approval from FEMA risk de-obligation of funds.

HSGP projects that involve the installation of equipment, exercises not specifically excluded from a FEMA EHP review per the GPD Programmatic Environmental Assessment (PEA) (for more information on the PEA see IB 345 and ground-disturbing activities, new construction, including communication towers, or modification/renovation of existing buildings or structures must undergo a FEMA EHP review. Furthermore, for those proposed construction or renovation projects that are part of larger projects funded from a non-FEMA source (such as an EOC that is part of a larger proposed public safety complex), a FEMA EHP review must be complete before the larger project is initiated. For these types of projects, sub-grantees must complete the FEMA EHP Screening Form (included in this guidance) and submit it, with all supporting documentation, to their Ohio EMA Grant Programs Specialist. Sub-grantees should submit the FEMA EHP Screening Form for each project as soon as possible upon receiving grant award. Refer to IBs 329, 345, and 356 located at <http://www.fema.gov/> for further details on EHP requirements.

The following activities would not require the submission of the FEMA EHP Screening Form: planning and development of policies or processes; management, administrative or personnel actions; classroom-based training; table top exercises; and acquisition of mobile and portable equipment (not involving installation).

No projects initiated after September 9, 2010 without proper EHP review will be funded. Projects using HSGP funds that were initiated or completed before an EHP review was concluded will be de-obligated. To avoid unnecessary delays in starting a project, grantees are encouraged to pay close attention to the reporting requirements for an EHP review.

***Operation Stonegarden (OPSG) –Activities and Requirements***

The intent of OPSG is to focus on operational aspects of enhancing coordination between Federal, State and local law enforcement agencies to increase the security of the United States Borders. While equipment is an allowable expense, the FY 2011 OPSG is not intended to be an equipment-centric grant.

*Operational Overtime.* Operational overtime costs associated with law enforcement activities, in support of border law enforcement agencies for increased border security enhancement. Per the *PRICE of Homeland Security Act* (Public Law 110-412), all grantees are allowed to utilize up to



50 percent (50%) of their FY 2011 OPSG funding for personnel related costs, which include overtime activities. Any request for a personnel cap waiver must be coordinated through Ohio EMA as the SAA and will require FEMA administrator approval.

*Part Time Personnel.* FY 2011 OPSG funds may be used to pay additional current part time law enforcement personnel salaries in order to bring them to temporary full time status.

*Travel, Per Diem, and Lodging.* Travel and per diem costs associated with the deployment/redeployment of personnel to border areas and for travel associated with law enforcement entities assisting other local jurisdictions in law enforcement activities.

*Vehicle and Equipment Rentals*

*Vehicle/Equipment Maintenance*

*Fuel Cost and/or Mileage Reimbursement.* There is no cap for reimbursement of operational activities.

*Backfill.* Costs associated with backfill for personnel supporting operational activities.

*Law Enforcement Readiness.* Use of FY 2011 OPSG funds may be used to increase operational, material, and technological readiness of State, local, Tribal, and territorial law enforcement agencies.

*OPSG Unallowable Costs.* OPSG unallowable costs include costs associated with staffing and general IT computing equipment and hardware, such as personal computers, faxes, copy machines, modems, etc. The FY 2011 OPSG is not intended as a hiring program. Therefore, applying funds toward hiring full-time or permanent sworn public safety officers is also unallowable. FY 2011 OPSG funding shall not be used to supplant inherent routine patrols and law enforcement operations or activities not directly related to providing enhanced coordination between local and Federal law enforcement agencies.

#### **IV. Law Enforcement Specific Guidance**

##### ***Law Enforcement Terrorism Prevention-oriented Activities (LE-SHSP, UASI)***

Per the 9/11 Act, States are required to ensure that at least 25 percent (25%) of SHSP appropriated funds and 25 percent (25%) of UASI appropriated funds are dedicated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities (LETPA). This requirement does not include award funds from OPSG, MMRS, and CCP. Funds leveraged toward LETPA must prioritize activities associated with activities that focus on:

- Building Prevention and Protection Capabilities
- Maturation and Enhancement of State and Major Urban Area Fusion Centers.

##### ***State Priorities/Requirements for LE-SHSP Program***

Ohio's FY2011 regional LE SHSP terrorism prevention investment area is *Enhance Intelligence Fusion and Information Sharing Capabilities*.

One of the US Department of Homeland Security's (US DHS) most important initiatives in FY2011 is support for the maturation of the Information Sharing Environment (ISE), and specifically, the continued enhancement of State and Major Urban Area fusion centers to include support for implementation of the Nationwide Suspicious Activity Reporting (SAR) Initiative (NSI). These centers provide an important linkage between local, State, tribal, regional, and

Federal partners, as well as private industry, and as part of a national information sharing capability must establish and maintain the capacity to receive threat-related information, understand its implications locally and further disseminate it to other local, State, tribal, and private sector entities. At the same time State and Major Urban Area fusion centers need to be able to aggregate, blend, and analyze information gathered from local law enforcement and share that information with Federal authorities. Allowable expenditures of funding include support for equipment and consultation necessary to enable connection to information sharing systems such as the National Data Exchange (NDex), the Nationwide SAR Initiative, and supporting program areas.

In support of these efforts, Ohio EMA and Homeland Security (OHS) are encouraging the Major Urban Area fusion centers to prioritize the allocation of LE SHSP grant funding to meet and maintain identified levels baseline capabilities, as outlined in the Global Justice Information Sharing Initiative's (Global) *Baseline Capabilities for State and Major Urban Area Fusion Centers*.

Additionally, fusion centers should assess their achievement of the baseline capabilities, so they may identify any resulting gaps. Requested LE SHP grants funds should then be prioritized to target and address these gaps, and the results of this gap analysis should be included in grant applications for any fusion center funding. All efforts should be made to address gaps that are identified by taking advantage of the service deliveries made available through the joint US DHS and Department of Justice Fusion (DOJ) Process Technical Assistance Program. In 2011 all fusion center employees are expected to complete the online 28 CFR Part 23 certification training made available through this program.

**FY2011 LE-SHSP grant funds may not be used to support fusion center-related initiatives unless the fusion center is able to certify that privacy and civil rights/civil liberties (CR/CL) protections are in place that are determined to be at least as comprehensive as the ISE Privacy Guidelines by the ISE Privacy Guidelines Committee (PGC) within 6 months of the award date on this FY2011 award. If these protections have not been submitted for review and on file with the ISE PGC, LE SHSP grants funds may only be leveraged to support the development and/or completion of the fusion center's privacy protections requirements.**

State and local LE-SHSP applications must align with terrorism prevention investment area of "Enhancing Intelligence Fusion and Information Sharing Capabilities" to be eligible for funding.

### ***Governance***

The FY2011 LE SHSP funds will be distributed for projects that are regionally-based and developed by Regional Law Enforcement Advisory Groups or the Northern Border Executive Committee. These groups are essential to the funding process, as they allow for collaborative planning and resource distribution throughout the state. The Advisory Groups are based in the eight (8) Homeland Security Planning Regions.

Membership for the Regional Law Enforcement Advisory Groups include, at minimum:

- Three (3) police chiefs – from within the largest and smallest counties and one mid-sized county
- Three (3) county sheriffs – representing the largest and smallest counties and one mid-sized county
- One (1) university law enforcement representative (where applicable)

- One (1) representative from a criminal justice services agency (where applicable)
- One (1) representative from a terrorism early warning group or fusion center (where applicable)

The Regional Law Enforcement Advisory Group will come to a consensus on the projects for which the region will be applying and will submit detailed descriptions of each project in EGMS. Included in the project description will be the objective of the project and a statement of how the anticipated outputs will contribute toward achieving the priority’s milestones.

The Northern Border Executive Committee will act as the Advisory Group for the Northern Border Initiative funding which is limited to equipment purchases and funding for marine patrols that support northern border initiative activities as they are outlined in the current approved Northern Border Initiative Operational Order.

Regional proposals will be accepted on behalf of each Homeland Security region. All law enforcement agencies within a region receiving funds or other benefits through the LE SHSP must be in compliance with crime statistics reporting, using either the Ohio Incident-Based Reporting System or Uniform Crime Reporting, per Ohio Revised Code Section §5502.62(C)(6).

Furthermore, agencies receiving funding should designate an individual to serve as the agency’s point of contact to maintain a Contact Information Management System (CIMS) account and check it regularly in order to relay timely information to appropriate partners.

A current listing of the Regional Law Enforcement Advisory Group’s membership, programmatic agent, and fiscal agent must be submitted with the application in order to be eligible for funding. This information must be maintained with Ohio EMA throughout the grant period in order to continue to remain eligible for funding

***Eligible Program Activities***

To be eligible for Ohio’s FY2011 LE SHSP funding, regional project applications *must* directly align with the following five (5) state terrorism prevention priorities outlined below.

1. Information Sharing and Intelligence Fusion
2. Regional Terrorism Information Program (this priority includes the Terrorism Liaison Officers and Regional Information Coordinators)
3. Early Identification Technology
4. Grant Project Planning & Sustainability
5. Chemical, Biological, Radiological, Nuclear and Explosive (CBRNE) Detection
  - a. No more than 30% of the total regional award (excluding NBI funds) may be used toward the CBRNE detection priority.

Applicants must describe how their project relates to one or more priorities and directly aligns with an investment milestone summarized in the table below.

<b>LE SHSP Priority</b>	<b>Priority Goal</b>	<b>Corresponding Investment Milestones</b>
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<p><u>One</u>: Information Sharing and Intelligence Fusion</p>	<p>Strengthen information sharing, collection, fusion, and analysis statewide by integrating existing electronic information sharing systems and providing for real-time submission of suspicious activity reports to regional terrorism early warning groups, regional fusion centers, and the Strategic Analysis Information Center (SAIC)</p>	<ol style="list-style-type: none"> <li>1. Establish a committee to make recommendations for development and implementation of a statewide electronic information sharing strategic plan.</li> <li>2. Complete the strategy leveraging the existing plans of stakeholders.</li> <li>3. Complete a NIEM-compliant electronic Suspicious Activity Reporting (SAR) system aligned with the national SAR effort.</li> <li>4. Develop/identify a criminal intelligence database to integrate intelligence from agencies across Ohio in one location for statewide queries.</li> <li>5. Implement cyber and physical solutions to integrate existing information/intelligence systems.</li> <li>6. Purchase new (or expand existing) electronic platforms and equipment to expand state and local fusion centers and terrorism early warning groups.</li> <li>7. Integrate GIS, video and acoustic sensor platforms, including public and private surveillance systems, into fusion centers and EOCs within bounds of privacy policies.</li> </ol>
<p><u>Two</u>: Regional Terrorism Info. Program (this priority includes the Terrorism Liaisons &amp; Regional Information Coordinators)</p>	<p>Develop a multi-disciplined Statewide Terrorism Liaison Officer (TLO) Program to share information and intelligence horizontally and vertically.</p>	<ol style="list-style-type: none"> <li>1. Provide continuing education for TLOs and train and deploy multi-disciplinary TLOs in every county.</li> </ol>
<p><u>Three</u>: Early Identification Technology</p>	<p>Develop statewide early identification capabilities that enable law enforcement officers and other criminal justice stakeholders to detect threats at the earliest possible stage.</p>	<ol style="list-style-type: none"> <li>1. Deploy early identification equipment (biometric identification equipment, license plate readers, etc.) and mobile data equipment to LE agencies and other criminal justice entities.</li> </ol>
<p><u>Four</u>: Project Planning, Training &amp; Sustainability</p>	<p>Conduct project planning and training for coordination of programs and sustainability of projects.</p>	<ol style="list-style-type: none"> <li>1. Regional Law Enforcement Advisory Groups will hold planning summits to ensure the continued development, interoperability, &amp; sustainability of programs.</li> </ol>

<p>Five: CBRNE Detection</p>	<p>Build statewide risk-based CBRNE detection capabilities</p>	<ol style="list-style-type: none"> <li>1. Under the guidance of statewide Technical Advisory Committees (TACs), deploy CBRNE detection equipment for regional response teams.</li> <li>2. Complete CBRNE detection gap analysis and implement plan to coordinate/build-out the regional CBRNE detection capability.</li> <li>3. <b><u>Please note that all equipment purchased under this priority must receive prior approval from the appropriate TAC and must demonstrate a nexus to intelligence and information sharing (e.g. Bomb Squad members being trained as TLOs, etc.)</u></b></li> <li>4. The protection of Critical Infrastructure/Key Resources (CIKR) with funding from priority #5 is allowable with the understanding that the physical site in question must be fully incorporated into the Automated Critical Asset Management System (ACAMS) and has the LE SHSP Advisory Committee approval for that respective region.</li> <li>5. Once the Regional Advisory Committee decides upon supporting the expenditure, OHS will consult with State Infrastructure Staff to avoid duplication of effort and ensure efficient use of remaining LE SHSP Funding. Any equipment purchased under this context must have a justification that supports one or more of the existing LE SHSP Priorities which will be reviewed by OEMA and OHS. The 30% cap applies to any items purchased out of these categories (CBRNE, CIKR Protection).</li> </ol>
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***Alignment with Plans and Guidance***

All LE SHSP projects will be aligned with the following plans/guidance:

- Ohio’s FY2011 Investment Justification
- Ohio Homeland Security Strategic Plan Version 3.1
- National Preparedness Guidance Target Capabilities (TCL)
- National Incident Management System (NIMS)
- National Response Framework (NRF)

***Allowable Planning, Training, and Exercise Examples Specific to Law Enforcement Terrorism Prevention-oriented Activities***

The allowable costs under the FY2011 LE-SHSP grant are divided into five program categories: Planning, Equipment, Training, Exercises, Administration, and limited Organizational. Activities implemented under the FY2011 LE-SHSP must support terrorism preparedness by building or enhancing capabilities that relate to the prevention of and protection against terrorism in order to be considered eligible. However, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Sub-grantees must demonstrate this dual-use quality for any activities implemented under this program that are not explicitly focused on terrorism preparedness.

***Personnel Costs***

In order for Ohio to meet the requirements of the *Personnel Reimbursement for Intelligence Cooperation and Enhancement (PRICE) of Homeland Security Act* (Public Law 110-412), all regional personnel and personnel-related costs, are allowed up to 35 percent (35%) of FY2011 LE-SHSP without time limitation placed on the period of time that such personnel can serve under the grant. These guidelines are not retroactive to previous fiscal years of HSGP funding.

In general, the use of LE-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 35 percent include, but are not limited to:

- Operational overtime
- Overtime/backfill to participate in approved training or exercise deliveries
- Overtime to participate in intelligence sharing activities
- Salaries and personnel costs of planners, equipment managers, exercise coordinators, and/or training coordinators
- Salaries and personnel costs under the M&A category
- Contractor costs associated with performing the above activities
- These activities are also subject to the funding and eligibility requirements detailed under the allowable cost categories. For further details, applicants should contact their Ohio EMA grants coordinator.

### ***Planning Activity Examples***

Establishment/Enhancement of Fusion Centers:

- Hiring an IT specialist to plan, develop, and implement the IT applications necessary for the fusion center
- Support efforts to fully implement the Statewide fusion process, including coordination between State and Urban Area fusion centers, as well as other intelligence analytic entities located in the area of responsibility, such as intelligence units, real time crime information and analysis centers, HIDTAs, etc
- Hiring contractors and consultants to make recommendations on the development of capabilities at State and Major Urban Area fusion centers; such centers should be designed in support of the analytic and other baseline capabilities as outlined in the Global Justice Information Sharing Initiative’s (Global) *Baseline Capabilities for State and Major Urban Area Fusion Centers*
- Hiring privacy and security officials to plan, develop, and implement privacy and security policies necessary to support the fusion center

Other Allowable Planning Activity Examples:

- Conducting point vulnerability analyses and assessments
- Soft target security planning (e.g., public gatherings)
- Developing border security operations plans in coordination with CBP
- Developing, implementing, and reviewing Area Maritime Security Plans for ports, waterways, and coastal areas
- Updating and refining threat matrices
- Integrating and coordinating private sector participation with fusion center activities
- Developing and implementing civil rights, civil liberties and privacy policies, procedures, and protocols
- Acquiring systems allowing connectivity to State, local, tribal, territorial, and Federal data networks, such as the National Crime Information Center (NCIC) and Integrated Automated Fingerprint Identification System (IAFIS), as appropriate

Planning funds cannot be used for the purpose of hiring public safety (fire, EMS, law enforcement) personnel who will also fulfill traditional public safety duties. These funds cannot supplant existing budgets for these planning activities. In no case is dual compensation allowable.

Upon completion of a given planning project, the sub-grantee will submit copies of the completed plans and/or planning tasks that were developed, enhanced, or updated using FY2011 LE-SHSP funds. These will be submitted to Ohio EMA's Grant Branch no later than the end of the grant performance period and will be used to validate the work was completed as per the budget. Failure to do so may result in forfeiture or repayment of grant funds.

Further, all publications created with FY2011 LE-SHSP funding shall prominently contain the following statement: "This document was prepared under a grant from the U.S. Department of Homeland Security (DHS). Points of view or opinions expressed in this document are those of the authors and do not necessarily represent the official position or policies of the U.S. DHS."

### ***Organizational***

FY2011 LE SHSP funds may be used only for the following organizational activities directly supporting the Northern Border Initiative (NBI) project.

#### **Operational Overtime Costs:**

In support of efforts to enhance capabilities for detecting, deterring, disrupting, and preventing acts of terrorism, operational overtime costs are allowable for increased security measures at critical infrastructure sites. FY2011 LE SHSP funds for organizational costs may be used to support select operational expenses associated with increased security measures at critical infrastructure sites in the following authorized categories:

- Increased border security activities in coordination with CBP, as outlined in Information Bulletin #135

FY 2011 LE SHSP funds may only be spent for operational overtime costs upon prior approval provided in writing (email or memorandum) from the OH EMA NBI Grants Coordinator.

### ***CBRNE Detection Equipment***

For the FY2011 LE-SHSP, no more than 30% of the total regional award (excluding NBI funds) may be used toward the CBRNE detection priority. Any CBRNE detection equipment purchases must be made in direct support of a law enforcement agency and must demonstrate a nexus to intelligence and information sharing (e.g. Bomb Squad members being trained as TLOs, etc.) OHS will submit all regional CBRNE equipment requests to the appropriate statewide Technical Advisory Committee (TAC) for review and approval. This will help to support coordination with other regions and avoid duplication of efforts within the region. It is only after this process that equipment will be approved for purchase. The region must receive approval for the item in through the EGMS from Ohio EMA's Grants Branch. This approval must take place prior to any encumbrance or expenditure of funds for the item in question. The Ohio LE SHSP grant is designed to build capabilities to prevent terrorism by sharing information and intelligence. It is focused on detecting terrorism before an act can be carried out. A limited amount of CBRNE **response** equipment may be allowed on a case-by-case basis and must be accompanied by a written justification that includes why the equipment cannot be purchased with another funding source.

### ***Training Activity Examples***

Law enforcement terrorism prevention **and protection-oriented funds** may be used for a range of law enforcement terrorism prevention related training activities to enhance the capabilities of State and local personnel, including the following:

- Establishment and/or Enhancement of Fusion Centers. Grant funds may be used to support intelligence analyst training in the following manners:
  - *Participation in DHS approved intelligence analyst training.* States wishing to develop or sponsor intelligence analyst courses for a national audience should submit courses to FEMA for review and approval in accordance with the process outlined in *Parts II and VI* of this guidance document. The list of approved courses will be constantly updated and can be accessed in the FEMA catalog at [http://www.firstrespondertraining.gov/odp\\_webforms](http://www.firstrespondertraining.gov/odp_webforms).
  - *Limited participation in non-FEMA approved intelligence analyst training.* States may send students to attend non-approved intelligence analysis courses for up to three offerings in accordance with the training process outlined in *Parts II and VI* of this guidance document.

A certificate of completion of all intelligence analysts training must be on file with the SAA and must be made available to Program Analysts upon request upon the hiring of personnel. Funds utilized to establish or enhance recognized State and Major Urban Area fusion centers must support the development of a statewide fusion process that corresponds with the Global Justice/Homeland Security Advisory Council (HSAC) Fusion Center Guidelines and the *National Strategy for Information Sharing*, and achievement of a baseline level of capability as defined by Global's *Baseline Capabilities for State and Major Urban Area Fusion Centers*, a supplement to the Fusion Center Guidelines, located at <http://www.it.ojp.gov/documents/baselinecapabilitiesa.pdf>.

#### ***Additional Allowable Training Activities***

- Allowable costs include training courses that focus on:
  - Building information sharing capacities (especially among law enforcement, non-law enforcement, other government agencies, and the private sector)
  - Fusion Liaison Officer (FLO) Programs
  - Methods of target hardening
  - Facility law enforcement security personnel, to include facilities, vessels, and ports
  - CBRNE, agriculture, and cyber threats
  - History of terrorism and social environments contributing to threats
  - Surveillance and counter-surveillance techniques
  - Privacy, civil rights, and civil liberties regulations, policies, procedures, and protocols
  - Critical Infrastructure Protection training, to include identifying/assessing critical infrastructure assets, vulnerabilities, and threats
  - Cyber/agriculture/food security threats recognition and protective measures training
  - Cultural awareness training for community engagement activities and undercover operations related to terrorist organizations
  - Languages such as Arabic, Urdu, or Farsi which are spoken by known terrorists and terrorist organizations
  - Joint training with other homeland security entities (e.g., U.S. Secret Service, CBP)
  - Geospatial database use, design, development, and management training

#### ***Exercise Activity Examples***

Law enforcement terrorism prevention protection-oriented funds may be used to design, develop, conduct, and evaluate terrorism prevention-related exercises, including the following:

- Exercises to evaluate the effectiveness of information sharing plans, policies, procedures, and protocols



- Exercises to evaluate facility and/or vessel security protection
- Exercises to evaluate area maritime security protection
- Exercises to evaluate threat recognition capabilities
- Exercises to evaluate cyber security capabilities
- Exercises to evaluate agricultural/food security capabilities
- Exercises to evaluate prevention readiness and techniques
- —Red Team|| (force on force) exercises
- Interoperable communications exercises
- Critical infrastructure vulnerability, protection, and/or attack exercises

Where practical, these exercises should involve the public sector, non-governmental partners, trained citizen volunteers, and the general public. State and local governments should work with their Citizen Corps Councils to include volunteers from programs such as Volunteers in Police Service, Neighborhood Watch, and the general public, including people with disabilities. States and Urban Areas are eligible for technical assistance for the design, development, conduct, and evaluation of terrorism prevention-focused exercises. This assistance, largely administered by the FEMA National Exercise Division/ Terrorism Prevention Exercise Program (TPEP), must be applied for and utilized in coordination with the SAA. More information on the TPEP and additional exercise support can be found at <https://hseep.dhs.gov>.

## V. Grant Administration

*Grant Administration* information is intended to help sub-grantees in understanding the rules and regulations associated with administering federally-funded grant awards and the state's process for meeting these requirements. We attempted to pull this standard financial, administrative and legal information to create a comprehensive source of administrative information related to the preparedness grant programs.

### ***Standard Financial Requirements***

Any sub-grantee(s) accepting grant funds from Ohio EMA shall comply with all applicable laws and regulations.

The administrative requirements that apply to most Department of Homeland Security (DHS) award recipients and specifically the awards made to our governmental partners through the grant program(s) included in this guidance arise from the Office of Management and Budget (OMB) Circular A-102, *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments* (also known as the —A-102 Common Rule), found under DHS regulations at Title 44, Code of Federal Regulations (CFR) Part §13, —Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments. For the purposes of this grant guidance, reference to these requirements will be made by noting “44 CFR Part 13”.

The requirements for allowable costs/cost principles are contained in the A-102 Common Rule, OMB Circular A-110 (2 CFR §215.27), DHS program legislation, Federal awarding agency regulations, the terms and conditions of the award and the accompanying grant guidance. The applicable costs principles for the grants included in this guidance are:

- 2 CFR Part §225, *Cost Principles for State, Local, and Indian Tribal Governments*, (formerly referenced as OMB Circular A-87).
- OMB Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*.
- 48 CFR Part §31.2, Federal Acquisitions Regulations (FAR), *Contracts with Commercial Organizations*.

The sub-grantee is required to ensure that the requirements of the federal grant are met as well as any applicable requirements of the state and local government. Acceptance of a federal grant and its requirements do not relieve the sub-grantee of requirements of local and/or state government.

## A. Application Requirements

### ***Submission Requirements***

Grant Agreements and Assurances with original signature must be mailed to Ohio EMA and must be postmarked by April 24, 2012. Grant Agreements/Assurances not postmarked by that date/time will not be guaranteed timely review, approval and/or funding. Grant Agreements/Assurances *must be mailed or hand delivered* to the Ohio EMA Preparedness Grants Branch, 2855 W. Dublin-Granville Rd, Columbus, Ohio, 43235. It is recommended that the sub-grantee use a method of delivery that can be tracked.

For FY2011 HSGP sub-grants, all grant application and management beyond the Grant Agreement and Assurances will be conducted using Ohio's Electronic Grant Management System (EGMS). Sub-grantees may access the system and user guide by using the following web link <http://ema.state.oh.us/oemagrants> . Applicants must complete and upload the remaining required documents into EGMS. Uploads are to be submitted by 11:59 PM on April 24, 2012.

### ***Required Forms***

#### **1. Grant Agreement – (mailed or hand delivered)**

The grant agreement is the official document as to the agreement of the sub-grantee to the terms and conditions of the grant as presented by Ohio EMA through the requirements outlined in the grant agreement as well as the grant guidance. In order to complete the form, the sub-grantee must provide the contact information for the sub-grantee grant manger, the sub-grantee fiscal contact and ensure the agreement has been signed (with original signature) and dated.

#### **2. Assurances – (mailed or hand delivered)**

The assurance forms are a requirement of federal sub-grants and outline several of the administrative requirements prescribed by law, regulation and/or executive order. In order to complete this form, the sub-grantee is required to check the appropriate boxes on the summary sheet, complete the Standard Form LLL (lobbying form), sign the summary sheet and submit by mail with the signed grant agreement.

#### **3. Summary of Projects/Costs – (uploaded in EGMS)**

This form acts first as a checklist to ensure all forms are complete and attached. It next lists all Projects being submitted for funding and their respective Total Costs. Finally, the sub-grantee's authorized representative will sign and verify the Governance/Advisory Team did concur on the submission of the application.

#### **4. EGMS User Information Form – (uploaded in EGMS)**

This form allows a sub-grantee to permit additional accounts within EGMS. In addition to the Signatory Official, one additional contact can be permitted to upload information and/or documentation. Also, accounts can be added for the sole purpose of *working* on the grant application and/or cash requests –but not permitted to submit.

#### **5. Governance/Advisory Team – (Uploaded in EGMS)**

This form identifies the current membership of Team and must be maintained throughout the grant program period. Identify the respective members for each of the disciplines on the Team. As a reminder, no one person may represent multiple disciplines on the Team and no one discipline shall have the majority of members of the Team.

#### **6. Contact Information – (Uploaded in EGMS)**

For Ohio EMA to complete the official Grant Agreement, the sub-grantee must identify the three individuals who will manage and address any state/federal questions on the status of

projects or funding. The Project Manager should be the person who has the day-to-day status of all project tasks and accomplishments. The Financial Officer should be the representative in the County Auditor's or Treasurer's office who will receive the transfer of funds and can address the pay-in/out of funds transferred to the county. The Signatory Official is the person who signs the Grant Agreement on behalf of the county. This information should also be reflected in the appropriate boxes on the sub-grantee's grant agreement.

## **7. NIMS Compliance**

In order to receive FY 2011 HSGP funding, the sub-grantee is required to certify as part of their grant application that they are addressing and/or have met the FY2010 NIMS requirements. Additional information about NIMS requirements, compliance and resources for achieving compliance can be found at *Ohio EMA NIMS* website <http://www.ema.ohio.gov/NimsGuidance.aspx> or the *NIMS Integration Center web page*, <http://www.fema.gov/emergency/nims>

## **8. EHP Review Form (as applicable; uploaded to EGMS)**

All projects should be reviewed for EHP impacts prior to submitting in EGMS. For any project that *may* have EHP impacts the EHP review form must be completed and submitted. If you have questions regarding the determination please contact your respective Grants Coordinator (see POC's at the end of this application package).

## **9. Travel Pre-Approval Form (as applicable; uploaded to EGMS)**

This form is used to submit for pre-approval of travel using Planning, Training and Admin funds. **This form is required 30 days in advance of travel opportunity for costs to be considered for reimbursement. Note: The approval of the travel does not constitute approval of all costs incurred during the travel. Travelers must obtain signed approval from Ohio EMA to ensure costs are eligible for reimbursement.**

## **10. Training Pre-Approval Form (as applicable; uploaded to EGMS)**

**All training activities supported by FY2011 HSGP must be pre-approved by the Ohio EMA and applicant must obtain signed approval from Ohio EMA to ensure costs are eligible for reimbursement.**

## **11. Exercise Pre-Approval Form (if applicable; uploaded to EGMS)**

This form is only required to be completed and submitted by those counties that have an exercise Project in their application.

## ***Budget Submission***

Each sub-grantee will be required to submit into EGMS the budget that outlines, in detail, the projects and estimated costs for completing the projects. The purpose of the budget is to provide a detailed account for the programming of federal funds while allowing Ohio EMA to complete a review for eligibility, EHP concerns and administrative requirements. Sub-grantees have been given an ample application window to allow for meeting with advisory teams to ensure a comprehensive review, prioritization and budgeting of federal funds. Since the budget process is dynamic and allows for changes through the grant lifecycle, sub-grantees are encouraged to provide detailed projects and avoid "place holder" project budgets. Sub-grantees are further

encouraged to work with their Ohio EMA Grant Programs' Specialist to identify documentation requirements and details prior to uploading their budgets.

## **B. Application Processing**

### ***Standards for Review***

Ohio EMA will ensure review and comment of all applications within 30 days of documented receipt. Sub-grant applications that do not provide the level of detail necessary to approve will be sent back to the sub-grantee for further development.

### ***Issuance of Grant Agreement***

Upon final review and approval of the sub-grantee's FY2011 application, the grant agreement will be signed and dated by the Ohio EMA Executive Director and a copy forwarded to the sub-grantee for their records. Receipt of the signed grant agreement is the authorization of the sub-grantee to obligate grant funds. Any costs incurred prior to issuance of the grant agreement may not be reimbursed.

## **C. Post Award Requirements**

### ***Grant Performance Period***

The performance period for the FY2011 HSGP sub-grants can be found on the grant agreement for each sub-grantees' specific award. Note that all costs must be incurred within the period of performance to include receipt and installation of all equipment. No funds may be spent on activities or costs that occur outside of the defined grant performance period. Lack of progress towards completion of grant funded activities may result in de-obligation of funds. Any de-obligated funds will be re-obligated to recipients with projects that can be completed within the period of performance. There will be no extensions to the grant performance period listed on the sub-grantees' grant agreement.

### ***Standards for Financial Management***

Sub-grantees are required by 44 CFR, Part 13 to have in place an accounting system that maintains records which adequately identify the source and application of funds provided for grant funded projects. The accounting system must include information pertaining to sub-grant awards, obligations, un-obligated balances, assets, liabilities, outlays or expenditures and income. Ohio EMA requirements for sub-grantee accounting include the ability to track expenditures by grant program and by federal fiscal of the award (i.e. FY2009 CCP, FY2010 CCP, etc.).

### ***Source Documentation***

44 CFR Part 13 also requires that accounting records be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and sub-grant award documents, etc. As such, Ohio EMA requires that sub-grantees have source documentation available prior to requesting cash reimbursement. Proper documentation for select items is as follows:

- Travel costs
  - Copy of the government unit travel policy

- Receipts/documentation as required by travel policy
- Justification and/or approval from government entity for overage in per diem rates, etc.
- Personnel costs
  - Time and Effort documentation with activity reports reflecting allowable work
  - Proof of payment
- Contract costs
  - Copy of draft contract for eligibility review prior to contract award
  - Copy of awarded contract for grant file
  - Deliverables listed in contract
  - Terms of payment outlined in contract
  - For contracts to an individual, a signature of the “contractor” is required.
- Equipment costs
  - Invoice (not quote) for equipment purchased
  - Documentation that equipment is received on site and installed as necessary
- Meeting costs
  - Agenda/Course Description
  - Attendance roster

### ***Changes***

Per 44 CFR Part 13, sub-grantees must obtain the prior approval of the awarding agency (Ohio EMA) in any case where a change is to be made to the scope of the project, regardless of budget impact. Ohio EMA will require all sub-grantees to request a budget modification and approval, to include EHP approval, through EGMS prior to costs being incurred for the item(s) to be changed. Costs incurred prior to appropriate actions being taken to modify and approve the budget may result in costs being denied for reimbursement. Budget modifications will be reviewed promptly by Ohio EMA Preparedness Grants Staff with an expectation that properly documented and submitted budget modifications are approved within seven to ten business days of submission.

### ***Procurement***

The procurement process is one of, if not the most, scrutinized aspect of the federal grant programs. The emphasis on how procurements are made is based from the 44 CFR Part 13 requirements that “all procurement transactions be conducted in a manner providing full and open competition with the standards of section 13.36”. Additionally, sub-grantees must ensure that they meet the procurement requirements of the Ohio Revised Code and local procurement regulations. All sub-grantees are strongly urged to seek out their procurement department/individual to seek guidance on implementing the grant requirements into the procurement of any grant funded item or service. In accordance with this requirement, sub-grantees will be required to document actions that demonstrate compliance with the “full and open” regulation. The following guidance is provided in an effort to help sub-grantees navigate the requirements of procurement:

- For procurements that range from \$0 through the jurisdictions locally established or ORC established bidding threshold, the sub-grantee should be able to demonstrate that it solicited quotes from a reasonable number - generally defined as three or more – of qualified sources. Procurements done in this manner are considered “small purchase procedures”.

- Procurements that exceed the local and/or ORC established bidding threshold but do not exceed \$100,000 should follow the local jurisdiction’s competitive bidding process.
- Procurements that exceed \$100,000 must follow a procedure that ensures compliance with 44 CFR Part 13 requirements.
  - Any procurement in excess of \$100,000 must be pre-coordinated with Ohio EMA to ensure proper documentation and procedures are met.
- If the procurement process is followed and the sub-grantee identifies that there is a lack of competition or the item is only available from one source, the purchase must be pre-coordinated with Ohio EMA. As the purchase will be considered “non-competitive” it must be documented in a specific manner.
  - Procurements that are completed outside of the competitive process without pre-coordination with Ohio EMA will not be reimbursed.

Sub-grantees should note that the following situations are considered to be restrictive of competition and should be avoided:

- Placing unreasonable requirements on firms in order for them to qualify to do business,
- Requiring unnecessary experience and excessive bonding,
- Noncompetitive pricing practices between firms or between affiliated companies,
- Noncompetitive awards to consultants that are on retainer contracts,
- Organizational conflicts of interest,
- Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance of other relevant requirements of the procurement, and
- Any arbitrary action in the procurement process.

Sub-grantees will maintain records sufficient to detail the significant history of any procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. Sub-grantees alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements.

***Equipment and Supplies Requirements***

Utilization of HSGP funds for equipment purchases requires that sub-grantees maintain specific documentation on each item through its useful life until final disposition occurs. Per 44 CFR Part 13, procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, as a minimum, meet the following requirements:

- Property records must be maintained that include:
  - A description of the property,
  - A serial number or other identification number,
  - The source of property,
  - Who holds title,
  - The acquisition date, and cost of the property,
  - Percentage of Federal participation in the cost of the property,
  - The location, use and condition of the property, and

- Any ultimate disposition data including the date of disposal and sale price of the property.
- A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.
- Adequate maintenance procedures must be developed to keep the property in good condition.
- If the sub-grantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

When the equipment is no longer needed for the original project and/or has outlasted its useful life, 44 CFR Part 13 prescribes the following requirements for final disposition:

- Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.
- Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency (FEMA through Ohio EMA) shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.
- In cases where a grantee or sub-grantee fails to take appropriate disposition actions, the awarding agency may direct the grantee or sub-grantee to take excess and disposition actions.

Supplies as defined as tangible personal property other than “equipment” for used in this guidance have a disposition requirement when the residual value of the combined unused inventory exceeds \$5,000. In cases where this may occur, the awarding agency is entitled to its share of the value of the remaining inventory.

### ***Sub-Granting***

No sub-grantee receiving FY2011 HSGP funding may sub-grant funding to another entity without prior coordination and approval from Ohio EMA.

### ***Single Audit Requirements***

Sub-grantees are responsible for obtaining audits in accordance with the Single Audit Act Amendments of 1996 (31 U.S.C. 7501–7507); 31 U.S.C. 503, 1111; Executive Order 8248; Executive Order 11541; and revised OMB Circular A–133, “Audits of States, Local Governments, and Non-Profit Organizations.” The audits shall be made by an independent auditor in accordance with generally accepted government auditing standards covering financial audits. Sub-grantees must ensure that funds received and expended under this grant program are coordinated with the jurisdictions fiscal office (treasurer, auditor, etc.)

### ***Reporting Requirements***

Upon official award, applicants acknowledge they will have to agree to complete quarterly reports to the Ohio EMA; and also agree to update the Bi-annual Strategy Implementation Report (BSIR) on the federal Grants Reporting Tool (GRT, due NLT January 10 and July 10 each year until the grant concludes, and then to complete one final BSIR within 120 days of the federal grant closure date. Further information on quarterly and bi-annual reporting will be provided with issuance of the official grant agreement.



## **D. Payment**

### ***Reimbursement Requests***

The reimbursement request process for the FY2011 HSGP programs will be executed solely through the EGMS system. In order to be processed, Ohio EMA will require that reimbursements include documentation noting that services have been completed (contract, personnel, etc.) and/or that equipment has been received on site and invoiced. To be reimbursed, costs must be eligible and proper back-up documentation must be submitted through the EGMS. Cash requests will be reviewed by a Program Specialist to ensure completeness when received by Ohio EMA.

### ***Standards for Review***

The reimbursement review process includes an initial review for completeness, determination of eligibility and data entry of the cash request for tracking/monitoring. This review is conducted by the Preparedness Grants Program Specialist and focuses on accuracy of requests, prior approval of costs in the budget and ensuring complete documentation accompanies the request. Cash requests that are properly executed by the sub-grantee will be processed in five business days or less.

If a request is not complete, this includes but is not limited to the following items: lack of proper documentation, costs not included on the approved budget, no prior EHP approval, etc. the request will be rejected to the sub-grantee for revision. Sub-grantees are encouraged to utilize their Program Specialist for technical assistance in filling out the cash request and compiling documentation to support the cash request prior to submission in an attempt to expedite the approval process.

### ***Payment***

Upon approval by the Preparedness Grants Branch, the sub-grantees' funds will be requested for payment from Ohio EMA's fiscal unit. The payment process entails requesting money from the federal entity, receiving funds at the state level, vouchering the funds and the dispatching of an EFT to the sub-grantee. While this process relies heavily on external stakeholders, Ohio EMA has and will work to ensure the quickest processing of sub-grantee payments.

## **E. Enforcement, Termination and After the Grant Requirements**

### ***Monitoring***

Per 44 CFR Part 13, Ohio EMA is responsible for managing the day-to-day operations of grant and sub-grant supported activities and must monitor grant and sub-grant supported activities to assure compliance with applicable Federal requirements. The monitoring process is a tool that ultimately ensures a strong grant administration and management structure. Ohio EMA utilizes a monitoring program that includes a desk review process and on site monitoring visits.

Desk reviews are conducted through the budget and reimbursement approval processes.

On site monitoring visits are a scheduled meeting with at the sub-grantee's location and are completed by a one or more Ohio EMA Grants/Program and Fiscal staff. The review will evaluate specific costs and fiscal/grant activities, to include programmatic achievements, within

any open or recently closed grant. The review may also include the inspection of Equipment purchased with grant funds, review of grant files and administrative processes.

All on site monitoring of this grant will be coordinated with the sub-grantee with ample advance notification.

### ***Enforcement***

If a sub-grantee materially fails to comply with any term of their award, whether stated in a Federal statute or regulation, this guidance, an assurance, a notice of award, or elsewhere, Ohio EMA may take one or more of the following actions, as appropriate in the circumstances:

- Temporarily withhold cash payments pending correction of the deficiency by the sub-grantee,
- Disallow (that is, deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance,
- Wholly or partly suspend or terminate the current award for the sub-grantee's program,
- Withhold further awards for the program,
- Require reimbursement of the costs incurred, or
- Take other remedies that may be legally available.

Ohio EMA, in taking any enforcement action, will provide the sub-grantee an opportunity for an appeal or other administrative proceeding to which the sub-grantee is entitled.

### ***Grant Termination***

Ohio EMA may suspend or terminate funding under this grant, in whole or in part, or other measures may be imposed for any of the following reasons:

- Agreement between Ohio EMA and the sub-grantee to terminate or de-obligate;
- Failing to comply with the requirements or statutory objectives of federal law
- Failing to make satisfactory progress toward the goals or objectives set forth in this application
- Failing to follow grant agreement requirements or the respective grant guidance
- Failing to submit required reports
- Filing a false certification in this application or other report or document.

Before suspending or terminating funding, Ohio EMA will provide the sub-grantee reasonable notice of its intent to impose any measure and will make efforts to resolve the problem informally.

## Terms and Conditions of the Grant and Sub-Grant

Ohio EMA, as the recipient of this grant is required to advise all sub-grantees of the HSGP program of the requirements imposed upon them by Federal statute, executive orders and regulations. Please enjoy the following several pages of reading.

**Freedom of Information Act (FOIA).** Information submitted in the course of applying for funding under this program or provided in the course of an entity's grant management activities which is under Federal control is subject to the *Freedom of Information Act* (FOIA), 5 U.S.C. §552. The applicant is also encouraged to consult its own State and local laws and regulations regarding the release of information, which should be considered when reporting sensitive matters in the grant application, needs assessment and strategic planning process. Note that some information, though not considered classified, may be protected from release or in how it is released. It is important to understand those laws and regulations that fall into an alternate category of Sensitive But Unclassified (SBU) information.

- **Sensitive But Unclassified (SBU).** SBU is a designation of information in the United States Federal government that, though unclassified, often requires strict controls over its distribution. SBU is a broad category of information that includes material covered by such designations as For Official Use Only (FOUO), Law Enforcement Sensitive (LES), Sensitive Homeland Security Information, Security Sensitive Information (SSI), Protected Critical Infrastructure Information (PCII), etc. Some categories of SBU information have authority in statute or regulation (e.g. SSI, CII) while others, including FOUO, do not.
- **Sensitive Security Information (SSI).** Information submitted in the course of applying for funding or reporting under certain programs or provided in the course of an entity's grant management activities under those programs which is under Federal control is subject to protection under SSI, and must be properly identified and marked. Sensitive Security Information (SSI) is a control designation used by the Department of Homeland Security related to protecting information related to transportation security. It is applied to information about security programs, vulnerability and threat assessments, screening processes, technical specifications of certain screening equipment and objects used to test screening equipment, and equipment used for communicating security information relating to air, land, or maritime transportation. The applicable information is spelled out in greater detail in 49 CFR Part §1520.7.
- **Protected Critical Infrastructure Information (PCII).** The PCII Program, established pursuant to the *Critical Infrastructure Act of 2002* (Public Law 107-296) (*CII Act*), created a framework which enables members of the private sector, States, local jurisdictions, and Tribal nations to voluntarily submit sensitive information regarding critical infrastructure to DHS. The Act provides statutory protection from public disclosure and civil litigation for CII that is validated as PCII. When validated as PCII, the information can only be shared with government employees who complete the training requirement, who have homeland security duties, and a need to know. PCII accreditation is a formal recognition that the covered government entity has the capacity and capability to receive and store PCII appropriately. DHS encourages all States, local jurisdictions, and Tribal nations to pursue PCII accreditation to cover their government agencies. Accreditation activities include signing a memorandum of agreement (MOA) with DHS, appointing a PCII Officer and developing a standard operating procedure for handling PCII. For additional information about PCII or the accreditation process, please contact the DHS PCII Program Office at [pcii-info@dhs.gov](mailto:pcii-info@dhs.gov).
- **Chemical-terrorism Vulnerability Information (CVI).** DHS issues a Manual to provide guidance on how to identify, handle and safeguard information developed by private and public entities under Section 550 of Public Law 109-295 and its implementing regulations, the Chemical Facility Anti-Terrorism Standards (CFATS), 6 CFR Part §27. Pursuant to CFATS. This information is known as Chemical-terrorism Vulnerability Information, or CVI, is relevant for

anyone authorized to possess or receive CVI (including chemical facility officers, employees, representatives and contractors, and Federal, State, local and Tribal government employees and contractors), as well as anyone who obtains what they reasonably should know is CVI. [http://www.dhs.gov/xlibrary/assets/chemsec\\_cvi\\_proceduresmanual.pdf](http://www.dhs.gov/xlibrary/assets/chemsec_cvi_proceduresmanual.pdf)

- **Sensitive Personally Identifiable Information (Sensitive PII).** Certain personally identifiable information, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual and needs to be carefully managed. Social Security number or alien number (A-number), for example, requires stricter handling guidelines because of the increased risk to an individual if compromised. A key part of the DHS mission to protect the homeland is to minimize our impact on individual privacy. In this regard DHS has developed a *Handbook for Safeguarding Sensitive PII, which can be found at [http://www.dhs.gov/xlibrary/assets/privacy/privacy\\_guide\\_spai\\_handbook.pdf](http://www.dhs.gov/xlibrary/assets/privacy/privacy_guide_spai_handbook.pdf)*. As required by OMB M-07-16, these rules also apply to DHS licensees, certificate holders, and grantees that handle or collect PII, including Sensitive PII, for or on behalf of DHS.

***Civil Rights Act of 1964.*** All recipients of financial assistance will comply with the requirements of Title VI of the *Civil Rights Act of 1964* (42 U.S.C. § 2000d *et seq.*), which provides that no person in the United States will, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

***Civil Rights Act of 1968.*** All recipients of financial assistance will comply with Title VIII of the *Civil Rights Act of 1968*, which prohibits recipients from discriminating in the sale, rental, financing, and advertising of dwellings, or in the provision of services in connection therewith, on the basis of race, color, national origin, religion, disability, familial status, and sex (42 U.S.C. §3601 *et seq.*), as implemented by the Department of Housing and Urban Development at 24 CFR Part §100. The prohibition on disability discrimination includes the requirement that new multifamily housing with four or more dwelling units—*i.e.*, the public and common use areas and individual apartment units (all units in buildings with elevators and ground-floor units in buildings without elevators)—be designed and constructed with certain accessible features (see 24 CFR Part §100.201).

***Title IX of the Education Amendments of 1972 (Equal Opportunity in Education Act).*** All recipients of financial assistance will comply with the requirements of Title IX of the *Education Amendments of 1972* (20 U.S.C. §1681 *et seq.*), which provides that no person in the United States will, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance. These regulations are codified at 44 CFR Part §19.

***Age Discrimination Act of 1975.*** All recipients of financial assistance will comply with the requirements of the *Age Discrimination Act of 1975* (42 U.S.C. § 6101 *et seq.*), which prohibits discrimination on the basis of age in any program or activity receiving Federal financial assistance.

***Americans with Disabilities Act of 1990.*** All recipients of financial assistance will comply with the requirements of Titles I, II, and III of the *Americans with Disabilities Act*, which prohibits recipients from discriminating on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§12101–12213).

***Limited English Proficiency (Civil Rights Act of 1964, Title VI).*** All recipients of financial assistance will comply with the requirements of Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, and resulting agency guidance, national origin and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, recipients must take reasonable steps to ensure

that LEP persons have meaningful access to your programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Recipients are encouraged to consider the need for language services for LEP persons served or encountered both in developing budgets and in conducting programs and activities. For assistance and information regarding LEP obligations, go to <http://www.lep.gov>.

**Lobbying Prohibitions.** None of the funds provided under an award may be expended by the recipient to pay any person to influence, or attempt to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with any Federal action concerning the award or renewal of any Federal contract, grant, loan, cooperative agreement. These lobbying prohibitions can be found at 31 U.S.C. §1352.

**Drug-Free Workplace Regulations.** All recipients of financial assistance will comply with the requirements of the *Drug-Free Workplace Act of 1988* (412 U.S.C. §701 *et seq.*), which requires that all organizations receiving grants from any Federal agency agree to maintain a drug-free workplace. The recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute. Failure to comply with these requirements may be cause for debarment. These regulations are codified at 44 CFR Part §17.

**Debarment and Suspension.** Executive Orders 12549 and 12689 provide protection from fraud, waste, and abuse by debarring or suspending those persons deemed irresponsible in their dealings with the Federal government. The recipient must certify that they are not debarred or suspended from receiving Federal assistance. For additional information, see 2 CFR Part §3000.

**Federal Debt Status.** The recipient may not be delinquent in the repayment of any Federal debt. Examples of relevant debt include delinquent payroll or other taxes, audit disallowances, and benefit overpayments. (See OMB Circular A-129, also refer to SF-424, item number 17.)

**Hotel and Motel Fire Safety Act of 1990.** In accordance with section 6 of the *Hotel and Motel Fire Safety Act of 1990*, 15 U.S.C. §2225a, the recipient agrees to ensure that all conference, meeting, convention, or training space funded in whole or in part with Federal funds, complies with the fire prevention and control guidelines of the *Federal Fire Prevention and Control Act of 1974*, 15 U.S.C. §2225.

**Rehabilitation Act of 1973.** All recipients of financial assistance will comply with the requirements of Section 504 of the *Rehabilitation Act of 1973*, 29 U.S.C. §794, as amended, which provides that no otherwise qualified handicapped individual in the United States will, solely by reason of the handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. These requirements pertain to the provision of benefits or services as well as to employment.

For additional detailed information, please refer to the following:

**FEMA Office of Disability Integration and Coordination.** at <http://www.fema.gov/about/odic>.

**Guidelines for Accommodating Individuals with Disabilities in Disaster.** at

<http://www.fema.gov/oer/reference/>.

**Disability and Emergency Preparedness Resource Center.** available at

<http://www.disabilitypreparedness.gov>.

**ADA Best Practices.** available at <http://www.ada.gov/pcatoolkit/toolkitmain.htm>.

**National Environmental Policy Act (NEPA) of 1969.** All recipients of financial assistance will comply with the requirements of the *NEPA*, as amended, 42 U.S.C. §4331 *et seq.*, which establishes national policy goals and procedures to protect and enhance the environment, including protection against natural disasters. To comply with NEPA for its grant-supported activities, DHS requires the environmental aspects of construction grants (and certain non-construction projects as specified by the component and awarding office) to be reviewed and evaluated before final action on the application.

**Equipment Marking.** Awardees may consider marking equipment in the following manner, "Purchased with funds provided by the U.S. Department of Homeland Security," in order to facilitate their own audit processes, as well as Federal audits and monitoring visits, which may result from receiving Federal funding. Equipment maintenance requirements are outlined in 44 CFR Part §13.32.

**Disadvantaged Business Requirement.** Applicants are advised that, to the extent that recipients of a grant use contractors or subcontractors, such recipients shall use small, minority, women-owned or disadvantaged business concerns and contractors or subcontractors to the extent practicable.

**National Preparedness Reporting Compliance.** *The Government Performance and Results Act of 1993* (Public Law 103-62) (GPRA) requires that the Department collect and report performance information on all programs. For grant programs, the prioritized Investments and their associated milestones provide an important tool for assessing grant performance and complying with these national preparedness reporting requirements. FEMA will work with grantees to develop tools and processes to support this requirement. FEMA anticipates using this information to inform future-year grant program funding decisions. Award recipients must agree to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within their grant agreement. This includes any assessments, audits, or investigations conducted by DHS, the Office of the Inspector General, or the U.S. Government Accountability Office (GAO).

**Animal Welfare Act of 1966.** All recipients of financial assistance will comply with the requirements of the *Animal Welfare Act*, as amended (7 U.S.C. §2131 *et seq.*), which requires that minimum standards of care and treatment be provided for vertebrate animals bred for commercial sale, used in research, transported commercially, or exhibited to the public. Recipients must establish appropriate policies and procedures for the humane care and use of animals based on the *Guide for the Care and Use of Laboratory Animals* and comply with the *Public Health Service Policy and Government Principles Regarding the Care and Use of Animals*.

**Clean Air Act of 1970 and Clean Water Act of 1977.** All recipients of financial assistance will comply with the requirements of 42 U.S.C. §7401 *et seq.* and Executive Order 11738, which provides for the protection and enhancement of the quality of the Nation's air resources to promote public health and welfare and for restoring and maintaining the chemical, physical, and biological integrity of the nation's waters is considered research for other purposes.

**Protection of Human Subjects.** All recipients of financial assistance will comply with the requirements of the Federal regulations at 45 CFR Part §46, which requires that recipients comply with applicable provisions/law for the protection of human subjects for purposes of research. Recipients must also comply with the requirements in DHS Management Directive 026-04, *Protection of Human Subjects*, prior to implementing any work with human subjects. For purposes of 45 CFR Part §46, research means a systematic investigation, including research, development, testing, and evaluation, designed to develop or contribute to general knowledge. Activities that meet this definition constitute research for purposes of this policy, whether or not they are conducted or supported under a program that is considered research for other purposes. The regulations specify additional protections for research involving human fetuses, pregnant women, and neonates (Subpart B); prisoners (Subpart C); and children (Subpart D). The use of autopsy materials is governed by applicable State and local law and is not directly regulated by 45 CFR Part §46.

**National Flood Insurance Act of 1968.** All recipients of financial assistance will comply with the requirements of Section 1306(c) of the *National Flood Insurance Act*, as amended, which provides for benefit payments under the Standard Flood Insurance Policy for demolition or relocation of a structure insured under the Act that is located along the shore of a lake or other body of water and that is certified by an appropriate State or local land use authority to be subject to imminent collapse or subsidence as a

result of erosion or undermining caused by waves or currents of water exceeding anticipated cyclical levels. These regulations are codified at 44 CFR Part §63.

***Flood Disaster Protection Act of 1973.*** All recipients of financial assistance will comply with the requirements of the *Flood Disaster Protection Act of 1973*, as amended (42 U.S.C. §4001 et seq.), which provides that no Federal financial assistance to acquire, modernize, or construct property may be provided in identified flood-prone communities in the United States, unless the community participates in the National Flood Insurance Program and flood insurance is purchased within one year of the identification. The flood insurance purchase requirement applies to both public and private applicants for DHS support. Lists of flood-prone areas that are eligible for flood insurance are published in the *Federal Register* by FEMA.

***Coastal Wetlands Planning, Protection, and Restoration Act of 1990.*** All recipients of financial assistance will comply with the requirements of Executive Order 11990, which provides that federally funded construction and improvements minimize the destruction, loss, or degradation of wetlands. The Executive Order provides that, in furtherance of Section 101(b)(3) of NEPA (42 U.S.C. § 4331(b)(3)), Federal agencies, to the extent permitted by law, must avoid undertaking or assisting with new construction located in wetlands unless the head of the agency finds that there is no practicable alternative to such construction, and that the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use. In making this finding, the head of the agency may take into account economic, environmental, and other pertinent factors. The public disclosure requirement described above also pertains to early public review of any plans or proposals for new construction in wetlands. This is codified at 44 CFR Part §9.

***USA Patriot Act of 2001.*** All recipients of financial assistance will comply with the requirements of the *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act* (USA PATRIOT Act), which amends 18 U.S.C. §§175–175c. Among other things, it prescribes criminal penalties for possession of any biological agent, toxin, or delivery system of a type or in a quantity that is not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose. The Act also establishes restrictions on access to specified materials. —Restricted persons,|| as defined by the Act, may not possess, ship, transport, or receive any biological agent or toxin that is listed as a select agent.

***Trafficking Victims Protection Act of 2000.*** All recipients of financial assistance will comply with the requirements of the government-wide award term which implements Section 106(g) of the *Trafficking Victims Protection Act (TVPA) of 2000*, as amended (22 U.S.C. §7104), located at 2 CFR Part §175. This is implemented in accordance with OMB Interim Final Guidance, *Federal Register*, Volume 72, No. 218, November 13, 2007. In accordance with the statutory requirement, in each agency award under which funding is provided to a private entity, Section 106(g) of the TVPA, as amended, requires the agency to include a condition that authorizes the agency to terminate the award, without penalty, if the recipient or a sub-recipient —

Engages in severe forms of trafficking in persons during the period of time that the award is in effect; 15  
Procures a commercial sex act during the period of time that the award is in effect; or  
Uses forced labor in the performance of the award or sub-awards under the award. Full text of the award term is provided at 2 CFR §175.15.

***Fly America Act of 1974.*** All recipients of financial assistance will comply with the requirements of the Preference for U.S. Flag Air Carriers: Travel supported by U.S. Government funds requirement, which states preference for the use of U.S. flag air carriers (air carriers holding certificates under 49 U.S.C. §41102) for international air transportation of people and property to the extent that such service is available, in accordance with the *International Air Transportation Fair Competitive Practices Act of 1974* (49 U.S.C. §40118) and the interpretative guidelines issued by the Comptroller General of the United States in the March 31, 1981, amendment to Comptroller General Decision B138942.

**Activities Conducted Abroad.** All recipients of financial assistance will comply with the requirements that project activities carried on outside the United States are coordinated as necessary with appropriate government authorities and that appropriate licenses, permits, or approvals are obtained. All recipients of financial assistance will comply with requirements to acknowledge Federal funding when issuing statements, press releases, requests for proposals, bid invitations, and other documents describing projects or programs funded in whole or in part with Federal funds.

**Copyright.** All recipients of financial assistance will comply with requirements that publications or other exercise of copyright for any work first produced under Federal financial assistance awards hereto related unless the work includes any information that is otherwise controlled by the Government (e.g., classified information or other information subject to national security or export control laws or regulations). For any scientific, technical, or other copyright work based on or containing data first produced under this award, including those works published in academic, technical or professional journals, symposia proceedings, or similar works, the recipient grants the government a royalty-free, nonexclusive and irrevocable license to reproduce, display, distribute copies, perform, disseminate, or prepare derivative works, and to authorize others to do so, for government purposes in all such copyrighted works. The recipient shall affix the applicable copyright notices of 17 U.S.C. §401 or 402 and an acknowledgement of government sponsorship (including award number) to any work first produced under an award.

**Use of DHS Seal, Logo, and Flags.** All recipients of financial assistance must obtain DHS' approval prior to using the DHS seal(s), logos, crests or reproductions of flags or likenesses of DHS agency officials, including use of the United States Coast Guard seal, logo, crests or reproductions of flags or likenesses of Coast Guard officials.

**DHS Specific Acknowledgements and Assurances.** All recipients of financial assistance must acknowledge and agree—and require any sub-recipients, contractors, successors, transferees, and assignees acknowledge and agree—to comply with applicable provisions governing DHS access to records, accounts, documents, information, facilities, and staff.

- Recipients must cooperate with any compliance review or complaint investigation conducted by DHS.
- Recipients must give DHS access to and the right to examine and copy records, accounts, and other documents and sources of information related to the grant and permit access to facilities, personnel, and other individuals and information as may be necessary, as required by DHS regulations *and* other applicable laws or program guidance.
- Recipients must submit timely, complete, and accurate reports to the appropriate DHS officials and maintain appropriate backup documentation to support the reports.
- Recipients must comply with all other special reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.
- If, during the past three years, the recipient has been accused of discrimination on the grounds of race, color, national origin (including limited English proficiency), sex, age, disability, religion, or familial status, the recipient must provide a list of all such proceedings, pending or completed, including outcome and copies of settlement agreements to the DHS awarding office and the DHS Office of Civil Rights and Civil Liberties.
- In the event any court or administrative agency makes a finding of discrimination on grounds of race, color, national origin (including limited English proficiency), sex, age, disability, religion, or familial status against the recipient, or the recipient settles a case or matter alleging such discrimination, recipients must forward a copy of the complaint and findings to the DHS Component and/or awarding office.
- The United States has the right to seek judicial enforcement of these obligations.

## **Prohibition on Using Federal Funds**



The recipient understands and agrees that it cannot use any Federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption of any law, regulation or policy, at any level of government, without the express prior written approval of FEMA.

## State Policy Requirements Affecting Grant Programs

The following Ohio Department of Public Safety policies are included as required by the policy.



Ohio Department of Public Safety  
Policy Number : DPS-501.40

### ADDRESSING CIVIL RIGHTS COMPLAINTS FROM CLIENTS OF THE DEPARTMENT OF PUBLIC SAFETY

Date of Revision : **8/30/2011**  
Priority Review : **All Employees ; All Supervisors**  
Distribution : **All ODPS Divisions**

#### Summary of Revisions

New policy to ensure compliance with Title VI of the Civil Rights Act of 1964 and other federal laws and regulations prohibiting discrimination.

#### Purpose

To provide guidelines and procedures that allow the Ohio Department of Public Safety (ODPS) to process and forward complaints alleging discrimination from clients, customers, program participants, or consumers of ODPS or ODPS grant recipients.

#### Policy

##### A. STATEMENT OF POLICY

- All individuals have the right to participate in programs and activities operated by ODPS and ODPS grant recipients regardless of race, color, national origin, sex, religion, disability, and age. **ODPS will make every effort to ensure ODPS and its grant recipients comply with Title VI of the Civil Rights Act of 1964, the Omnibus Crime Control and Safe Streets Act of 1968, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and the DOJ regulations on the Equal Treatment for Faith-Based Organizations.**

##### 2. RETALIATION

- Persons who believe they have been discriminated against on the basis of their membership in a protected class (race, color, religion, sex, national origin, disability, age, ancestry, or military status) shall not be retaliated against in terms and conditions of employment or services for exercising their right to file a discrimination complaint or inquiry.
- No person who participates in the investigation of a complaint, or is a witness in an investigation, or brings attention to a person in authority, of an alleged discrimination shall be retaliated against.

##### B. DEFINITIONS

- Discrimination:** To make a distinction, show bias towards, or be prejudicial against, a person or thing on the basis of the group, class, or category to which the person or thing belongs, rather than according to actual merit.
- Civil Rights Complaint Coordinator:** Person designated by ODPS who is responsible for receiving and acknowledging discrimination complaints and forwarding them to the U.S. Department of Justice (DOJ), Office of Justice Programs, Office for Civil Rights (OCR); the Ohio Civil Rights Commission

(OCRC), or other appropriate agency for review of the complaint to determine if a violation was committed. The ODPS EEO Manager shall be the designated Civil Rights Complaint Coordinator.

- Grant Recipient:** An agency or organization that receives funding from a division within ODPS, whether it is federal pass-through funding or a state grant. ODPS divisions that provide grants to agencies and organizations include, but are not limited to, the Office of Criminal Justice Services (OCJS), Ohio Emergency Management Agency (EMA) and Ohio Homeland Security (OHS).
- Retaliation:** Occurs when adverse action is taken against an individual in a protected class because he or she engaged in protected activity.
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d):** Prohibits an individual from being excluded from participation in, being denied the benefits of, or being subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart C).
- Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. §3789d(c)(1)):** Prohibits recipients that receive federal funding under this statute from discriminating, either in employment practices or in the delivery of services or benefits, on the basis of race, color, religion, national origin, and sex as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart D).
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794):** Prohibits discrimination on the basis of disability, in regard to both employment and the delivery of services or benefits, in any program or activity receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart G).
- Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132):** Prohibits discrimination against qualified individuals with disabilities, in regard to both employment and the delivery of services or benefits, in all programs, activities, and services of public entities as set forth in the DOJ implementing regulations (28 C.F.R. Part 35). Title II applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.
- Title IX of the Education Amendments of 1972 (20 U.S.C. §1681):** Prohibits discrimination on the basis of sex in educational programs and activities that receive federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 54).
- Age Discrimination Act of 1975 (42 U.S.C. §6102):** Prohibits discrimination on the basis of age in the programs and activities receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart I). The Act, which applies to all ages, permits the use of certain age distinctions and factors other than age that meet the Act's requirements.
- DOJ regulations on the Equal Treatment for Faith-Based Organizations:** Prohibits discrimination on the basis of religion in the delivery of services and prohibits organizations from using DOJ funding on

inherently religious activities (28 C.F.R. Part 38).

### C. COMPLAINT PROCEDURES

1. ODPS shall accept and acknowledge all discrimination complaints from clients, customers, program participants, or consumers of ODPS or ODPS grant recipients. All discrimination allegations and complaints shall be referred to the designated ODPS Civil Rights Complaint Coordinator.
2. A client, customer, program participant or consumer may file a complaint of discrimination via email to the appropriate ODPS grant coordinator or via U. S. Mail to the attention of the ODPS Civil Rights Complaint Coordinator (1970 West Broad Street, Columbus, Oh, 43223). The complaint should include the complainant's name, contact information, and a brief explanation of the alleged discrimination. If the complaint is sent to an ODPS Grant Coordinator, that employee shall forward it immediately to the ODPS Civil Rights Complaint Coordinator.
3. The Complaint Coordinator shall provide an acknowledgement of the complaint to the client, customer, program participant, or consumer via e-mail or in a letter confirming the complaint has been received. The contents of the acknowledgement response must include information specifying the external agency to which the complaint has been forwarded for investigation, and provide information in which the complainant can contact that agency directly. If the complaint is against the ODPS or an ODPS grant recipient implementing funding from the DOJ and the ODPS is not forwarding the complaint to the OCR, the acknowledgement response shall also notify the complainant that he/she may file a complaint directly with the OCR at the following address:

**Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 Seventh Street NW  
Washington, D.C. 20531**

4. The Complaint Coordinator shall then forward the complaint to OCR, OCRC, or other appropriate agency. The complaint shall be investigated by the appropriate agency.
5. All clients, customers, program participants, or consumers of ODPS or ODPS grant recipients shall have access to these procedures at any time via the ODPS website ([www.publicsafety.ohio.gov](http://www.publicsafety.ohio.gov)).
6. Any client, customer, program participant, or consumer may choose to file a complaint directly with the DOJ-OCR (if the complaint is against the ODPS or an ODPS grant recipient implementing funding from the DOJ), OCRC, or the appropriate agency as opposed to filing with ODPS. If a complaint is filed directly with an outside agency, ODPS requests that a courtesy copy be forwarded to the ODPS Civil Rights Complaint Coordinator by the complainant. If the complaint is against an ODPS grant recipient, once the grant recipient becomes aware of the complaint, the grant recipient must notify the ODPS Civil Rights Complaint Coordinator of the complaint and how it is being investigated.

### D. TRAINING

1. ODPS shall provide annual training for agency employees on these complaint

procedures. The training shall explain an employee's responsibility to refer discrimination complaints from clients, customers, program participants, or consumers to the Complaint Coordinator. This information shall be disseminated to new ODPS employees during new employee orientation training or as appropriate. ODPS will also disseminate a copy of these complaint procedures to ODPS grant recipients.

2. The current policy shall be evaluated annually to determine its effectiveness. ODPS shall make any necessary changes to ensure the complaint process is timely and efficient.

### Current Form and Supplemental References

#### Department of Justice Informational Links:

- [Title VI of the Civil Rights Act of 1964 \(42 U.S.C. §20006\)](#)
- [Omnibus Crime Control and Safe Streets Act of 1968 \(42 U.S.C. §17999\(c\)\(1\)\)](#)
- [Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. §794, Section 794\)](#)
- [Title II of the Americans with Disabilities Act of 1990 \(42 U.S.C. §12132\)](#)
- [Title IX of the Education Amendments of 1972 \(20 U.S.C. §1681\)](#)
- [Age Discrimination Act of 1975 \(42 U.S.C. §6102\)](#)
- [DOJ regulations on the Equal Treatment for Faith-Based Organizations](#)

#### Standard References

None

#### Policy References

<a href="#">DPS-100.01</a>	ADMINISTRATIVE INVESTIGATIONS
<a href="#">DPS-501.01</a>	WORK RULES - NON-SWORN BARGAINING UNIT PERSONNEL
<a href="#">DPS-501.02</a>	WORK RULES - SWORN PERSONNEL
<a href="#">DPS-501.03</a>	WORK RULES - EXEMPT PERSONNEL
<a href="#">DPS-501.04</a>	WORK RULES - TEMPORARY WORKERS, CONTRACT VENDORS, CONSULTANTS, NON-DPS STAFF
<a href="#">DPS-501.15</a>	INITIAL EMPLOYMENT ORIENTATION TRAINING
<a href="#">DPS-501.29</a>	DISCRIMINATION AND UNLAWFUL HARASSMENT
<a href="#">OSP-103.19</a>	ADMINISTRATIVE INVESTIGATIONS - OSP EMPLOYEES
<a href="#">OSP-203.03</a>	POWERS / DUTIES, AUTHORITY / CODE OF ETHICS / OATH / RULES AND REGULATIONS



Ohio Department of Public Safety  
Policy Number : DPS-501.39

**ADDRESSING COMPLAINTS OF EMPLOYMENT  
DISCRIMINATION AGAINST ODPS GRANT RECIPIENTS**

Date of Revision : **5/30/2011**  
Priority Review : **All Employees ; All Supervisors**  
Distribution : **All ODPS Divisions**

**Summary of Revisions**

New policy to ensure compliance with federal laws and regulations prohibiting employment discrimination.

**Purpose**

To provide guidelines and procedures that allow the Ohio Department of Public Safety (ODPS) to process and forward complaints alleging employment discrimination by employees or applicants of ODPS grant recipients.

**Policy**

**A. STATEMENT OF POLICY**

1. It is the policy of ODPS to prohibit discriminatory employment practices against anyone employed by an ODPS grant recipient, and to ensure all employees have equal employment opportunity. It is the policy of the State of Ohio and ODPS to ensure a working environment free from any discrimination and to prohibit sexual harassment of applicants, customers, clients, and employees, including discriminatory sexual advances or harassment adversely affecting an employee's terms and conditions of employment either directly or indirectly. **ODPS will ensure that grant recipients comply with all applicable federal laws regarding employment discrimination.**
2. **RETALIATION**
  - a. Persons who believe they have been discriminated against on basis of their membership in a protected class (race, color, religion, sex, national origin, disability, age, ancestry, or military status) shall not be retaliated against in terms and conditions of employment or services for exercising their right to file a discrimination complaint or inquiry.
  - b. No person who participates in the investigation of a complaint, or is a witness in an investigation, or brings attention to a person in authority, of an alleged discrimination complaint shall be retaliated against.

**B. DEFINITIONS**

1. **Discrimination:** To make a distinction, show bias towards, or be prejudicial against, a person or thing on the basis of the group, class, or category to which the person or thing belongs, rather than according to actual merit.
2. **Civil Rights Complaint Coordinator:** Person designated by ODPS who is responsible for acknowledging discrimination complaints filed by employees

or applicants of ODPS grant recipients and forwarding them to one of the following: U.S. Equal Employment Opportunity Commission (EEOC); the U.S. Department of Justice (DOJ), Office for Civil Rights (OCR); the Ohio Civil Rights Commission (OCRC); or other appropriate agency. The ODPS EEO Manager shall be the designated Civil Rights Complaint Coordinator.

3. **Grant Recipient:** An agency or organization that receives funding from a division within ODPS, whether it is federal pass-through funding or a state grant. ODPS divisions that provide grants to agencies and organizations include the Office of Criminal Justice Services (OCJS), Ohio Emergency Management Agency (EMA) and Ohio Homeland Security (OHS).
4. **Retaliation:** Occurs when adverse action is taken against an individual in a protected class because he or she engaged in protected activity.
5. **Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. §3789d(c)(1)):** Prohibits discrimination on the basis of race, color, religion, national origin, and sex, in regard to both employment practices and the delivery of services, in any program or activity receiving federal financial assistance under this statute as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart D).
6. **Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132):** Prohibits discrimination against qualified individuals with disabilities, in regard to both employment and the delivery of services or benefits, in all programs, activities, and services of public entities as set forth in DOJ implementing regulations (28 C.F.R. Part 35).
7. **Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794):** Prohibits discrimination on the basis of disability, in regard to both employment and the delivery of services or benefits, in any program or activity receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 42, Subpart G).
8. **Title IX of the Education Amendments of 1972 (20 U.S.C. §1681):** Prohibits discrimination on the basis of sex, in regard to both employment and the delivery of services or benefits, in educational programs receiving federal financial assistance as set forth in the DOJ implementing regulations (28 C.F.R. Part 54).

**C. COMPLAINT PROCEDURES**

1. ODPS shall accept and acknowledge all discrimination complaints from employees or applicants of ODPS grant recipients. All discrimination allegations and complaints shall be referred to the designated ODPS Civil Rights Complaint Coordinator.
2. An employee or applicant of an ODPS grant recipient may file a complaint of discrimination via e-mail to the appropriate ODPS grant coordinator or via U.S. Mail directly to the attention of the ODPS Civil Rights Complaint Coordinator (1970 West Broad Street, Columbus, OH, 43223). The complaint should include the complainant's name, contact information, and a brief explanation of the alleged discrimination. If the complaint is sent to an ODPS Grant Coordinator, that employee shall forward it immediately to the ODPS Civil Rights Complaint Coordinator.
3. The Complaint Coordinator shall provide an acknowledgement of the complaint to the employee or applicant of the ODPS grant recipient via e-

mail or in a letter confirming the complaint has been received. The contents of the acknowledgement response must include information specifying the external agency to which the complaint has been forwarded for investigation. If the complaint is against an ODPS grant recipient implementing funding from the DOJ and the ODPS is not forwarding the complaint to the OCR, the acknowledgement response shall also notify the complainant that he/she may file a complaint directly with the OCR at the following address:

**Office for Civil Rights  
Office of Justice Programs  
U.S. Department of Justice  
810 Seventh Street NW  
Washington, D.C. 20531**

4. The Complaint Coordinator shall then forward the complaint to the EEOC, DOJ-OCR, OCRC, or other appropriate agency. The complaint shall be investigated by the appropriate agency.
5. All employees or applicants of ODPS grant recipients shall have access to these procedures at any time via the ODPS website ([www.publicsafety.ohio.gov](http://www.publicsafety.ohio.gov)).
6. Any employee or applicant of an ODPS grant recipient may choose to file a complaint directly with the grant recipient, EEOC, DOJ-OCR (if the grant recipient receives funding from the DOJ), OCRC, or other appropriate agency as opposed to filing with ODPS. If a complaint is filed directly with the grant recipient or with an outside agency, once the grant recipient becomes aware of the complaint, the grant recipient must notify the ODPS Civil Rights Complaint Coordinator of the complaint and how it is being investigated.

**D. TRAINING**

1. ODPS shall provide annual training for agency employees on these complaint procedures. The training shall explain an employee's responsibility to refer discrimination complaints from employees or applicants of ODPS grant recipients to the Complaint Coordinator. This information shall be disseminated to new ODPS employees during new employee orientation training or as appropriate. **The ODPS shall also disseminate a copy of these complaint procedures to ODPS grant recipients.**
2. The current policy shall be evaluated annually to determine its effectiveness. ODPS shall make any necessary changes to ensure the complaint process is timely and efficient.

**Current Form and Supplemental References**

**Department of Justice Informational Links:**

- [Omnibus Crime Control and Safe Streets Act of 1968 \(42 U.S.C. §3789\(c\)\(1\)\)](#)
- [Title II of the Americans with Disabilities Act of 1990 \(42 U.S.C. §12132\)](#)
- [Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. §794, Section 504\)](#)
- [Title IX of the Education Amendments of 1972 \(20 U.S.C. §1681\)](#)

**Standard References**

None

**Policy References**

<a href="#">DPS-100.01</a>	ADMINISTRATIVE INVESTIGATIONS
<a href="#">DPS-501.01</a>	WORK RULES - NON-SWORN BARGAINING UNIT PERSONNEL
<a href="#">DPS-501.02</a>	WORK RULES - SWORN PERSONNEL
<a href="#">DPS-501.03</a>	WORK RULES - EXEMPT PERSONNEL
<a href="#">DPS-501.04</a>	WORK RULES - TEMPORARY WORKERS, CONTRACT VENDORS, CONSULTANTS, NON-DPS STAFF
<a href="#">DPS-501.15</a>	INITIAL EMPLOYMENT ORIENTATION TRAINING
<a href="#">DPS-501.29</a>	DISCRIMINATION AND UNLAWFUL HARASSMENT
<a href="#">OSP-103.19</a>	ADMINISTRATIVE INVESTIGATIONS - OSP EMPLOYEES
<a href="#">OSP-203.03</a>	POWERS / DUTIES, AUTHORITY / CODE OF ETHICS / OATH / RULES AND REGULATIONS

## POINTS OF CONTACT

For **Grant Fiscal and Administrative** needs, contact:

- Jessica Yuzwa  
614-799-3603 or via [jlyuzwa@dps.state.oh.us](mailto:jlyuzwa@dps.state.oh.us)
- Joe Haller  
614-799-3690 or via [jdhaller@dps.state.oh.us](mailto:jdhaller@dps.state.oh.us)
- David O'Reilly,  
614-799-3604 or via [dtoreilly@dps.state.oh.us](mailto:dtoreilly@dps.state.oh.us)
- Carl Sofranko  
614-799-3605 or via [cdsofranko@dps.state.oh.us](mailto:cdsofranko@dps.state.oh.us)
- State Agencies: Kathleen Nelson  
614-799-3836 or via [knelson@dps.state.oh.us](mailto:knelson@dps.state.oh.us)

For LE-SHSP **Programmatic** needs, contact:

- Jim Burton, Grants and Agreements Administrator,  
614-466-0332 or via [jtburton@dps.state.oh.us](mailto:jtburton@dps.state.oh.us)
- Andrew Stefanik, LE SHSP Coordinator,  
614-752-5560 or via [ajstefanik@dps.state.oh.us](mailto:ajstefanik@dps.state.oh.us)

For **State Homeland Security Strategy and Other Planning** inquiries, contact

- Tracy Proud, Senior Strategic Planner,  
614-644-3886 or via [tproud@dps.state.oh.us](mailto:tproud@dps.state.oh.us)
- Melinda Craig, Strategic Planner,  
614-644-7940 or via [mrcraig@dps.state.oh.us](mailto:mrcraig@dps.state.oh.us)

For **Exercise Program** needs, contact:

- Darren Price, Exercise Program Manager,  
614-799-3690 or via [deprice@dps.state.oh.us](mailto:deprice@dps.state.oh.us)

For **Training Program** needs, contact:

- Phil Johnson, Training & Exercise Branch Chief,  
614-799-3680 or via [prjohnson@dps.state.oh.us](mailto:prjohnson@dps.state.oh.us)
- Lisa Jones, Training Officer,  
614-799-3824 or via [ljones@dps.state.oh.us](mailto:ljones@dps.state.oh.us)

For **Grant Management** inquiries, contact:

- Kathleen Nelson  
614-799-3836 or via [knelson@dps.state.oh.us](mailto:knelson@dps.state.oh.us)
- Andrew Elder, Grants Branch Chief,  
614-889-7178 or via [adelder@dps.state.oh.us](mailto:adelder@dps.state.oh.us)

## **Appendix A: Grant Application Forms**

- 1) Summary of Projects/Costs**
- 2) EGMS User Information Form**
- 3) County Terrorism Advisory Team Information**
- 4) Contact Information**
- 5) NIMS Compliance Information**
- 6) EHP Review Form**
- 7) Travel Pre-Approval Form**
- 8) Training Pre-Approval Form**
- 9) Exercise Pre-Approval Form**

## FY2011 Homeland Security Grant Programs

**Application Deadline, uploaded/post-marked by April 24, 2012**

**Application Checklist, completed:**

- 1. *This form.* FY2011 Homeland Security Grant Program (HSGP) Summary of Projects/Costs
- 2. EGMS User Information Sheet
- 3. Contact Information Sheet
- 4. Governance/Advisory Team membership
- 5. NIMS Compliance Information
- 6. EHP Review Form (as applicable)
- 7. Travel Pre-Approval Form (if applicable)
- 8. Training Pre-Approval Form (if applicable)
- 9. Exercise Pre-Approval Form (if applicable)

### FY2011 HSGP Summary of Projects/Costs

<b>Sub-Grantee:</b>	
<b>Award Amount:</b>	\$

	Project Title(s) (shown in order of priority, Admin does <i>not</i> require a priority #)	Funding Budget
1.		\$
2.		\$
3.		\$
4.		\$
5.		\$
6.		\$
7.		\$
8.		\$
9.		\$
10.		\$
--.	Grant Administration (if/as applicable)	\$
<b>Total Funding (must equal Award Amount):</b>		\$

*With my signature below, I hereby certify that the Jurisdictions Governance/Advisory Team did on \_\_\_\_\_ (insert date) review and concur on the projects, narrative, and budget costs contained within this grant application.*

Grant Signatory Official (signature)

Date

\_\_\_\_\_

\_\_\_\_\_

# Ohio Emergency Management Agency Electronic Grants Management System User Information Form

Sub-Grantee Name: \_\_\_\_\_

Grant Fiscal Year: FY2011 \_\_\_\_\_

Grant Name: \_\_\_\_\_

Signatory Officials Name: \_\_\_\_\_

Other than the Signatory Official, the following person is permitted to submit documentation in the Electronic Grants Management System:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

The following people are permitted to register for an account and work within the Electronic Grants Management System:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

\_\_\_\_\_  
Grant Signatory Official's Signature

\_\_\_\_\_  
Date



# Governance/Advisory Team Information

Date:

--

<b>Jurisdiction:</b>	
----------------------	--

*Identify the appointed representatives for each Discipline. Each Discipline may have as many representatives as needed to assist in the oversight and the management of the program. However, no one person may be a representative under multiple disciplines. Also, no one discipline may have a majority of the Team's total membership. The Team must develop its own operational procedures by which to conduct its business. The Team must appoint its own Chairperson (or Co-Chairs).*

**Fire Service** *(can include private/public fire departments)*

<b>Names/Titles/Depts</b>	
---------------------------	--

**Emergency Medical Service** *(can include private/public EMS departments)*

<b>Names/Titles/Depts</b>	
---------------------------	--

**Police Departments** *(can include private/public police departments)*

<b>Names/Titles/Depts</b>	
---------------------------	--

**County Sheriff's Office**

<b>Names/Titles/Depts</b>	
---------------------------	--

**Emergency Management Agency**

<b>Names/Titles/Depts</b>	
---------------------------	--

**Public Works** *(ie. Water, Gas, Electric, Transportation, etc, and can include private/public departments)*

<b>Names/Titles/Depts</b>	
<b>Public Health</b> <i>(ie. Health Depts, Hospitals, Emergency Care Facilities, etc, and can include private/public organizations)</i>	
<b>Names/Titles/Depts</b>	
<b>Township Trustee(s)</b>	
<b>Names/Titles/Twps</b>	
<b>Mayor's Office(s)</b>	
<b>Names/Titles/Cities</b>	
<b>County Commissioners' Office</b>	
<b>Names/Titles</b>	
<b>Others</b> <i>(the Team is welcome to include other agencies/disciplines on their committee as needed to include private/public organizations) ch 1, added line</i>	
<b>Names/Titles/Depts</b>	
<b>Team Chairperson (s)</b> <i>(Identify the Team's duly appointed Chairperson or Co-Chairs)</i>	
<b>Name/Title/Dept</b>	
<b>Name/Title/Dept</b>	
<p><i>If during the grant period any changes are made to the above information, a revised Governance/Advisory Team form MUST be provided to the Ohio EMA within 5 business days of the change.</i></p>	

# Contact Information

<b>Sub-Grantee:</b>	
<b>Tax ID#:</b>	
<b>Point of Contact Information</b> <i>Identify the Grant Project Manager, Jurisdiction's Financial Officer, and Signatory Official.</i>	
<b>Grant Project Manager</b> <i>(Individual who will operationally manage and answer questions on the day-to-day project accomplishments.)</i>	
<b>Name/Title</b>	
<b>Department</b>	
<b>Address</b> (Street, City, Zip)	
<b>Telephone</b>	
<b>Fax</b>	
<b>Email</b>	
<b>Jurisdiction Financial Officer</b> <i>(Individual from Auditor/Treasurer's office authorized to provide/share information on financial records.)</i>	
<b>Name/Title</b>	
<b>Department</b>	
<b>Address</b> (Street, City, Zip)	
<b>Telephone</b>	
<b>Fax</b>	
<b>Email</b>	
<b>Signatory Official</b> <i>(Individual authorized to sign the Notice of Award)</i>	
<b>Name/Title</b>	
<b>Department</b>	
<b>Address</b> (Street, City, Zip)	
<b>Telephone</b>	
<b>Fax</b>	
<b>Email</b>	
<i>If during the grant period any changes are made to the above information, a revised Contact Information form MUST be provided to the Ohio EMA within 5 business days of the change. If change is for the Signatory official, an official letter from the Jurisdiction announcing the change must accompany the form</i>	

## NIMS Compliance Information

<b>Applicant:</b>	
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To be eligible to receive FY 2011 Federal preparedness funding assistance, applicants must meet NIMS compliance requirements. State, Territory, Tribal, and local governments are considered to be in full NIMS compliance if they have adopted and/or implemented the FY2010 compliance activities. Adoption and/or implementation has been self-certified each year by the Governor’s office for each State and Territory, which includes Tribal and local governments. Ohio Revised Code 5502.28(c) designates NIMS and its incident response management component, the Incident Command System (ICS), as the primary response/recovery framework for all jurisdictions in the state.

Therefore, the Applicant’s Director, Chief Executive, or designee must review and certify below that the FY2010 NIMS requirements have in fact been implemented to the “good faith effort” standard within the agency or jurisdiction by all disciplines receiving direct benefit as a result of FY05 – FY 2010 Federal preparedness expenditures and likely to receive direct benefit as a result of FY2011 Federal preparedness expenditures. Evidence of compliance with these requirements must be made available, upon request, to Ohio EMA. Failure to do so may result in suspended or terminated funding.

Please check one:

- The Applicant is one of the 17 state agencies, commissions, divisions, or departments, or is a jurisdiction over 5,000 population (based on the 2000 U.S. Census) required to complete a National Incident Management System Compliance Assistance Support Tool (NIMSCAST). The Applicant’s NIMSCAST is complete and any open corrective action plans are being addressed.
  
- The Applicant is not required to complete a National Incident Management System Compliance Assistance Support Tool (NIMSCAST). The Applicant has established a training program that ensures the requisite NIMS/ICS training for personnel with a role in emergency response or incident management. The Applicant also has established the necessary policies and procedures to execute any responsibilities assigned in a state or local emergency operations plan.

**The Applicant hereby certifies that the tasks necessary to address implementation of NIMS requirements in accordance with FY2010 NIMS guidance have been accomplished, and as such the Applicant has satisfied the NIMS compliance conditions that are a prerequisite to receipt of FY2011 grant funds.**

\_\_\_\_\_  
Grant Signatory (signature)

\_\_\_\_\_  
Date

Please refer to the Ohio NIMS Implementation Guidance is available at <http://ema.ohio.gov/NimsGuidance.aspx> for additional detail regarding NIMS compliance requirements.



OMB Control#: 1660-0115  
Expiration Date: 10/31/2013  
FEMA Form: 024-0-1

DEPARTMENT OF HOMELAND SECURITY  
FEDERAL EMERGENCY MANAGEMENT AGENCY  
**ENVIRONMENTAL AND HISTORIC PRESERVATION SCREENING FORM**

**Paperwork Burden Disclosure Notice**

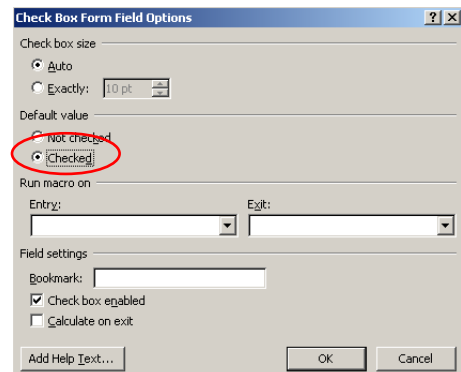
*Public reporting burden for this form is estimated to average 8 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting the form. You are not required to respond to this collection of information unless it displays a valid OMB control number. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, Paperwork Reduction Project (1660- 0115) **NOTE: Do not send your completed form to this address.***

**Completing the Screening Form:**

This form must be attached to all project information sent to the Grant Programs Directorate (GPD) to initiate environmental and historic preservation (EHP) compliance review, per the National Environmental Policy Act (NEPA) and other EHP laws and executive orders. *There is no need to complete and submit this form if the grant scope is limited to planning, management and administration, classroom-based training, table-top exercises and functional exercises, or purchase of mobile and portable equipment where no installation needed.* Information Bulletin 345 (September 1, 2010) provides details on these activities. The form must be completed by someone with in-depth understanding of project details and location. Completion of this form does not conclude the EHP review process and FEMA may need to contact you for further information. Not providing requested information may result in funding release delays. This form is intended to be completed electronically. The following website provides a version of this form that is suitable for printing and completing by hand as well as additional guidance such as on how to make an aerial map: <http://www.fema.gov/plan/ehp/ehp-applicant-help.shtm#5>.

To check (X) a box (for example,  Yes  No), left double-click using your mouse and a Check Box Form Field Options box will appear, then under the Default Value, select Checked and press OK (see figure, right). To write in a text field (\_\_\_\_), select the text field with your mouse and begin typing.

*Submit completed form with necessary attachments to GPDEHPIInfo@dhs.gov with the following information in the e-mail subject line: EHP Submission: Project Title, Subgrantee Name; Grant Award Number (Example, EHP Submission: Courthouse Camera Installation, Any Town, State, 12345).*



**Complete all of Section A, Section B, all of each portion(s) of Section C corresponding to checked blocks in Section B, and all of section D that apply to the project.**

**A. PROJECT INFORMATION (complete all)**

DHS Grant Award Number: \_\_\_\_\_ Grant Program: .....\_\_\_\_\_

Fiscal Year:..... \_\_\_\_\_

Project Title: .....\_\_\_\_\_

Grantee (SAA):.....\_\_\_\_\_

Grantee POC:.....\_\_\_\_\_

Mailing Address: .....\_\_\_\_\_

E-mail: .....\_\_\_\_\_

Sub grantee: .....\_\_\_\_\_

Subgrantee POC: .....\_\_\_\_\_

Mailing Address: .....\_\_\_\_\_

E-mail: .....\_\_\_\_\_

Dollar value of grant (if known): \_\_\_\_\_

## B. PROJECT TYPE

Please check ALL the block(s) that best fit the scope of the project.

- 1. Training and Exercises. Go to page 2. Complete all of Section C.1.
- 2. Purchase of Equipment. Go to page 3. Complete all of Section C.2.
- 3. Physical security enhancements. Go to page 3. Complete all of Section C.3.
- 4. Renovations/upgrades/modifications to existing structures. Go to page 3. Complete all of Section C.4.
- 5. New construction/addition. Go to page 4. Complete all of Section C.5.
- 6. Communication towers, related equipment, and equipment shelters. Go to page 5. Complete all of Section C.6.
- 7. Other. If your project does not match any of these categories, go to page 6. Complete Section C.7

*The following information is required to initiate EHP review of the project. Based on the project's scope of work, determine which project type applies below and complete that section. For multi-component projects or those that may fit into multiple project types, complete the section that best applies and provide a complete project description. The project description should contain a brief summary of what specific action is proposed, where it is proposed, and how it will be implemented. If the project involves multiple locations, information for each must be provided. Attach additional pages, if needed.*

Provide a complete project description: \_\_\_\_\_

## C. PROJECT DETAILS

1.  **Training and Exercises** (check each that applies):  Classroom-based  Field-based  
*If the training is classroom and discussion-based only, and is not field-based, this form does not need to be completed and submitted.* All other training must provide the following:
- a. Describe the scope of the proposed training or exercise (purpose, frequency, materials, and equipment needed, number of participants, and type of activities required)  
(Attach additional pages, if needed): \_\_\_\_\_
  - b. Will the field-based training take place at an existing facility having established procedures for that particular proposed training and exercise, and that conforms with existing land use designations (refer to Information Bulletin #329 ([http://fema.dps.mo.gov/empg/IB%20329\\_20090902.pdf](http://fema.dps.mo.gov/empg/IB%20329_20090902.pdf)) for further information)? .....  Yes  No
    - If yes, please provide the name and location of the facility (physical training site address or latitude-longitude): \_\_\_\_\_
    - If no, provide the location (physical project address or latitude-longitude) **and** a full description of the area where training will occur: \_\_\_\_\_
  - c. Does the field-based training/exercise differ in any way (including, but not limited to frequency, amount of facilities/land used, materials or equipment used, number of participants, type of activities) from previously permitted training exercises and training practices? .....  Yes  No
    - If yes, explain any differences between the proposed activity and those that were approved in the past, and the reason(s) for the change in scope: \_\_\_\_\_
  - d. Will any equipment or structures need to be installed to facilitate training? .....  Yes  No
    - If yes, explain how and where this is proposed to be done (include site-specific color photographs: ..... \_\_\_\_\_
2.  **Purchase of equipment** (If the entire project is limited to purchase of mobile/portable equipment and there is no installation needed, you do not need to complete and submit this form.)

- a. Specify what equipment, and the quantity: .....
- b. Provide AEL number(s) (if known):.....
- c. Will this equipment be installed? .....  Yes  No

If Yes, go to page 6. Complete Section D.

**3.  Physical security enhancements and or installations (for example: installation of back-up generators, fencing, cameras, building/room access control, bollards, motion detection systems, x-ray machines, and lighting).**

- a. Describe what, how, and where improvement(s)/installation(s) will occur in/on the facility/building/structure: .....
- b. Provide project location (physical project address and latitude-longitude): .....
- c. Will the new equipment/improvements use the existing power supply systems? .....  Yes  No  
If no, describe new power source and installation (such as utility trenching): .....
- d. If generator installation, please state the capacity (KW): .....  
If a separate fuel tank is also included, describe if it is to be installed above or below ground, and its capacity (gallons): .....
- e. Go to Page 6. Provide additional project details in Section D.

**4.  Renovations/upgrades/modifications to existing structures.**

- a. Provide detailed description of modifications: .....
- b. Provide project location (physical project address and latitude-longitude): .....
- c. Will any equipment need to be installed? .....  Yes  No  
• If yes, please note in Section 2, (purchase of equipment).
- f. Go to Page 6. Provide additional project details in Section D.

**5.  New construction/addition (for example: emergency operations centers, docks, piers, security guardhouse).**

- a. Provide detailed scope of work (site acreage, new facility square footage/number of stories, utilities, parking, stormwater features, etc): .....
- b. Provide project location (physical project address or latitude-longitude): .....
- c. Will any equipment need to be installed? .....  Yes  No  
• If yes, please note in Section 2 (purchase of equipment).
- d. Will the new building/facility/renovations use existing utilities? .....  Yes  No  
• If no, describe installation of new utilities in (a) above (including trenching): .....
- e. Go to Page 6. Provide additional project details in Section D.

**6.  Communication towers, related equipment, and equipment shelters**

- a. Provide a detailed description of the project.....
- b. Provide project location (physical project address or latitude-longitude): .....
- c. Provide the elevation above mean sea level of the project location: .....
- d. For projects involving antenna(s) installations on existing towers:
  - Provide the height of the existing tower: .....
  - The height of the tower following the installation of the new antenna(s): .....
- e. For new tower projects, state the total height (in feet) of the communication tower or structure including any antennae to be mounted: .....  
• If the proposed tower height is greater than 199 feet above ground level, state why



this is needed to meet the requirements of the project: \_\_\_\_\_

- Will the tower be free-standing or require guy wires? .....  Free standing  Guy wires
- If guy wires are required, state number of bands and how many: \_\_\_\_\_
- State why a guyed tower is needed to meet the requirements of this project: \_\_\_\_\_
- What kind of lighting will be installed, if any (for example: white strobe, red strobe, or steady burning?): \_\_\_\_\_

f. A general description of terrain (For example: mountainous, rolling hills, flat to undulating): \_\_\_\_\_

Describe the frequency and seasonality of fog/low cloud cover: \_\_\_\_\_

g. Provide a list of habitat types and land use on and adjacent to the tower site (within ½ mile), by acreage and percentage of total (e.g., woodland conifer forest, grassland, agriculture) waterbody, marsh): \_\_\_\_\_

h. Is there evidence of bird roosts or rookeries present within ½-mile of the proposed site? .....  Yes  No

If yes, describe: \_\_\_\_\_

Distance to nearest wetland area (for example: forested swamp, marsh, riparian, marine) and coastline if applicable: \_\_\_\_\_

Distance to nearest telecommunication tower: \_\_\_\_\_

i. Have measures been incorporated for minimizing impacts to migratory birds?.....  Yes  No

• If yes, describe: \_\_\_\_\_

j. Has an FCC registration been obtained for this tower? .....  Yes  No

• If yes, provide Registration #: \_\_\_\_\_

k. Has the FCC E106 process been completed? .....  Yes  No

l. Has the FCC Tower Construction Notification System (TCNS) process been completed? .....  Yes  No

• If yes, attach all relevant environmental documentation submitted as part of the registration process including use of the Tower Construction Notification System (TCNS), if applicable. FRN# \_\_\_\_\_

m. Will any equipment or structures need to be installed? .....  Yes  No

• If yes, explain what type how and where this is proposed to be done (*attach additional pages, if pages needed*): \_\_\_\_\_

n. Will equipment be co-located on existing FCC licensed tower or other structure?.....  Yes  No

• If yes, identify the type of structure: \_\_\_\_\_

o. Go to Page 6. Provide additional project details in Section D.

7.  **Other.** For any project that does not fit a category listed above, please provide a thorough summary of the proposed action and location. Include as much detail as necessary to ensure someone not personally familiar with the project is able to conduct an EHP review.

a. Project Summary: \_\_\_\_\_

b. Provide additional project details in Section D.

**D. OTHER PROJECT RELATED INFORMATION (complete all that apply)**

The following website may provide some additional EHP related guidance and resources to help complete this section <http://www.fema.gov/plan/ehp/ehp-applicant-help.shtm#5>.

1. If work is proposed on/in an existing building(s) or structure(s) provide the year built: ..... \_\_\_\_\_
  - If the building or structure involved is over 45 years old and significant renovation, rehabilitation, or modification has occurred, please provide the year(s) and briefly describe the nature of remodeling: ..... \_\_\_\_\_
2. If the project affects the exterior of the building, are there any known buildings and/or structures that are 45 years or older in the immediate project area? .....  Yes  No/NA
  - If yes, please provide the location, ground-level color photos of these, and identify their location(s) on the aerial map.
3. Is the building or structure on which work is proposed a historic property or in a historic district, or are there any adjacent historic properties? .....  Yes  No
  - Information about historic properties may be found on the National Register of Historic Places at <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome> or the respective State Historic Preservation Office may have information on their website.
4. Will ground disturbance be required to complete the project? .....  Yes  No
  - If yes, provide total extent (depth, length and width) of each unique ground disturbing activity. Light poles, bollards and fencing are each unique ground disturbing activities (For example, six light poles, 24" dia. x 4' deep; trenching 12" x 500' x 18" deep): ..... \_\_\_\_\_
5. Has the ground been previously disturbed? .....  Yes  No
  - If yes, please describe the current disturbed condition of the area (for example, parking lot, roadway right-of-way, commercial development): ..... \_\_\_\_\_
6. Are there technical drawings or site plans available, if yes please attach. ....  Yes  No
7. Attach color site photographs:
  - Ground-level color site photos that provide context and show where site work/physical installations are proposed (label photos),
  - Ground-level color photographs of each side of the building involved.
  - Aerial color photograph with project limits outlined and with the location of any proposed installations identified.
  - Aerial color photograph(s) showing all ground disturbing activities (if applicable).
8. Is the project part of an approved plan such as a Master Plan or an Implementation Plan or any larger action/project?  Yes  No
  - If yes, provide the plan/project name and brief description: ..... \_\_\_\_\_
9. Is there any *previously* completed environmental documentation for this project (for example: Environmental Impact Statement, Environmental Assessment, wetland delineation, archaeological study)? .....  Yes  No
  - If yes, please attach documentation. If a NEPA document, what was the decision? (*Check one, and please attach*):
    - Finding of No Significant Impact (FONSI) or
    - Record of Decision (ROD)
 Name of preparing agency: ..... \_\_\_\_\_  
 Date approved: ..... \_\_\_\_\_
10. Is there any *previously* completed agency coordination for this project (for example correspondence with the U.S. Fish and Wildlife Service, State Historic Preservation Office (SHPO), Tribal Historic Preservation Office (THPO), or permitting agencies)?  Yes  No
  - If yes, please attach documentation unless included in NEPA documentation identified above.
11. Provide FEMA Flood Insurance Rate Map (FIRM), with project limits outlined. FIRM maps can be created from: <http://www.fema.gov/hazard/map/firm.shtm>
12. Provide U.S. Fish and Wildlife Service, National Wetlands Inventory (NWI) Map created from: <http://www.fws.gov/wetlands/Data/Mapper.html>

**Form 7 – Travel Pre-Approval**

REQUEST FOR TRAVEL						
Pre-Approval Form						
<b>Sub-Grantee Name:</b>						
Event:						
Location:						
Dates:						
# of Attendees		Attendee(s):				
Disciplines						
Please enter a justification on how the event pertains to your job(s) under the scope of the grant:						
<b>Supporting documentation</b>	Daily Agenda <input type="checkbox"/>	Estimated Travel costs <input type="checkbox"/>	Other <input type="checkbox"/>			
Grant to be Charged:						
Category to be Charged:						
Planning	Training	Exercise	Admin			
<b>ESTIMATED TRAVEL EXPENSES</b>			<b>QTY</b>	<b>Unit Price</b>	<b>TOTAL</b>	
Registration Fees:			0.00	\$0.00		
GSA Per Diem:			0.00	\$0.00		
Air or Other Commercial Carrier:			0.00	\$0.00		
Rental Car/Personal Vehicle:			0.00	\$0.00		
GSA Lodging:			0.00	\$0.00		
Other Expenses: Tolls; Parking; Fuel			0.00			
				<b>TOTAL</b>	<b>\$0.00</b>	
Are the attendees staying at the host hotel? (Yes / No or N/A)						
<b>The pre-approval of this travel does not constitute that all costs incurred during the trip are allowable. Please refer to any/all applicable Local, State and Federal grant guidance as well as other regulations that may apply such as OMB circular A087.</b>						
By signing, you understand that any/all unallowable costs will be the responsibility of your Department.						
<b>Sub-Grantee Signatory's Signature :</b> ( usually the EMA Director)						
Ohio Emergency Management Agency Approval:			YES	or	NO	
Approved by and Date:			_____			
IF YOU HAVE ANY QUESTIONS PLEASE CALL YOUR RESPECTIVE GRANTS COORDINATOR						

State of Ohio FY2011 Homeland Security Grant  
Training Pre-Approval Form

Jurisdiction: \_\_\_\_\_

Training Coordinator: \_\_\_\_\_ (\_\_\_\_\_) \_\_\_\_\_  
(Name) (Title) (Telephone number)

Participating jurisdictions in addition to primary: \_\_\_\_\_

1). Is this a DHS Approved Course: yes \_\_\_\_\_ no \_\_\_\_\_

If yes, please list course number \_\_\_\_\_

2.) Course Description (If a draft agenda exists, please attach)

3.) Who will be instructing the training? \_\_\_\_\_

4.) Requested training dates and location: \_\_\_\_\_

5.) Number of estimated training participants and discipline:

**Submission of Forms:** If training costs are being budgeted, this form must be completed and submitted with the county's 2011 Homeland Security Grant Program (HSGP) grant application. Anticipated training expenses must be included in your EGMS budget.

Office Use Only

Date Received \_\_\_\_\_  
Approved \_\_\_\_\_

Date Reviewed \_\_\_\_\_  
Disapproved \_\_\_\_\_

Date Notified \_\_\_\_\_

## State of Ohio FY2011 State Homeland Security Program (SHSP) Exercise Application

Primary County: \_\_\_\_\_ Date: \_\_\_\_\_

Exercise Coordinator: \_\_\_\_\_ (Name) \_\_\_\_\_ (Title) \_\_\_\_\_ (Telephone number)

**1). Previous Exercise Program Participation by the County/Jurisdiction:**

- FY 2006 Homeland Security Grant Exercise Program \_\_\_\_\_
- FY 2007 Homeland Security Grant Exercise Program \_\_\_\_\_
- FY 2008 Homeland Security Grant Exercise Program \_\_\_\_\_
- FY 2009 Homeland Security Grant Exercise Program \_\_\_\_\_
- FY 2010 Homeland Security Grant Exercise Program \_\_\_\_\_

**2). Scope of Exercise:** Multi-County/List participating counties by name \_\_\_\_\_

\_\_\_\_\_ TTX OR \_\_\_\_\_ FE OR \_\_\_\_\_ FSE

**3). Requested Exercise Hazard:**

- Chemical \_\_\_\_\_
- Biological \_\_\_\_\_
- Radiological \_\_\_\_\_
- Nuclear \_\_\_\_\_
- Explosive \_\_\_\_\_
- Natural\* \_\_\_\_\_

**4). Requested exercise date(s):** \_\_\_\_\_

**5). Anticipated Exercise Participants:** (Check each category to be represented in the exercise and, where appropriate, provide the organization's name)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Elected Officials<br><input type="checkbox"/> Commissioners<br><input type="checkbox"/> City/Village<br><br><input type="checkbox"/> County Offices<br><br><input type="checkbox"/> Engineer<br><input type="checkbox"/> Health Dept<br><input type="checkbox"/> Human Svc<br><input type="checkbox"/> Coroner<br><input type="checkbox"/> EMA Office | <input type="checkbox"/> Law Enforcement<br><input type="checkbox"/> Sheriff<br><input type="checkbox"/> Local Police<br><input type="checkbox"/> State Patrol<br><input type="checkbox"/> FBI<br><br><input type="checkbox"/> Fire Department(s)<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><br><input type="checkbox"/> Search and Rescue<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><br><input type="checkbox"/> Amateur Radio | <input type="checkbox"/> Hospital(s)<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><br><input type="checkbox"/> EMS Units<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><input type="checkbox"/> _____<br><br><input type="checkbox"/> Federal Agencies<br><input type="checkbox"/> FEMA<br><input type="checkbox"/> Centers for Disease Control (CDC)<br><input type="checkbox"/> US Coast Guard<br><br><input type="checkbox"/> Civil Air Patrol<br><input type="checkbox"/> American Red Cross<br><input type="checkbox"/> Salvation Army<br><input type="checkbox"/> Media |
|--|---|--|
- Others: \_\_\_\_\_

**6). Have at least two (2) members of the local exercise planning team completed the Homeland Security Exercise and Evaluation Program (HSEEP) Training Course?**

Yes \_\_\_\_\_ No \_\_\_\_\_

**7). Have at least two (2) members of the local exercise planning team completed the FEMA Exercise Design and Evaluation Courses?**

Yes \_\_\_\_\_ No \_\_\_\_\_

**8). Level of exercise support requested:**

\_\_\_\_\_ County funded/provided exercise contractor (Must meet contractor requirements listed in the grant application guidance packet)

\_\_\_\_\_ County developed without contractor support (Must have planning team members trained in accordance with the grant application guidance packet).

**9). National Incident Management System (NIMS) compliance:**

Is the grant recipient (sub-grantee) compliant with National Management System (NIMS) requirements?

Yes \_\_\_\_\_ No \_\_\_\_\_

Has the grant recipient (sub-grantee) incorporated NIMS concepts and principles into the local training and exercise program?

Yes \_\_\_\_\_ No \_\_\_\_\_

Does the grant recipient (sub-grantee) routinely evaluate NIMS components (e.g., preparedness, communication and information management, resource management, command and management, mutual aid, interoperability, participation of non-governmental organizations and private sector) through its exercise program?

Yes \_\_\_\_\_ No \_\_\_\_\_

\* Natural disaster scenarios must be catastrophic in nature as defined by the National Response Framework (NRF).

## Appendix B: Detailed Planning Allowable Activities

### *Planning Activities Information*

The *FY 2011 HSGP Guidance and Application Kit* defines five broad categories of allowable planning costs. Following are examples for each of the categories. A specific emphasis should be placed on the preparedness of child congregate care systems, providers and facilities, and especially school districts and child/day care. Additional examples are group residential facilities operated by State and local child welfare authorities, and juvenile detention facilities.

- Developing hazard/threat-specific annexes that incorporate the range of prevention, protection, response, and recovery activities
- Developing and implementing homeland security support programs and adopting DHS national initiatives including but not limited to the following:
  - o Implementing the *National Preparedness Guidelines*
  - o Pre-event recovery planning
  - o Implementing the *NIPP* and associated Sector Specific Plans
  - o Enhancing and implementing SCIP and Tactical Interoperable Communications Plans (TICP) that align with the goals, objectives, and initiatives of the *National Emergency Communications Plan (NECP)*
  - o Costs associated with the adoption, implementation, and adherence to NIMS compliance requirements, including implementing the NIMS National Credentialing Framework
  - o Modifying existing incident management and EOPs to ensure proper alignment with the NRF coordinating structures, processes, and protocols
  - o Establishing or enhancing mutual aid agreements
  - o Developing communications and interoperability protocols and solutions
  - o Conducting local, regional, and Tribal program implementation meetings
  - o Developing or updating resource inventory assets in accordance to typed resource definitions issued by the NIC
  - o Designing State and local geospatial data systems
  - o Conducting public education and outreach campaigns, including promoting individual, family, and organizational emergency preparedness; alerts and warnings education; and evacuation plans as well as CBRNE prevention awareness
  - o Designing programs to address targeting at-risk populations and engaging them in emergency management planning efforts
  - o Activities, materials, services, tools and equipment to achieve planning, protection, response and recovery that is inclusive of people with disabilities (physical, programmatic and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities)
  - o Preparing materials for State Preparedness Reports (SPRs)
  - o WHTI implementation activities including the issuance of WHTI-compliant Tribal identification cards
- Developing related terrorism prevention activities including:
  - o Developing THIRA that reflects a representative make up and composition of the jurisdiction
  - o Developing initiatives that directly support local efforts to understand, recognize, prepare for, prevent, and respond to pre-operational activity and other crimes that are precursors or indicators of terrorist activity, in accordance with civil rights/civil liberties protections
  - o Developing law enforcement prevention activities, to include establishing and/or enhancing a fusion center
  - o Hiring an IT specialist to plan, develop, and implement the IT applications necessary for a fusion center
  - o Developing and planning for information/intelligence sharing groups

- Hiring contractors and consultants to make recommendations on the development of capabilities at State and Major Urban Area fusion centers; such centers should be designed in support of the analytic and other baseline capabilities as outlined in the Global Justice Information Sharing Initiative's (Global) *Baseline Capabilities for State and Major Urban Area Fusion Centers*
- Integrating and coordinating the fire service, emergency management, public health care, public safety, and health security data-gathering (threats to human and animal health) within State and Major Urban Area fusion centers to achieve early warning, monitoring, and mitigation of threats
- Integrating and coordinating private sector participation with fusion center activities
- Developing and implementing preventive radiological/nuclear detection activities
- Acquiring systems allowing connectivity to State, local, Tribal, territorial, and Federal data networks, such as the National Crime Information Center (NCIC) and Integrated Automated Fingerprint Identification System (IAFIS), as appropriate
- Planning to enhance security during heightened alerts, terrorist incidents, and/or during mitigation and recovery
- Multi-discipline preparation across first responder community, including EMS for response to catastrophic events and acts of terrorism
- Accessible public information/education: printed and electronic materials, public service announcements, seminars/town hall meetings, and web postings coordinated through local Citizen Corps Councils
- Citizen Corps volunteer programs and other activities to strengthen citizen participation
- Conducting public education campaigns including promoting suspicious activity reporting; individual, family, and organizational emergency preparedness; promoting the *Ready* campaign; and/or creating State, regional, or local emergency preparedness efforts that build upon the *Ready* campaign
- Evaluating Critical Infrastructure Protection (CIP) security equipment and/or personnel requirements to protect and secure sites
- CIP cost assessments, including resources (e.g., financial, personnel) required for security enhancements/deployments
- Multi-Jurisdiction Bombing Prevention Plans (MJBPP)<sup>13</sup>
- Underwater Terrorist Protection Plans
- Developing and enhancing plans and protocols, including but not limited to:
  - Community-based planning to advance —whole community|| security and emergency management
  - Developing, enhancing, maintaining a current EOP that conforms to the guidelines outlined in the CPG 101 v.2
  - Developing or enhancing local, regional, or Statewide strategic or tactical interoperable emergency communications plans
  - Activities associated with a conversion from wideband to narrowband voice channels
  - Implementing SCIP and TICPs that align with the goals, objectives, and initiatives of the NECP
  - Developing protocols or standard operating procedures for specialized teams to incorporate the use of equipment acquired through this grant program
  - Developing terrorism prevention/protection plans
  - Developing plans, procedures, and requirements for the management of infrastructure and resources related to HSGP and implementation of State or Urban Area Homeland Security Strategies
  - Developing plans for mass evacuation and pre-positioning equipment
  - Developing or enhancing border security plans
  - Developing or enhancing cyber security plans
  - Developing or enhancing secondary health screening protocols at major points of entry (e.g., air, rail, port)
  - Developing or enhancing cyber risk mitigation plans



- Developing or enhancing agriculture/food security risk mitigation, response, and recovery plans
- Developing public/private sector partnership emergency response, assessment, and resource sharing plans
- Developing or enhancing plans to engage and interface with, and to increase the capacity of, private sector/non-governmental entities working to meet the human service response and recovery needs of survivors
- Developing or updating local or regional communications plans
- Developing plans to support and assist jurisdictions, such as port authorities and rail and mass transit agencies
- Developing or enhancing continuity of operations and continuity of government plans
- Developing or enhancing existing catastrophic incident response and recovery plans to include and integrate Federal assets provided under the NRF
- Developing plans and response procedures for adjudicating, validating and responding to an alarm from a chemical or biological detector (response procedures should include emergency response procedures integrating local first responders)
- Developing or enhancing evacuation plans
- Developing mechanisms for utilizing the National Emergency Family Registry and Locator System (NEFRLS)
- Developing or enhancing plans to prepare for surge capacity of volunteers
- Developing or enhancing the State emergency medical services systems
- Developing or enhancing plans for donations and volunteer management and the engagement/integration of private sector/non-governmental entities in preparedness, response, and recovery activities
- Developing or enhancing Bombing Prevention Plans
- Developing school preparedness plans
- Developing preparedness plans for child congregate care facilities, including group residential facilities, juvenile detention facilities, and public/private child care facilities
- Developing plans to educate youth on disaster preparedness
- Ensuring jurisdiction EOPs adequately address warnings, emergency public information, evacuation, sheltering, mass care, resource management from non-governmental sources, unaffiliated volunteer and donations management, and volunteer resource integration to support each Emergency Support Function, to include appropriate considerations for integrating activities, materials, services, tools and equipment to achieve planning inclusive of people with disabilities (physical, programmatic and communications access for people with physical, sensory, mental health, intellectual and cognitive disabilities). Developing and implementing civil rights, civil liberties, and privacy policies, procedures, and protocols
- Designing and developing State, local, Tribal, and territorial geospatial data systems
- Developing and implementing statewide electronic patient care reporting systems compliant with the National Emergency Medical Services Information System (NEMSIS)
- Developing or conducting assessments, including but not limited to:
  - Developing pre-event recovery plans
  - Conducting point vulnerability assessments at critical infrastructure sites/key assets and develop remediation/security plans
  - Conducting or updating interoperable emergency communications capabilities assessments at the local, regional, or Statewide level
  - Developing border security operations plans in coordination with CBP
  - Developing, implementing, and reviewing Area Maritime Security Plans for ports, waterways, and coastal areas
  - Updating and refining threat matrices

- Conducting cyber risk and vulnerability assessments
- Conducting assessments and exercising existing catastrophic incident response and recovery plans and capabilities to identify critical gaps that cannot be met by existing local and State resources
- Conducting Bombing Prevention Capability Analysis
- Activities that directly support the identification of specific catastrophic incident priority response and recovery projected needs across disciplines (e.g., law enforcement, fire, EMS, public health, behavioral health, public works, agriculture, information technology, and citizen preparedness)
- Activities that directly support the identification of pre-designated temporary housing sites
- Activities that support the identification and development of alternate care sites
- Conducting community assessments, surveys, and research of vulnerabilities and resource needs to determine how to meet needs and build effective and tailored strategies for educating individuals conducting assessments of the extent to which compliance with the integration mandate of disability laws is being achieved
- Conducting Citizen Corps program assessments and evaluations, citizen preparedness surveys, volunteer impact studies, and cost/benefit analysis
- Soft target security planning (e.g., public gatherings)
- Participating in the FEMA Gap Analysis Program